



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

July 8, 2013

RE: LUKE ENGINEERING & MFG. CO.
WAYNE COUNTY
OH0000935163
LQG
RETURN TO COMPLIANCE (RTC)

Jim Eaton, Technical Director
Luke Engineering & Mfg. Co.
P.O. Box 478
456 South Boulevard
Wadsworth, OH 44282

Dear Mr. Eaton:

This letter acknowledges receipt of email correspondence from you dated April 2, 2013 and July 1, 2013 responding to Ohio EPA's Notice of Violation (NOV) letter dated March 13, 2013.

The documentation provided by this correspondence included annual RCRA training held on June 25, 2013, a photo of a properly labeled universal waste lamps container, completed weekly inspection forms, and a statement on future practices to separate incompatible waste and other materials. My review of that documentation and actions taken by Luke Engineering & Mfg. Co. (Luke Engineering) prior to issuance of the March 13, 2013 NOV letter indicates that Luke Engineering has adequately demonstrated abatement of the all violations identified during the February 26, 2013 inspection and cited in my letter of March 13, 2013, specifically:

1. **OAC Rule 3745-273-13(D)(1) Small Quantity Handler Must Contain Lamps In Proper Containers Or Packaging And Containers Or Packaging Must Be Closed.**
2. **OAC Rule 3745-273-14(E) Small Quantity Handler Must Label Containers Or Packaging Holding Universal Waste Lamps.**
3. **OAC Rule 3745-273-15(C) Small Quantity Handler Must Have System To Demonstrate Length Of Accumulation.**
4. **OAC Rule 3745-52-66-77(C) Separation of Incompatible Wastes and Other Materials**
5. **OAC Rule 3745-52-34(A)(2) Accumulation Date Must Be Clearly Marked**

6. OAC Rule 3745-52-34(A)(3) Containers Must Be Labeled With the Words "Hazardous Waste"
7. OAC Rule 3745- 66-74 Weekly Inspections Of Hazardous Waste Containers
8. OAC Rule 3745-65-33 Testing And Maintenance Of Equipment
9. OAC Rule 3745 65-52(D) Contingency Plan Must List Names, Addresses, And Phone Numbers Of Emergency Coordinators And Be Kept Current.
10. OAC Rule 3745-65-16(A)(2) Personnel Training Must Include Instruction Relevant To The Job Position Of The Employee.

Should you have any questions regarding this letter, please contact me at (330) 963-1165.

Sincerely,



Neil J. Wasilk
Environmental Specialist
Division of Materials and Waste Management

NJW:ddw

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