



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

February 22, 2008

**RE: SUNRISE EQUIPMENT COMPANY
OHR 000 146 704**

Ken Joseph
Sunrise Equipment Company
5075 Navarre Road S.W.
Canton, OH 44706-3333

Dear Mr. Joseph:

I have received your December 14, 2007 letter and attached documentation which responded to the violations found during my November 13, 2007 inspection of Sunrise Equipment Company (Sunrise) located at 5075 Navarre Road, SW in Canton, Ohio. Below I outline the current status of each violation.

Hazardous Waste

1. OAC rule 3745-52-11 – Hazardous waste determination.
Your letter states that waste lamps will be disposed of through Sunpro. I believe Sunpro sends these waste lamps for recycling and the reduced regulations called universal waste regulations only apply if the waste lamps are actually being recycled.
2. OAC 3745-52-40(C) – Keep records of test results, waste analyses, etc.
Your letter and attached MSDS document a correction of this violation.
3. OAC rule 3745-52-12(A) – Generator identification numbers.
Previously corrected.
4. Ohio Revised Code (ORC) 3734.02(E) and (F) – Accumulation beyond 180 days.
On November 27, 2007, Sunrise Equipment shipped 715 gallons of D001, D035, F003, and F005 hazardous waste to Hukill Chemical. You stated this included all the thinner waste on site at the time. Using the 6.9 pounds/gallon listed on the MSDS for the new thinner, I estimate the waste shipped weighed at least 5000 pounds.

Please submit a copy of the results of any analysis of samples of this waste that may have been done.

Sunrise must sample the ground that these drums were stored on to determine whether any contamination resulting from the storage remains and properly deal with any contamination found. This process is called the closure of the

hazardous waste management unit. Please be advised that you will be required to submit to Ohio EPA a closure plan which complies with OAC Chapters 3745-54 and 55. Ohio EPA will notify you in writing in the near future with specific requirements for submittal of the closure plan.

You probably will want to discuss the preparation of this closure plan with an environmental consultant. One list of such consultants can be found at: <http://www.epa.state.oh.us/derr/yap/docs/CP/rptVAPCP.pdf>. You may want to ask for references of closure plans that a consultant has had approved by Ohio EPA.

5. OAC rule 3745-52-34(D)(5)(c) – Employees familiar with waste handling and emergency procedures.
Your letter documents a correction of this violation.
6. OAC rule 3745-65-31 – Maintenance and operation of facility.
Your letter and attached photographs document a correction of this violation.
7. OAC rule 3745-65-32 – Required equipment.
Your November 27, 2007 waste shipment corrected this violation.
8. OAC 3745-52-34(C)(1)(a) – Satellite accumulation area.
Your letter and attached photographs document a correction of this violation.
9. OAC 3745-52-34(C)(1)(b) – Satellite accumulation area.
Your letter and attached photographs document a correction of this violation.
10. OAC rule 3745-52-34(D)(4) – Hazardous waste labels.
Your November 27, 2007 waste shipment corrected this violation.
11. OAC rule 3745-52-34(D)(4) – Accumulation start dates.
Your November 27, 2007 waste shipment and your letter document the correction of this violation.
12. OAC rule 3745-66-74 – Inspections of container storage areas.
Your November 27, 2007 waste shipment corrected this violation.

Used Oil

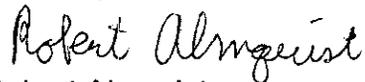
13. OAC rule 3745-279-22(C) - Used oil labels.
Your letter and attached photographs document a correction of this violation.
14. OAC rule 3745-279-22(D) - Response to releases of used oil.
Your letter and attached photographs document a correction of this violation.

Ken Joseph
Sunrise Equipment Company
February 22, 2008
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You can find copies of the regulations and other information on the Division of Hazardous Waste Management web page at: <http://www.epa.state.oh.us/dhwm/>.

If you have any questions, please contact me at (330) 963-1217, or robert.almquist@epa.state.oh.us.

Sincerely,



Robert Almquist
Division of Hazardous Waste Management

RA:cl

cc: Natalie Oryshkewych, DHWM, NEDO
Tammy Heffelfinger, DHWM, CO

ec: Frank Popotnik, DHWM, NEDO
Harry Sarvis, DHWM, CO
John Palmer, DHWM, NEDO

Notice:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your facility from its obligation to comply with all applicable regulations.