



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

March 1, 2007

Tony DeSanto
EHS Manager
G.E. Ravenna Lamp Plant
6800 N. Chestnut St.
Ravenna, OH 44266

RE: GE RAVENNA LAMP PLANT (GE), OHD 059 061 317, PORTAGE COUNTY, RCRA/LQG COMPLIANCE EVALUATION INSPECTION, RETURN TO COMPLIANCE

Dear Mr. DeSanto:

Thank you for your January 26, 2007 response to Ohio EPA's November 29, 2006 Notice of Violation (NOV) letter. You submitted information and documentation including:

- Information regarding the generation and characterization of the waste water shipped to Chemtron under profile #Q20040121A25.
- Information regarding the generation and characterization of the other waste waters generated at the facility including:
 - Non-production floor mop water
 - Production floor mop water
 - Boiler water
 - Recirculation pit water
 - Acid Neutralization System water
 - Ultrasonic water
 - E-mix water
 - Phosphate water
- A copy of a training sign-in sheet demonstrating that employees have been trained in universal waste management.
- A copy of training sign-in sheets for annual hazardous waste training performed on January 2, 2007 and a hard copy of the Powerpoint presentation used in said training.
- Engineering Drawings of the floor sump and pond system.
- A discussion regarding the solvent room and outside retention pond system, including a brief history, description and purpose of the system.
- A statement from GE indicating that the pipe from the solvent room to the outside retention pond has been sealed off using a pneumatic sewer pipe plug.
- A discussion regarding recent analytical results of samples taken from the outside retention pond indicating that the pond has not been contaminated.
- A discussion regarding the generation, characterization and management of the mop water generated at the facility.
- A discussion regarding the generation, characterization and management of wastes generated by the arc tube crusher.

GE RAVENNA LAMP PLANT
MARCH 1, 2007
PAGE - 2 -

My review of this documentation and information reveals that GE has demonstrated abatement of the following hazardous waste violations cited in Ohio EPA's November 29, 2007 NOV:

OAC Rule 3745-52-11 Hazardous waste determination

OAC Rule 3745-273-16 Employee Training for Small Quantity handlers of Universal Waste:

OAC Rule 3745-65-16 (C) Personnel training:

OAC Rule 3745-52-20(A) Manifest general requirements:

Therefore, GE has abated all violations and addressed all concerns cited in Ohio EPA's November 29, 2007 NOV and is hereby returned to compliance.

Failure to list specific deficiencies in this communication does not relieve GE from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve GE from liability for any past or present violations of the state's hazardous waste laws.

Should you have any questions, please feel free to call me at (330) 963-1181.

Sincerely,



Suzanne Prusnek
Environmental Specialist
Division of Hazardous Waste Management

SP:ddw

ec: Frank Popotnik, DHWM, NEDO, OEPA
Harry Sarvis, DHWM, CO, OEPA