



State of Ohio Environmental Protection Agency

FILE COPY

SR

STREET ADDRESS:

Lazarus Government Center  
50 W. Town St., Suite 700  
Columbus, Ohio 43215

Central District Office

TELE: (614) 728-3778 FAX: (614) 728-3898  
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049  
Columbus, OH 43216-1049

May 17, 2007

Re: Siam Reclaim Technologies, Inc.  
Conditionally Exempt Small Quantity  
Generator  
OHR000113050  
Franklin County, CDO  
NOV

Mr. Roland Inthisarn  
Siam Reclaim Technologies, Inc.  
4720 Groves Road  
Columbus, OH 43232

Dear Mr. Inthisarn:

Thank you for accompanying me during Ohio EPA's May 1, 2007, inspection of Siam Reclaim Technologies, Inc. (Siam) facility in Columbus, Ohio. Ohio EPA received a request made by Riverside County Community Health Agency's Department of Environmental Health located in Riverside, CA to conduct an inspection of this facility. Bruce Bailey works for this agency. He is concerned about a facility in his county that appears to be a sham CRT recycler. The facility's main operation is located in Columbus, Ohio and therefore, Mr. Bailey is curious as to the main facility's compliance record and operating practices. He requested Ohio EPA inspect the main facility in case they operate in the same negligent manner as the facility in his county. I inspected Siam 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).

I found the following violation of Ohio's hazardous waste laws. 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:

**OAC Rule 3745-52-11, Waste Evaluation:** Any person who generates a waste must evaluate the waste to determine if the waste is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51.

- (a) Siam has failed to determine if the waste (broken) glass generated from the reclaiming of the monitors is a hazardous waste. If the glass on the monitor is broken, it is processed along with the "good" monitors. The glass from the "bad" monitors is broken down further and sent back to Intechra in Arizona.

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

Mr. Roland Inthisarn  
Siam Reclaim Technologies, Inc.  
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- Siam must immediately evaluate this waste to determine if it is a listed or characteristic hazardous waste as required by OAC 3745-52-11. Ohio EPA has made multiple attempts to obtain information on how the broken glass is sent to Intechra and where it is sent from Intechra. Once Siam makes this determination, you must send me the documentation.

Enclosed you will find a copy of the checklist and process description. Should you have any questions, please feel free to call me at (614) 728-3882. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/opp/ocapp.html>.

Sincerely,



Elizabeth D. Lamerson  
Environmental Specialist  
Division of Hazardous Waste Management  
Central District Office

Enclosure

c: Tammy McConnell, DHWM/CO  
CDO File

EDL/nsm Siam NOV

**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.

E-mail this completed form to <a href="mailto:tammy.mcconnell@epa.state.oh.us">tammy.mcconnell@epa.state.oh.us</a> or mail it to Tammy McConnell, Central Office	Ohio Environmental Protection Agency <b>RCRA SUBCELLULAR SITE IDENTIFICATION/VERIFICATION FORM</b>		For Ohio EPA use only																		
2. Site EPA ID No.	EPA ID Number: OHR000113050																				
3. Site Name	Name: Siam Reclaim Technologies, Inc.	Website (optional):																			
4. Site Location Information	Street Address: 4720 Groves Road																				
	City, Town, or Village: Columbus	State: OH																			
	County Name: Franklin	Zip Code: 43232																			
5. Site Land Type (check only one)	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
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6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.htm">www.census.gov/epcd/www/naics.htm</a>	A.		B.																		
C.		D.																			
7. Facility Representative:  Additional names can be recorded in number 12.  Only provide address information if it is different than the site address.	First Name: Roland		MI:	Last Name: Inthisarn																	
	Phone Number: (614) 863-9999		Phone Number Extension:																		
	E-Mail Address: <a href="mailto:roland@siamreclaimtech.com">roland@siamreclaimtech.com</a>																				
	Fax Number: (614) 863-9946		Fax Number Extension:																		
	Street or P.O. Box: Same																				
	City, Town or Village:																				
	State:		Country:		Zip Code:																
8. 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.	A. Name of Site's Legal Owner:		Date Became Owner (mm/dd/yyyy):																		
	Namthrong, LLC		2000																		
	Owner Type: Mark with an X	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>				Private	County	District	Federal	Indian	Municipal	State	Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>						
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	Street or P.O. Box: 41 S. Grant Avenue																				
	City, Town, or Village: Columbus		Owner Phone #:																		
	State: Ohio		Country: USA	Zip Code: 43215																	
	B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):																		
	Siam Reclaim Technologies, Inc.																				
Operator Type: Mark with an X	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>				Private	County	District	Federal	Indian	Municipal	State	Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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Street or P.O. Box:																					
City, Town, or Village:		Operator Phone #:																			
State:		Country:	Zip Code:																		
9. Violations Cited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																					
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)																					
<input type="checkbox"/> Not Regulated																					



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**PROCESS DESCRIPTION SECTION**

Give a general process description ( include all processes at the facility )

Siam Reclaim Technologies, Inc. (Siam) disassembles monitors. The good tubes are sent to Thailand (southeast Asia). The good tubes are then remanufactured into working units. Certain size monitors are reused here in the US, like those that are made into slot machines.

Siam purchases monitors from Intechra and Redemtech. If the monitors have broken glass, they are sent back to Intechra in Phoenix, AZ. The monitors are inspected visually. If the tubes are burned or broken, they continue down the line to separate the front and back panel. The good tubes are also separated from the back panel, but they are sent to Thailand to be reused. The broken glass is broken even more and sent to Intechra. The plastic goes down one conveyor while the by products, such as cords and circuit boards, are sent down another.

\*\*\*\*\*

**WASTE ACTIVITIES AND P2 SUMMARY SECTION**

For each of the processes listed above that generate a waste give the following information: (1) name of process generating waste, (2) name or description of waste generated (e.g. sludge, solvent, ash, used oil, spent lamps, etc.), (3) EPA waste codes, if applicable, (4) quantity generated per month, (5) type of accumulation (container, tank, etc.) (6) waste accumulation location in facility, (7) type of on-site treatment (if used), (8) name of off-site management facility and type of waste management activity occurring there, (9) Current P2 activities, and (10) P2 opportunities.

The broken glass has not been properly evaluated.

The plastic is sent to plastic recyclers. The three plastic recyclers that are used are Technopolymers, Owl Plastics, and Xing Yun. The plastic sent to Technopolymers is traded for cardboard boxes to place the by products. The plastic is sent off site weekly.

The circuit boards, cords, and wires are sent to Interco Recycling in Chicago, IL. Interco reclaims the metals. The floor sweepings are also sent to Interco.

The steel and aluminum are sent to Joyce Iron and Metal.

The shrink wrap and cardboard are also recycled.

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: <100Kg. (Approximately 25-30 gallons) of waste in a calendar month.  
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.  
LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or >1 Kg. of acutely hazardous waste in a calendar month.  
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

**WASTE EVALUATION**

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes \_ No  N/A \_

The facility has not properly evaluated the broken glass that is sent off site to Intechra.

**GENERATOR CLASSIFICATION**

2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes  No  N/A \_

*NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.*

**OFF-SITE SHIPMENT OF HAZARDOUS WASTE**

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes \_ No  N/A \_

This depends on the evaluation from question 1.

**TREATMENT OF HAZARDOUS WASTE**

4. Does the generator treat hazardous waste in a :
- a. Container that meets 3745-66-70 to 3745-66-77? Yes \_ No  N/A
  - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C) Yes \_ No  N/A
  - c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes \_ No  N/A
  - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes \_ No  N/A

*NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.*

*NOTE: If waste is treated to meet LDRs, use LDR checklist.*

**REMARKS**