

Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korieski, Director

September 13, 2010

RE: **ARROW MANUFACTURING, LTD.
OHR 000 134 585
LAKE COUNTY
NOTICE OF VIOLATION**

Mr. John L. Habe IV
President
Arrow Manufacturing, Ltd.
8687 Tyler Boulevard
Mentor, Ohio 44060

Dear Mr. Habe:

Thank you for accompanying Paul Dolensky and me during Ohio EPA's June 21, 2010 inspection of the Arrow Manufacturing, Ltd. (Arrow) facility in Mentor, Ohio. Brian Holmes also represented Arrow during the inspection. Ohio EPA inspected Arrow to determine its compliance with Ohio's hazardous waste and used oil laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). During the inspection, Ohio EPA also helped you identify ways to prevent pollution by reducing waste. This letter will explain the violations we found, what you need to do to correct the violations, other general concerns we have, what you need to do to respond to our general concerns and the pollution prevention opportunities we identified.

Arrow is a manufacturer of metal parts. You stated that Arrow does not generate any routine hazardous waste because you have switched to a soap or solvent that has a higher flash point and that the still has been removed.

Ohio EPA found the following violations of Ohio's hazardous waste laws. In order to correct these violations you must do the following and submit the required information to Ohio EPA **within 30 days** of the date of this letter:

Violations

1. **Universal Waste Management, OAC 3745-273-13(D)(1):** Waste lamps must be contained in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps. Containers or packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage.

In a storage closet there were approximately a dozen waste lamps of varying sizes sticking out of an open box.

The lamps should be placed in appropriately sized boxes that prevent breakage. The box of waste lamps should have been closed.

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Please document that all waste lamps have been placed into appropriate sized boxes containing a cardboard separator. Please document that the boxes are closed by submitting a photo. Also confirm that the employee(s) responsible for managing waste lamps has been instructed on proper waste lamp management.

2. **Universal Waste Lamp Labeling, OAC 3745-273-14(E):** Waste lamps or containers of universal waste lamps must be labeled with the words, "Universal Waste Lamps" or "Waste Lamps" or "Used Lamps".

The box of waste lamps was unlabeled.

Ohio EPA received an electronic response from you dated June 23, 2010, that provided a sample label to be used for the lamps. Please document that the boxes are labeled by submitting a photo.

Comments

1. **OAC 3745-273-15 Accumulation time limits, OAC 3745-273-15(C)(6):**

A small quantity handler of universal waste who accumulates 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. The handler may make this demonstration by:

Any method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

During the inspection you stated that a company had come in and replaced the lamps with new energy efficient lamps. You also stated that the old lamps were removed from the facility by that company. Please provide the paperwork documenting when the old florescent lamps were removed and disposed of by the company that installed the new lamps in the facility. This paperwork would demonstrate the length of time that the universal waste lamps that we observed that day had been accumulating.

Ohio EPA received an electronic response from you dated June 23, 2010, that provided a sample label to be used for the lamps. This label included a space for the accumulation date for any future lamps.

2. Please contact Paula Canter at (614) 644-2923 for instructions regarding changing Mentor Machine to Arrow Manufacturing, Ltd. (address 8687) on the Notification of Regulated Waste Activity form (EPA Form 9029) <http://epa.ohio.gov/dhwm/notiform.aspx>.

Please let her know that you need to remove Micron Manufacturing (address 8677) or the address 8677 Tyler Blvd. from your activity form.

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Please explain to her also that you do not believe at this time that Arrow Manufacturing, Ltd. is a small quantity generator of hazardous waste. She will ask you if you want to retain or withdraw your U.S.EPA identification number.

I will be asking Micron Manufacturing to fill out a Notification of Regulated Waste Activity form also specific to their address (8677).

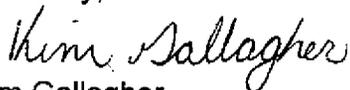
Arrow may be able to reduce the waste your company generates through recycling. If you find ways to recycle, reduce or altogether eliminate the amount of waste that your company generates, you may be able to reduce treatment and disposal costs. And, you may possibly reduce your regulatory requirements. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/opp>.

If you would like to be considered for an in-depth, on-site confidential compliance assistance and/or pollution prevention assessment, or if you would like more information, please contact Adrienne LaFavre at (330) 963-1250.

Enclosed you will find a copy of the checklists that we completed during the inspection. Should you have any questions, please feel free to call me at (330) 963-1214. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

The Division of Hazardous Waste Management has created an electronic news service to provide you with updates on events and news related to hazardous waste activities in Ohio. You can find more information at <http://web.epa.state.oh.us/dhwm/listserv.html>.

Sincerely,



Kim Gallagher
Environmental Specialist
Division of Hazardous Waste Management

KG:cl
Enclosure

ec: Frank Popotnik, DHWM, NEDO
Natalie Oryshkewych, DHWM, NEDO
Harry Sarvis, DHWM, CO
Paula Canter, DHWM, CO

cc: Marlene Kinney, DHWM, NEDO

Notice:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with applicable regulations.

