



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Cabinet Creations
Lucas County
Hazardous Waste
Return to Compliance

OHR 000 156 836

October 7, 2009

Mrs. Dawn Lillibridge, Owner
Cabinet Creations
5344 Jackman Road
Toledo, Ohio 43613

Dear Mrs. Lillibridge:

Thank you for your September 9, 2009, response to Ohio EPA's August 17, 2009, Notice of Violation letter. The information you submitted included documentation for the management of universal waste. My review of the documentation submitted reveals that Cabinet Creations has adequately demonstrated abatement of the violation cited in the September 9, 2009, NOV letter.

The following is a summary of the violation cited in the September 9, 2009, NOV as a result of our August 11, 2009, 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.

Cabinet Creations failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility. At the time of our inspection, four spent fluorescent bulbs were stored in a corner of the cabinet manufacturing area.

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. A copy of Fluorescent Lamps: What You Should Know, was given to you at the time of our inspection. I recommend that you review this document and contact me if you have any questions.

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Cabinet Creations must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If Cabinet Creations decides to conduct waste sampling, please notify me at least seven days prior to the sampling event date so that a representative from Ohio EPA can be present to observe the sampling and to split samples if necessary. In lieu of conducting sampling, Cabinet Creations can manage the spent fluorescent bulbs as universal waste. If Cabinet Creations plans to manage the spent fluorescent bulbs as universal waste, please submit photographic documentation showing the four spent bulbs stored in a container that is properly closed, labeled, and dated. Cabinet Creations must also properly train employees, who handle or have responsibility for managing universal waste, on waste handling and emergency procedures relative to their responsibilities and send me documentation that this has been completed. In addition, Cabinet Creations must submit the name of the facility where you plan to recycle the bulbs.

On September 9, 2009, Cabinet Creations submitted via electronic mail photographs to document that the four spent bulbs are now properly stored in a closed, labeled and dated container. Cabinet Creations has also trained the two maintenance employees on proper universal waste handling procedures. Cabinet Creations will manage spent fluorescent bulbs as universal waste and plans to contact Gross Electric in Toledo, Ohio to broker their bulbs to a permitted recycling facility.

With this information, this violation is considered 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/>.

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

Sincerely,



Melissa L. Boyers
Division of Hazardous Waste Management

/csl

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
DHWM, NWDO Lucas County 2009 General File

ec: Melissa Boyers, 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.