



State of Ohio Environmental Protection Agency

FILE COPY

STREET ADDRESS:

Central District Office

MAILING ADDRESS:

Lazarus Government Center  
50 W. Town St., Suite 700  
Columbus, Ohio 43215

TELE: (614) 726-3778 FAX: (614) 726-3898  
www.epa.state.oh.us

P.O. Box 1049  
Columbus, OH 43216-1049

May 17, 2007

Re: **Siam Reclaim Technologies, Inc.**  
**Conditionally Exempt Small Quantity**  
**Generator**  
**OHR000113050**  
**Franklin County, CDO**  
**NOV**

Mr. Roland Inthisarn  
Siam Reclaim Technologies, Inc.  
4720 Groves Road  
Columbus, OH 43232

Dear Mr. Inthisarn:

Thank you for accompanying me during Ohio EPA's May 1, 2007, inspection of Siam Reclaim Technologies, Inc. (Siam) facility in Columbus, Ohio. Ohio EPA received a request made by Riverside County Community Health Agency's Department of Environmental Health located in Riverside, CA to conduct an inspection of this facility. Bruce Bailey works for this agency. He is concerned about a facility in his county that appears to be a sham CRT recycler. The facility's main operation is located in Columbus, Ohio and therefore, Mr. Bailey is curious as to the main facility's compliance record and operating practices. He requested Ohio EPA inspect the main facility in case they operate in the same negligent manner as the facility in his county. I inspected Siam to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC).

I found the following violation of Ohio's hazardous waste laws. In order to correct this violation you must do the following and send me the required information **within 30 days** of your receipt of this letter:

**OAC Rule 3745-52-11, Waste Evaluation:** Any person who generates a waste must evaluate the waste to determine if the waste is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51.

- (a) Siam has failed to determine if the waste (broken) glass generated from the reclaiming of the monitors is a hazardous waste. If the glass on the monitor is broken, it is processed along with the "good" monitors. The glass from the "bad" monitors is broken down further and sent back to Intechra in Arizona.

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

Mr. Roland Inthisarn  
Siam Reclaim Technologies, Inc.  
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- Siam must immediately evaluate this waste to determine if it is a listed or characteristic hazardous waste as required by OAC 3745-52-11. Ohio EPA has made multiple attempts to obtain information on how the broken glass is sent to Intechra and where it is sent from Intechra. Once Siam makes this determination, you must send me the documentation.

Enclosed you will find a copy of the checklist and process description. Should you have any questions, please feel free to call me at (614) 728-3882. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/opp/ocapp.html>.

Sincerely,



Elizabeth D. Lamerson  
Environmental Specialist  
Division of Hazardous Waste Management  
Central District Office

Enclosure

c: Tammy McConnell, DHWM/CO  
CDO File

EDL/nsm Siam NOV

**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.

E-mail this completed form to [tammy.mcconnell@epa.state.oh.us](mailto:tammy.mcconnell@epa.state.oh.us) or mail it to Tammy McConnell, Central Office

**Ohio Environmental Protection Agency  
RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

2. Site EPA ID No. EPA ID Number: OHR000113050

3. Site Name Name: Siam Reclaim Technologies, Inc. Website (optional):

4. Site Location Information  
 Street Address: 4720 Groves Road  
 City, Town, or Village: Columbus State: OH  
 County Name: Franklin Zip Code: 43232

5. Site Land Type (check only one)  
 Private County District Federal Indian Municipal State Other

6. NAICS code(s) [www.census.gov/epcd/www/naics.html](http://www.census.gov/epcd/www/naics.html)  
 A. B.  
 C. D.

7. Facility Representative: First Name: Roland MI: Last Name: Inthisarn  
 Phone Number: (614) 863-9999 Phone Number Extension:  
 E-Mail Address: [roland@siamreclaimtech.com](mailto:roland@siamreclaimtech.com)  
 Fax Number: (614) 863-9946 Fax Number Extension:  
 Street or P.O. Box: Same  
 City, Town or Village:  
 State: Country: Zip Code:

8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.  
 A. Name of Site's Legal Owner: Namthrong, LLC Date Became Owner (mm/dd/yyyy): 2000  
 Owner Type: Private County District Federal Indian Municipal State Other  
 Mark with an X          
 Street or P.O. Box: 41 S. Grant Avenue  
 City, Town, or Village: Columbus Owner Phone #:  
 State: Ohio Country: USA Zip Code: 43215  
 B. Name of Site's Operator: Siam Reclaim Technologies, Inc. Date Became Operator (mm/dd/yyyy):  
 Operator Type: Private County District Federal Indian Municipal State Other  
 Mark with an X          
 Street or P.O. Box:  
 City, Town, or Village: Operator Phone #:  
 State: Country: Zip Code:

9. Violations Cited?  Yes  No

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)  
 Not Regulated

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

**A. Hazardous Waste Activities**

UNKNOWN: Cited for violation of 3745-52-11

a. Large Quantity Generator (LQG):

b. Small Quantity Generator (SQG)

c. Conditionally Exempt Small Quantity Generator

d. United States Importer of Hazardous Waste

e. Mixed Waste (hazardous and radioactive) Generator

4. Recycler of Hazardous Waste

5. Exempt Boiler and/or Industrial Furnace

a. Small Quantity On-site Burner Exemption

b. Smelting, Melting, Refining Furnace Exemption

6. Underground Injection Control Facility

**B. Universal Waste Activities**

1. Small Quantity Handler of Universal Waste  
(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):

2. Large Quantity Handler of Universal Waste  
(accumulates 5,000 kg or more).

3. Destination Facility for Universal Waste  
(Check all boxes below that apply for each of the three types of facilities above.)

	Generated	Accumulated
A. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
D. Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**C. Used Oil Activities**

1. Used Oil Generator

2. Used Oil Transporter Indicate Type(s) of Activity(ies)

Transporter

Transfer Facility

3. Used Oil Processor and/or Re-refiner  
Indicate Type(s) of Activity(ies)

Processor

Re-refiner

4. Off-Specification Used Oil Burner

5. Used Oil Fuel Marketer -  
Indicate Type(s) of Activity(ies)

a. Marketer Who Directs Shipment of Off-Specification Oil

b. Used Oil to Off-Specification Used Oil Burner

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

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12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

N	Announced ?	Additional Facility Representatives:
N	Tanks?	Other comments:
N	Containers?	

13.	Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
	Elizabeth Lamerson		May 1, 2007

14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of owner, operator, or an authorized representative	Name and Title (Print)	Date (mm-dd-yyyy)

\*\*\*\*\*

**PROCESS DESCRIPTION SECTION**

Give a general process description ( include all processes at the facility )

Siam Reclaim Technologies, Inc. (Siam) disassembles monitors. The good tubes are sent to Thailand (southeast Asia). The good tubes are then remanufactured into working units. Certain size monitors are reused here in the US, like those that are made into slot machines.

Siam purchases monitors from Intechra and Redemtech. If the monitors have broken glass, they are sent back to Intechra in Phoenix, AZ. The monitors are inspected visually. If the tubes are burned or broken, they continue down the line to separate the front and back panel. The good tubes are also separated from the back panel, but they are sent to Thailand to be reused. The broken glass is broken even more and sent to Intechra. The plastic goes down one conveyor while the by products, such as cords and circuit boards, are sent down another.

\*\*\*\*\*

**WASTE ACTIVITIES AND P2 SUMMARY SECTION**

For each of the processes listed above that generate a waste give the following information: (1) name of process generating waste, (2) name or description of waste generated (e.g. sludge, solvent, ash, used oil, spent lamps, etc.), (3) EPA waste codes, if applicable, (4) quantity generated per month, (5) type of accumulation (container, tank, etc.) (6) waste accumulation location in facility, (7) type of on-site treatment (if used), (8) name of off-site management facility and type of waste management activity occurring there, (9) Current P2 activities, and (10) P2 opportunities.

The broken glass has not been properly evaluated.

The plastic is sent to plastic recyclers. The three plastic recyclers that are used are Technopolymers, Owl Plastics, and Xing Yun. The plastic sent to Technopolymers is traded for cardboard boxes to place the by products. The plastic is sent off site weekly.

The circuit boards, cords, and wires are sent to Interco Recycling in Chicago, IL. Interco reclaims the metals. The floor sweepings are also sent to Interco.

The steel and aluminum are sent to Joyce Iron and Metal.

The shrink wrap and cardboard are also recycled.

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: <100Kg. (Approximately 25-30 gallons) of waste in a calendar month.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or >1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

**WASTE EVALUATION**

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes \_ No  N/A \_

The facility has not properly evaluated the broken glass that is sent off site to Intechra.

**GENERATOR CLASSIFICATION**

2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes X\_ No  N/A \_

*NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.*

**OFF-SITE SHIPMENT OF HAZARDOUS WASTE**

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes \_ No  N/A \_

This depends on the evaluation from question 1.

**TREATMENT OF HAZARDOUS WASTE**

4. Does the generator treat hazardous waste in a :
- a. Container that meets 3745-66-70 to 3745-66-77? Yes \_ No  N/A \_X
  - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C) Yes \_ No  N/A \_X
  - c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes \_ No  N/A \_X
  - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes \_ No  N/A \_X

*NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.*

*NOTE: If waste is treated to meet LDRs, use LDR checklist.*

**REMARKS**



PHASE 0 AD-HOC BARCODE SHEET

10/20/2011 3:29 PM

Department:

DMWM

Subdepartment:

DMWM-Hazardous Waste

Office Location:

CDO

Media:

LAND

Doc Type:

NOV

Doc Subtype:

<NONE>

Program:

<NONE>

County:

25 - FRANKLIN

Facility ID

OHR000164509

Facility Name:

(Optional)

SOUTHERN AUTO SALES

(Auto Load)

(Override)

Input is 19 characters long.

Input is 0 characters long.

Date:

10/20/2011

Record ID:

(Optional)



Environmental  
Protection Agency

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

FILE COPY

October 20, 2011

Ms. Kristina Banner  
Southern Auto Sales  
2415 S. High St.  
Columbus, OH 43207

Re: **Southern Auto Sales**  
**Franklin County**  
**OHR000164509**

Dear Ms. Banner:

On June 7, 2011, I conducted a complaint investigation of your 2415 S. High St. facility in Columbus, Ohio to determine its compliance with Ohio's hazardous waste laws and Used Oil Rules as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). I sent you a Notice of Violation (NOV) letter on June 30th, 2011 specifying the violations observed during the inspection. I returned to the facility on September 27, 2011 to do a facility walk through. Ohio EPA has not received a response to the June 30th, 2011 NOV.

Southern Auto Sales remains in violation of the following Ohio used oil rules. In order to correct these violations you must do the following and send me the required information **within 30 days of your receipt of this letter**.

**1. Used Oil Generator Standards (OAC 3745-279-22 (C))**

Containers and aboveground tanks used to store used oil at generator facilities shall be labeled or marked clearly with the words "Used Oil." At the time of the inspection the containers being used to collect oil from engine blocks were not labeled with the words "Used Oil."

Southern Auto Sales needs to label the used oil containers and submit a photo to me.

**2. Used Oil Generator Standards [OAC 3745-279-22(D)]**

The generator upon detection of a release of used oil must clean up and properly manage the used oil and other materials. The ground used oil drums and dumpster was heavily stained with oil, as well as a few areas in the north driveway.

Oil spill-affected area(s) must be cleaned up promptly. Remove all visibly stained soils and manage them properly. They may be treated at a special facility or disposed as solid waste. Please submit photos to me showing final cleanup around the used oil storage area.

Ms. Kristina Banner  
Sothern Auto Sales  
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Enclosed you will find a copy of the checklists that we completed as a result of the inspection. Should you have any questions, please feel free to call me at (614-728-3884). You can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dmwm/>.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Maneff". The signature is fluid and cursive, with the first name "Peter" written in a larger, more prominent script than the last name "Maneff".

Peter Maneff  
District Representative  
Division of Materials and Waste Management  
Central District Office

Enclosure

c: CDO File

PM/nsm SouthernAutoSalesComplaint2NOV