



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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www.epa.state.oh.us

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

November 2, 2009

**RE: UNITED INITIATORS, INC.
CESQG
OHD 046 202 602
LORAIN COUNTY
RETURN TO COMPLIANCE**

Mr. John Wharton
United Initiators, Inc.
555 Garden Street
Elyria, OH 44035

Dear Mr. Wharton:

Thank you for accompanying me during Ohio EPA's August 31, 2009, inspection of the United Initiators, Inc. (United) facility in Elyria, Ohio. Jason Drew also represented United during the inspection. Ohio EPA inspected United to determine its compliance with Ohio's conditionally exempt small quantity hazardous waste generator laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). A Notice of Violation was sent to United on September 29, 2009. A response consisting of a letter and photos was received from United on October 28, 2009.

My review of this documentation reveals that United has now abated all violations discovered during the August 31, 2009 inspection as listed below.

1. **Universal Waste Management, OAC 3745-273-13(D)(1):** Waste lamps must be contained in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps. Containers or packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage.
2. **Universal Waste Lamp Labeling, OAC 3745-273-14(E):** Waste lamps or containers of universal waste lamps must be labeled with the words, "Universal Waste Lamps" or "Waste Lamps" or "Used Lamps".
3. **Universal Waste Batteries, OAC 3745-273-14(A):** Waste batteries or containers of batteries must be labeled with the words, "Universal Waste – Batteries" or "Waste Battery(ies)" or "Used Battery(ies)".
4. **Universal Waste Thermostats, OAC 3745-273-14(D):** Waste thermostats or containers of thermostats must be labeled with the words, "Universal Waste – Thermostats" or "Waste Thermostats" or "Used thermostats".

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If you should have any questions, please feel free to contact me at (330) 963-1214.

Sincerely,



Kim Gallagher
Environmental Specialist
Division of Hazardous Waste Management

KG:cl

ec: Frank Popotnik, DHWM, NEDO
Natalie Oryshkewych, DHWM, NEDO

cc: Marlene Kinney, DHWM, NEDO

NOTICE:

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