



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: SLS Electric
OHD987008323
2nd NOV

January 19, 2010

Mr. Steve Lauber
SLS Electric
550 4th Street
Perrysburg, Ohio 43551

Dear Mr. Lauber:

On September 23, 2009, Melissa Boyers and I inspected SLS Electric (hereafter referred to as SLS) located at 550 4th Street in Perrysburg, Ohio. The compliance evaluation inspection was completed to determine SLS's compliance with Ohio's hazardous waste laws and regulations as adopted under chapter 3734 of the Ohio Revised Code (ORC) and chapter 3745 of the Ohio Administrative Code (OAC). I sent you a Notice of Violation (NOV) letter on October 1, 2009, specifying the violations observed during the inspection. To date, SLS has failed to respond to the October 1, 2009 NOV letter and remains in violation of the following:

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

- a) SLS 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.

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

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SLS must also properly train employees, who handle or have responsibility for managing universal waste, on waste handling and emergency procedures relative to their responsibilities. This can be a simple review of the fact sheet, Fluorescent Lamps: What You Should Know, which was given to you at the time of my inspection. **SLS must submit to Ohio EPA, name(s) and documentation that this training has occurred.** Please contact me if you have any questions.

b.) SLS failed to have waste evaluation documentation for the sand blast sand that is generated at the facility.

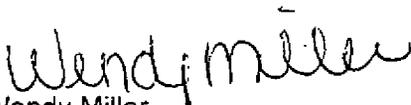
At the time of inspection, you were informed that you should no longer dispose of the sand blast sand until you have run analytical on a representative sample to determine whether it is hazardous waste. Any environmental laboratory or environmental firm should be able to provide this service to you. Specifically, SLS must have analytical completed using The TCLP, or Toxicity Characteristic Leaching Procedure, SW846 for RCRA Metals. **Once you receive the analytical results, you must submit them to me for review prior to disposal of the sand blast sand.**

Please respond, in writing, to this NOV letter within **fourteen (14) days**. Your response must include all actions and timetables necessary to demonstrate compliance.

You can find copies of the rules and other information on the division's web page at <http://www.epa.ohio.gov/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.ohio.gov/ocapp>

Should you have any questions, please feel free to call me at (419) 373-3114.

Sincerely,



Wendy Miller
Division of Hazardous Waste Management

/lb

pc: ~~Lucas County General File~~
Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO