



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Wood County
Compliance Evaluation Inspection
Electro Prime, Inc.
OHR 000 030 114
Return to Compliance

February 6, 2008

Mr. Kevin E. Meade, Vice President
Electro Prime, Inc.
63 Dixie Highway
Rossford, Ohio 43460

Dear Mr. Meade:

Thank you for your January 31, 2008, response to Ohio EPA's January 4, 2008, Notice of Violation letter. Electro Prime, Inc. (EP) submitted the following: Photographic and written documentation regarding the proper management of universal waste lamps.

The status of the violations previously cited follows:

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

Each lamp or a 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)."

EP failed to label their universal waste lamps.

On January 31, 2008, EP submitted photographs showing proper labeling of universal waste lamps storage containers. ***This violation has been abated.***

2. **OAC Rule 3745-273-15(C): Universal Waste – Accumulation Time**

This rule states in part that a small quantity handler of universal waste who accumulates universal waste shall demonstrate the amount of time that the universal waste has been accumulated on-site. The period of accumulation must not exceed 365 days or 12 months.

On January 31, 2008, EP stated that monitoring this item was added to their Preventive Maintenance Program. ***This violation has been abated.***

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

A small quantity handler of universal waste must contain any lamp 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.

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EP failed to keep the universal waste lamps in closed containers.

To abate this violation, EP must obtain suitable containers for storing the universal waste lamps and keep them closed. EP must send to me photographic documentation that this was done.

On January 31, 2008, EP submitted a photograph that shows a properly closed universal waste lamps storage container. ***This violation has been abated.***

4. **OAC Rule 3745-66-73(A): Management of Containers**

A generator of hazardous waste who stores the waste in containers shall keep the containers always closed during storage, except when it is necessary to add or remove waste.

EP failed to keep two of the roll-off boxes storing hazardous waste (F019) closed. ***This violation was abated during the inspection.***

As we discussed during the inspection, you may be able to find other ways to reduce the waste your company generates. If you would like more information on topics concerning pollution prevention, you can visit <http://www.epa.state.oh.us/ocapp/ocapp.html>. If you find additional ways to recycle, reduce or altogether eliminate the amount of waste that your company generates, you may be able to reduce treatment and disposal costs. In addition, you may possibly reduce your regulatory requirements.

The Division of Hazardous Waste Management (DHWM) has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign up for this free service. You can find more information at <http://www.epa.state.oh.us/dhwm/listserv.html>. Please feel free to share this information with your colleagues.

You can find copies of the rules and other information at <http://www.epa.state.oh.us/dhwm>.

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

Sincerely,



Edgar V. Pulido
Division of Hazardous Waste Management

/cs
pc: Colleen Weaver, Supervisor, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
ec: DHWM, NWDO File: Electro Prime, Inc., Wood County
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.