



**Environmental  
Protection Agency**

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

Re: Guardian Manufacturing Company  
OHD 016 121 048  
Huron County  
Hazardous Waste  
RTC

July 28, 2011

Mr. Ronald Vanderpool, Operations Manager  
Guardian Manufacturing Company.  
302 Conwell Avenue  
Willard, Ohio 44890-9525

Dear Mr. Vanderpool:

Thank you for your July 12, 2011, response (received in this office on July 14, 2011) to Ohio EPA's June 15, 2011, Notice of Violation letter (NOV). The response included personnel training information (outline, sign-in sheets, corrective action summary to ensure training is given annually in the future), updates to your contingency plan including your emergency coordinators and emergency equipment capabilities and information on the management of your lamp ballasts.

On July 21, 2011, I spoke with Brian Kolesar, Environmental Engineer via telephone inquiring about the personnel training information that you provided. Your response included the personnel training for 2008 and 2009 which had been conducted but you were unable to locate the documentation during our May 25, 2011, inspection. I asked Mr. Kolesar if training had been conducted in 2010 and he stated it had not due to all the cutbacks, etc. I explained that as long as the plant is still operating and even if only one or two people are managing hazardous waste that personnel training must be provided. Mr. Kolesar agreed and stated he understood. Mr. Kolesar also stated that you all have taken corrective actions steps to ensure that you are familiar with the filing procedures, etc. pertaining to this type of information as he is only at the facility once or so a week.

My review of this documentation reveals that Guardian Manufacturing Company has adequately demonstrated abatement of the following violations discovered during the May 25, 2011, inspection as listed below:

<b>Violation</b>	<b>Date Violation Observed</b>	<b>Date Violation Abated</b>
1. OAC Rule 3745-52-34 (C)(1)(b) Hazardous waste label for satellite areas.	May 25, 2011	June 1, 2011
2. OAC Rule 3745-65-16(C) Personnel Training.	May 25, 2011	July 14, 011
3. OAC Rule 3745-65-52(D) Content of contingency plan – emergency coordinator.	May 25, 2011	July 14, 2011

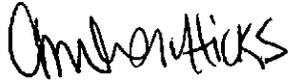
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Violation	Date Violation Observed	Date Violation Abated
4. OAC Rule 3745-65-52(E) Content of contingency plan – emergency equipment.	May 25, 2011	July 14, 2011
5. OAC Rule 3745-273- 13(D)(1) Waste management – standards for small quantity handlers of universal waste (lamps).	May 25, 2011	June 1, 2011
6. OAC Rule 3745-273-14(E) Waste management – labeling/marketing standards for small quantity handlers of universal waste (lamps).	May 25, 2011	June 1, 2011

In addition, thank you for the additional information pertaining to your management of your lamp ballasts. Based on the information provided in your response, you are managing your lamp ballasts properly.

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 Materials and Waste Management

pc: Colleen Weaver, DMWM, NWDO  
Cindy Lohrbach, DMWM, NWDO  
~~DMWM-HW, NWDO File: Guardian Manufacturing Company~~

ec: Amber Hicks, DMWM, 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.