



State of Ohio Environmental Protection Agency

Northeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Laura H. Powell, Acting Director

January 16, 2007

RE: JOHNSON RUBBER COMPANY
EPA ID NO. OHD 004 210 118
GEAUGA COUNTY
LQG COMPLIANCE INSPECTION
RETURN TO COMPLIANCE (RTC)

Diana Sly
Environmental Management Representative
Johnson Rubber Company
P.O. Box 67
16025 Johnson Street
Middlefield, OH 44062-0067

Dear Ms. Sly:

Thank you for correspondence submitted by Mr. Pete Hottos dated January 5, 2007, and received on January 9, 2007, responding to Ohio EPA's NOV letter dated November 27, 2006.

Johnson Rubber submitted documentation including: photographs of a marked and labeled container, training materials and documentation and documentation of contingency plan distribution.

My review of this documentation indicates that Johnson Rubber has adequately demonstrated abatement of all violations from the October 19, 2006 inspection, cited in my letter of November 27, 2006, specifically:

1. Personnel Training

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| OAC 3745-65-16(A)(1) | Personnel must receive training in a way that ensures compliance. |
| OAC 3745-65-16(A)(2) | Training director must be experienced. Training must include information pertinent to the job position of the employee. |
| OAC 3745-65-16(A)(3) | Training program must ensure personnel are able to respond effectively to emergencies. |
| OAC 3745-65-16(B) | Personnel must complete training within 6 months of their employment date and must not work unsupervised until they have completed it. |
| OAC 3745-65-16(C) | Personnel must take part in an annual review of the initial training. |
| OAC 3745-65-16(D)(1) | Facility must maintain employee name and job title records for each hazardous waste management position. |
| OAC 3745-65-16(D)(2) | Facility must maintain a written job description for each position. |
| OAC 3745-65-16(D)(3) | Facility must maintain a written description of the training given to each person. |

2. Contingency Plan

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| OAC 3745-65-53(B) | A copy of the contingency plan shall be submitted to local authorities |
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3. Universal Waste

OAC 3745-273-13(D)(1) Small quantity handler must manage lamps appropriately
OAC 3745-273-14(E) Small quantity handler must label unit holding universal waste lamps

Should you have any questions regarding this letter, please contact me at (330) 963-1165.

Sincerely,



Neil J. Wasilk
Environmental Specialist
Division of Hazardous Waste Management

NJW:ddw

cc: Natalie Oryshkewych, Ohio EPA, DHWM, NEDO
ec: Sherry Stone, Ohio EPA, DHWM, NEDO

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your facility from its obligation to comply with all applicable regulations.