



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

**RE: Mansfield News Journal  
Richland County  
DHWM, NWDO  
Return to Compliance**

July 9, 2008

Mr. Mark Bolyard  
Mansfield News Journal  
P.O. Box 25  
Mansfield, OH 44901

Dear Mr. Bolyard:

Thank you for sending the June 20, 2008, June 23, 2008, June 24, 2008, and June 27, 2008, responses to the Ohio Environmental Protection Agency's (Ohio EPA's) Notice of Violation (NOV) dated May 22, 2008. The following is a summary of the violations cited in the May 22, 2008, NOV and the facility's compliance with respect to each violation:

**Violation:**

1. **OAC Rule 3745-52-11, Hazardous Waste Determination:** "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..."

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

Ohio EPA received documentation on June 20, 2008, that Mansfield News Journal (MNJ) did not retain any records identifying the company that last picked up the spent lamps. This documentation also stated that MNJ has decided to manage the spent lamps as universal waste and included a summary describing how the lamps will be managed and where the lamps will be shipped.

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On June 24, 2008, Ohio EPA received an electronic mail containing pictures of the labels and containers used to store the universal waste lamps.

*Therefore, this violation was considered abated on June 24, 2008.*

**General Concerns:**

- A. **Used Oil:** During the inspection, MNJ stated that used oil from maintenance activities is picked up. However, a receipt for the most recent pick up was not located during the inspection and MNJ did not know the name of the facility picking up the used oil.

Ohio EPA received documentation on June 23, 2008, that used oil is picked up by Sensmeier Oil Company (SOC). On June 27, 2008, Ohio EPA received documentation that SOC sent the used oil to Environmental Specialists Inc. in McDonald, Ohio. No further information needs to be submitted for this general concern.

**This general concern was considered addressed on June 27, 2008.**

- B. **Future Lamp Project:** During the inspection, it was brought to Ohio EPA's attention that MNJ is planning on having all lamps and ballasts replaced by an outside company. MNJ should be aware that even though all lamps and ballasts are physically being replaced by an outside company, MNJ is still considered the generator of these items and is responsible for their proper disposal.

Ohio EPA received documentation on June 20, 2008, that MNJ will dispose of these lamps as universal waste and will comply with the applicable regulations. However, in a phone conversation on June 23, 2008, Ohio EPA became aware that this project may not happen during this fiscal year. Since the date of this project is still unknown and an outside vendor has not been secured, MNJ cannot submit the requested information to Ohio EPA. However, MNJ does intend to comply with all applicable rules. In light of this, no further information needs to be submitted for this general concern.

**This general concern was considered addressed on June 20, 2008.**

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Should you have any questions, please feel free to call me at (419) 373-3065.

Sincerely,



Kara Reynolds  
Environmental Specialist  
Division of Hazardous Waste Management

/csf

cc: Colleen Weaver, DHWM, NWDO  
Kara Reynolds, DHWM, NWDO  
Cindy Lohrbach, DHWM, NWDO  
DHWM, NWDO Richland County File: Richland County General 2001-

**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.