



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: NovaVision  
Wood County  
Hazardous Waste  
Notice of Violation

October 1, 2009

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

Dear Mr. Messmer:

On September 23, 2009, Wendy Miller and I conducted a compliance evaluation inspection at NovaVision located at 524 East Woodland Circle in Bowling Green, Ohio. We inspected NovaVision 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.

During our visit we spoke with you and Mr. Mike Manahan, toured your building and observed your operations. NovaVision specializes in holographic stickers, tamper-evident stickers, and security tape and seals. NovaVision uses an electroforming process in the creation of the holograms. No used oil or hazardous waste solvents are generated at the facility.

NovaVision also generates spent fluorescent lamps which are currently managed as solid waste. At the time of our inspection, NovaVision 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.

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.

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 my inspection. I recommend that you review this document and contact me if you have any questions.

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. 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.

Ohio EPA will issue an EPA ID number to track our inspection activity. NovaVision cannot use this number for manifesting hazardous waste shipments. If NovaVision 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.ohio.gov/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.

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  
/csi

Enclosure

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.**

**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>	EPA ID Number:		Website: <b>www.novavisioninc.com</b>						
<b>Site Name</b>	Name: <b>NovaVision</b>		(Optional)						
<b>Site Location Information</b>	Street Address: <b>524 East Woodland Circle</b>		State: <b>OH</b>						
	City, Town, or Village: <b>Bowling Green</b>		Zip Code: <b>43402</b>						
	County Name: <b>Wood</b>								
<b>Site Land Type</b> (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other	
<b>NAICS code(s)</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>									
<b>Facility Representative</b>	First Name: <b>Mike</b>		MI:	Last Name: <b>Messmer</b>					
Additional names can be recorded in number 12	Phone Number: <b>419-354-1427</b>		Phone Number Extension: <b>4203</b>						
Only provide address information if it is different than the site address	E-Mail Address: <b>mmessmer@novavisioninc.com</b>		Fax Number Extension:						
	Fax Number: <b>419-353-7908</b>		Street or P.O. Box:						
	City, Town or Village:		State:		Zip Code:				
<b>Legal Owner And Operator of the Site.</b>	Name of Site's Legal Owner:		Date Became Owner (mm/dd/yyyy):						
List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Owner Type:	Private	County	District	Federal	Indian	Municipal	State	Other
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<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:		Owner Type:						
	Owner Type:	Private	County	District	Federal	Indian	Municipal	State	Other
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Street or P.O. Box:		Operator Phone #:						
	City, Town or Village:		United States		Zip Code:				
	State:								

**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

**TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)**

<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Underground Injection Control Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	

**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 if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRA info source record, you do not need to list them all. 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:	<b>Mike Manahan</b>
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments:	
Containers	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time
<b>Melissa Boyers</b>	<b>Wendy Miller</b>	<b>9/23/2009 10:00</b>

**OPTIONAL CERTIFICATION.** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Owner, Operator, or an Authorized Representative	Name and Title (Print)	Date (mm/dd/yyyy)
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**PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY**

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

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