



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

May 2, 2013

RE: HELICAL LINE PRODUCTS
OHD 982071045
LORAIN COUNTY
SQG CEI RTC

Bill Bonds, Secretary/Treasurer
Helical Line Products
P.O. Box 217
Avon Lake, OH 44012

Dear Mr. Bonds:

Thank you for your letter dated April 29, 2013, responding to my notice of violation letter dated April 15, 2013. Your response included copies of manifests, an LDR notification, and some pictures. Our review of the information submitted reveals that your facility has adequately addressed all of the violations cited from my April 3, 2013 inspection.

One concern is noted based on your response. At the time of the inspection, proper labels and accumulation dates were added to the boxes of spent lamps. The picture submitted shows 3 closed boxes of spent lamps with no accumulation date and without the proper labels. Perhaps the labels and date are on a side of the box that is not visible in the photograph. Please be certain to label each box of spent lamps as specifically "waste lamps", "used lamps", or "universal waste lamps". Also include the accumulation start date on the boxes or alternatively keep other records or documentation to demonstrate how long the lamps have been accumulating.

If you have any questions concerning this letter, please contact me at (330) 963-1226 or by e-mail.

Sincerely,

Sheryl K. Slone, P.E.
District Engineer
Division of Materials and Waste Management

SKS:ddw

ec: Natalie Oryshkewych, DMWM, NEDO
Nyall McKenna, DMWM, NEDO
Jeff Mayhugh, DMWM, CO
cc: Marlene Kinney, DMWM, NEDO