



Environmental
Protection Agency

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

Re: **Blanchard Valley Farmers
Cooperative, Inc.
OHD 000 723 288
Putnam County
DHWM, NWDO
Return to Compliance**

March 31, 2011

Mr. Dave Koch
Blanchard Valley Farmers Cooperative, Inc.
16490 State Route 696
Pandora, Ohio 45877

Dear Mr. Koch:

Thank you for sending the documentation in response to the Ohio Environmental Protection Agency's (Ohio EPA's) Notice of Violation (NOV) dated February 8, 2011. The documentation was received by Ohio EPA on March 22, 2011. The documentation submitted by Blanchard Valley Farmers Cooperative, Inc (BVFC) includes a cover letter describing universal waste management activities.

My review of the submitted information reveals that BVFC has abated all violations discovered during the January 25, 2011, compliance evaluation inspection as outlined below. BVFC will remain a non-generator of hazardous waste and a generator of used oil, lead-acid batteries, and universal waste lamps.

Violations:

1. **Ohio Administrative Code (OAC) Rule 3745-52-11, Hazardous Waste Determination:** "Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste..."

BVFC failed to evaluate the spent lamps to determine if they were a hazardous waste in accordance with OAC Rule 3745-52-11, prior to disposing of them in the trash as solid waste.

On March 22, 2011, Ohio EPA received documentation that BVFC will manage spent lamps as universal waste. BVFC will ship universal waste lamps to Heritage Environmental (HE) in Toledo, Ohio. HE is a handler of universal waste lamps and sends universal waste lamps to Lighting Resources in Indiana where they are recycled.

Therefore, this violation is considered abated on March 22, 2011.

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2. **OAC Rule 3745-279-22 (C)(1), Used Oil Storage Requirements for Generators:** "Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words 'Used Oil.'"

BVFC failed to mark two 55-gallon drums located in the used oil storage area with the words "Used Oil."

During the inspection, BVFC properly labeled these drums with the words "Used Oil."

Therefore, this violation is considered abated on January 25, 2011.

Should you have any questions, please feel free to call me at (419) 373-3065.

Sincerely,



Kara Reynolds
Environmental Specialist
Division of Hazardous Waste Management

/cs

pc: Colleen Weaver, DHWM, NWDO
Kara Reynolds, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
DHWM, NWDO Putnam County File: -General

NOTICE:

Ohio 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.