



State of Ohio Environmental Protection Agency

Northwest District Office

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

OH R 000157024
Re: NovaVision
Wood County
Hazardous Waste
Return to Compliance

November 6, 2009

Mr. Mike Messmer, General Manager, VP
NovaVision
524 East Woodland Circle
Bowling Green, Ohio 43402

Dear Mr. Messmer:

Thank you for your November 3, 2009, response to Ohio EPA's October 1, 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 NovaVision has adequately demonstrated abatement of the violation cited in the October 1, 2009, NOV letter.

The following is a summary of the violation cited in the October 1, 2009, NOV as a result of our September 23, 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.

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

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.

NovaVision must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If NovaVision 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, NovaVision can manage the spent fluorescent bulbs as universal waste. If NovaVision plans to manage the spent fluorescent bulbs as universal waste, please submit photographic documentation showing the storage containers properly closed, labeled, and dated.

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NovaVision 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, NovaVision must submit the name of the facility where you plan to recycle the bulbs.

On November 3, 2009, NovaVision submitted a copy of the procedure that will be used for all employees who manage fluorescent bulbs. NovaVision will manage the spent fluorescent lamps as universal waste and will recycle them at Environmental Recycling located in Bowling Green, Ohio. In addition, an example universal waste label was submitted along with a photograph showing the storage box properly identified by the label.

With this information, this violation is considered abated.

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

/llr

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