



**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

Re: Interstate Optical Company, Inc.  
OHD085239309  
Richland County  
Hazardous Waste  
NOV/RTC

December 7, 2010

Mr. Ted Mabry, Vice President of Production  
Interstate Optical Company, Inc.  
680 Lindaire Lane  
P. O. Box 308  
Mansfield, Ohio 44901

Dear Mr. Mabry:

Thank you for your response to Ohio EPA's September 21, 2010, letter requesting additional information as a follow-up to Interstate Optical Company, Inc. (IOC)'s August 31, 2010, compliance evaluation inspection (CEI).

On October 20, 2010, Greg Pugh submitted your facility emergency equipment inspection log sheets; LDR forms for your methanol/isopropyl alcohol (D001, F003) and sodium hydroxide (D002) waste streams; and stated that during the period that IOC was operating as a small quantity generator (SQG) (1/13/10—5/11/10), the facility did not maintain a log for container storage inspections, but that your facility does monitor this area. Thus, IOC has now implemented a log which is placed on the cabinet to inspect your container storage area. Mr. Pugh submitted a copy of this log as well.

On November 30, 2010, I suggested via email to Mr. Pugh that IOC add any type of absorbent materials used for spill clean-up to their emergency equipment checklist. Mr. Pugh responded that your facility maintains absorbent pigs and pads for such an emergency; however, he will ensure that these types of material are available in your container storage area. I would recommend ensuring that these are added to your emergency equipment checklist so that IOC can ensure they are ready and available in the event of a hazardous waste spill or release.

**Notice of Violation/Return to Compliance**

Please note that at the time of the August 31, 2010, CEI, it was discovered that IOC was operating as a SQG from January 13, 2010 - May 11, 2010. The facility is currently operating as a conditionally exempt small quantity generator (CESQG) of hazardous waste. Based on the August 31, 2010, CEI and additional information received on October 20, 2010, I found the following violation of Ohio's hazardous waste laws:

- 1. Container Storage Inspections.  
OAC Rule 3745-66-74**

Mr. Ted Mabry, Vice President of Production  
December 7, 2010  
Page 2

Container storage area(s) must be inspected, at least weekly (defined as every seven days); looking for leaks and deterioration, and these inspections must be recorded in an inspection log or summary.

During the time period that IOC was operating as a SQG, the facility was not conducting weekly (defined as every seven days), container storage inspections of the waste present in the storage area and recording this information in a log.

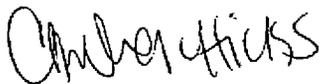
The facility is currently operating as a CESQG. *Please note that IOC is not required to conduct weekly container storage inspections during any month in which they are operating as a CESQG.* This requirement only applies to SQG and large quantity generators of hazardous waste. However, keep in mind that any month IOC may become a SQG, weekly container storage inspections **must** be conducted and recorded in a log for the waste that was generated during the time period IOC operates as a SQG, and maintains that waste on-site.

**This violation is considered abated** as the facility is currently operating as a CESQG. Likewise, the facility submitted to me a copy of a container storage inspection log on October 20, 2010, which the facility is now maintaining in the container storage area on a cabinet.

IOC has complied with all other SQG requirements for the time period they were operating as a SQG. I have enclosed the following guidance which you may find useful: Hazardous Waste Generator Categories and Episodic Generation.

No response to this letter is necessary. If you should have any questions, please feel free to call me at (419) 373-3082 or email me at [amber.hicks@epa.ohio.gov](mailto:amber.hicks@epa.ohio.gov).

Sincerely,



Amber M. Hicks  
Division of Hazardous Waste Management

//lr

Enclosure

ec: Amber Hicks, DHWM, NWDO

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

~~D:\HW\NWDO\Files\Interstate Optical Company, Inc.~~

**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.