



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  
**2<sup>nd</sup> Notice of Violation**

February 2, 2010

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

Dear Mr. Leininger:

On September 23, 2009, the Ohio Environmental Protection Agency (Ohio EPA) conducted a compliance evaluation inspection of Ohio & Michigan Paper Co. (OMPC) located at 350 4th Street – Ampoint Industrial Park in Perrysburg, Ohio. On October 7, 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, OMPC 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 7, 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.

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.

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.



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A copy of Fluorescent Lamps: What You Should Know, was given to you at the time of our inspection. I recommend that you review this document and contact me if you have any questions.

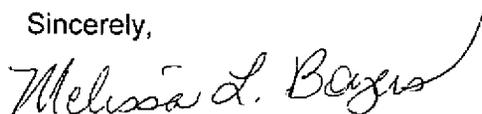
OMPC must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If OMPC plans to manage the spent fluorescent bulbs when generated as universal waste, please submit the name of the facility where you plan to recycle the bulbs. OMPC must also properly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

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

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.