



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: Sandusky County
Compliance Evaluation Inspection
Crown Battery Manufacturing Company
OHD 005 043 054
Return to Compliance

November 17, 2009

Mr. Robert L Michael, Sr., Safety & Environmental Director
Crown Battery Manufacturing Company
1445 Majestic Drive
Fremont, Ohio 43420

Dear Mr. Michael:

On November 13, 2009, I received your letter in response to Ohio EPA's notice of violation issued to you on September 30, 2008. Based on the information you included in this letter, the status of the violations observed during my September 10, 2008, inspection is as follows:

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

Any person, who generates a waste, as defined in Rule 3745-51-02 of the administrative code, must determine if that waste is a hazardous waste.

CBM has failed to properly evaluate the spent fluorescent bulbs generated at the facility.

You stated in your letter that you will be managing your spent light bulbs as universal waste. The spent bulbs will be properly stored and labeled and will be sent to be recycled at Environmental Recycling, Inc., in Bowling Green, Ohio.

This violation has been abated.

2. **OAC Rule 3745-66-91 to 3745-66-100: Tank System Requirements**

Tank system requirements apply to owner or operators of facilities that use tank systems for storing or treating hazardous waste.

At the time of the inspection, CBM did not have any of the required tank information located on-site available for review for the two 1500 and the two 1000 gallon hazardous waste storage tanks that were installed in 2006. I am enclosing a copy of the Tank System Requirements Checklist for your review.

You stated in your letter that you are currently recycling 100% of your spent sulfuric acid and effectively realizing a zero-discharge of sulfuric acid. Furthermore, you are no longer accumulating spent sulfuric acid (D002) at your facility and disposing of this waste as hazardous waste at the Vickery Environmental facility, Sandusky County, Ohio.



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Note that as former large quantity generator, if you choose to stop using the tanks or the facility cease operation, you are required to meet the closure performance standards as stated in the Ohio Administrative Code, OAC Rule 3745-66-11.

These violations have been abated.

3. **OAC Rule 3745-279-24: Off-site Shipments of Used Oil**

Generators must ensure that their used oil is transported only by transporters who have obtained U.S. EPA identification numbers, except as provided in OAC Rule 3745-279-24 paragraphs (A) to (C).

In your letter you stated that you stopped giving the used oil away to any individual or business. You added that Safety-Kleen in Toledo, Ohio, will be picking up your used from now on. Used oil will be recycled.

This violation has been abated.

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

Enclosures

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

~~DHWM, NWDO File: Crown Battery Manufacturing Company, Sandusky 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.