



**Environmental  
Protection Agency**

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

Re: Designetics  
Lucas County  
OHR000162263  
Hazardous Waste  
**Return to Compliance**

January 26, 2011

Mr. Craig Williams, President  
Designetics  
1624 South Eber Road  
Holland, Ohio 43528

Dear Mr. Williams:

Thank you for your October 22, 2010, January 4, 2011, January 20, 2011, and January 24, 2011, responses to Ohio EPA's October 29, 2010, Notice of Violation (NOV) letter. My review of the documentation submitted reveals that Designetics has adequately demonstrated abatement of the violations cited in the October 29, 2010, NOV letter.

The following is a summary of the violations cited in the October 29, 2010, NOV as a result of our October 13, 2010, inspection and your compliance with respect to each:

**1. Waste Evaluation, OAC Rule 3745-52-11:**

Any person who generates a waste must determine if that waste is a hazardous waste by using generator knowledge or by testing the waste.

Designetics failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility. At the time of our inspection, approximately five spent fluorescent bulbs were stored in a corner near the machine shop.

Designetics must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If Designetics plans to manage the spent fluorescent bulbs as universal waste, please submit photographic documentation showing the spent bulbs, identified at the time of our inspection, stored in a container that is properly closed, labeled, and dated.

If you plan to manage the spent fluorescent bulbs as universal waste, Designetics must also properly train employees, who handle or have responsibility for managing universal waste, on waste handling and emergency procedures relative to their responsibilities. Please review the universal waste requirements with the appropriate employees and send me documentation (memo or sign-in sheets) that this has been completed. In addition, Designetics must submit the name of the facility where you plan to recycle the bulbs.

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On October 22, 2010, Designetics submitted, via electronic mail, photographic documentation showing the five spent fluorescent bulbs now stored in a cardboard container that is properly labeled, dated and closed.

On January 20, 2011, Designetics submitted, via electronic mail, information regarding the future management of the spent fluorescent bulbs. Universal waste training was given on January 24, 2011, to the employees who will be responsible for managing the spent lamps. Also submitted was a copy of the sign in sheet listing the names of the employees who attended the training. Designetics will manage all spent fluorescent bulbs as universal waste. Designetics intends to ship the universal waste lamps off-site for recycling at Environmental Recycling in Bowling Green, Ohio.

*With this information, this violation has been abated.*

2. **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."

Designetics had one 55-gallon drum of used coolant oil in the machine shop and one 55-gallon drum of used oil in the compressor room that were not properly labeled.

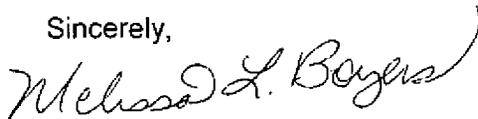
At the time of my inspection, Designetics properly labeled the two 55-gallon drums with the words "used oil".

*This violation was previously abated in the NOV letter dated October 29, 2010.*

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

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pc: Cindy Lohrbach, DHWM, NWDO  
Colleen Weaver, DHWM, NWDO  
DHWM, NWDO 2011 Lucas County General File  
ec: Melissa Boyers, DHWM, NWDO