



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

November 10, 2009

RE: FORMER ZEE-TECH, INC. CESQG  
MAHONING COUNTY  
NOV/RTC

Mr. John Calhoun  
13456 Tombaugh Avenue  
Alliance, OH 44601

Dear Mr. Calhoun:

On September 23, 2009, representing the Ohio EPA's Division of Hazardous Waste Management, I visited the former Zee-Tech facility in Sebring, Ohio and observed fluorescent lamps and used oil being collected. On October 2, 2009 we met at the site to discuss management and recycling of these wastes according to Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC).

It was determined that you had failed to properly label three containers of used oil and the lamps had been collected and were to be disposed as a solid waste. On October 2, 2009 you abated the violations when you properly labeled your used oil and contained and properly labeled your lamps. The lamps were received as a universal waste by Green Lights, LLC on October 15, 2009. As of October 2, 2009, the violations identified here, were all abated.

Please note that this letter does not address ongoing violations at this site from operations conducted during Mr. Jerry McHugh's tenure at the site. Those violations that remain to be addressed will be summarized and presented under a separate cover.

### NOTICE OF VIOLATIONS

The following violations of Ohio's hazardous waste rules and regulations were identified during an inspection on September 23, 2009:

- 1. Waste Evaluation, OAC 3745-52-11:** Any person who generates a waste must evaluate the waste to determine if the waste is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51. Lamps were not labeled and were to be disposed to the trash. You failed to evaluate spent lamps.

Spent fluorescent and high intensity discharge lamps may be considered hazardous waste due to their mercury, lead and other metal content and must be disposed or recycled properly.

Spent lamps that are recycled are not subject to the hazardous waste rules. For additional information refer to the Ohio EPA Fact Sheet "Universal Waste Rules for Handlers of Lamps" at: [http://epa.ohio.gov/portals/32/pdf/Universal\\_Waste\\_Rules\\_for\\_Handlers\\_of\\_Lamps.pdf](http://epa.ohio.gov/portals/32/pdf/Universal_Waste_Rules_for_Handlers_of_Lamps.pdf). A list of lamp recyclers may be found at: <http://www.epa.ohio.gov/portals/32/pdf/comp.lamp.ballast.list.pdf>. This information is also enclosed.

**This violation was abated when your lamps were sent for recycling to Green Light LLC. on October 15, 2009.** You reported that all lamps would now be managed as a universal waste. You were provided the list of facilities that accept lamps for recycling.

ZEE-TECH, INC.  
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**2. OAC 3745-279-22(C): Used Oil Storage Requirements for Generators (Labels) - Containers** at your facility were not labeled as “used oil” per the rule.

This violation was abated when your containers were labeled as “used oil”. Guidance for managing used oil is enclosed and found also at:

[http://epa.ohio.gov/portals/32/pdf/Used\\_Oil\\_Generators\\_Guidance.pdf](http://epa.ohio.gov/portals/32/pdf/Used_Oil_Generators_Guidance.pdf) .

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides compliance and pollution prevention assistance on environmental issues related to air, land, and water. If desired, this can include an onsite assessment of your operations with a resulting report containing waste minimization and energy conservation suggestions. OCAPP can be contacted at 800-329-7518 or <http://epa.ohio.gov/Default.aspx?alias=epa.ohio.gov/ocapp>

You may also contact Adrienne Lafavre of this office at (330) 963-1250 for compliance assistance.

The Division of Hazardous Waste Management (DHWM) has copies of the rules and other information on the DHWM's web page at: <http://www.epa.ohio.gov/dhwm/>.

Enclosed you will find the checklists completed for the inspection. No further response to the recently identified violations is required. Should you have any questions, please feel free to contact me at (330) 963-1146 or at: [ron.shadrach@epa.state.oh.us](mailto:ron.shadrach@epa.state.oh.us).

Sincerely,



Ronald J. Shadrach  
District Representative  
Division of Hazardous Waste Management

Enclosures

RJS:ddw

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

**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.

Ohio Environmental Protection Agency  
**RCRA SUBTITLE C SITE  
 IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to [kristina.durnell@epa.state.oh.us](mailto:kristina.durnell@epa.state.oh.us)  
 or mail it to Kristina Durnell, Central Office

Site EPA ID No.	EPA ID Number: <b>OHD 101 845 154</b>	
Site Name	Name: <b>Zee-Tech Warehousing</b>	Website: (Optional)
Site Location Information	aka: <b>Royal Sebring Properties; Sebring China</b>	
	Street Address: <b>101 South 15<sup>th</sup> Street</b>	
	City, Town, or Village: <b>Sebring</b>	State: OH
	County Name: <b>Mahoning</b>	Zip Code: <b>44672</b>
Site Land Type (check only one)	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>
NACS code(s)		
<a href="http://www.census.gov/epcd/www/w/nacs.html">www.census.gov/epcd/www/nacs.html</a>		
Facility Representative	First Name: <b>Jerry</b>	MI: Last Name: <b>McHugh</b>
Additional names can be recorded in number 12	Phone Number: <b>330-938-9555 &amp; 888-264-7355</b>	Phone Number Extension:
Only provide address information if it is different than the site address	E-Mail Address:	Fax Number Extension:
	Fax Number:	
	Street or P.O. Box:	
	City, Town or Village:	Zip Code:
	State:	
Legal Owner And Operator of the Site.	Name of Site's Legal Owner: <b>Jerry McHugh</b>	Date Became Owner (mm/dd/yyyy):
List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	Owner Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	
	Type: <input checked="" type="checkbox"/>	
	Street or P.O. Box:	Owner Phone #:
	City, Town or Village:	Country: Zip Code:
	State:	Date Became Operator (mm/dd/yyyy):
	Name of Site's Operator:	
	Operator Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	
	Type: <input type="checkbox"/>	
	Street or P.O. Box:	Operator Phone #:
	City, Town or Village:	United States Zip Code:
	State:	

**VIOLATIONS CITED?**  Yes  No

**TYPE OF HANDLER— A MINIMUM OF ONE BOX MUST BE CHECKED**

<input type="checkbox"/> Not a HW Generator	<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
		<input type="checkbox"/> Small Quantity Generator (SQG)
		<input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator
		<input type="checkbox"/> U.S. Importer of Hazardous Waste
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

