



**Environmental
Protection Agency**

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

Re: LFE Instruments
fka: Triplett Corp.
OHD005036389
Allen County
Hazardous Waste
Return to Compliance

April 30, 2012

Mr. Kyle Apkarian
Vice President, Finance
LFE Instruments
One Triplett Drive
Bluffton, Ohio 45817

Dear Mr. Apkarian:

Thank you for your March 8, March 13, March 15, March 20 (multiple), March 22 (several), March 30, and April 2, 2012, responses to Ohio EPA's March 2, 2012, Notice of Violation (NOV) letter. You submitted documentation including your universal waste training outline and sign-up sheet, photos of closed and properly labeled and dated containers for spent lamps, photos of labeled containers of used oil, photos of your waste accumulation area and a copy of the sample analytical report. In addition, on March 22, 2012, I observed sampling of the dibasic ester waste, the management of used oil and universal waste lamps and your waste accumulation area.

My review of this documentation reveals that LFE Instruments (LFEI) has adequately demonstrated abatement of the four violations cited in my March 2, 2012, NOV, including:

**1. Waste Evaluation – Spent Lamps
OAC Rule 3745-52-11**

On March 20, 2012, you stated that spent lamps will be placed into closed, dated boxes, labeled with the words "Used Lamps". Employees will be informed of the universal waste management standards for the used lamps. Waste Management of Ohio will be used to recycle the used lamps. Also, on March 20, 2012, you submitted a copy of the universal waste lamps management policy and sign-up sheet for eight employees. On March 22, 2012, I observed that the container of universal waste lamps was closed and properly labeled. **Therefore, this violation was abated on March 22, 2012.**

2. **Waste Evaluation – Dibasic Ester
OAC Rule 3745-52-11**

On March 22, 2012, I observed the sampling of the dibasic ester waste at your facility. You submitted the analytical results on March 30, 2012. The results indicate that the waste is the hazardous waste D039 (tetrachloroethylene) and D040 (trichloroethylene). **Therefore, this violation was abated on March 30, 2012.**

3. **Used Oil Container Condition
OAC Rule 3745-279-22(B)**

On March 20, 2012, you stated that the used oil was put into closed containers and will be recycled through Systech Environmental Corporation. On March 22, 2012, I observed two 5-gallon pails of used oil. These containers are in good condition and are not leaking. **Therefore, this violation was abated on March 22, 2012.**

4. **Used Oil Container Labeling
OAC Rule 3745-279-22(C)(1)**

On March 20, 2012, you stated that the used oil was put into containers labeled with the words "Used Oil" and will be recycled through Systech Environmental Corporation. On March 22, 2012, I observed two 5-gallon pails of used oil. These containers were labeled with the words "Used Oil". **Therefore, this violation was abated on March 22, 2012.**

These violations were discovered during my February 16, 2012, inspection.

If you have any questions, please feel free to call me at 419-373-3074.

Sincerely,



Don North
District Representative
Division of Materials and Waste Management

/llr

pc: Cindy Lohrbach, DMWM, NWDO
Colleen Weaver, DMWM, NWDO (hard copy) J
ec: Colleen Weaver, DMWM, NWDO (scanned copy)
Don North, DMWM, NWDO