

**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Susan L. Kelly, Director

January 6, 2012

**RE: BEARING AND DRIVE SYSTEMS, INC.
SMALL QUANTITY GENERATOR
OHR 000 025 395
CUYAHOGA COUNTY
RTC**

Mr. Michael Luciano
BDS, Inc.
14888 Foltz Parkway
Strongsville, Ohio 44149

Dear Mr. Luciano:

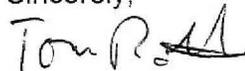
Thank you for your December 16, 2011 response (dated December 27, 2011) to Ohio EPA's December 8, 2011 Notice of Violation letter. The documentation you submitted included bills of lading for the solvent and waste lamps removed by Heritage-Crystal Clean. You indicated that Heritage-Crystal Clean will now service all of the facility's parts cleaners through its continued use program. Also included were photographs of the properly labeled and closed universal waste lamp containers to be used at your facility to accumulate waste lamps.

My review of this documentation reveals that Bearing and Drive Systems has now abated all violations discovered during the December 1, 2011 inspection as listed below.

Letter Citation #	Rule Citation
1.	OAC Rule 3745-65-33, Preparedness and Prevention, Emergency Equipment
2.	OAC Rule 3745-52-34 (D)(4), Use and Management of Containers, Labeling
3.	OAC Rule 3745-66-74, Use and Management of Containers, Inspection
4.	OAC Rule 3745-273-13 (D)(1), Universal Waste Lamp Containers
5.	OAC Rule 3745-273-14 (E), Universal Waste Lamp Labeling

Should you have any questions, please feel free to call me at (330) 963-1231.

Sincerely,



Tom Roth
District Representative
Division of Materials and Waste Management

TR/cl

ec: Jeff Mayhugh, DMWM, CO
Nyall McKenna, DMWM, NEDO

Marlene Kinney, DMWM, NEDO
Natalie Oryshkewych, DMWM, NEDO

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