



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Road
Twinsburg, OH 44087-1924

TELE: (330) 953-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Laura H. Powell, Acting Director

January 17, 2006 7

RE: GE OHIO LAMP
TRUMBULL COUNTY
OHD 066 052 804
PARTIAL RETURN TO COMPLIANCE

Mr. Matthew Buxbaum
General Electric Ohio Lamp
1210 N Park Ave
Warren, Ohio 44483

Dear Mr. Buxbaum:

On January 8, 2007, Ohio EPA received a letter with attachments dated January 5, 2007 from GE Ohio Lamp. This letter was in response to Ohio EPA's December 5, 2006 Notice of Violation letter (NOV). The response included the following:

- Attachment #1 - January 5, 2007 request for an exemption from the 50 foot rule including a copy of a December 5, 2006 letter from the City of Warren Fire Department and detailed drawing of the northwest corner of the facility.
- Attachment #2 - Completed weekly inspection log for the chrome sludge area.
- Attachment #3 - List of job titles and the personnel who fill each job.
- Attachment #4 - Job titles and descriptions.
- Attachment #5 - Location of emergency equipment.
- Attachment #6 - Envirite LDR.
- Attachment #7 - E-mail from Chemtron.
- Attachment #8 - Hazardous Waste training outline.

As stated in the December 2006 NOV, no further action was required for the following violations:

1. ***Establishing and operating a hazardous waste facility without a permit and storing hazardous waste without a permit, Ohio Revised Code (ORC) § 3734.02 (E) and (F).***
3. ***Waste Evaluation, OAC rule 3745-52-11.***
4. ***Required [Emergency] Equipment, OAC rule 3745-65-32(C).***
7. ***Required Aisle Space, OAC 3745-65-35.***
8. ***[Satellite] Accumulation Area Requirements, OAC rule 3745-52-34(C)(1)(b).***
9. ***Labeling Requirements for Hazardous Waste Containers, OAC rule 3745-52-34(A)(3).***
10. ***Labeling Requirements for Hazardous Waste Containers, OAC rule 3745-52-34(A)(2).***

Mr. Matthew Buxbaum
General Electric Ohio Lamp
January 17, 2007
Page 2

11. ***Used Oil Storage Requirements for Generators, OAC rule 3745-279-22(C)(1).***
15. ***Packaging of Universal Waste Lamps, OAC rule 3745-273-13(D)(1).***
16. ***Labeling/markings- standards for small quantity handlers of universal waste, OAC rule 3745-273-14(E).***
17. ***Accumulation time limits – standards for small quantity handlers of universal waste, OAC rule 3745-273-15(A).***
18. ***Accumulation time limits – standards for small quantity handlers of universal waste, OAC rule 3745-273-15(C).***

Based on the information provided, it appears that GE Ohio Lamp has adequately addressed the following violations from the December 2006 NOV:

5. ***Testing and Maintenance of Equipment, OAC rule 3745-65-33.***
6. ***Inspections of Hazardous Waste Accumulation Areas, OAC rule 3745-66-74.***
12. ***Personnel Training, OAC rule 3745-65-16(D)(1).***
13. ***Personnel Training, OAC rule 3745-65-16(D)(2).***
14. ***Contingency Plan, OAC 3745-65-52(E).***
19. ***Retention of Land Disposal Restriction Forms, OAC rule 3745-270-07(A)(8).***

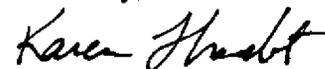
Violation #2 ***Special Requirements for Ignitable or Reactive Waste, OAC rule 3745-66-76,*** will remain outstanding until such time as the Director of Ohio EPA approves the exemption. Ohio EPA has received GE Ohio Lamp's request for an exemption and it is currently being reviewed.

It also appears that GE Ohio Lamp noted and taken action regarding all of the concerns listed in the NOV. If any further information becomes available regarding the one-time LDR notification, please forward that information to Ohio EPA.

Failure to list specific deficiencies and/or violations in this communication does not relieve GE Ohio Lamp from the responsibility of complying with all applicable laws, rules and regulations.

Should you have any questions please feel free to call me or my supervisor, Frank Popotnik at this office.

Sincerely,



Karen L. Nesbit
Division of Hazardous Waste Management

KLN:cl

cc: Natalie Oryshkewych, DHWM, NEDO

ec: Frank Popotnik, DHWM, NEDO
Harry Sarvis, DHWM, CO