



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

February 9, 2012

RE: PRIDE OF THE HILLS MFG., INC.  
NON-GENERATOR  
OHD 005 044 094  
HOLMES COUNTY  
NOV

Mr. Curt Murray, Sr.  
Pride of the Hills Mfg., Inc.  
8275 State Route 514  
Big Prairie, Ohio 44611-9692

Dear Mr. Murray:

Thank you for accompanying me during Ohio EPA's January 25, 2012 inspection of the Pride of the Hills Manufacturing (PHMI) facility in Killbuck, Ohio. I inspected PHMI to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734, of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). My inspection included a review of company operations and written documentation. In addition to the inspection for compliance with Ohio's hazardous waste rules, the facility was inspected for compliance with Ohio's universal hazardous waste and used oil rules.

PHMI is a manufacturer of pressure vessels used in the oil and gas drilling industry. These vessels are fabricated from steel along with associated piping and control valves. The vessels are installed on newly drilled oil and gas wells to separate the oil, gas, and water produced by the wells over time. No hazardous waste or waste oil is currently generated by PHMI. Universal waste lamps are generated at the facility and are currently disposed of as solid waste.

The following violation of Ohio's hazardous waste rules was found during this inspection. In order to correct these violations you must do the following and send me the required information **within 30 days** of the date of this letter:

**1. Waste Evaluation, OAC 3745-52-11:**

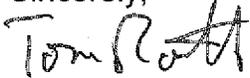
Any person who generates a waste must evaluate the waste to determine if it is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51. PHMI violated this regulation by disposing of waste lamps (primarily fluorescent lamps) as solid waste without determining whether or not the waste lamps are a hazardous waste. The waste fluorescent lamps contain mercury and may contain other hazardous metals. These may therefore be a hazardous waste. To abate this violation, submit documentation of PHMI evaluation of the waste lamps in compliance with Ohio's hazardous waste regulations.

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**As an alternative to determining whether your particular waste lamps are hazardous waste, you may wish to manage them as Universal Waste.** In general, this would involve saving the waste lamps in a properly labeled and closed container and having them recycled by a lamp recycler. If PHMI chooses to manage the waste lamps as Universal Waste and recycle the lamps through an approved lamp recycler, indicate this in your response letter.

Should you have any questions, please feel free to call me at (330) 963-1231. You can find copies of the rules and other information on the Division of Materials and Waste Management's web page at: <http://www.epa.state.oh.us/dhwm/>.

Sincerely,



Tom Roth  
District Representative  
Division of Materials and Waste Management

TR/cl

cc: Jeff Mayhugh, DMWM, CO  
Niall McKenna, DMWM, NEDO  
Natalie Oryshkewych, DMWM, NEDO  
Marlene Kinney, DMWM, NEDO