



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: American Colors, Inc.
OHD 986 966 323
Erie County
Hazardous Waste
Return to Compliance

April 29, 2008

Mr. James Sayre, E.H.S. Manager
American Colors, Inc.
1110 Edgewater Avenue
P. O. Box 397
Sandusky, Ohio 44870

Dear Mr. Sayre:

Thank you for your response to Ohio EPA's February 7, 2008, Notice of Violation (NOV) letter. On March 11, 2008, Ohio EPA received the following information:

- ❖ A statement indicating your hazardous waste training will be conducted annually.
- ❖ A statement outlining the procedures the facility will follow to ensure that container storage area inspections are conducted every seven days when waste is present in the container storage area; including, who is responsible for these inspections in the event that you are not at the facility on a required inspection date.
- ❖ A statement indicating that tank inspections will be conducted daily; tank inspection logs indicating the inspections are being completed daily; as well as information that you are researching purchasing a remote camera system as an option for daily tank inspections.
- ❖ A revised tank inspection log including lines for visually inspecting spill control equipment/high level float devices and the Spray-Gard leak detectors.
- ❖ Photographs of re-stocked spill control equipment in the container storage area as well as a statement indicating that this material will be available and replenished if utilized.
- ❖ Information and calculations pertaining to your acetone solvent recovery system indicating that all stored acetone waste is at least recycled through the still within approximately 9.5 days.
- ❖ Updated annual hazardous waste training including management procedures for the facility's universal wastes, including lamps.

In addition, I conducted a site visit to your facility on April 18, 2008.

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My review of this documentation reveals that American Colors, Inc., has adequately demonstrated abatement of the violations discovered during the January 8, 2008, compliance evaluation inspection (CEI) as outlined below:

Violation	Date Violation Cited	Date Violation Abated
1. OAC 3745-52-34 (D) (4) Accumulation Time of Hazardous Waste.	January 8, 2008	January 8, 2008
2. OAC Rule 3745-65-16 (C) Personnel Training.	January 8, 2008	March 11, 2008
3. OAC Rule 3745-66-74 Container Storage Inspections.	January 8, 2008	March 11, 2008
4. OAC Rule 3745-66-93 (F) (1) Ancillary Equipment Requirements - Inspections.	January 8, 2008	March 11, 2008
5. OAC Rule 3745-66-93 (F) (2) Ancillary Equipment Requirements - Inspections.	January 8, 2008	March 11, 2008
6. OAC Rule 3745-66-95 (A) (1) Tank System Inspections.	January 8, 2008	March 11, 2008
7. OAC Rule 3745-66-95 (A) (2) Tank System Inspections.	January 8, 2008	March 11, 2008
8. OAC Rule 3745-66-95 (A) (3) Tank System Inspections.	January 8, 2008	March 11, 2008
9. OAC Rule 3745-66-95 (A) (4) Tank System Inspections.	January 8, 2008	March 11, 2008
10. OAC Rule 3745-66-95 (C) Tank System Inspections	January 8, 2008	March 11, 2008
11. OAC Rule 3745-273-13 (D) (1) Waste management - standards for small quantity handlers of universal waste (lamps).	January 8, 2008	January 8, 2008
12. OAC Rule 3745-273-14 (E) Waste management - Labeling /marking standards for small quantity handlers of universal waste (lamps)	January 8, 2008	January 8, 2008
13. OAC Rule 3745-273-15 (C) Accumulation time limits - standards for small quantity handlers of universal waste (lamps).	January 8, 2008	January 8, 2008

American Colors, Inc., has also satisfied the two Areas of Concern noted in the February 7, 2008, NOV with the March 11, 2008, response.

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No response to this letter is necessary. If you should have any questions, please feel free to call me at (419)373-3082.

Sincerely,



Amber M. Hicks
Division of Hazardous Waste Management

/cs

pc: Colleen Weaver, Supervisor, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
~~DHWM, NWDO File: American Colors, Inc.~~

ec: Amber Hicks, DHWM, NWDO

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.