



State of Ohio Environmental Protection Agency

Northwest District Office

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

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

June 22, 2009

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

Dear Mr. Michael:

On May 19, 2009, I received your letter dated May 18, 2009. This letter is 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 previously cited violations 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 in the process of ceasing the use of your above ground tanks that are holding your corrosive hazardous waste.