



State of Ohio Environmental Protection Agency

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March 26, 2007

Mr. Mike Dolkowski
Environmental Recycling, Inc.
527 East Woodland Circle
P.O. Box 167
Bowling Green, OH 43402

Re: Partial Return to Compliance for the Hazardous Waste Annual Report Requirement
OHR000034025

Dear Mr. Dolkowski:

On March 1, 2007, the Division of Hazardous Waste Management (DHWM) received from Environmental Recycling a Hazardous Waste Annual Report (HWAR) for 2005 in response to a January 11, 2007, Notice of Violation Letter. In that letter, Environmental Recycling was cited with a violation of Ohio Administrative Code rule 3745-65-75. A report for 2006 was also received on March 1, 2007. The reports have been reviewed and are satisfactory except for the items which follow. All the concerns apply to both years' reports.

1) The check box for "Treater, Storer, or Disposer of Hazardous Waste" was not marked on the Site Identification form. We will correct this for you but please remember to mark it in future reports.

2) Large Quantity Generator (LQG) is marked as the facility's generator status. However, the total amount generated in 2006 is 2,000 pounds, which is less than the LQG threshold of 2,200 pounds. In 2005 the total generated was 5,650 pounds. Note that there are two separate items for indicating generator status on the Site Identification form. One is labeled "Generator of Hazardous Waste" and the other "Hazardous Waste Report Generator Status". The status marked under "Generator of Hazardous Waste" is what will be forwarded to US EPA's RCRA database as the current status of the facility as of the certification date. The "Hazardous Waste Report Generator Status" is for indicating the status that was applicable during the reporting year. If the site went over 2,200 pounds in any one month then LQG is correct. Please verify what the correct generator status should be for the report year and what status you want to display in the RCRA national database.

3) Section 4 of the Generation & Management (GM) form is for the reporting of waste remaining in the permitted storage area as of December 31. Melissa Boyers of DHWM's Northwest District Office says that customer's lamps would have been stored in that area at that time. The reporting of the waste receipt information as well as the amount in storage

Ted Strickland, Governor

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provides a complete picture of the waste management at the facility.

To correct this omission, print GM forms (one for each year) from DHWM's Annual Report Web page at http://www.epa.state.oh.us/dhwm/ann_report.html. Complete the forms and mail them to Paula Canter's attention at the address above. Paula will add them to the electronic reports and e-mail a pdf of the final data to the report contact for his records. The Source Code would be G61 to show Section 4 Box A.1 and A.1.a would be Yes. In Section 4 Box B enter the handling method code S01 for container storage and estimate the amount that was in storage as of December 31. In the DRUMS software section 4 appears just above the comment box at the bottom.

4) Waste receipts (WR) for batteries and electronics were reported with a management method code of H141 (storage and transfer without treatment). According to the flow chart we provided with the Notice of Violation letter, we think these shouldn't have been reported because they are being transferred off-site with no recovery performed. Please verify whether DHWM should delete these records.

5) The Process System (PS) form is for the reporting of the amount of waste processed by each management method. The waste is to be reported as two separate amounts, the total and the RCRA-regulated portion. (Some commercial TSD facilities also process non-RCRA waste.) The RCRA portion was not listed. Because Ohio EPA considers the universal waste lamps you receive to be hazardous waste, the RCRA portion should be reported. It may be the same amount as the total but please confirm this.

6) A comparison of the WR and PS data shows a significant discrepancy between the amount of lamps received (WR form) and the amount processed (PS form). While we don't expect them to be identical, they should be closer than what was reported. The table below lists the quantities reported for management method code H010, metal recovery. The unit of measure is tons.

Year	PS	WR sum	Difference
2005	782.59	1599.91	817.32
2006	6551.62	664.3	5887.32

Please verify the quantity of lamps that were processed via metal recovery during each calendar year.

We acknowledge that completing the report for the first time can be a challenge. Please provide your responses to Paula Canter at the address listed above. If you have questions contact her via phone at 614-644-2923 or by e-mail sent to paula.canter@epa.state.oh.us.

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Environmental Recycling, Inc.
March 26, 2007

Sincerely,

Paula S. Canter for

Pamela S. Allen, Manager
Regulatory & Information Services Section
Division of Hazardous Waste Management

cc: Tammy Heffelfinger, DHWM-CO
Melissa Boyers, DHWM-NWDO

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