



Environmental
Protection Agency

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

June 21, 2012

Perry Durbin
General Electric Co.
Ravenna Lamp Plant
6800 N. Chestnut St.
Ravenna, OH 44266

RE: GE RAVENNA LAMP PLANT, OHD059061317, PORTAGE COUNTY, LQG NOV-PRTC

Dear Mr. Durbin:

On May 18, 2012, Sheryl Slone and this writer, representing Ohio EPA, Division of Materials and Waste Management (DMWM), visited the General Electric Company Ravenna Lamp Plant (GE), located at 6800 North Chestnut Street in Ravenna, Ohio to conduct a hazardous waste compliance evaluation inspection (CEI). GE was represented by Larry Shroyer, Sean Patterson, Gus Washington, Nick Ragan and you.

Subsequently, on May 30, June 8, June 14, June 15 and June 18, 2012, GE submitted documentation concerning waste evaluation information, container and waste management, personnel training and emergency equipment inspections.

The purpose of the inspection was to determine GE's compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). The inspection included a review of the facility's operations, as well as written documentation. GE was inspected for the requirements of a large quantity generator (LQG) of hazardous waste.

Information obtained pertaining to GE's processes and waste generation is discussed on the Process Description-Waste Activities Summary Sheet within the enclosed inspection checklists.

Based on the inspection, Ohio EPA identified the following violations:

- 1. Labeling and Dating Hazardous Waste Accumulation Containers, OAC rule 3745-52-34(A)(2):** While being accumulated on-site, each container with hazardous waste contents must be labeled with the words "Hazardous Waste" and with an accumulation date that is clearly marked and visible for inspection.

During the inspection of the dosed arc tube hazardous waste accumulation area, 13, 55-gallon containers were not positioned in manner that allowed the accumulation period to be visible for inspection. GE's May 30, 2012 submittal included a photograph, as well as indicated that the containers were repositioned to allow access to the hazardous waste labels. In addition, the weekly inspection checklist was modified to include this requirement as an inspection item.

Based on submitted documentation, this violation has been adequately addressed. No further response is requested.

2. **Satellite Accumulation Requirements, OAC rule 3745-52-34(C)(1)(a)(b):** A generator may accumulate as much as fifty-five gallons of hazardous waste in containers at or near any point of generation provided that the generator complies with OAC rules 3745-66-71 [conditions of containers], 3745-66-72 [compatibility of waste with container], 3745-66-73(A) [management of containers] and marks the containers with the words "hazardous waste" or other words that identify the contents.

GE failed to comply with the satellite accumulation requirements at the following areas:

- Dosed Arc Tube Crusher: One, 55-gallon container of crushed, dosed arc tubes was observed open and not labeled. The container was subsequently closed and labeled during the inspection.
- Lucoalox Room: One, 5-gallon container of E-mix solids was observed open. GE's June 8, 2012 submittal included a photograph demonstrating that the container was closed.

This violation has been adequately addressed. No further response is requested.

3. **Personnel Training, OAC rule 3745-65-16(A)(2)(3)(C):** Facility personnel must complete training on hazardous waste management and emergency response procedures.

GE failed to meet the following requirements of this rule:

- Annual hazardous waste refresher training (i.e., hazardous waste management and contingency plan) was not provided to two employees. GE's May 30 and June 8, 2012 submittals included documentation that the two employees received refresher training on May 21, 2012.
- Annual hazardous waste refresher training previously provided to personnel did not include instruction on the facility's hazardous waste contingency plan. GE's May 30, June 8 and June 15, 2012 submittals included documentation that 103 employees received training on the facility's hazardous waste contingency plan during the week of June 11, 2012. However, at least 48 personnel still require refresher training on the facility's contingency plan.

To address this violation, GE must provide training to all required personnel on the facility's hazardous waste contingency plan and submit documentation (e.g., sign-in sheet(s)) when the training was provided to each employee.

Ohio EPA offers the following comments:

1. Please be aware that the former hazardous waste accumulation area in the warehouse must be decommissioned in accordance with the closure performance standard found in OAC rule 3745-66-11(A)(B), as well as the applicable disposal/decontamination requirements found in OAC rule 3745-66-14. For more information, please refer to Ohio EPA's Closure Plan Review Guidance for RCRA Facilities, October 2009, Section 1.10 – Generator Closure. A copy was previously provided to you via e-mail.

2. You may find copies of the hazardous waste rules and other information on Ohio EPA's web page at: <http://www.epa.ohio.gov/dmwm>
3. Ohio EPA has created an electronic news service to provide facilities with quick and timely updates on news and events related to environmental matters in Ohio. For more information, please refer to: <http://ohioepa.custhelp.com/ci/documents/detail/2/subscriptionpage>
4. The Ohio Department of Development's Office of Energy Efficiency may be able to help with energy efficiency issues. For more information, please refer to: <http://development.ohio.gov/Energy>
5. You may be able to reduce the amount of waste your facility generates by finding ways to recycle, reduce or eliminate it. Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides free compliance and pollution prevention assistance on environmental issues related to air, land and water. Should your facility be interested in receiving a free pollution prevention assessment in the future, please contact me or OCAPP. OCAPP may be contacted at (800) 329-7518 or via the internet at: <http://epa.ohio.gov/ocapp/contact.aspx>

GE must immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 21 days of receipt of this letter, GE is requested to provide documentation to this office including the steps taken to abate the violations cited above. Documentation of steps taken to return to compliance may be submitted via the postal service or electronically to frank.zingales@epa.ohio.gov.

Please be advised that the violations cited above will continue until the violations have been properly abated. Failure to comply with ORC Chapter 3734 and the rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, GE is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

Should you have any questions, please contact me at (330) 963-1108.

Sincerely,



Frank A. Zingales
Environmental Specialist
Division of Materials and Waste Management

FAZ:ddw
Enclosure

ec: Natalie Oryshkewych, DMWM, NEDO
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cc: Marlene Kinney, DMWM, NEDO