



**Environmental
Protection Agency**

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

Re: Allied Moulded Products, Inc.
Plant #1
Williams County
OHR000153320
Hazardous Waste
Return to Compliance

March 6, 2012

Mr. Ron Clark, Safety & Environmental Coordinator
Allied Moulded Products, Inc.
222 North Union Street
Bryan, Ohio 43506

Dear Mr. Clark:

Thank you for your February 16, 2012, response to Ohio EPA's February 13, 2012, Notice of Violation/Partial Return to Compliance (NOV/PRTC) letter. Ohio EPA also made a site visit on February 29, 2012, and Allied Moulded Products, Inc. (AMPI) provided additional information. AMPI submitted photographic documentation for the used oil totes, and provided universal waste management documentation. My review of the documentation provided reveals that AMPI has adequately demonstrated abatement of all of the violations cited in the February 13, 2012, NOV/PRTC letter.

The following is a summary of the violations cited in the February 13, 2012, NOV/PRTC letter as a result of my January 25, 2012, inspection and your compliance with respect to each:

1. OAC Rule 3745-279-22(C)(1): Labeling:

Containers, aboveground tanks, and fill pipes used for underground storage tanks shall be labeled or marked clearly with the words "used oil."

AMPI had six totes of used oil in the water tower room and one tote of used oil in the maintenance area that were not properly labeled.

At the time of my inspection, AMPI properly labeled the one used oil tote located in the maintenance area with the words "used oil". A copy of the fact sheet, [The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil](#), was given to you at the time of my inspection. Please review this information and contact me if you have any questions.

On January 26, 2012, AMPI submitted photographic documentation showing the six used oil totes located in the water tower room now properly labeled with the words "used oil".

This violation was previously abated on January 26, 2012.

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.

AMPI did not store the spent universal waste fluorescent lamps in containers that were closed. Specifically, AMPI had one open box of spent mercury vapor bulbs and one open cardboard container of spent fluorescent tube lamps.

On January 26, 2012, AMPI submitted photographic documentation showing the box and container of spent fluorescent bulbs/lamps now properly closed.

This violation was previously abated on January 26, 2012.

3. 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".

AMPI did not have the box of spent mercury vapor bulbs properly labeled.

On January 26, 2012, AMPI submitted photographic documentation showing the box of spent mercury vapor bulbs now properly labeled.

This violation was previously abated on January 26, 2012.

4. 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.

AMPI was unable to demonstrate the length of time the box of mercury vapor universal waste bulbs have been on-site.

On February 16, 2012, AMPI submitted a copy of the bill of lading for the spent fluorescent lamps that were shipped off-site on February 15, 2012, to Environmental Recycling in Bowling Green, Ohio, where they will be recycled. AMPI will begin dating the universal waste storage containers with the accumulation start date once the first bulb is placed in the new box.

With this information, this violation has been abated.

Mr. Ron Clark, Safety & Environmental Coordinator
March 6, 2012
Page 3

5. OAC Rule 3745-273-16: Universal Waste Employee Training:

A small quantity handler of universal waste shall ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relative to their responsibilities during normal facility operations and emergencies.

AMPI has not ensured that all employees are thoroughly familiar with proper universal waste handling and emergency procedures.

On February 29, 2012, AMPI provided Ohio EPA with documentation regarding the universal waste training that was conducted on February 23, 2012. Ohio EPA reviewed the training video (Universal Waste – bulbs, batts, bugs & barometers) that was purchased by AMPI and the sign-in sheets which documented employee attendance.

With this information, this violation has been abated.

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/>.

Should you have any questions or if I can be of assistance, please contact me at (419) 373-3066.

Sincerely,



Melissa L. Boyers
Division of Hazardous Waste Management

/llr

pc: Cindy Lohrbach, DMWM, NWDO
Colleen Weaver, DMWM, NWDO

ec: Colleen Weaver, DMWM, NWDO (scanned e-copy)
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.