



State of Ohio Environmental Protection Agency

Northwest District Office

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

**Re: Lamps, Inc. dba
Environmental Recycling
Wood County
DHWM/NWDO
OHR 000 034 025
Return to Compliance**

November 21, 2008

Mr. Michael Dolkowski, President
Lamps, Inc. dba Environmental Recycling
527 East Woodland Circle
Bowling Green, Ohio 43402

Dear Mr. Dolkowski:

Thank you for your November 17, 2008, response to Ohio EPA's October 29, 2008, Notice of Violation letter. Environmental Recycling (ER) submitted a detailed training policy to ensure timely annual refresher training, an inspection policy to ensure weekly inspections occur once every seven days, and information to address the areas of concern noted during the compliance evaluation inspection. My review of this documentation reveals that ER has adequately demonstrated abatement of all of the violations discovered during the September 30, 2008, compliance evaluation inspection.

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

**1. OAC Rule 3745-54-16(C), OAC Rule 3745-65-16(C), and Permit Condition B.6:
Personnel Training:**

A generator shall provide annual refresher training for all personnel involved in the handling and management of hazardous waste at the facility.

ER failed to provide annual refresher training for all personnel involved in the handling and management of hazardous waste at the facility.

ER had at least one employee that was over the one year requirement for annual training. Jeff Kill received annual training on 5/29/07 and 8/21/08.

To abate this violation, ER must submit a detailed written training policy that ensures all employees receive annual training in a timely manner.

On November 17, 2008, ER submitted information outlining how annual refresher training will be monitored for compliance. ER has created a training matrix that will track the required training and the frequency needed to maintain compliance. ER plans to schedule training on an annual basis in advance to ensure that any schedule conflicts are remedied prior to the training deadline.

With this information, this violation has been abated.

**2. OAC Rule 3745-55-74, OAC Rule 3745-66-74, and Permit Condition C.9:
Inspections:**

At least weekly, the owner or operator must inspect areas where containers are stored, looking for leaking containers and for deterioration of containers and the containment system causes by corrosion or other factors.

ER failed to conduct weekly inspections of the storage areas. ER inspected the fluorescent bulb/hazardous waste storage areas on 4/8/08 and then again on 4/16/08. The Agency defines weekly as once every seven days following the previous inspection.

To abate this violation, ER must submit a detailed written inspection policy that ensures the storage areas are inspected weekly as required.

On November 17, 2008, ER submitted information outlining the change made to the weekly inspection procedures to ensure they are completed once every seven days. ER has made it the responsibility of the safety and compliance officer and the facility manager to complete the weekly inspections. Having more than one person responsible for completing the weekly inspections reduces the chance for errors to occur.

With this information, this violation has been abated.

Areas of Concern:

1. During our inspection we observed that the yellow lines used to designate the permitted storage areas located in building #1 and #2 are fading. Forklifts and machinery operating in these storage areas tend to scrape off sections of the paint. ER plans to re-paint these yellow lines in January 2009, and use an epoxy sealant over the yellow lines to help decrease the wearing off of the paint that designates the permitted storage areas. Ohio EPA requests to be notified when this work is to take place and receive photographic documentation once the work has been completed.

On November 17, 2008, ER stated that they will notify the Ohio EPA as this work commences and will also submit pictures to document the completion of the project.

2. During our inspection, ER stated that 99% or more mercury is recovered from the fluorescent bulb crushing process. ER estimates that 80% of the bulbs they process are four and eight foot fluorescent, and 20% are HID's. ER takes the average amount of mercury contained in the different sizes of bulbs to calculate the mercury recovered in parts per million. Carbon filters located along the bulb crushing process capture any residual mercury, resulting in the estimate that 100% of the mercury processed is recovered.

Liquid mercury that comes into the facility via devices is hand poured into the storage flask that also contains the mercury recovered by the phosphorous powder retort oven. ER sells the liquid mercury to Mercury Waste Solutions, LLC or Bethlehem Apparatus.

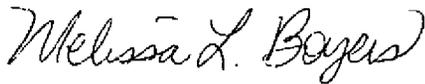
Ohio EPA would like ER to track for 30 days the exact number and size of bulbs processed and the amount of mercury that is recovered from those bulbs. ER would need to keep the mercury recovered from devices in separate containers during this time.

Once this is completed, please submit this information to Ohio EPA.

ER's process recycles mercury. Ohio EPA would like ER to undertake this study to demonstrate that ER's bulb crushing process is indeed recycling a legitimate amount of mercury.

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

Sincerely,



Melissa L. Boyers
Environmental Specialist
Division of Hazardous Waste Management

/llr

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
DHWM, NWDO Wood County File: Environmental Recycling-2007
ec: Melissa Boyers, DHWM, NWDO
Gary Deutschman, 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.