



State of Ohio Environmental Protection Agency

Northwest District Office

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

**RE: Hebco Products Inc.
OHR 000 008 102
Crawford County
DHWM, NWDO
Return to Compliance**

August 27, 2009

Mr. Sean Larkin
Hebco Products Inc.
1232 Whetstone Street
Bucyrus, Ohio 44820

Dear Mr. Larkin:

Thank you for sending the documentation in response to the Ohio Environmental Protection Agency's (Ohio EPA's) Notice of Violation (NOV) dated February 13, 2009. The documentation was received by Ohio EPA on August 20, 2009. The documentation submitted includes a hazardous waste manifest for the disposal of the mop water, a service agreement with Crystal Clean, and a manifest log.

After review of the submitted material, Hebco Products Inc. (HPI) is a small quantity generator of hazardous waste and a generator of used oil and universal waste lamps.

My review of the submitted documentation reveals that HPI has abated all violations discovered during the February 2, 2009, compliance evaluation inspection as listed below.

Violations:

1. Ohio Administrative Code (OAC) Rule 3745-52-11, Hazardous Waste

Determination: "Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste..."

HPI failed to evaluate the following waste streams to determine if they were a hazardous waste in accordance with OAC Rule 3745-52-11, prior to sending them off site: a) spent lamps, and b) mop water from the clean-up of the floor and used oil spills.

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- a. Spent Lamps- HPI failed to evaluate the spent lamps prior to crushing them on-site in the homemade lamp crusher.

On March 24, 2009, Ohio EPA received documentation that included a hazardous waste manifest from the shipment of crushed lamps and a description of how HPI will manage spent lamps in the future.

This violation is considered abated on March 24, 2009.

- b. Mop Water from the Clean-up of the Floor and Used Oil Spills -HPI mops the floor to clean up used oil spills and during general housekeeping. HPI failed to evaluate the mop water prior to pretreatment (by dilution) and disposal down the drain to determine if this waste is a hazardous waste.

On April 29, 2009, Ohio EPA received analytical results from HPI indicating the mop water is hazardous for lead (D008). On August 5, 2009, Ohio EPA received information verifying that HPI is a small quantity generator (SQG) of hazardous waste. On August 20, 2009, Ohio EPA received documentation that the hazardous mop water was picked up by Heritage Crystal Clean for disposal.

Therefore, this violation is considered abated on August 20, 2009.

General Concerns:

- A. Used Oil Filtration System: As discussed during the inspection, HPI has a filtration system for the used oil generated at the plant. No used oil is shipped off-site. All used oil is filtered and placed into the system to be used again. All used oil fines and metals removed from the used oil filtration system are recycled with other scrap metal. It is unclear if the used oil filtration system has a paper or metal filter that would ever need to be changed and potentially become a waste.

On March 24, 2009, Ohio EPA received written documentation that the cloth used oil filters will be sent to Covanta Energy in Niagara Falls, New York to be burned in a waste to energy incinerator for secondary use. Ohio EPA received written documentation on April 1, 2009, that the metal used oil filters will be recycled by HPI through scrap metal recycling.

This general concern is considered addressed on April 1, 2009.

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Should you have any questions, please feel free to call me at (419) 373-3065.

Sincerely,



Kara Reynolds
Environmental Specialist
Division of Hazardous Waste Management

/csl

cc: Colleen Weaver, DHWM, NWDO
Kara Reynolds, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
DHWM, NWDO Crawford County File: HebcO Products

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.