



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

Re: Grelton Elevator, Inc.
OHR000177865
Complaint #3269
Henry County
Return to Compliance

September 13, 2013

Mr. Thomas Norden, General Manager
Grelton Elevator, Inc.
6944 County Road 7
Grelton, Ohio 43523

Dear Mr. Norden:

Thank you for your September 4, 2013, and September 5, 2013, responses to Ohio EPA's August 26, 2013, Notice of Violation (NOV) letter. Grelton Elevator, Inc. (Grelton) located at 6944 County Road 7 in Grelton, Ohio, submitted universal waste and used oil documentation. My review of the documentation submitted, reveals that Grelton has adequately demonstrated abatement of all of the violations cited in the August 26, 2013, NOV.

The following is a summary of the violations cited in the August 26, 2013, NOV as a result of Ohio EPA's August 13, 2013, inspection and your compliance with respect to each:

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.

Grelton failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility. Grelton was managing the spent lamps as solid waste.

On September 5, 2013, Grelton reported that they will manage the spent fluorescent bulbs as universal waste. The bulbs, when generated, will be stored properly and picked up by Environmental Recycling in Bowling Green, Ohio, for recycling.

With this information, this violation has been abated.

2. Labeling: OAC Rule 3745-279-22(C)(1):

Containers, aboveground tanks, and fill pipes used for underground storage tanks shall be labeled or marked clearly with the words "Used Oil."

Grelton had one 55-gallon drum of used oil and a draining trough collecting used oil that were not properly labeled.

On September 4, 2013, Grelton submitted, via electronic mail, photographic documentation of the 55-gallon drum and draining trough now properly labeled with the words "Used Oil".

With this information, this violation is considered abated.

3. OAC Rule 3745-279-24: Off-Site Shipment:

Generators shall ensure that their used oil is transported only by transporters who have obtained an EPA identification number.

Grelton has been giving the used oil they generate to other businesses for their used oil burners.

On September 5, 2013, Grelton reported that their used oil will be picked up by DISC Environmental Service, Inc., in Walbridge, Ohio, for recycling.

With this information, this violation has been abated.

Grelton also reported that they have contacted Werlor Waste Control, Inc., in Defiance, Ohio, to pick up and recycle the plastic containers and cardboard boxes. In addition, Grelton contacted Safety Kleen to arrange for the used oil filters to be recycled rather than managed as a solid waste.

Should you have any questions or if I can be of assistance, please contact me at (419) 373-3066.

Sincerely,



Melissa L. Boyers
Division of Materials & Waste Management

/llr

Enclosures

pc: Lisa Gifford, DMWM, NWDO
Colleen Weaver, DMWM, NWDO
Tom Cikotte, DAPC, NWDO
ec: Colleen Weaver, DMWM, NWDO
Melissa Boyers, DMWM, NWDO

Notice:

Ohio's 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.