

**Environmental
Protection Agency**

**Governor
Lt. Governor
Director**

November 9, 2011

Sean Madden
Röchling Glastic Corporation
4321 Glenridge Rd.
Cleveland, OH 44121-2891

**RE: RÖCHLING GLASTIC CORPORATION, OHD 990 ⁶⁹⁴ ~~614~~ 416, CUYAHOGA
COUNTY, LQG-CEI, RETURN TO COMPLIANCE**

Dear Mr. Madden:

Thank you for your October 20, 2011 response to Ohio EPA's September 26, 2011 Notice of Violation (NOV). The documentation you submitted included the following:

1. An updated contingency plan showing three less-than-90-day accumulation areas.
2. An updated contingency plan including an evacuation plan for the facility.
3. A copy of a disposal manifest for the universal waste identified in violation #3 of the NOV.
4. Documentation showing that all appropriate facility personnel have been given annual refresher training as of October 7, 2011
5. Documentation showing that Rick Mayes and Richard Vulcan were given annual refresher training in 2010.
6. An explanation that a sign has been posted to reinforce that the area identified in Violation #7 is a satellite accumulation area.
7. An explanation that a new work procedure has been introduced for the area identified in Violation #8.
8. A copy of the updated contingency plan page that identifies emergency coordinators.
9. An explanation that management of satellite accumulation areas was re-emphasized during the 2011 annual refresher training Röchling Glastic provided in October 2011.
10. An explanation that Röchling Glastic's waste analysis plan has been made consistent with the procedures that are being used with respect to generator treatment of hazardous waste at the facility.
111. An explanation that employees have been reminded of proper labeling procedures for universal waste lamps.

Ohio EPA has reviewed the documentation and determined that it is sufficient to correct the outstanding violations and concerns cited in the NOV:

3. **Universal Waste—Accumulation Time**
OAC 3745-273-15(A)
4. **Personnel Training Requirements**
OAC 3745-65-16(C)
5. **Personnel Training**
OAC 3745-65-16(A)(1)
6. **Contingency Plan—Evacuation Plan**
OAC 3745-65-52(F)
7. **General Inspection Requirements**
OAC 3735-66-74
8. **Management of Containers**
OAC 3745-66-73(A)

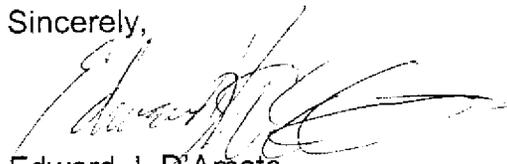
The documentation submitted is also sufficient to address the concerns cited in the NOV.

No response to this letter is required.

Failure to list specific deficiencies in this communication does not relieve Röchling Glastic Corporation from the responsibility of complying with all applicable Ohio EPA laws and regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Please feel free to contact me at (330) 963-1170 if you have any questions.

Sincerely,



Edward J. D'Amato
Environmental Specialist
Division of Materials and Waste Management

EJD:ddw

cc: Natalie Oryshkewych, DMWM, NEDO
ec: Jeff Mayhugh, DMWM, CO
Frank Popotnik, DMWM, NEDO
Sherry Slone, DMWM, NEDO