



Environmental
Protection Agency

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

Re: Welded Construction, L.P.
Wood County
OHD 061 515 573
RTC

March 22, 2011

Mr. Chris Ling
Field Safety Manager
Welded Construction, L.P.
26933 Eckel Road
Perrysburg, Ohio 43551

Dear Mr. Ling:

Thank you for your response to my Notice of Violation (NOV) letter dated February 2, 2011. Your February 14, 2011, response included information on how you will be managing your fluorescent lamps as universal waste through Mr. Lightbulb. You also provided photographs of the containers and tanks labeled properly with the words "Used Oil".

The following is a summary of the violations found during the inspection:

1. Waste Evaluation, OAC Rule 3745-52-11:

Any person who generates a waste must determine if that waste is a hazardous waste by using generator knowledge or by testing the waste.

- a) At the time of the inspection, WC did not have waste evaluation documentation for the spent sand blast media.

This portion of this violation was considered abated on January 12, 2011, because you did not have enough sandblast media to sample and analyze. You generate about two 5-gallon containers per year. Your compliance will be evaluated in a future inspection.

You indicated in your February 14, 2011, response that you will be analyzing this material in the future when you have enough sandblast media waste. This violation was previously abated.

- b) WC also failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility.

To abate this portion of the violation, you must confirm how you plan to manage the spent lamps in the future and where they will be recycled if you choose to handle them as universal waste.

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You indicated in your February 14, 2011, response that you will be utilizing Mr. Lightbulb in Toledo to recycle your spent fluorescent lamps. You have also established a holding bin for lamps and have labeled it appropriately. Please note that you must keep the bin closed so that the bulbs remain intact. It also keeps accidentally broken bulbs contained and lessens the likelihood that mercury will escape. Therefore, this violation is considered abated.

2. Labeling of Used Oil, OAC 3745-279-22(C)(1):

Generators must label or mark containers holding used oil with the words "Used Oil".

To abate this violation, you must label the tanks with the words "Used Oil" and send me photographs or email documentation showing that this has been done.

In your February 14, 2011, response, you submitted photographs of all three tanks properly labeled with the words "Used Oil". You also submitted photographs of the two containers you labeled. Therefore, this violation is considered abated.

With the information you submitted, all violations cited during Ohio EPA's January 12, 2011, compliance evaluation inspection are considered abated.

Should you have any questions or if I can be of assistance, please contact me at (419) 373-3114.

Sincerely,



Wendy Miller
Division of Hazardous Waste Management

/cs

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
~~DHWM, NWDO, Wood County, Welded Construction File~~