



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 Korieski, Director

Re: Dold Cabinet & Trim Shop
Wood County
OHR000113357
Hazardous Waste-CESQG
2nd Notice of Violation

February 2, 2010

Mr. Edward Cluckey
Dold Companies
26610 Eckel Road
Perrysburg, Ohio 43551

Dear Mr. Cluckey:

On September 23, 2009, the Ohio Environmental Protection Agency (Ohio EPA) conducted a compliance evaluation inspection at Dold Cabinet & Trim Shop (Dold) located at 455 W. Woodland Circle in Bowling Green, Ohio. On October 9, 2009, you were sent a Notice of Violation (NOV) letter which outlined the violation we found and what you needed to do to correct this violation. To date, Dold has failed to respond to the initial NOV letter and the violation cited remains outstanding.

The following is a summary of the violation cited in the NOV which was sent to you on October 9, 2009:

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.

Dold 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, approximately ten spent fluorescent bulbs were stored in the mezzanine above the manufacturing area; some were sticking out of a cardboard box and a few were leaning against the wall.

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.

Dold must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If Dold plans to manage the spent fluorescent bulbs as universal waste, please submit photographic documentation showing the spent bulbs, identified at the time of our inspection, stored in a container that is properly closed, labeled, and dated.

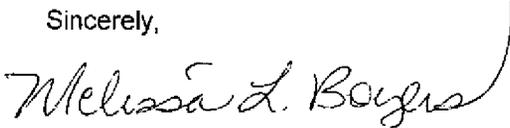
Mr. Edward Cluckey
February 21, 2010
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Dold must also properly train employees, who handle or have responsibility for managing universal waste, on waste handling and emergency procedures relative to their responsibilities. Please review the universal waste requirements with the appropriate employees and send me documentation that this has been completed. In addition, Dold must submit the name of the facility where you plan to recycle the bulbs.

Please submit documentation demonstrating abatement of the above outstanding violation to this office within **15 days** of receipt of this letter. 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

/lb

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO

~~DHWM, NWDO, Wood County 2009 General File~~
Dold Cabinet + Trim File

MelB

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.