OhioEPA
State of Ohio Environmental Protection Agency

Northwest District Office

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www.epa.state.oh.us

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

Re: Ohio & Michigan Paper Co.
Wood County
OHR000117812
Hazardous Waste
Notice of Violation

October 7, 2009

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

Dear Mr. Leininger:

On September 23, 2009, Wendy Miller and I conducted a compliance evaluation inspection at Ohio & Michigan Paper Co. (OMPC) located at 350 4th Street – Ampoint Industrial Park in Perrysburg, Ohio. We inspected OMPC 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. This letter will explain the violation we found and what you need to do to correct this violation.

During our visit we spoke with you regarding the facility and its operations. OMPC distributes janitorial items, industrial paper products and safety items. OMPC buys these items in bulk and then sells smaller quantities to their customers. You stated that years ago there was a parts repair area that utilized a parts washer. The repair area is no longer in use and has been converted to an indoor baseball batting area for the employees. No used oil is generated and all vehicle maintenance is outsourced as needed.

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

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. 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.

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

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.

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
or mail it to Kristina Durnell, Central Office

Site EPA ID No.	EPA ID Number: **OHR000117812**
Site Name	Name: **Ohio & Michigan Paper Co.** Website: (Optional)
Site Location Information	Street Address: **350 4th Street - Ampoint Ind. Park** City, Town, or Village: **Perrysburg** State: OH County Name: **Wood** Zip Code: **43551**
Site Land Type (check only one)	Private ☒ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other ☐
NAICS code(s) www.census.gov/epcd/www/naics.html	
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: **Al** MI: Last Name: **Leininger** Phone Number: **419-666-1500** Phone Number Extension: E-Mail Address: Fax Number: Fax Number Extension: Street or P.O. Box: City, Town or Village: State: Zip Code:
Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Date Became Owner (mm/dd/yyyy): Owner Type: Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other ☐ Street or P.O. Box: City, Town or Village: Owner Phone #: State: Country: Zip Code: Name of Site's Operator: Date Became Operator (mm/dd/yyyy): Owner Type: Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other ☐ Street or P.O. Box: City, Town or Village: Operator Phone #: State: United States Zip Code:

VIOLATIONS CITED? ☒ Yes ☐ No

TYPE OF HANDLER– A MINIMUM OF ONE BOX MUST BE CHECKED

☐ Not a Generator	☒UNKNOWN:Cited for violation of 3745-52-11	☐Large Quantity Generator (LQG)
		☐Small Quantity Generator (SQG)
		☐Conditionally Exempt Small Quantity Generator
		☐U.S. Importer of Hazardous Waste
		☐Mixed Waste (Hazardous and Radioactive) Generator

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

- ☐ Recycler of Hazardous Waste
- ☐ Underground Injection Control Facility
- ☐ Hazardous Waste Transporter
- ☐ Treater, Storer or Disposer of Hazardous Waste
- ☐ Exempt Boiler and/or Industrial Furnace
- ☐ Small Quantity On-Site Burner Exemption
- ☐ Smelting, Melting, Refining Furnace Exemption

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY)

- ☐ Small Quantity Handler of Universal Waste
- ☐ Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)
- ☐ Destination Facility for Universal Waste

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

- ☐ Batteries
- ☐ Pesticides
- ☐ Mercury containing equipment
- ☐ Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S)

- ☐ Used Oil Generator
- ☐ Used Oil Transporter
- ☐ Used Oil Transfer Facility
- ☐ Used Oil Processor
- ☐ Used Oil Re-refiner
- ☐ Off-Specification Used Oil Burner
- ☐ Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
- ☐ 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 RCRAInfo 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	☐ Yes	☒ No	Additional Facility Representatives:
Tanks	☐ Yes	☒ No	Other Comments: **Parts repair area no longer in use, no parts washer on-site**
Containers	☐ Yes	☒ No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Melissa Boyers	**Wendy Miller**	**9/23/2009 2:30**

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) _____

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Ohio & Michigan Paper Co. **Facility Type:** LQG/SQG/CESQG/TSD **EPA ID#: OHR000117812**

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