



**Environmental
Protection Agency**

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

Re: Haulette Manufacturing
OHD987013786
Mercer County
Hazardous Waste
Return to Compliance

July 9, 2012

Mr. Fred Kremer
Haulette Manufacturing Inc.
8271 US 127N
Celina, Ohio 45822

Dear Mr. Kremer:

Thank you, for your June 15, June 22 and July 2, 2012, responses to Ohio EPA's March 30, 2012, Notice of Violation (NOV) letter and June 11, 2012, Partial Return to Compliance letter. You submitted documentation including universal waste training logs and a copy of hazardous waste manifest #007527474, documenting the off-site shipment of hazardous waste paint from your storage trailer.

My review of this documentation reveals that Haulette Manufacturing Inc. (HMI) has adequately demonstrated abatement of all the violations observed during my March 15, 2012, inspection, and the agency's general concern.

The following is a summary of the status of each violation and the general concern:

1. Off-site Shipments of Used Oil by Generators - OAC Rule 3745-279-24

This violation was previously corrected on April 19, 2012.

**2. Universal Waste Packaging - Lamps
OAC Rule 3745-273-13(D)(1)**

This violation was previously corrected on April 19, 2012.

**3. Universal Waste Labeling - Lamps
OAC Rule 3745-273-14(E)**

This violation was previously corrected on April 19, 2012.

Mr. Fred Kremer
July 6, 2012
Page 2

**4. Accumulation Time for Universal Waste - Lamps
OAC Rule 3745-273-15(C)**

This violation was previously corrected on April 19, 2012.

**5. Universal Waste Employee Training
OAC Rule 3745-273-16**

Attached to your June 15, 2012, response letter are copies of training logs for HMI employees. Therefore, this violation was abated on June 15, 2012.

General Concern:

1. HMI should immediately evaluate the paint and containers which it has moved out of the paint trailer, determine if any of the material is waste, evaluate the waste to determine if it is hazardous waste, ship the hazardous waste to a permitted hazardous waste facility within 180 days, if more than 100 kg (about 25 gallons) of hazardous waste for the month is generated and submit photographic documentation that this has been accomplished. If hazardous waste is shipped off-site, HMI must submit a copy of the manifest to Ohio EPA.

Attached to your June 22 and July 2, 2012, response letters are copies of hazardous waste manifest #007527474, documenting the off-site shipment of hazardous waste paint (D001, F003, F005 and D035). Therefore, this general concern has been addressed.

If you have any questions, please feel free to contact me at (419) 373-3074.

Sincerely,



Don North
District Representative
Division of Materials and Waste Management

/cg

pc: Cindy Lohrbach, DMWM, NWDO
Colleen Weaver, DMWM, NWDO (hard copy)

ec: Colleen Weaver, DMWM, NWDO (scanned copy)
Don North, DMWM, NWDO