



State of Ohio Environmental Protection Agency

Northeast District Office

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

February 23, 2007

RE: OHIO CIRCUITS
OHD004198412
LARGE QUANTITY GENERATOR
SUMMIT COUNTY
PARTIAL RETURN TO COMPLIANCE/NOV

Mr. Nilesh Patel
Vice President
Ohio Circuits
2250 East Aurora Road
Twinsburg, OH 44087-1926

Dear Mr. Patel:

I have received and reviewed the following documents submitted by Ohio Circuits. These documents were provided to abate the violations noted in Ohio EPA's June 1, 2006 notice of violation letter and were received on:

January 8, 2007. The slides from the annual hazardous waste training given to employees on January 4, 2007.

January 26, 2007. A copy of the employee sign in sheet and the quizzes for the hazardous waste training. The sign in sheets were provided to document that the employees received the training on January 4, 2007. (Please note that the year is wrong on the sign in sheet. It should be 2007 and not 2006).

February 6, 2007. A copy of the revised Contingency Plan for Ohio Circuits.

February 9, 2007. Two photographs. One photograph was of the spill control equipment that has been placed in the hazardous waste storage area. The other photograph shows that a telephone has been installed in the hazardous waste storage area.

Based on the documentation received on January 26, 2007, the following violation has been partially abated:

6. OAC 3745-65-16(A), (B) and (C); Personnel Training. Annual refresher training has been provided, as is required by this rule.

Based on review of the revised contingency plan received by Ohio EPA on February 6, 2007, Ohio Circuits has returned to compliance with the following violations:

7. OAC rule 3745-65-51 (A); Contingency plan.
8. OAC rule 3745-65-52(A), (C), (E), and (F); Content of contingency plan. Partial return to compliance. The violation will be completely abated upon receipt of a contingency plan that includes the home address of the emergency coordinator and alternate emergency coordinator.
9. OAC 3745-53(A) and (B); Copies of the contingency plan have been provide to the Twinsburg police and fire departments.

10. OAC rule 3745-65-55; Emergency Coordinator. A primary and alternate emergency coordinator have been chosen.

Based on the photographs emailed to me on February 9, 2007, Ohio Circuits has returned to compliance with the following violations:

11. OAC rule 3745-65-32(B) and 3745-65-34(A); Preparedness and Prevention. A telephone has been installed in the hazardous waste storage room.
12. OAC rule 3745-65-32(C); Preparedness and Prevention. Ohio Circuits has purchased and placed spill control equipment in the hazardous waste storage room.

The following violations remain unabated:

1. Ohio Administrative Code (OAC) rule 3745-66-92; Design and installation of new tank systems or components.
2. OAC rule 3745-66-93; Containment and detection of releases.
3. OAC rule 3745-66-94(B); General Operating Procedures.

Violations 1, 2 and 3 will be abated once the certification and assessment for the two hazardous waste storage tanks, and the design, containment calculations and coating used on the secondary containment system, are received and reviewed by Ohio EPA and found to be adequate. The certifications will be submitted in the next several weeks per my phone conversation with Ike Habib on 1/31/2007.

4. OAC rule 3745-66-95; Tank inspections. Please provide a copy of the daily inspection log that is being used to document that the hazardous waste storage tanks are being inspected.
6. OAC rule 3745-65-16(D) and (E). Personnel Training. Please provide job titles and job descriptions for all positions at the facility related to hazardous waste management and the name of the employee filling each job. For each position handling hazardous waste include a written description of the type and amount of introductory and continuing training that will be given to each person. Include a description on how records that document that the training has been given will be kept. Please be advised that training records on current personnel must be kept until closure of the facility.
8. OAC rule 3745-65-52(D). Content of Contingency Plan. The plan does not list the home addresses of the primary and alternate emergency coordinators.
13. OAC rule 3745-65-33; Emergency equipment testing and logs.

All communication and emergency equipment shall be tested and maintained as necessary to assure operation in time of emergency. The inspections must be recorded in a log or summary. Please submit two weeks worth of completed inspection checklists. Please note that the list of equipment on the checklist should be consistent with the equipment listed in the contingency plan and found in the hazardous waste storage room.

18. OAC 3745-52-32(B); Pre-transportation requirement.

I provided you a picture of a hazardous waste label that meets this requirement. Please submit a photograph showing that containers of hazardous waste have been properly labeled prior to transport off-site.

19. OAC 3745-270-07(A)(7); Notification and certification requirements.

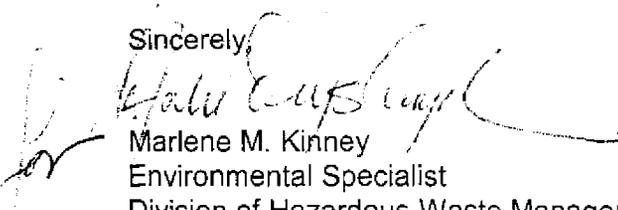
The following statement should be placed in the Vickery Environmental file and a copy of it sent to me: The waste shipped to Vickery Environmental is a D002. The LDR standards do not apply to this hazardous waste when it is shipped to Vickery because the waste is being managed in an underground injection well which is regulated by the "Safe Drinking Water Act".

23. OAC 3745-273-13(D)(1); Standards for universal waste lamps, failure to store waste lamps in a closed container.
24. OAC 3745-273-14(E); Standards for universal waste lamps, failure to label a used lamps container.
25. OAC 3745-273-15(C); Standards for universal waste, failure to document the length of time the universal waste is stored at the facility.
26. OAC 3745-273-16; Standards for universal waste, failure to train employees who handle universal waste.

Violations 23, 24, 25, and 26 are related to management of spent fluorescent bulbs. Please provide a brief summary of how spent fluorescent bulbs will be managed by Ohio Circuits. For example, the summary could include such information as: the employee(s) who manage the spent bulbs will place them into a box that is then closed and labeled with the words "Universal Waste Lamps". The box will be labeled with the date the first bulb was placed into it. A log will be kept tracking the dated boxes of spent bulbs such that spent bulbs do not remain onsite longer than one year.

Please respond within thirty days of receipt of this letter with the requested documentation. 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. Should you have any questions, please feel free to call me at (330) 963-1162.

Sincerely,



Marlene M. Kinney
Environmental Specialist
Division of Hazardous Waste Management

MMK:ddw

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