



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.ohio.gov

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

Re: Flower Manufacturing, LLC.
Hazardous Waste
Sandusky County
NOV

February 25, 2010

Mr. Ken Flower
Flower Manufacturing, LLC
423 Knapp Street
Fremont, Ohio 43420

Dear Mr. Flower:

Thank you for accompanying me during Ohio EPA's February 8, 2010, hazardous waste compliance inspection (CEI) of Flower Manufacturing, LLC. (Flower) located at 423 Knapp Street, Fremont, Ohio. This inspection was conducted to determine Flower's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC), and Ohio's hazardous waste regulations as adopted under Chapter 3745. of the Ohio Administrative Code (OAC). The inspection included a tour of your facility. This letter will explain the violation I found.

I conducted this CEI because Yerges Manufacturing, U.S. EPA ID number OHD002226140, notified Ohio EPA on August 25, 1988, that they were a small quantity generator of hazardous waste at your location. Upon arriving at your facility, you stated that Yerges Manufacturing moved and that you had been at the current location since 2004. I then proceeded to conduct a CEI for your facility.

Flower is a manufacturer of paper car air fresheners. Flower is not a generator of hazardous waste. Wastes generated at Flower include scrap paperboard and fluorescent bulbs. In addition, you stated you had one machine that has hydraulic oil, but to date you have not had to change it. We discussed the proper management and recycling of used oil.

During the CEI, I gave you the following information: the fact sheets Universal Waste Rules for Handlers of Lamps; Fluorescent Lamps: What you Should Know; The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil and a list of computer, fluorescent lamp and ballast recyclers.

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

Any person who generates a waste must determine if that waste is a hazardous waste in accordance with the criteria for hazardous waste as set forth in Chapter 3745-51 of the Administrative Code.

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

Flower is currently disposing of their fluorescent bulbs in the trash. Flower 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 can be conducted by taking a representative sample of this waste to properly evaluate this waste stream through a laboratory analysis which lists constituents present and at what concentration. Flower must ensure that the laboratory chosen to perform this sampling utilizes the proper method(s) to evaluate these bulbs. Flower must sample the fluorescent bulbs to determine the Toxicity Characteristic Leaching Procedure (TCLP) concentrations of barium (D005), cadmium (D006), lead (D008), and mercury (D009) as listed in OAC Rule 3745-51-24 following the methods as outlined in U.S. EPA's SW-846. Flower may run total concentrations for these constituents as a screening tool. If the concentration(s) are detected for any of these constituents at or above the regulatory limit, a TCLP may be required to ensure these constituent(s) are not present above the Ohio EPA regulatory level.

If the bulbs are determined to be hazardous through a proper waste evaluation, Flower 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). Flower may recycle their bulbs if they are hazardous or non-hazardous. Ohio EPA would encourage this option as a pollution prevention alternative.

- On February 12, 2010, you contacted Philips Manufacturing in order to obtain the waste evaluation information pertaining to your lamps. As of February 23, 2010, you had not received this information.
- In lieu of conducting a waste evaluation, Flower may choose to manage their bulbs as a universal waste as outlined in OAC Chapter 3745-273.

Please consult the fact sheet Universal Waste Rules for Handlers of Lamps given to you during the inspection for more information. If you choose this option, please provide me an outline of your universal waste management plan.

- ***To abate this violation, please submit to me your waste evaluation of your lamps (either proper characterization from the manufacturer or your sampling analytical) or an outline of your universal waste management plan (indicating how you will manage, label, send off-site within one year, where lamps will be recycled, etc.)***

If you perform sampling, Ohio EPA will use the data you provide, in addition to other documentation, to make regulatory decisions concerning the wastes tested. The data you submit should be reviewed using a data review process, referred to as data validation, to confirm the validity of your data prior to submission. Data validation includes a review of the following components: laboratory test methods, laboratory data completeness, documentation of holding time(s), chain(s) of custody, and quality assurance/quality control (QA/QC) data.

To confirm the validity of your data, you may use Ohio EPA's tier 1 data validation plan review form which can be obtained from Ohio EPA's web page: http://www.epa.state.oh.us/dhwm/tier_i_data_validation_manual.html. Ohio EPA may request the documentation needed to confirm the validity of the data submitted.

Please submit a brief narrative of each sampling event which includes: process generating the waste, point in the process the sample was obtained, sampling techniques used to obtain the sample and a description of how this sample was determined to be a representative sample of the waste tested.

In addition, if sampling is performed, please notify me at least seven days prior to taking the samples so that I or an Ohio EPA representative may be present.

Pollution Prevention:

I have contacted our Office of Compliance and Pollution Prevention (OCAPP) to inquire if they know of some possible options for you to re-use or find someone that may be able to re-use or recycle your waste paperboard. Someone from their office may be contacting you. If you find additional ways to recycle, reduce, or altogether eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs.

Mr. Ken Flower
February 25, 2010
Page 4

Furthermore, you may possibly reduce your regulatory requirements. If you would like a free, non-regulatory on-site pollution prevention assessment or if you would like more information about pollution prevention, please contact me at (419) 373-3082. Ohio EPA has helpful information about pollution prevention at the following web address:
<http://www.epa.ohio.gov/ocapp/>

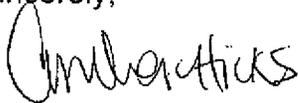
In addition, the Ohio Department of Development's Office of Energy Efficiency may be able to help with energy efficiency issues. Their website is at:
<http://www.development.ohio.gov/cdd/oeef/>

The division has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage

Enclosed you will find a copy of the checklists that I completed during the inspection. Should you have any questions, please feel free to call me at (419) 373-3082.

Please address all correspondence to Amber Hicks, Ohio EPA, 347 N. Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,



Amber M. Hicks
Division of Hazardous Waste Management

/lr

Enclosures

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
DHWM; NWDO File: Sandusky County General ;
ec: Amber Hicks, 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.

Send to Central Office <input checked="" type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
---	---	-----------------------

Completed verification forms required to be submitted to CO should be e-mailed to kristina.durnell@epa.state.oh.us.

Site EPA ID No.	EPA ID Number: OHD002226140	
Site Name	Name: Flower Manufacturing, LLC.	Website: www.customfreshners.com (Optional)
Site Location Information	Street Address: 423 Knapp Street	
	City, Town, or Village: Fremont	State: OH
Site Land Type (check only one)	County Name: Sandusky	
	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"/>	Zip Code: 43420
NAICS code(s) www.census.gov/epcd/www/naics.html		

Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Ken	MI:	Last Name: Flower
	Phone Number: 888-241-9109		Phone Number Extension:
	E-Mail Address: ken@customfreshners.com		
	Fax Number: 888-283-4085		Fax Number Extension:
	Street or P.O. Box:		
	City, Town or Village:		Zip Code:

Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner:		Date Became Owner (mm/dd/yyyy):			
	Owner Type:	Private <input 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"/>				
	Street or P.O. Box:		Owner Phone #:			
	City, Town or Village:		Country:		Zip Code:	
	State:		Date Became Operator (mm/dd/yyyy):			
	Name of Site's Operator:					
	Operator Type:	Private <input 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"/>				
	Street or P.O. Box:		Operator Phone #:			
	City, Town or Village:		Country:		Zip Code:	
	State:					

VIOLATIONS CITED? Yes No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE		
<input checked="" type="checkbox"/> Not a HW 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

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)	
<input type="checkbox"/> Recycler of Hazardous Waste <input type="checkbox"/> Underground Injection Control Facility <input type="checkbox"/> Hazardous Waste Transporter <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace <input type="checkbox"/> Small Quantity On-Site Burner Exemption <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY))		
<input type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste	
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)		
CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES		
<input type="checkbox"/> Batteries		
<input type="checkbox"/> Pesticides		
<input type="checkbox"/> Mercury containing equipment		
<input type="checkbox"/> Lamps		
USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))		
<input type="checkbox"/> Used Oil Generator		
<input type="checkbox"/> Used Oil Transporter		
<input type="checkbox"/> Used Oil Transfer Facility		
<input type="checkbox"/> Used Oil Processor		
<input type="checkbox"/> Used Oil Re-refiner		
<input type="checkbox"/> Off-Specification Used Oil Burner		
<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil		
<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner		
Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRA info source record, you do not need to list them. Instead just indicate the date of the most recent source record.		
COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.		
Announced	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Containers	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Amber Hicks		2-8-10 11:05
Comments: On February 8, 2010, I conducted a compliance evaluation inspection of Flower Manufacturing, LLC., located at 423 Knapp Street, Fremont, Ohio.		
I conducted this CEI because Yerges Manufacturing, U.S. EPA ID number OHD002226140, notified Ohio EPA on August 25, 1988, that they were a small quantity generator of hazardous waste at your location. Upon arriving at the facility, Mr. Flower stated that Yerges Manufacturing moved and that he had been at the current location since 2004. I then proceeded to conduct a CEI at the facility.		
Flower is a manufacturer of paper car air fresheners. Flower is not a generator of hazardous waste. Wastes generated at Flower include scrap paperboard and fluorescent bulbs.		
Thus, the number should not be deactivated, however, there is currently no hazardous waste nor would there be anticipation of hazardous waste generation in the future at this address.		

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Flower Manufacturing, LLC. Facility Type: LQG SQG CESQG TSD Date of Inspection: 2-8-10 EPA ID#: OHD002226140

Waste Generated			On- or Off-Site Management		P2 Activities		
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps etc.) and EPA Waste Code, if applicable	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities	
1	Lighting	Fluorescent bulbs	Unknown	NA	Disposing in local landfill. Cited for 52-11.	None.	Facility plans to manage as universal waste and begin recycling.
2	Manufacturing of car air freshners.	Waste/scrap paperboard.	Unknown	NA	Disposing in local landfill.	None.	Facility would like to find a way to re-use or someone who could reuse or recycle. I have contacted OCAPP to inquire about P2 opportunities for this waste stream.
3							
4							
5							
6							
7							

8							
9							

REMARKS GENERAL INFORMATION

General Process Information:

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information:

Not sure if facility would be interested or not.

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.
 Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other: