



State of Ohio Environmental Protection Agency

Northwest District Office

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www.epa.ohio.gov

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

Re: Carlo Salvi USA, Inc.
Lucas County
OHR000037937
Hazardous Waste
Return to Compliance

March 9, 2010

Mr. Tony Macaro, Office Manager
Carlo Salvi USA, Inc.
4035 King Road
Sylvania, Ohio 43560

Dear Mr. Macaro:

Thank you for your February 5, 2010, response to Ohio EPA's October 8, 2009, Partial Return to Compliance letter. The information you submitted included a copy of the manifest for the disposal of the 55-gallon drum of waste xylene/petroleum distillates and documentation for the recycling of the buckets of used oil. My review of the documentation submitted reveals that Carlo Salvi USA, Inc. (Carlo Salvi) has adequately demonstrated abatement of the request for information and violation cited in the September 3, 2009, Notice of Violation (NOV) letter.

The following is a summary of the requested information and violation cited in the September 3, 2009, NOV as a result of my August 18, 2009, inspection and your compliance with respect to each:

1. OAC Rule 3745-52-11: Waste Evaluation

Any person who generates a waste must determine if that waste is a hazardous waste by using generator knowledge or by testing the waste. Carlo Salvi failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility.

Hazardous bulbs are considered "spent materials" and remain hazardous waste even when recycled. Hazardous waste lamp generators have the option of handling their lamps as hazardous waste or as universal waste.

Managing hazardous waste lamps under the universal waste rules eases certain regulations imposed on generators of spent lamps.

Carlo Salvi must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs.



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If Carlo Salvi decides to conduct waste sampling, please notify me at least seven days prior to the sampling event date so that a representative from Ohio EPA can be present to observe the sampling and to split samples if necessary.

In lieu of conducting sampling, Carlo Salvi can manage the spent fluorescent bulbs as universal waste. If Carlo Salvi plans to manage the spent fluorescent bulbs when generated as universal waste, please submit the name of the facility where you plan to recycle the bulbs. Carlo Salvi must also properly train employees, who handle or have responsibility for managing universal waste, on waste handling and emergency procedures relative to their responsibilities. Please review the universal waste requirements with the appropriate employees and send me documentation that this has been completed.

On September 18, 2009, Carlo Salvi submitted a letter regarding your plan for the management of spent fluorescent bulbs. Carlo Salvi plans to manage the spent fluorescent bulbs as universal waste when generated. Carlo Salvi has contacted two facilities (Heritage Environmental and Environmental Recycling) to set up the recycling program for the spent bulbs. Carlo Salvi must ensure that the employee(s) who manage the spent fluorescent bulbs when generated are properly trained using the fact sheets given to you at the time of our compliance inspection.

This violation was previously abated in the Partial Return to Compliance letter dated October 8, 2009.

2. OAC Rule 3745-279-22(C)(1): Labeling:

Containers, aboveground tanks, and fill pipes used for underground storage tanks shall be labeled or marked clearly with the words "used oil."

Carlo Salvi had two 5-gallon buckets of used oil that were not properly labeled. These buckets of used oil were left behind by the previous operator, New Age Rebuilders. Carlo Salvi has not generated used oil to date.

At the time of our inspection, Carlo Salvi properly labeled the 5-gallon buckets with the words "used oil".

This violation was previously abated in the Notice of Violation letter dated September 3, 2009.

Request for Information:

Carlo Salvi must submit to Ohio EPA proof of shipping to a proper disposal/recycling facility for the 55-gallon drum of waste xylene/petroleum distillates (D001, F003).

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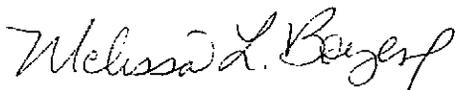
In addition, Carlo Salvi must submit documentation for the proper shipping and disposal/recycling for the buckets of used oil currently on-site.

On February 5, 2010, Carlo Salvi submitted a copy of the manifest for the disposal of the 55-gallon drum of hazardous waste picked up by Safety Kleen on February 3, 2010. In addition, Carlo Salvi submitted a copy of the paperwork for the used oil that was also picked up by Safety Kleen for fuels blending on February 3, 2010.

Ohio EPA has helpful information about compliance assistance and pollution prevention at the following web address: <http://www.epa.ohio.gov/ocapp>. In addition, you can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>.

If you have any questions or I can be of assistance, please contact me at (419) 373-3066.

Sincerely,



Melissa L. Boyers
Division of Hazardous Waste Management

//lr

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
DHWM;NWDO Carlo Salvi USA Lucas County File

ec: Melissa Boyers, DHWM, NWDO

Notice:

Ohio's 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.