



**Environmental
Protection Agency**

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

Re: Century Marketing
OHD099967705
Wood County
Hazardous Waste
Return to Compliance

September 20, 2012

Mr. Seth Hill
Mfg. & Dist. Manager
CMC Group
12836 South Dixie Highway
Bowling Green, Ohio 43402

Dear Mr. Hill:

Thank you for your September 17, 2012, response to Ohio EPA's September 4, 2012, Notice of Violation (NOV) letter. Century Marketing (Century) submitted information regarding universal waste management. My review of the documentation submitted reveals that Century has adequately demonstrated abatement of the violations cited in the September 4, 2012, NOV.

The following is a summary of the violations cited in the September 4, 2012, NOV as a result of Ohio EPA's August 14, 2012, inspection and your compliance with respect to each:

1. OAC Rule 3745-273-13(D)(1): Universal Waste: Fluorescent Lamp Management:

A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, of damage that could cause leakage under reasonably foreseeable conditions.

Century did not store the spent fluorescent lamps in containers that were structurally sound or closed. Specifically, Century had several containers of spent fluorescent lamps in the mezzanine area that were open. In addition, Century had several spent fluorescent lamps lying on the shelves in the mezzanine area that were not properly stored in a container.

On September 17, 2012, Century submitted, via electronic mail, photographs of the mezzanine area showing the spent fluorescent lamps now stored in structurally sound containers that are closed.

With this information, this violation is considered abated.

2. OAC Rule 3745-273-14(E): Universal Waste: Fluorescent Lamp Labeling:

Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste - Lamps", "Waste Lamps" or "Used Lamps".

Century did not have the containers of spent fluorescent lamps located in the mezzanine area properly labeled. In addition, Century had several spent fluorescent lamps lying on the shelves in the mezzanine area that were not properly labeled.

On September 17, 2012, Century submitted, via electronic mail, photographs of the mezzanine area showing the spent fluorescent lamps now stored in containers that are properly labeled "Universal Waste Lamps".

With this information, this violation is considered abated.

3. OAC Rule 3745-273-16: Universal Waste Employee Training:

A small quantity handler of universal waste shall ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relative to their responsibilities during normal facility operations and emergencies.

Century has not ensured that all employees are thoroughly familiar with proper waste handling and emergency procedures.

On September 17, 2012, Century submitted, via electronic mail, a copy of the sign in sheet for the universal waste training that was conducted on 9/17/12. Century reviewed universal waste fact sheets with the four maintenance employees who will be responsible for managing the spent fluorescent lamps.

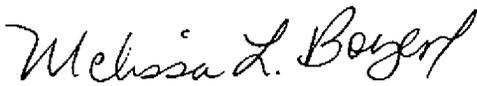
With this information, this violation is considered abated.

Mr. Seth Hill
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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 Materials and Waste Management

/lr

pc: Cindy Lohrbach, DMWM, NWDO,
Colleen Weaver, DMWM, NWDO

ec: Colleen Weaver, DMWM, NWDO (scanned e-copy)

Notice:

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