



**Environmental
Protection Agency**

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

April 28, 2011

Sunshine Scherer
Gojo Industries
P.O. Box 991
Akron, OH 44309

**RE: GOJO INDUSTRIES, OHD 004 162 038, CUYAHOGA COUNTY
LQG-CEI, NOTICE OF VIOLATION/RETURN TO COMPLIANCE**

Dear Ms. Scherer:

On April 18, 2011, Ohio EPA's Division of Materials and Waste Management, represented by Edward D'Amato and Sherry Slone, inspected Gojo Industries located at 3783 State Road, Cuyahoga Falls for compliance with Ohio hazardous waste laws and regulations found in Chapters 3734 of the Ohio Revised Code (ORC) and 3745 of the Ohio Administrative Code (OAC). You and Perry Durbin and Jeanette Bogdanski represented Gojo Industries during the inspection.

Gojo Industries manufactures skin cleansers and soaps at its Cuyahoga Falls facility. The facility is a large quantity generator of hazardous waste.

The following violations were found:

**1. Used Oil Storage Requirements for Generators (Labels)
OAC 3745-279-22(C)**

Containers and above ground tanks used to store used oil at generator facilities shall be labeled or marked clearly with the words "Used Oil."

A portable container in the Rolling Stock Area that used to accumulate used oil was not labeled per this rule. This violation was corrected during the inspection when Gojo properly marked the container. No further action is required regarding this violation.

**2. Labeling/Marking Standards for Universal Waste
OAC 3745-273-14(E)**

Each universal waste lamp or a container or package in which such lamps are contained, must be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)", or "Waste Lamp(s)", or "Used Lamp(s)."

Universal Waste Lamp boxes were not labeled per this rule. This violation was corrected when Gojo notified Ohio EPA via e-mail that the containers had been properly marked. No further action is required regarding this violation.

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During the inspection, you expressed interest in any information I may have about daylighting. Studies have shown that, in addition to energy savings, daylighting can increase employee productivity. The following articles discuss the costs and advantages of daylighting. These were sent to you via e-mail on April 26, 2011:

Federal Energy Managers See Daylight To Energy Savings:
http://www1.eere.energy.gov/femp/news/news_detail.html?news_id=7148.

The Practical Application of Daylighting Systems as an Effective Energy Conservation Measure with a Reasonable Return on Investment:
<http://repository.tamu.edu/bitstream/handle/1969.1/5172/ESL-IC-02-10-07.pdf?sequence=4>.

Daylighting and Productivity: A study of the effects of the indoor environment on human function: <http://www.thespaceplace.net/articles/hobstetter200703.php>.

Daylighting Application and Effectiveness in Industrial Facilities:
<http://repository.tamu.edu/bitstream/handle/1969.1/5583/ESL-IE-05-05-24.pdf?sequence=4>.

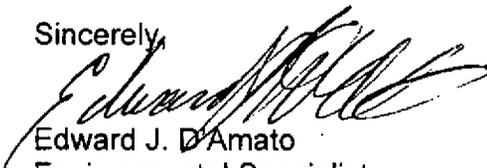
The Division of Materials and Waste Management has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following web link:
http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage.

Enclosed are copies of the checklists used for the inspection.

Failure to list specific deficiencies in this communication does not relieve Gojo Industries from the responsibility of complying with all applicable Ohio EPA laws and regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Please feel free to contact me at (330) 963-1170 if you have any questions.

Sincerely,


Edward J. D'Amato
Environmental Specialist
Division of Materials and Waste Management

EJD:cl
Enclosures

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

cc: Marlene Kinney, DMWM, NEDO