



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Kehl Kolor Inc.
Ashland County
NOV

April 7, 2009

Mr. Mark Kehl
Kehl Kolor Inc.
824 U.S. Route 42
Ashland, Ohio 44805

Dear Mr. Kehl:

Thank you for accompanying me during the March 26, 2009, hazardous waste compliance evaluation inspection (CEI) of Kehl Kolor (Kehl) located in Ashland, Ohio. This inspection was conducted to determine Kehl's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC), and Ohio's hazardous waste regulations as adopted under Chapter 3745. of the Ohio Administrative Code (OAC). The inspection included a tour of facility operations and a review of facility paperwork.

Kehl is a commercial printer. The only waste generated onsite is when the print rollers are cleaned with a solvent containing rag to remove ink between print jobs. Kehl's solvent contaminated cloth rags are currently laundered by Spirit Services. At the time of inspection, Ohio EPA considered Kehl a non-generator of hazardous waste. Kehl also generates fluorescent bulbs.

1. Waste Evaluation, OAC Rule 3745-52-11

Kehl failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility.

Kehl must immediately cease disposing of the fluorescent bulbs as non-hazardous waste until a proper waste evaluation has been completed. Fluorescent bulbs typically contain mercury and other heavy metals which could make them a hazardous waste. Hazardous waste bulbs are considered "spent materials" and remain hazardous waste even when recycled. Hazardous waste lamp generators have the option of handling their lamps as hazardous waste or as universal waste.



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Managing hazardous waste lamps under the universal waste rules eases certain regulations imposed on generators of spent lamps. During the inspection, I gave you a fact sheet outlining the universal waste rules for handlers of lamps and a list of fluorescent bulb recyclers. Please review this information and contact me if you have any questions.

Kehl must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If Kehl plans to manage the spent fluorescent bulbs as universal waste, please submit photographic documentation showing the storage container properly labeled and dated. In addition, Kehl must submit the name of the facility where you plan to recycle the bulbs.

Ohio EPA will issue an EPA ID number to track our inspection activity at Kehl. Kehl cannot use this number for manifesting hazardous waste shipments.

If Kehl wants to use an EPA ID number for manifesting hazardous waste, used oil or universal waste activities, Kehl must complete and submit a Notification of Regulated Waste Activity form (EPA Form 9029 (Rev. 11/2002)) to Ohio EPA.

This form is available on our Web page at <http://www.epa.state.oh.us/dhwm/notiform.html> or Kehl can call me at (419) 373-3058 or the Division of Hazardous Waste Management, Central Office, RIS at (614) 644-2977 and we will mail you a copy.

If you find ways to recycle, reduce, or altogether eliminate the amount of waste your company generates you may be able to reduce treatment and disposal costs. Furthermore, you may possibly reduce your regulatory requirements. Ohio EPA has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp.html>.

The Division of Hazardous Waste Management (DHWM) has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information at the following Web link <http://www.epa.state.oh.us/dhwm/listserv.html>. Please feel free to share this information with your colleagues.

You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

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Enclosed you will find a copy of the checklists that I completed during the inspection. Please address all correspondence to Amy Heller, Ohio EPA, 347 N. Dunbridge Road, Bowling Green, Ohio 43402. Should you have any questions, please feel free to call me at (419) 373-3058.

Sincerely,



Amy Heller
Division of Hazardous Waste Management

//lr

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
(DHWM, NWDO File: Ashland County General... 3

ec: Amy Heller, DHWM, NWDO

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.

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

For Ohio EPA use only

E-mail this completed form to kristina.durnell@epa.state.oh.us
or mail it to Kristina Durnell, Central Office

Site EPA ID No.	EPA ID Number: <i>n/a</i>	
Site Name	Name: Kehl Kolor	Website: (Optional)
Site Location Information	Street Address: 824 U.S. Rte 24	State: OH
	City, Town, or Village: Ashland	Zip Code: 44805
	County Name: Ashland	
Site Land Type (check only one)	Private <input type="checkbox"/>	County <input type="checkbox"/>
	District <input type="checkbox"/>	Federal <input type="checkbox"/>
	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>
	State <input type="checkbox"/>	Other <input type="checkbox"/>
NAICS code(s) www.census.gov/epcd/www/naics.html		
Facility Representative	First Name: Mark	MI: Last Name: Kehl
	Phone Number: 419-281-3107	Phone Number Extension:
Additional names can be recorded in number 12	E-Mail Address:	Fax Number Extension:
	Fax Number:	
Only provide address information if it is different than the site address	Street or P.O. Box:	
	City, Town or Village:	Zip Code:
	State:	
Legal Owner And Operator of the Site.	Name of Site's Legal Owner:	
List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Owner Type: Private <input type="checkbox"/>	Date Became Owner (mm/dd/yyyy):
	County <input type="checkbox"/>	Federal <input type="checkbox"/>
	District <input type="checkbox"/>	Indian <input type="checkbox"/>
	Federal <input type="checkbox"/>	Municipal <input type="checkbox"/>
	Indian <input type="checkbox"/>	State <input type="checkbox"/>
	Municipal <input type="checkbox"/>	Other <input type="checkbox"/>
	State <input type="checkbox"/>	
	Other <input type="checkbox"/>	
	Street or P.O. Box:	Owner Phone #:
	City, Town or Village:	Country: Zip Code:
	State:	Date Became Operator (mm/dd/yyyy):
	Name of Site's Operator:	Federal <input type="checkbox"/>
	Operator Type: Private <input type="checkbox"/>	Indian <input type="checkbox"/>
	County <input type="checkbox"/>	Municipal <input type="checkbox"/>
	District <input type="checkbox"/>	State <input type="checkbox"/>
	Federal <input type="checkbox"/>	Other <input type="checkbox"/>
	Indian <input type="checkbox"/>	
	Municipal <input type="checkbox"/>	
	State <input type="checkbox"/>	
	Other <input type="checkbox"/>	
	Street or P.O. Box:	Operator Phone #:
	City, Town or Village:	United States Zip Code:
	State:	

VIOLATIONS CITED? Yes No

TYPE OF HANDLER- A MINIMUM OF ONE BOX MUST BE CHECKED		
<input checked="" type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
		<input type="checkbox"/> Small Quantity Generator (SQG)
		<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
		<input type="checkbox"/> U.S. Importer of Hazardous Waste
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

- | | |
|---|--|
| <input type="checkbox"/> Recycler of Hazardous Waste | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace |
| <input type="checkbox"/> Underground Injection Control Facility | <input type="checkbox"/> Small Quantity On-Site Burner Exemption |
| <input type="checkbox"/> Hazardous Waste Transporter | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | |

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED

(CHECK ALL BOXES THAT APPLY)

- | | |
|---|---|
| <input type="checkbox"/> Small Quantity Handler of Universal Waste | <input type="checkbox"/> Destination Facility for Universal Waste |
| <input type="checkbox"/> Large Quantity Handler of Universal Waste
(accumulates 5,000 kg. or more) | |

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

- Batteries
- Pesticides
- Mercury containing equipment
- Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))

- Used Oil Generator
- Used Oil Transporter
- Used Oil Transfer Facility
- Used Oil Processor
- Used Oil Re-refiner
- Off-Specification Used Oil Burner
- Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
- Used Oil Fuel Marketer to Off-Specification Used Oil Burner

Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the 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.

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

- | | | | |
|------------|------------------------------|--|--------------------------------------|
| Announced | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Additional Facility Representatives: |
| Tanks | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Other Comments: |
| Containers | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | |

Name of Inspector(s)

Name of Inspector(s)

Date of Inspection/Time
(mm/dd/yyyy) (hh:mm)

Amy Heller

3/26/2009

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, WASTE, P2 SUMMARY SHEET

Facility Name:	Facility Type: LQG/SGQ/CESQG/TSD	Date of Inspection:	EPA ID #:
Kehl Kolor, Inc.	non-generator	3/26/09	N/A

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation <small>(container, tank, etc) and location of waste accumulation area</small>	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1 cleaning print rollers	spent rags non-haz laundered	varies		Sent to Spirit Services		
2 spent bulbs	universal waste or hazardous waste	varies				
3						
4						
5						