



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: RemTec International
OHD 043 643 360
Wood County
Hazardous Waste
Return to Compliance

July 24, 2008

Mr. Scott Warner
RemTec International
1100 Haskins Road
Bowling Green, Ohio 43402

Dear Mr. Warner:

Thank you for your February 28, 2007, response to Ohio EPA's February 15, 2007, Notice of Violation letter (NOV) which I received in this office on March 2, 2007. Your response stated the following information:

- ⇒ RemTec International (RemTec) only receives halons and refrigerants from the refrigeration industry.
- ⇒ These refrigerants are only used in the chilling process and are not utilized as solvents.
- ⇒ In the normal course of business all material that RemTec receives at the facility is reclaimed. However, on occasion the material may be cross-contaminated and unable to be reclaimed. RemTec at this time will ensure to conduct a proper waste evaluation of the material. If based on the waste evaluation, the material is non-hazardous it will be destroyed in the on-site Plascon Arc Plasma destruction facility. If it is hazardous, it will be sent off-site to a proper hazardous waste treatment, storage, or disposal facility. All of this information will be properly documented and maintained at the facility.

My review of this documentation reveals that RemTec International has adequately demonstrated abatement of the violation discovered during the June 21 & 23, 2006, compliance evaluation inspection as listed below:

Violation	Date of Violation	Date Violation Abated
1. OAC Rule 3745-52-11 Waste Evaluation	June 23, 2006	March 2, 2007

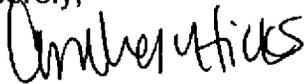
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Other general comments:

- ❖ As stated in OAC Rule 3745-51-04 (B) (12), used chlorofluorocarbon refrigerants from totally enclosed heat transfer equipment, including...air conditioning...and refrigeration systems that use chlorofluorocarbons as the heat transfer fluid...are wastes which are not hazardous wastes provided the refrigerant is reclaimed for further use.
- ❖ In addition, a letter from U.S. EPA, Office of Solid Waste and Emergency Response, dated August 2, 1989, stated "On July 28, 1989, published a Federal Register notice (54 FR 31335) that clarified the applicability of RCRA Subtitle C regulations to CFC refrigerants.... This notice also announced the availability of data relating to whether CFC refrigerants exhibit the characteristic of a hazardous waste. In determining whether the CFC refrigerant to be recycled is a hazardous waste because it exhibits a characteristic of a hazardous waste, a generator may cite the Federal Register notice to demonstrate that such materials do not exhibit a hazardous characteristic under normal operating conditions. You may find this letter at the following link:
[http://yosemite.epa.gov/osw/rcra.nsf/0c994248c239947e85256d090071175f/D55CA2DC57AF98CE8525670F006BDF7C/\\$file/11451.pdf](http://yosemite.epa.gov/osw/rcra.nsf/0c994248c239947e85256d090071175f/D55CA2DC57AF98CE8525670F006BDF7C/$file/11451.pdf)
- ❖ We spoke by telephone on July 18, 2008, and you stated to date that nothing has changed in the source of your material and or in the procedures you are following for reclamation. To date, you stated that RemTec has not generated any waste.
- ❖ I stated to you at this time that RemTec must keep in mind that if the source of the material you reclaim changes or if anything else in your process changes they must ensure you are following all applicable regulations.
- ❖ In addition, if you do generate waste at any point, you must ensure that you have properly evaluated this waste to ensure that RemTec has identified all possible applicable hazardous characteristics of the waste.

No response to this letter is necessary. If you should have any questions, please feel free to call me at (419) 373-3082.

Sincerely,



Amber M. Hicks
Division of Hazardous Waste Management

/llr

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
DHWM, NWDO File: RemTec International
ec: Amber Hicks, DHWM, NWDO