



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

March 14, 2008

RE: **TECNOCAP LLC
TRUMBULL COUNTY
OHD 981 528 524
RETURN TO COMPLIANCE**

Mr. Ed Richardson
Tecnocap LLC
2100 Griswold Street Ext NE
Warren, Ohio 44483

Dear Mr. Richardson:

On March 12, 2008, the Ohio EPA received Tecnocap's response to the February 14, 2008 notice of violation letter (NOV). The Tecnocap response included the following attachments:

- A. Sign in sheets from the annual hazardous waste training.
- B. Revised page from the contingency plan showing the emergency coordinator list had been updated.

As stated in the NOV, Tecnocap had adequately addressed the following violations at the time of the inspection and no further action was required:

- 3.) ***Labeling Requirements for Hazardous Waste Containers, OAC rule 3745-52-34(A)(2).***
- 4.) ***Used Oil Storage Requirements for Generators, OAC rule 3745-279-22(C)(1).***
- 5.) ***Labeling/marking- standards for small quantity handlers of universal waste, OAC rule 3745-273-14(E).***
- 6.) ***Packaging of Universal Waste Lamps, OAC rule 3745-273-13(D)(1).***

Based on the information submitted, it appears that Tecnocap has adequately addressed the following violations:

- 1.) ***Personnel Training, OAC rule 3745-65-16(C).***
- 2.) ***Contingency Plan Requirements, OAC rule 3745-65-52(D).***

Ohio EPA also noted two concerns. You stated in your response that you will be looking into a battery recycling program. If it is determined that no batteries are generated, please make a note in your files so that this can be addressed in your next inspection.

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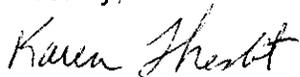
The second concern was in regards to the 50 foot exemption per the Ohio Revised Code (ORC) §3734.02(G). Your response is under review by Ohio EPA's Legal Section. We will advise you under separate cover if additional information is needed.

Failure to list specific deficiencies and/or violations in this communication does not relieve Tecnocap from the responsibility of complying with all applicable laws, rules and regulations.

Further be advised that any instances of non-compliance can continue as subjects of pending or future enforcement actions.

Should you have any questions or require additional information, please contact Frank Popotnik, my supervisor, or me at (330) 963-1200.

Sincerely,



Karen L. Nesbit
Division of Hazardous Waste Management

KLN:cl

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

cc: Natalie Oryshkewych, DHWM, NEDO