



**Environmental
Protection Agency**

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

RECEIVED

MAR 07 2012

**OHIO E.P.A.
N.W.D.O.**

Re: Wilson Barrett Battery Power System
OHR000127944
Wood County
Hazardous Waste
Partial Return to Compliance

March 2, 2012

Mr. Rick Slawinski, Service Manager
Wilson Barrett Battery Power System
2840 Innovative Drive
Northwood, Ohio 43619

Dear Mr. Slawinski:

Thank you for your January 27, 2012, February 1, 2012, February 2, 2012, February 6, 2012, February 13, 2012, February 20, 2012, and February 23, 2012, responses to Ohio EPA's January 23, 2012, Notice of Violation/Partial Return to Compliance (NOV/PRTC) letter. The violations cited were discovered during my October 13, 2011, inspection at your facility. Additional violations were also cited based upon the analytical results submitted by Wilson Barrett to Ohio EPA on December 16, 2011. The documents you submitted included: waste disposal manifest and land disposal restriction form, photographic documentation for container labeling and emergency spill control equipment, emergency coordinator and employee training documentation, weekly/monthly inspection logs, and tank system alternatives.

The following is a summary of the additional violations, based upon the analytical results submitted by Wilson Barrett on December 16, 2011, cited in the January 23, 2012, NOV/PRTC letter and your compliance with respect to each:

6. ORC Section 3734.02 (F): Unlawful Transportation:

No person shall store, treat, or dispose of hazardous waste identified or listed under this chapter and rules adopted under it, regardless of whether generated on or off the premises where the waste is stored, treated, or disposed of, or transport or cause to be transported any hazardous waste identified or listed under this chapter and rules adopted under it to any other premises, except at or to any of the following: (1) A hazardous waste facility operating under a permit issued in accordance with this chapter; (2) A facility in another state operating under a license or permit issued in accordance with the "Resource Conservation and Recovery Act of 1976" 90 Stat. 2806, 42 U.S.C.A. 6921, as amended.

Wilson Barrett unlawfully transported characteristic hazardous waste to other than a permitted hazardous waste facility. Wilson Barrett has historically been sending spent battery wash/slop water mixed with battery acid to Midwest Guardian located in Wapakoneta, Ohio. Midwest Guardian is not permitted to accept hazardous waste for treatment, storage, or disposal.

In 2011, Wilson Barrett shipped hazardous waste to Midwest Guardian on the following dates: 3/7/11 (8 drums); 6/14/11 (16 drums); and 9/30/11 (16 drums).

Wilson Barrett has ceased sending hazardous waste to Midwest Guardian. On December 20, 2011, I spoke with Curtis Petchler from Towlift, Inc., and notified him that the facility was operating as a small quantity generator (SQG) of hazardous waste. I also notified him that as a SQG, Wilson Barrett has 180-days from September 30, 2011, to properly dispose of the six drums of waste battery wash/slop water (D002).

On January 27, 2012, Wilson Barrett submitted, via electronic mail, a copy of the manifest, complete with LDR form, for 12 drums of battery rinse water (D002) and waste battery acid (D002) that were shipped off-site for disposal at Chemtron Corporation on January 18, 2012.

7. OAC Rule 3745-52-20(A): Manifest Requirements:

A generator who transports, or offers for transportation, hazardous waste for off-site treatment, storage, or disposal must prepare a uniform hazardous waste manifest, U.S. EPA form 8700-22 before transporting the hazardous waste off-site.

Wilson Barrett shipped a hazardous waste off-site without a manifest. Specifically, Wilson Barrett has been sending spent battery wash/slop water mixed with battery acid to Midwest Guardian without a hazardous waste manifest.

On January 27, 2012, Wilson Barrett submitted, via electronic mail, a copy of the manifest, complete with LDR form, for 12 drums of battery rinse water (D002) and waste battery acid (D002) that were shipped off-site for disposal at Chemtron Corporation on January 18, 2012.

With this information, this violation has been abated.

8. OAC Rule 3745-52-34(D)(4): Container Management, Labeling:

A generator may for one hundred eighty days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit provided that the waste is placed in containers that are labeled or marked clearly with the words "Hazardous Waste" while being accumulated and/or treated on-site.

Wilson Barrett has six 55-gallon drums of waste battery wash/slop water (D002) located in the hazardous waste storage area that are not marked with the words "Hazardous Waste."

On January 27, 2012, Wilson Barrett submitted, via electronic mail, photographic documentation showing the drums of waste battery wash/slop water now properly labeled with the words "Hazardous Waste".

With this information, this violation has been abated.

9. OAC Rule 3745-52-34(D)(4): Accumulation Start Date:

A generator may, for one hundred eighty days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit provided that the waste is placed in containers that have the date upon which each period of accumulation begins clearly marked and visible for inspection on each container.

Wilson Barrett has six 55-gallon drums of waste battery wash/slop water (D002) located in the hazardous waste storage area that do not have an accumulation start date.

On January 27, 2012, Wilson Barrett submitted, via electronic mail, photographic documentation showing the drums of waste battery wash/slop water now properly labeled with the accumulation start date (September 30, 2011).

With this information, this violation has been abated.

10. OAC Rule 3745-52-34(D)(5)(a): Emergency Coordinator:

A generator must ensure that at all times there is at least one employee either on the premises or on call (available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This employee is the emergency coordinator.

Wilson Barrett failed to have a designated emergency coordinator.

On February 1, 2012, Wilson Barrett submitted, via electronic mail, the names of the designated emergency coordinators. Joe Pavlovic is the primary emergency coordinator and Gloria Reetz is the secondary emergency coordinator.

With this information, this violation has been abated.

11. OAC Rule 3745-52-34(D)(5)(b): Preparedness and Prevention:

A generator must post the following information next to the telephone: the name and telephone number of the emergency coordinator; location of fire extinguishers and spill control equipment, and if present, fire alarms; and the telephone number of the fire department, unless the facility has a direct alarm.

Wilson Barrett failed to have the required information posted next to the telephone located nearest to the hazardous waste storage area.

To abate this violation, Wilson Barrett must post the required information next to the telephone and submit a copy of the posted list. Wilson Barrett must also submit photographic documentation to show that the list has been properly posted in this area.

On February 8, 2012, Wilson Barrett submitted, via electronic mail, a copy of the emergency response information that is now posted above the telephone in the shop area. In addition, photographic documentation was submitted showing this information posted on the wall above the shop telephone.

With this information, this violation is considered abated.

12. OAC Rule 3745-52-34(D)(5)(c): Emergency Procedures/Preparedness and Prevention:

A generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.

Wilson Barrett failed to properly train employees on proper waste handling and emergency procedures related to the wastes generated on-site.

On February 2, 2012, Wilson Barrett submitted, via electronic mail, a copy of the training outline that was going to be used to conduct the hazardous waste employee training. Wilson Barrett conducted the training on February 10, 2012. On February 13, 2012, Wilson Barrett submitted a copy of the sign in sheet listing the names of the employees required to attend the training.

With this information, this violation is considered abated.

13. OAC Rule 3745-65-32(C): Required Equipment:

All facilities shall be equipped with portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment.

Wilson Barrett does not maintain spill control equipment in the hazardous waste storage area.

On February 6, 2012, Wilson Barrett submitted, via electronic mail, photographic documentation showing the new acid specific spill kit and neutralizer kit that have been added to the hazardous waste storage area.

With this information, this violation is considered abated.

14. OAC Rule 3745-65-33: Emergency Equipment:

All facility communications or alarm systems, spill control equipment and decontamination equipment must be tested and maintained as necessary to assure its proper operation in time of emergency. The owner or operator must record the inspections in a log or summary.

Wilson Barrett does not test and maintain the emergency equipment to assure its proper operation in the event of an emergency. These tests are not recorded in a log. It is recommended that the log include the following information: date and time of test, name of person conducting the test, observations made and date/nature of any repairs.

On February 23, 2012, Wilson Barrett submitted, via electronic mail, a copy of the policy that outlines the procedures for testing and maintaining the emergency equipment at the facility on a monthly basis. Also submitted was a copy of a completed inspection log dated February 22, 2012.

With this information, this violation is considered abated.

15. OAC Rule 3745-66-74: Weekly Inspections:

Container storage areas shall be inspected on a weekly basis looking for leaks and for deterioration.

These inspections shall be recorded in an inspection log or summary. Ohio EPA interprets weekly to mean once within the seven-day period following the previous inspection.

Wilson Barrett was not conducting inspections of the hazardous waste storage areas where the waste battery wash/slop water (D002) is stored.

On January 27, 2012, Wilson Barrett submitted, via electronic mail, five weeks of completed weekly inspection logs (12/23/11, 12/30/11, 1/6/12, 1/11/12, and 1/18/12).

With this information, this violation is considered abated.

16. OAC Rule 3745-270-07(A)(1): Land Disposal Restrictions:

A generator of a hazardous waste must determine if the waste has to be treated before it can be land disposed. This is done by determining if the hazardous waste meets the treatment standards by either testing the waste, or by using knowledge of the waste.

Wilson Barrett failed to determine if the hazardous waste needed to be treated to meet the treatment standard prior to disposal.

On January 27, 2012, Wilson Barrett submitted, via electronic mail, a copy of the manifest, complete with LDR form, for 12 drums of battery rinse water (D002) and waste battery acid (D002) that were shipped off-site for disposal at Chemtron Corporation on January 18, 2012.

With this information, this violation is considered abated.

17. OAC Rule 3745-270-07(A)(2): Land Disposal Restrictions:

With the initial shipment of waste to each treatment or storage facility, the generator must send a one-time written notice to each treatment or storage facility receiving the waste, and place a copy in the generator's files. The notice must include the information in Column A of Table 1 of this rule.

Wilson Barrett failed to send a LDR form with the hazardous waste when it was shipped off-site for disposal.

On January 27, 2012, Wilson Barrett submitted, via electronic mail, a copy of the manifest, complete with LDR form, for 12 drums of battery rinse water (D002) and waste battery acid (D002) that were shipped off-site for disposal at Chemtron Corporation on January 18, 2012.

With this information, this violation is considered abated.

18. OAC Rule 3745-270-09(A): Land Disposal Restrictions:

The initial generator of a waste must determine each EPA hazardous waste number applicable to the waste in order to determine the applicable treatment standards. If the generator determines that his waste displays a hazardous characteristic (i.e. D002), the generator must determine underlying hazardous constituents in the characteristic waste.

Wilson Barrett failed to determine if underlying hazardous constituents were present in the waste battery wash/slop water, which is a characteristic hazardous waste.

On January 27, 2012, Wilson Barrett submitted, via electronic mail, a copy of the manifest, complete with LDR form, for 12 drums of battery rinse water (D002) and waste battery acid (D002) that were shipped off-site for disposal at Chemtron Corporation on January 18, 2012.

In addition, on February 23, 2012, Wilson Barrett submitted, via electronic mail, information they received from Chemtron Corporation regarding underlying hazardous constituents (UHC's). Wilson Barrett's waste battery acid and waste wash/slop water is not being monitored for UHC's because it is deep well injected. Should this waste stream be sent to another facility for treatment or disposal, Chemtron Corporation will test and monitor for UHC's.

With this information, this violation is considered abated.

On January 26, 2012, I spoke with Curtis Petchler, Towlift, Inc., who indicated that they do not plan to manage the battery wash station collection trough or the battery wash water recycling unit as tanks. The facility plans to no longer use these two units and will be taking them out of service. The battery rinse water (D002) and waste battery acid (D002) that were shipped off-site for disposal at Chemtron Corporation on January 18, 2012, included the waste that had been stored in these two units. Wilson Barrett then neutralized, scrubbed and rinsed the unit three times. All neutralizer and rinse waters were collected and shipped off-site as a hazardous waste (D002) on January 18, 2012, to Chemtron Corporation. On February 6, 2012, Wilson Barrett submitted, via electronic mail, photographic documentation showing the wash station and tank system removed from the building and broken down to be managed as scrap.

Since Wilson Barrett removed the battery wash station collection trough and the battery wash water recycling unit from the facility on February 6, 2012, the following violations have been abated:

19. OAC Rule 3745-66-101(B)(2): SQG Tank System Requirements:

Hazardous waste or treatment reagents must not be placed in a tank if they could cause the tank or its inner liner to rupture, leak, corrode, or otherwise fail before the end of its intended life.

Wilson Barrett failed to ensure that the tank liners would not rupture, leak, or corrode at the following tanks:

- a. Wilson Barrett was storing hazardous waste (D002) in the battery wash station collection trough located under the wooden washing grates. Wilson Barrett must immediately cease storing hazardous waste in the washing station collection trough or begin managing this unit as a tank. Ohio EPA recommends that Wilson Barrett transfer the waste battery wash water out of the trough immediately after use to avoid operating this unit as a tank. Wilson Barrett must submit to Ohio EPA documentation to demonstrate how you plan to manage this area in the future.
- b. In addition, Wilson Barrett was storing hazardous waste (D002) in the battery wash water recycling unit. Wilson Barrett must immediately cease storing hazardous waste in the battery wash water recycling unit or begin managing this as a tank. This unit was intended to operate as a wash water recycling unit and not as a hazardous waste storage tank. Wilson Barrett must submit to Ohio EPA documentation to demonstrate how you plan to manage this area in the future.

This violation was abated on February 6, 2012.

20. OAC Rule 3745-66-101(B)(3): SQG Tank System Requirements:

Uncovered tanks must be operated to ensure at least sixty centimeters (two feet) of freeboard, unless the tank is equipped with a containment structure, a drainage control system, or a diversion structure.

Wilson Barrett failed to ensure that there was at least two feet of freeboard at the following tanks:

- a. Wilson Barrett was storing hazardous waste (D002) in the battery wash station collection trough located under the wooden washing grates. Wilson Barrett must immediately cease storing hazardous waste in the washing station collection trough or begin managing this unit as a tank. Ohio EPA recommends that Wilson Barrett transfer the waste battery wash water out of the trough immediately after use to avoid operating this unit as a tank. Wilson Barrett must submit to Ohio EPA documentation to demonstrate how you plan to manage this area in the future.
- b. In addition, Wilson Barrett was storing hazardous waste (D002) in the battery wash water recycling unit. Wilson Barrett must immediately cease storing hazardous waste in the battery wash water recycling unit or begin managing this as a tank. This unit was intended to operate as a wash water recycling unit and not as a hazardous waste storage tank. Wilson Barrett must submit to Ohio EPA documentation to demonstrate how you plan to manage this area in the future.

This violation was abated on February 6, 2012.

21. OAC Rule 3745-66-101(C)(3): SQG Tank System Requirements:

Generators must inspect the level of waste in the uncovered tank at least once each operating day to ensure that two feet of freeboard is maintained.

Wilson Barrett failed to conduct the required inspections of the following tanks:

- a. Wilson Barrett was storing hazardous waste (D002) in the battery wash station collection trough located under the wooden washing grates. Wilson Barrett must immediately cease storing hazardous waste in the washing station collection trough or begin managing this unit as a tank. Ohio EPA recommends that Wilson Barrett transfer the waste battery wash water out of the trough immediately after use to avoid operating this unit as a tank. Wilson Barrett must submit to Ohio EPA documentation to demonstrate how you plan to manage this area in the future.
- b. In addition, Wilson Barrett was storing hazardous waste (D002) in the battery wash water recycling unit. Wilson Barrett must immediately cease storing hazardous waste in the battery wash water recycling unit or begin managing this as a tank. This unit was intended to operate as a wash water recycling unit and not as a hazardous waste storage tank.

Wilson Barrett must submit to Ohio EPA documentation to demonstrate how you plan to manage this area in the future.

This violation was abated on February 6, 2012.

22. OAC Rule 3745-66-101(C)(4): SQG Tank System Requirements:

Generators must inspect the construction materials of the tank at least weekly to detect corrosion or leaking of fixtures or seams.

Wilson Barrett failed to conduct the required inspections of the following tanks:

- a. Wilson Barrett was storing hazardous waste (D002) in the battery wash station collection trough located under the wooden washing grates. Wilson Barrett must immediately cease storing hazardous waste in the washing station collection trough or begin managing this unit as a tank. Ohio EPA recommends that Wilson Barrett transfer the waste battery wash water out of the trough immediately after use to avoid operating this unit as a tank. Wilson Barrett must submit to Ohio EPA documentation to demonstrate how you plan to manage this area in the future.
- b. In addition, Wilson Barrett was storing hazardous waste (D002) in the battery wash water recycling unit. Wilson Barrett must immediately cease storing hazardous waste in the battery wash water recycling unit or begin managing this as a tank. This unit was intended to operate as a wash water recycling unit and not as a hazardous waste storage tank. Wilson Barrett must submit to Ohio EPA documentation to demonstrate how you plan to manage this area in the future.

This violation was abated on February 6, 2012.

23. OAC Rule 3745-66-101(C)(5): SQG Tank System Requirements:

Generators must inspect the area immediately surrounding the tank at least weekly to detect erosion or obvious signs of leakage.

Wilson Barrett failed to conduct the required inspections of the following tanks:

- a. Wilson Barrett was storing hazardous waste (D002) in the battery wash station collection trough located under the wooden washing grates. Wilson Barrett must immediately cease storing hazardous waste in the washing station collection trough or begin managing this unit as a tank. Ohio EPA recommends that Wilson Barrett transfer the waste battery wash water out of the trough immediately after use to avoid operating this unit as a tank. Wilson Barrett must submit to Ohio EPA documentation to demonstrate how you plan to manage this area in the future.
- b. In addition, Wilson Barrett was storing hazardous waste (D002) in the battery wash water recycling unit. Wilson Barrett must immediately cease storing hazardous waste in the battery wash water recycling unit or begin managing this as a tank.

This unit was intended to operate as a wash water recycling unit and not as a hazardous waste storage tank. Wilson Barrett must submit to Ohio EPA documentation to demonstrate how you plan to manage this area in the future.

This violation was abated on February 6, 2012.

24. OAC Rule 3745-52-34(A)(3): Tank Management, Labeling:

A generator may for one hundred eighty days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit provided that the waste is placed in containers and tanks that are labeled or marked clearly with the words "Hazardous Waste".

Wilson Barrett failed to properly label the following tanks:

- a. Wilson Barrett was storing hazardous waste (D002) in the battery wash station collection trough located under the wooden washing grates. Wilson Barrett must immediately cease storing hazardous waste in the washing station collection trough or begin managing this unit as a tank. If Wilson Barrett plans to manage this unit as a tank, the tank must be properly labeled "Hazardous Waste", and photographic documentation must be submitted to demonstrate compliance. Ohio EPA recommends that Wilson Barrett transfer the waste battery wash water out of the trough immediately after use to avoid operating this unit as a tank. Wilson Barrett must submit to Ohio EPA documentation to demonstrate how you plan to manage this area in the future.
- b. In addition, Wilson Barrett was storing hazardous waste (D002) in the battery wash water recycling unit. Wilson Barrett must immediately cease storing hazardous waste in the battery wash water recycling unit or begin managing this as a tank. This unit was intended to operate as a wash water recycling unit and not as a hazardous waste storage tank. If Wilson Barrett plans to manage this unit as a tank, the tank must be properly labeled "Hazardous Waste", and photographic documentation must be submitted to demonstrate compliance. If you do not plan to operate this unit as a tank, Wilson Barrett must submit to Ohio EPA documentation to demonstrate how you plan to manage this area in the future.

This violation was abated on February 6, 2012.

The following is a summary of the violations discovered during my October 13, 2011, inspection and cited in the November 2, 2011, NOV/PRTC letter and your compliance with respect to each:

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

Any person who generates a waste must determine if that waste is a hazardous waste by using generator knowledge or by testing the waste.

At the time of the inspection, Wilson Barrett did not have waste evaluation documentation for the battery wash/slop water. Wilson Barrett has historically shipped this waste stream to Midwest Guardian as part of a contractual agreement. Wilson Barrett was not able to verify what Midwest Guardian does with the battery wash/slop water once they receive it at their facility.

On November 28, 2011, the Ohio EPA, represented by Melissa Boyers and Don North, met with Curtis Petchler from Towlift, Inc., to provide sampling oversight. A representative of Alloway was present to sample the waste battery wash/slop water which is a mixture of battery acid, neutralizing cleaner, and water. Samples were taken from drum #1, drum #2, drum #5, the mobile battery wash unit, and the on-site battery wash water recycling unit. The five samples were analyzed for Toxic Characteristic Leaching Procedure (TCLP) Resource Conservation and Recovery Act (RCRA) metals (SW-846 Method 1311/6010), and pH.

On December 16, 2011, Wilson Barrett submitted a copy of the analytical results for the three drums of battery wash/slop water, the water from the mobile battery wash unit, and the water from the on-site battery wash water recycling unit. The analytical results indicate that the waste battery wash/slop water and the water from the on-site battery wash water recycling unit are hazardous waste. Each waste stream exhibits the hazardous characteristic of corrosivity (D002) due to a pH less than or equal to two. The analytical pH results for each sample are as follows: drum #1- pH 1.1; drum #2- pH 1.4; drum #5- pH <1.0; water from the mobile battery wash unit- pH 3.1; and water from the on-site battery wash water recycling unit- pH 1.5.

Wilson Barrett must begin managing the battery wash/slop water and the water from the on-site battery wash water recycling unit as a hazardous waste. The Ohio EPA recommends that Wilson Barrett collect and evaluate the water from the mobile battery wash unit prior to each disposal due to the potential inconsistency of this waste stream.

On January 27, 2012, Wilson Barrett submitted, via electronic mail, a copy of the manifest, complete with LDR form, for 12 drums of battery rinse water (D002) and waste battery acid (D002) that were shipped off-site for disposal at Chemtron Corporation on January 18, 2012.

Based upon the waste evaluation documentation that was received on December 16, 2011, this violation has been abated.

2. OAC Rule 3745-273-13(D)(1): Universal Waste: Fluorescent Lamp Management:

All lamps/bulbs being managed as a universal waste must be stored in packages that are structurally sound and adequate to prevent breakage. The packages/containers must be closed.

Wilson Barrett did not store the spent fluorescent lamps in containers that were closed. Specifically, there was a box of spent fluorescent bulbs located in the corner outside the conference room that was open.

On November 21, 2011, Wilson Barrett submitted photographic documentation showing the spent fluorescent lamps now stored in containers that are properly closed.

This violation was previously abated on November 21, 2011.

3. OAC Rule 3745-273-13(D)(2): Universal Waste: Fluorescent Lamp Management:

Any lamp/bulb that shows evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous constituents to the environment must be placed in a closed, structurally sound container.

Wilson Barrett did not store broken fluorescent lamps in containers that are closed and structurally sound. Specifically, there was a box of spent fluorescent bulbs located in the corner outside the conference room where a broken bulb was sticking up out of the box.

On November 21, 2011, Wilson Barrett submitted photographic documentation showing the spent fluorescent lamps now stored in containers that are structurally sound and properly closed.

This violation was previously abated on November 21, 2011.

4. OAC Rule 3745-273-14(E): Universal Waste: Fluorescent Lamp Labeling:

All packages and containers holding spent fluorescent lamps/bulbs are to be labeled with the words "Universal Waste - Lamps", "Waste Lamps" or "Used Lamps".

Wilson Barrett did not have the box of spent fluorescent bulbs located in the corner outside the conference room properly labeled.

At the time of our inspection, Wilson Barrett properly labeled the box of spent fluorescent bulbs with the words "Universal Waste Lamps".

This violation was previously abated on October 13, 2011.

5. OAC Rule 3745-273-15(C): Accumulation Time for Universal Waste Batteries and Lamps:

A small quantity handler of universal waste shall be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

Wilson Barrett was unable to demonstrate the length of time the universal waste bulbs in storage have been on-site. There were no dates on the spent fluorescent bulbs, storage containers, or documentation demonstrating how long the universal waste bulbs have been in storage.

Mr. Rick Slawinski, Service Manager
March 2, 2012
Page 13

On November 21, 2011, Wilson Barrett submitted photographic documentation showing the spent fluorescent lamps now stored in containers that are properly labeled with the accumulation start date.

This violation was previously abated on November 21, 2011.

Ohio EPA has helpful information about compliance assistance and pollution prevention at the following web address: <http://www.epa.ohio.gov/ocapp>. In addition, you can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>.

If you have any questions, please contact me by telephone at (419) 373-3066 or by e-mail at melissa.boyers@epa.ohio.gov.

Sincerely,



Melissa L. Boyers
Division of Materials and Waste Management

/llr

pc: Cindy Lohrbach, DMWM, NWDO
Colleen Weaver, DMWM, NWDO
Patricia Hess, Towlift, Inc., Cleveland, Ohio
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ec: Colleen Weaver, DMWM, NWDO (scanned e-copy)
Don North, DMWM, NWDO
Todd Anderson, Legal, CO
Melissa Boyers, DMWM, NWDO

Notice:

Ohio's 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.