



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 Korleski, Director

Re: Ohio & Michigan Paper Co.  
Wood County  
OHR000117812  
Hazardous Waste  
**Return to Compliance**

March 18, 2010

Mr. Al Leininger  
Ohio & Michigan Paper Company  
350 4th Street – Ampoint Industrial Park  
Perrysburg, Ohio 43551

Dear Mr. Leininger:

Thank you for your February 5, 2010, and February 18, 2010, responses to Ohio EPA's February 2, 2010, 2<sup>nd</sup> Notice of Violation (NOV) letter. The information you submitted included information regarding the management of universal waste. My review of the documentation submitted reveals that Ohio & Michigan Paper Co. (OMPC) has adequately demonstrated abatement of the violation cited in the September 3, 2009, Notice of Violation (NOV) letter.

The following is a summary of the requested information and violation cited in the October 7, 2009, NOV as a result of my 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.

OMPC 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.

OMPC must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If OMPC plans to manage the spent fluorescent bulbs when generated as universal waste, please submit the name of the facility where you plan to recycle the bulbs. OMPC 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.

**On February 5, 2010, OMPC submitted information on how you plan to manage your spent fluorescent bulbs in the future. OMPC plans to manage the spent bulbs as universal waste and has contacted Environmental Recycling in Bowling Green, Ohio, for their recycling services. OMPC's warehouse employees were trained and have been instructed on how to manage universal waste.**

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**On February 18, 2010, OMPC submitted documentation for the universal waste storage container that is now properly labeled and dated.**

***With this information, this violation is considered abated.***

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~~

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.