



**Environmental
Protection Agency**

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

January 14, 2010

**RE: FIRSTAR PRECISION CORPORATION
OHD 987008018
CUYAHOGA COUNTY;
CESQG/CEI/RTC**

Mr. David Tenny, Vice President
Firstar Precision Corporation
12340 Plaza Drive
Parma, OH 44130

Dear Mr. Tenny:

I received your letter dated January 11, 2011, responding to the August 20, 2010 and September 27, 2010 notice of violation (NOV) letters sent to you. The NOV was in response to a compliance evaluation inspection at Firstar Precision Corporation on August 9, 2010.

In your January 11, 2011 letter addressing violation #1, Firstar will analyze spent fluorescent bulbs to determine if they are hazardous prior to discarding. If the bulbs are hazardous, you will have LightBulb Supply manage the universal waste to ensure proper disposal. In your letter you report employees charged with handling Universal Waste have been trained using the New Universal Waste Guidance document.

Regarding violation #2, photographs submitted October 21, 2010 showed containers labeled with the words, "Used Oil". In addition, Firstar has instructed their personnel to label all such containers with the words, "Used Oil".

Regarding the pail of kerosene used to clean parts, you state in your letter that Firstar is now labeling all pails with their contents and covering them when not in use to prevent spillage.

Review of the documentation submitted reveals Firstar has **returned to compliance** with all violations cited in the August 20, 2010 NOV. The concern was also adequately addressed.

Thank you for your cooperation in this matter. Should you have any questions, please feel free to contact me at (330) 963.1279.

Sincerely,

Patricia M. Natali
Environmental Specialist
Division of Hazardous Waste Management

PMN:cl

cc: Mariene Kinney, DHWM, NEDO

ec: Frank Popotnik, DHWM, NEDO Harry Sarvis, DHWM, CO
Natalie Oryshkewych, DHWM, NEDO

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with applicable regulations.

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087-1924

330 | 963 1200
330 | 487 0769 (fax)
www.epa.ohio.gov