



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: Marion County  
Compliance Evaluation Inspection  
Ohio Galvanizing Corporation  
OHR 000 012 617  
Return to Compliance

October 10, 2007

Mr. Frank T. Bellamy, Vice President  
Ohio Galvanizing Corporation  
467 West Fairground Street  
Marion, Ohio 43302

Dear Mr. Bellamy:

Thank you for your September 27, 2007, response to Ohio EPA's August 29, 2007, Notice of Violation letter. Ohio Galvanizing Corporation (OGC) submitted the following documentation: photographic documentation of properly labeled hazardous waste containers; photographic documentation that the used oil container has been properly labeled, and photographic documentation showing that universal waste lamps are in containers that have been properly labeled, dated and the containers are kept closed.

The status of the violations previously cited follows:

**1. OAC Rule 3745-52-34(A)(3): Accumulation of Hazardous Waste – Labeling**

A large quantity generator of hazardous waste may, for ninety days or less, accumulate and/or conduct treatment of hazardous waste provided that while being accumulated and/or treated on-site, each container and tank is labeled or marked clearly with the words "Hazardous Waste."

OGC failed to individually label each tank accumulating hazardous waste with the words "Hazardous Waste."

This violation has been abated with your September 27, 2007, response.

**2. OAC Rule 3745-273-14(E): Universal Waste Lamps – Labeling**

A small quantity handler of universal waste must label or mark the universal waste to identify the type of universal waste. Each lamp or container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)."

OGC failed to label the container accumulating the spent light bulbs.

This violation has been abated with your September 27, 2007, response.

Mr. Frank T. Bellamy  
October 3, 2007  
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3. **OAC Rule 3745-273-14(C): Universal Waste Lamps – Length of Accumulation Tracking**

A small quantity handler of universal waste who accumulates universal waste shall be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

OGC failed to have a mechanism in place to demonstrate the length of universal waste accumulation.

This violation has been abated with your September 27, 2007, response.

4. **OAC Rule 3745-279-22(C)(1): Used Oil Generators – Labeling**

Used oil generators must label containers and above ground tanks used to store used oil with the words "Used Oil."

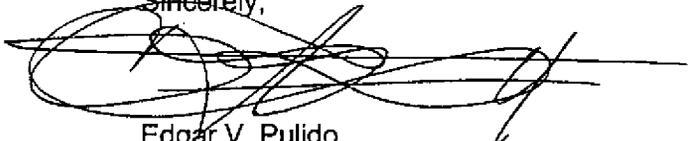
OGC failed to label a container storing used oil.

This violation has been abated with your September 27, 2007, response.

OGC has now abated all violations discovered during the August 2 and 8, 2007, inspections.

Should you have any questions, please feel free to contact me at (419)373-3015.

Sincerely,



Edgar V. Pulido  
Division of Hazardous Waste Management

/lb

pc: Colleen Weaver, Supervisor, DHWM, NWDO  
Cindy Lohrbach, DHWM, NWDO

~~DHWM, NWDO File: Ohio Galvanizing Corporation, Marion County~~

ec: Ed Pulido, 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.