



**Environmental
Protection Agency**

John R. Kasich, Governor
Mike Taylor, Lt. Governor
Susan J. Daily, Director

February 15, 2012

RE: IONBOND
OHD 004 535 431
CUYAHOGA COUNTY
CEI/RTC, SQG>>CESQG

Mr. Alan Whitaker
Operations Manager
Ionbond
24700 Highpoint Road
Beachwood, OH 44122

Dear Mr. Whitaker:

On September 16, 2011, September 30, 2011, and February 10, 2012, Ohio EPA received e-mails from you in response to the Ohio EPA notice of violation (NOV) letter dated May 20, 2011. The response letter included digital images of various labeled containers, information on the disposal of the fluorescent lamps, documentation of universal waste management training, documentation of waste disposal and waste analysis of the sand blasting waste.

Based on these submittals and inspection, Ohio EPA has determined that Ionbond has adequately addressed all of the following violations cited in the May 2011 NOV:

Violations:

1. ***Waste Evaluation, OAC 3745-52-11:*** There were three (3) waste streams that have not been evaluated by the facility.

The first is the white plastic container of unknown material found in the universal waste/used oil area. Based on information submitted on September 30, 2011, this material was a latex additive and was disposed with the vanadium tetrachloride noted in the NOV in concern #6.

The other two are the two different wastes generated by the two blasting units. Based on the analysis submitted on February 10, 2012, it appears these wastes are non-hazardous.

2. ***Labeling/marketing- standards for small quantity handlers of universal waste, OAC rule 3745-273-14(E).*** Ionbond demonstrated compliance with this rule by the photographs submitted on September 16, 2011.
3. ***Packaging of Universal Waste Lamps, OAC rule 3745-273-13(D)(1).*** Ionbond demonstrated compliance with this rule by the photographs submitted on September 16, 2011.

IONBOND
FEBRUARY 15, 2012
PAGE - 2 -

4. **Labeling/marking- standards for small quantity handlers of universal waste, OAC rule 3745-273-14(A):** Ionbond demonstrated compliance with this rule by the photographs submitted on September 16, 2011.
5. **Employee training for Small Quantity Handlers of Universal Waste, OAC rule 3745-273-16.** Ionbond demonstrated compliance with this rule by the training sign in sheet submitted on September 16, 2011.

Should you have any questions or require additional information, please contact Frank Popotnik, my supervisor, or me at (330) 963-1200.

Sincerely,



Karen L. Nesbit
Division of Materials and Waste Management

KLN:ddw

ec: Frank Popotnik, DMWM, NEDO
Natalie Oryshkewych, DMWM, NEDO
Jeff Mayhugh, DMWM, NEDO

cc: Marlene Kinney, DMWM, NEDO