



State of Ohio Environmental Protection Agency

**Northwest District Office**

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Bowling Green, OH 43402-9398

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www.epa.state.oh.us

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

Re: Semco, Inc.  
OHD 040 821 720  
Hazardous Waste  
Marion County  
Return to Compliance

August 19, 2008

Mr. Dan Bellow  
Environmental, Safety & Health Manager  
Semco, Inc.  
1025 Pole Lane Road  
Marion, Ohio 43302

Dear Mr. Bellow:

On May 1, 2008, I conducted a hazardous waste compliance evaluation inspection (CEI) of Semco, located at 1025 Pole Lane Road, Marion, Ohio. This inspection was conducted to determine Semco's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC), and Ohio's hazardous waste regulations as adopted under Chapter 3745 of the Ohio Administrative Code (OAC). The inspection included a tour of facility operations and a review of facility paperwork.

Semco manufactures copper-beryllium alloy plunger tips used in the dye casting industry. Hazardous waste generated at the facility includes Kolene System sludge (D002). Non-hazardous waste streams include baghouse dust; baghouse cartridges and filters; foundry sand; used oil/coolant; fluorescent light bulbs; and metal scrap (shavings, turnings, etc.). At the time of this inspection, Semco was operating as a Conditionally Exempt Small Quantity Generator (CESQG).

On August 12, 2008, you resubmitted photographs of your universal waste lamps storage. The status of the outstanding violations is as follows:

**1. 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 it is. 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)."

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

***You submitted a photograph showing the universal waste lamp container properly labeled. This violation has been abated.***

2. **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.

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

***You stated that from now you that the length of storage accumulation will be tracked by labeling the storage containers wit the date the first time a waste lamp goes in. This violation has been abated.***

3. **OAC Rule 3745-273-13(D)(1): Universal Waste Lamps – Storage Requirements**

A small quantity handler of universal waste must contain any lamps in containers or packages that are structurally sound, adequate to prevent breakage and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

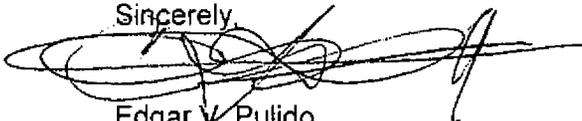
Semco failed to store the spent lamps in appropriate containers. In fact, Semco did not store the spent lamps in any container.

***You submitted a photograph showing the universal waste lamp container properly closed. This violation has been abated.***

Based on the information provided Semco, Inc. has corrected all the remaining cited violations and it is back into full compliance.

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

Sincerely,



Edgar V. Pulido  
Division of Hazardous Waste Management

/llr

Enclosures

pc: Colleen Weaver, Supervisor, DHWM, NWDO  
Cindy Lohrbach, DHWM, NWDO  
<DHWM, NWDO File: Semco, Inc.  
ec: Ed Pulido, DHWM, NWDO

**NOTE:**

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.