



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: ABCO Services, Inc.  
Lucas County  
Hazardous Waste  
OHD 018 365 932  
Return to Compliance

February 6, 2008

Mr. Kenneth L. Zimmerman, V.P. & C.O.O.  
ABCO Services, Inc.  
701 N. Westwood Avenue  
Toledo, Ohio 43607

Dear Mr. Zimmerman:

Thank you for your January 22, 2008, and February 6, 2008, responses to Ohio EPA's August 22, 2006, Notice of Violation letter. My review of the documentation submitted reveals that ABCO Services, Inc. (ABCO) has adequately demonstrated abatement of all of the violations cited in the August 22, 2006, Notice of Violation letter.

The following is a summary of the violations cited and your compliance with respect to each:

1. Waste Evaluation, OAC Rule 3745-52-11:

Any person who generates a waste must determine if that waste is a hazardous waste by using generator knowledge or by testing the waste.

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

ABCO must immediately cease disposing of the fluorescent bulbs as non-hazardous waste until a proper waste evaluation has been completed. Fluorescent bulbs typically contain mercury. 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. During the inspection you were given a Fact Sheet outlining the universal waste rules for handlers of lamps and a list of fluorescent bulb recyclers. Please review this information and contact me if you have any questions.

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ABCO must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If ABCO decides to conduct waste evaluation, please notify me at least 7 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. If ABCO plans to manage the spent fluorescent bulbs as universal waste, please submit photographic documentation showing the storage container properly labeled and dated.

On February 6, 2008, ABCO electronically submitted photographic documentation for the universal waste storage container that is now properly labeled "Waste Lamps". On February 6, 2008, I spoke with Ken Zimmerman who stated that on December 20, 2007, ABCO took 16 spent eight foot bulbs to Gross Electric. Gross Electric is brokering the bulbs and taking them to Environmental Recycling in Bowling Green where they will be recycled.

With this information, this violation is considered abated.

2. Labeling, OAC Rule 3745-279-22(C)(1) and 3745-279-45(G):

Containers, aboveground tanks, and fill pipes used for underground storage tanks shall be labeled or marked clearly with the words "used oil."

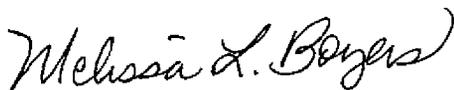
ABCO had a storage tank of used oil that was not properly labeled.

ABCO properly labeled the storage tank with the words "used oil" at the time of our investigation.

Therefore, this violation is considered abated.

Should you have any questions or if I can be of assistance, please contact me at (419) 373-3066.

Sincerely,



Melissa L. Boyers  
Division of Hazardous Waste Management

/csi

pc: Cindy Lohrbach, DHWM, NWDO  
Colleen Weaver, DHWM, NWDO  
DHWM, NWDO Lucas County General File  
ec: Melissa Boyers, DHWM, NWDO