



**Environmental  
Protection Agency**

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

Re: Acme Specialty Mfg.  
OHD033589870  
Lucas County  
Hazardous Waste  
**Return to Compliance**

February 7, 2012

Mr. Thomas Messina  
Acme Specialty Manufacturing  
3010 Monroe Street  
Toledo, Ohio 43606

Dear Mr. Messina:

Thank you for your January 18, 2012, response to Ohio EPA's January 9, 2012, Partial Return to Compliance (PRTC) letter. Your response included a Safety-Kleen invoice and shipping paper for six boxes of universal waste lamps, a universal waste lamps training record, and a universal waste lamps procedure and training plan.

My review of this documentation and my observations during my follow-up inspection reveal that Acme Specialty Manufacturing (ASM) has adequately demonstrated abatement of all the following violations observed during my September 12, 2011, inspection and cited in the September 20, 2011, NOV:

1. Waste Evaluation, OAC Rule 3745-52-11

The waste analyses demonstrate that the chrome and silver coated mirror glass is not hazardous waste. However, since the TCLP lead concentration of 3.76 mg/L in the silver coated mirror glass is close to the regulatory limit of 5 mg/L, Ohio EPA recommends that Acme periodically sample and analyze this waste to ensure that it is not hazardous. Also, based on this waste evaluation, it appears that Acme does not generate hazardous waste. This violation was abated on November 22, 2011.

2. Universal Waste Packaging – Lamps, OAC Rule 3745-273-13(D)(1)

On October 21, 2011, I observed ten closed containers of universal waste lamps. Therefore, this violation was abated on October 21, 2011.

3. Universal Waste Labeling – Lamps, OAC Rule 3745-273-14(E)

Mr. Thomas Messina  
February 7, 2012  
Page 2

On October 21, 2011, I observed ten closed containers of universal waste lamps labeled with the words "Used Lamps". Therefore, this violation was abated on October 21, 2011.

4. Accumulation Time for Universal Waste – Lamps, OAC Rule 3745-273-15(C)

On October 21, 2011, I observed ten closed containers of universal waste lamps labeled with the various accumulation dates. Therefore, this violation was abated on October 21, 2011.

5. Accumulation Time for Universal Waste – Lamps, OAC Rule 3745-273-15(A)

Attached to your January 18, 2012, response is a copy of the Safety-Kleen invoice and shipping paper for six boxes of universal waste lamps. **Therefore, this violation was abated on January 18, 2012.**

6. Universal Waste.Employee Training, OAC Rule 3745-273-16

Attached to your January 18, 2012, response are copies of your universal waste lamp disposal procedures and a training log that demonstrates that Acme provided the necessary training on January 18, 2012. **Therefore, this violation was abated on January 18, 2012.**

Also, in your January 18, 2012, response you explained that ASM will be using Safety-Kleen for its used oil recycling.

If you have any questions, please feel free to contact me at (419) 373-3074.

Sincerely,



Don North  
District Representative  
Division of Materials and Waste Management

/llr

pc: Colleen Weaver, DMWM, NWDO (hard copy of letter)  
Cindy Lohrbach, DMWM, NWDO

ec: Colleen Weaver, DMWM, NWDO (scanned copy of letter)  
Don North, DMWM, NWDO