



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184  
[www.epa.state.oh.us](http://www.epa.state.oh.us)

MAILING ADDRESS:

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

April 5, 2007

Mr. Mike Kimmel  
GM of Operations  
USA Lamp & Ballast Recycling, Inc.  
7806 Anthony Wayne Avenue  
Cincinnati, OH 45216

Re: Partial Return to Compliance for the Hazardous Waste Annual Report Requirement  
OHR000109819

Dear Mr. Kimmel:

On March 1, 2007, the Division of Hazardous Waste Management (DHWM) received a Hazardous Waste Annual Report (HWAR) for 2005 in response to a January 11, 2007, Notice of Violation Letter. In that letter, USA Lamp & Ballast was cited with a violation of Ohio Administrative Code rule 3745-65-75. A report for 2006 was also received on March 1. The reports have been reviewed and are satisfactory except for two items as follows:

1) 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.) Because Ohio EPA considers the universal waste lamps you receive to be hazardous waste, the RCRA portion should be reported. It probably is the same amount as the total but please confirm this by sending an e-mail to [paula.canter@epa.state.oh.us](mailto:paula.canter@epa.state.oh.us).

2) Section 4 of the Generation & Management (GM) form is for the reporting of waste remaining in the permitted storage area as of December 31. Cathy Altman of DHWM's Southwest District Office says that customer waste would have been stored in that area at that time. The reporting of the waste receipt information as well as the amount in storage 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](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 that the waste was not generated by USA Lamp & Ballast. The quantity generated would be 0. The answers to Section 2D and 3A would be No. 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.

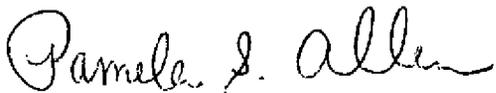
Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korfeski, Director

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Note that a letter identical to this one but dated March 16, 2007, was mailed to you but according to Cathy Altman, you have not received it. If you eventually do receive that letter, please disregard it.

If you have any questions about form completion, please contact Paula Canter at (614) 644-2923.

Sincerely,



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

ec: Tammy Heffelfinger, DHWM-CO  
Cathy Altman, DHWM-SWDO

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