



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road  
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: Cabinet Creations  
Lucas County  
Hazardous Waste  
Notice of Violation

August 17, 2009

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

Dear Mrs. Lillibridge:

On August 11, 2009, Wendy Miller and I conducted a compliance evaluation inspection at Cabinet Creations located at 5344 Jackman Road in Toledo, Ohio. We inspected Cabinet Creations to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). Pollution prevention options were also discussed during this inspection. This letter will explain the violation we found and what you need to do to correct this violation.

During our visit we spoke with you and Ms. Amanda Bomia-Laberdee, toured your building, and observed your operations. Cabinet Creations is a full-service custom cabinet manufacturer and employs a staff of designers, cabinet-makers, and installers. The front portion of your building includes a showroom and office spaces. The back portion of the building is used for cabinet manufacturing. No painting or staining is done on-site at this location and no used oil is generated.

Cabinet Creations also generates spent fluorescent lamps which are managed as solid waste. At the time of our inspection, Cabinet Creations was operating as a non-generator of hazardous waste.

We found the following violation of Ohio's hazardous waste rules. In order to correct this violation you must do the following and send me the required information within 30 days of your receipt of this letter:

**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.

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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.

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.

Ohio EPA will issue an EPA ID number to track our inspection activity. Cabinet Creations cannot use this number for manifesting hazardous waste shipments. If Cabinet Creations wants to use an EPA ID number for manifesting and other hazardous waste, used oil or universal waste activities, you 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 you can call me at (419) 373-3066 or the Division of Hazardous Waste Management, Central Office, RIS at (614) 644-2977 and we will mail you a copy.

Enclosed you will find a copy of the checklist that was completed during the inspection.

Ohio EPA has helpful information about compliance assistance and pollution prevention at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp.html>. In addition, 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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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

//lr

pc: Cindy Lohrbach, DHWM, NWDO  
Colleen Weaver, DHWM, NWDO  
DHWM, NWDO Lucas County 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.**

**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](mailto:kristina.durnell@epa.state.oh.us)  
or mail it to Kristina Durnell, Central Office

<b>Site EPA ID No.</b> <b>Site Name</b>  <b>Site Location Information</b>  <b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	EPA ID Number: Name: <b>Cabinet Creations</b>		Website: (Optional)					
	Street Address: <b>5344 Jackman Road</b> City, Town, or Village: <b>Toledo</b> County Name: <b>Lucas</b>		State: <b>OH</b> Zip Code: <b>43613</b>					
	Private <input checked="" 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"/>
<b>Facility Representative</b>  Additional names can be recorded in number 12.  Only provide address information if it is different than the site address	First Name: <b>Craig</b> Phone Number: <b>419-476-6838</b> E-Mail Address: Fax Number: <b>419-476-6408</b> Street or P.O. Box: City, Town or Village: State:		MI:	Last Name: <b>Lillibridge</b> Phone Number Extension:  Fax Number Extension:		Zip Code:		
	Name of Site's Legal Owner: <b>Craig &amp; Dawn Lillibridge</b> Owner Private County District Type: <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: City, Town or Village: State: Name of Site's Operator:  Owner Private County District Type: <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: City, Town or Village: State:		Date Became Owner (mm/dd/yyyy):  Owner Phone #: Country: Zip Code:		Date Became Operator (mm/dd/yyyy):  Operator Phone #: United States Zip Code:			

**VIOLATIONS CITED?**  Yes  No

**TYPE OF HANDLER- A MINIMUM OF ONE BOX MUST BE CHECKED**

<input type="checkbox"/> Not a Generator	<input checked="" 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



## PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Cabinet Creations      Facility Type: LQG/SQG/CESQG/TSD      EPA ID#:

<i>Description of Waste</i>				<i>On-Site Management</i>			<i>Off-Site Management</i>
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, etc)</small>	Waste Generated <small>(e.g. sludge, spent solvent, ash, etc)</small>	EPA Waste Code	QTY Gener ated per Month	Type of Accumulatio n/ Storage <small>(e.g. container, tank, etc)</small>	Type of On- Site Treatment <small>(recycle, wwt, etc)</small>	Waste Location <small>(Include map if possible)</small>	Name, state, and type of activity occurring at the facility.
1	Lighting						Managed as Solid Waste
2							
3							
4							