



State of Ohio Environmental Protection Agency

Northwest District Office

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Bowling Green, OH 43402-9398

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

Re: Lee's Body Shop
Fulton County
OHD050285428
Hazardous Waste
Return to Compliance

April 22, 2010

Mr. Larry Huner, Owner
Lee's Body Shop
415 East Linfoot
Wauseon, Ohio 43567

Dear Mr. Huner:

Thank you for your April 9, 2010, response to Ohio EPA's April 8, 2010, Notice of Violation (NOV) letter. The information you submitted included information regarding the management of universal waste. My review of the documentation submitted reveals that Lee's Body Shop (Lee's) has adequately demonstrated abatement of the violation cited in the April 8, 2010, NOV letter.

The following is a summary of the violation cited in the April 8, 2010, NOV as a result of our March 25, 2010, inspection and your compliance with respect to it:

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

Any person who generates a waste must determine if that waste is a hazardous waste by using generator knowledge or by testing the waste.

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

Hazardous 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.

Managing hazardous waste lamps under the universal waste rules eases certain regulations imposed on generators of spent lamps.

Please be aware that incandescent, fluorescent, metal halide, neon, high-intensity discharge, high-pressure sodium and mercury-vapor lamps could be hazardous waste when discarded. Fluorescent lamps may contain up to 40 milligrams (mg) of mercury, depending on the brand and manufacturer. Lamps may also contain lead and cadmium. Many lamps exhibit a characteristic of toxicity for heavy metals when disposed.

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A copy of Fluorescent Lamps: What You Should Know, was given to you at the time of our inspection. Since you are the only person who will be managing the spent fluorescent lamps, I recommend that you review this document and contact me if you have any questions.

Lee's must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If Lee's plans to manage the spent fluorescent bulbs when generated as universal waste, please submit the name of the facility where you plan to recycle the bulbs.

On April 9, 2010, Lee's submitted, via electronic mail, information regarding the future management of your spent fluorescent bulbs. Lee's plans to manage the spent fluorescent bulbs as universal waste and have them recycled at Environmental Recycling in Bowling Green, Ohio.

With this information, this violation has been abated.

Ohio EPA has helpful information about compliance assistance and pollution prevention at the following web address: <http://www.epa.ohio.gov/ocapp>. In addition, you can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>.

Should you have any questions or if I can be of assistance, please contact me at (419) 373-3066.

Sincerely,



Melissa L. Boyers
Division of Hazardous Waste Management

//lr

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
DHWM, NWDO Fulton County General File: 1117

ec: Melissa Boyers, DHWM, NWDO

Melissa Boyers - Re: Bulb recycling

From: Melissa Boyers
To: SHOP, LEE'S BODY
Date: 4/9/2010 11:25 AM
Subject: Re: Bulb recycling

Good Morning Larry,

Thank you for your response. My letter to you went out in yesterday's mail. The information you provided is sufficient to return the violation I cited to compliance. I will get a return to compliance letter out to you soon.

In regards to taking your spent fluorescent bulbs to Environmental Recycling (ER), be sure to check with them before showing up with your bulbs. Also, I need to let you know that there are DOT regulations regarding the transportation of the spent bulbs due to the presence of mercury. I don't regulate transportation or enforce DOT rules, but I wanted to let you know they are out there. You may want to see if ER has a "milk run" in Wauseon and can pick up your bulbs once a year so you don't exceed your storage time. If you have any questions, please don't hesitate to e-mail or call me.

Have a nice weekend, Melissa

Melissa L. Boyers
Environmental Specialist
Ohio EPA
Div of Hazardous Waste Mgmt
(419) 373-3066
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>>> LEE'S BODY SHOP <huner24@embarqmail.com> 4/9/2010 10:23 AM >>>
Lee's Body Shop, Inc
415 E. Linfoot St.
Wauseon, Oh 43567
419-335-9976

Dear Melissa:

I am writing in regards to our conversation after your recent visit. I have contacted Enviromental Recycling and believe it will be easiest for me to dispose of my florescent bulbs there. I will just drive them to their location myself when needed. I was surprised that it was only 30 cents per bulb. If anything further is needed, please contact me at the above number.

Larry Huner, owner