



State of Ohio Environmental Protection Agency

**Northwest District Office**

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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: Erie County  
Brady Sign Company  
Complaint #2704  
Return to Compliance

February 5, 2008

Mr. Richard Brady  
Brady Sign Company  
1721 Hancock Street  
Sandusky, Ohio 44870

Dear Mr. Brady:

Thank you for your January 17, 2008, response to Ohio EPA's Notice of Violation (NOV) dated January 4, 2008. This NOV was issued to address a violation found during Ohio EPA's complaint investigation conducted at your facility located at 1721 Hancock Street, Sandusky, Ohio, on December 12, 2007.

The information you submitted has been reviewed and status of the violation cited is as follows:

1. **OAC Rule 3745-52-11: Waste Evaluation**

Any person who generates a waste as defined in Rule 3745-51-02 of the administrative code must determine if that waste is a hazardous waste.

Brady Sign Company (BSC) has failed to properly evaluate the spent fluorescent bulbs generated at the facility.

BSC is currently disposing of their fluorescent bulbs in the trash. BSC must cease disposing of their fluorescent bulbs as non-hazardous waste in the local landfill until a proper waste evaluation has been completed. The waste evaluation must be conducted through one of three options: 1) BSC may apply generator knowledge of the hazardous characteristic(s) of the waste in light of the materials or the processes used through adequate documentation [manufacturer analytical information – Toxicity Characteristic Leaching Procedure (TCLP) test results], or 2) BSC may take a representative sample of this waste to properly evaluate this waste stream through a laboratory analysis which lists constituents present and at what concentration. BSC must ensure that the laboratory chosen to perform this sampling utilizes the proper method(s) to evaluate these bulbs.

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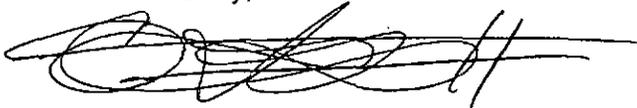
BSC must sample the fluorescent bulbs to determine the concentration of mercury (D009), cadmium (D006) and lead (D008) as listed in the OAC Rule 3745-51-24 following the method as outlined in U.S. EPA's SW-846. BSC may run a total concentration for these constituents as a screening tool. If the concentration is detected for mercury, lead or cadmium at or above the regulatory limit, a TCLP may be required to ensure this constituent(s) is not present above the Ohio EPA regulatory level; or 3) a combination of options 1 and 2.

If the bulbs are determined to be hazardous through a proper waste evaluation, BSC will have to manage their bulbs either as 1) a universal waste (OAC Chapter 3745-273) or 2) as a hazardous waste under Ohio's generator standards (OAC Chapter 3745-52). ***Instead of taking samples for analysis as described above, BSC may recycle their bulbs if they are hazardous or non-hazardous by managing them as universal waste. Ohio EPA would encourage this option as a pollution prevention alternative. Please refer to the information I gave you on how to manage light bulbs as universal waste.***

BSC purchased an "Onyxpac" to manage the waste bulbs as universal waste. In addition, training has been conducted to instruct their employees how to properly manage their universal waste. ***This violation has been abated.***

Should you have any questions, please feel free to call me at (419)373-3015.

Sincerely,



Edgar V. Pulido  
Division of Hazardous Waste Management

/cs

pc: Colleen Weaver, Supervisor, DHWM, NWDO  
Cindy Lohrbach, DHWM, NWDO  
~~DHWM, NWDO; File: General File #2704 - Erie County~~

ec: Ed Pulido, 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.
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