



**Environmental
Protection Agency**

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

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

June 11, 2012

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

Dear Mr. Kremer:

Thank you, for your April 19, 2012, and May 22, 2012, responses to Ohio EPA's March 30, 2012, Notice of Violation (NOV) letter. You submitted documentation including used oil and universal waste management procedures and training plans.

My review of this documentation reveals that Haulette Manufacturing Inc. (HMI) has adequately demonstrated abatement of four of the violations observed during my March 15, 2012, inspection, however one violation is still unabated and HMI has not addressed 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

HMI must ensure that its used oil is only being taken to a registered used oil collection center or recycler by a transporter with a US EPA ID#.

In your April 19, 2012, response, you indicate that HMI will use Safety-Kleen Corp. of Ft. Wayne, Indiana, US EPA ID# IND000715466, to recycle your used oil. Also attached is a photograph of a drum labeled "Used Oil". Therefore, this violation was corrected on April 19, 2012.

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

HMI does not consistently place waste lamps (all types) in closed containers.

In your April 19, 2012, response, you indicate that HMI will use Safety-Kleen Corp. of Ft. Wayne, Indiana, US EPA ID# IND000715466, to recycle your universal waste lamps (all types). You explained that Safety-Kleen will be providing the packaging. Therefore, this violation was corrected on April 19, 2012.

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

HMI does not consistently label the boxes of waste lamps with one of the required phrases.

In your April 19, 2012, response, you indicate that HMI will use Safety-Kleen Corp. of Ft. Wayne, Indiana, US EPA ID# IND000715466, to recycle your universal waste lamps (all types). You explained that Safety-Kleen will be providing packages that are labeled "Used Lamps". Therefore, this violation was corrected on April 19, 2012.

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

HMI is not able to demonstrate the length of time the universal waste lamps were accumulated.

In your April 19, 2012, response, you indicate that HMI will use Safety-Kleen Corp. of Ft. Wayne, Indiana, US EPA ID# IND000715466, to recycle your universal waste lamps (all types). You explained that Safety-Kleen will be providing packages that have labels attached and that a portion of the label is for recording the accumulation date. Therefore, this violation was corrected on April 19, 2012.

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

HMI has not adequately informed its employees handling universal waste lamps of the proper handling procedures.

In your April 19, 2012, response, you indicate that HMI is preparing a universal waste training document. Five employees are listed as responsible for universal waste and in need of the training. Also attached is an example of the HMI training record. However, in order to abate this violation, HMI must immediately submit documentation that training has been accomplished.

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.

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In order to address this general concern, and avoid other violations, HMI must immediately do what is required by the paragraph above and submit all required information to me. If you have any questions, please contact me immediately at (419) 373-3074.

HMI needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, HMI is requested to provide documentation to this office including the steps taken to abate the violations cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to don.north@epa.state.oh.us.

Please be advised that violations and the general concern cited above will continue until the violations have been properly abated and the general concern has been properly addressed. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, HMI is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

If you have any questions, please feel free to contact me at (419) 373-3074. You can find copies of the rules and other information on the division's web page at <http://www.epa.ohio.gov>.

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