



State of Ohio Environmental Protection Agency

Northwest District Office

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

**RE: Post Printing Co
OHD 005 049 754
Auglaize County
DHWM, NWDO
Return to Compliance**

March 19, 2009

Mr. Dan Schmiesing
Post Printing Co.
P.O. Box 101
Minster, OH 45865

Dear Mr. Schmiesing:

Thank you for sending the electronic mail and faxes in response to the Ohio Environmental Protection Agency's (Ohio EPA's) Notice of Violation (NOV) dated January 27, 2009. The electronic mail was received by Ohio EPA on March 3, 2009. One fax was received on March 3, 2009, and two faxes were received on March 9, 2009. The documentation submitted includes photographs of the universal waste lamp containers, other information concerning the universal waste lamp management at the facility, a letter from the Village of Minster, and other waste information from Post Printing Co (PPC).

After reviewing the submitted documentation, PPC will still be considered a non-generator of hazardous waste. However, PPC may generate new waste streams in the future that may be considered hazardous. At this time, PPC also generates universal waste lamps and used oil at the facility.

My review of the documentation reveals that PPC has abated all violations discovered during the January 6, 2009, compliance evaluation inspection as listed below.

Violation:

1. **Ohio Administrative Code (OAC) Rule 3745-52-11, Hazardous Waste Determination:** "Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste..."

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

On March 3, 2009, Ohio EPA received documentation that PPC will be managing the spent lamps as universal waste and recycling the spent lamps with Safety-Kleen Systems, Inc. (S-K). Ohio EPA received photographic documentation that the spent lamp containers have been properly labeled and the label includes an accumulation start date. Ohio EPA would like to remind PPC that the spent lamp container must be kept closed at all times unless a spent lamp is being added to the container. Additionally, PPC may only store the spent lamps on site for 365 days.

Therefore, this violation is considered abated on March 3, 2009.

General Concerns:

- A. Used Oil:** PPC takes their used oil from the 205 West Fourth Street plant to an aggregation point at their 340 West Industrial Drive plant using PPC owned vehicles. Less than one gallon of used oil is transported at a time. The used oil is then picked up by S-K using a hazardous waste manifest to be transported to S-K's Kentucky facility to be recycled.

PPC should not be using a hazardous waste manifest for the used oil being shipped to S-K since the used oil is not being managed as hazardous waste. Instead, PPC should be using a non-hazardous waste manifest to ship the used oil to S-K.

Likewise, if S-K is picking up any other wastes for PPC that are not hazardous wastes (such as non-hazardous inks, or spent lamps), then these items should not be shipped with a hazardous waste manifest.

This general concern serves as a reminder to JK and is considered addressed.

- B. Discharge to the City Sewer:** During the inspection, PPC stated that spent plate developer is directly discharged to the city sewer system. PPC stated that verbal verification of this process was received from the city after the city had reviewed samples from PPC.

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On March 9, 2009, Ohio EPA received documentation that included a letter from the Village of Minster stating that PPC may directly discharge the following chemicals to the waste water treatment plant: 956 Plate Developer, Plate Finisher 850S/US/C, and Kodak Polychrome Graphics Sword Excel Regenerator. No further information needs to be submitted for this general concern. This general concern is considered addressed.

- C. **Facility Machines:** During the facility tour, PPC showed Ohio EPA two machines that were being operated by two women. Ohio EPA believes that these are the only two machines still in operation at this location.

During a phone conversation on February 25, 2009, PPC stated that these machines print address labels on pamphlets, books, etc. On March 9, 2009, Ohio EPA received written documentation that these machines do not generate any waste. No further information needs to be submitted for this general concern. This general concern is considered addressed.

Should you have any questions, please feel free to call me at (419) 373-3065.

Sincerely,

Kara Reynolds

Kara Reynolds
Environmental Specialist
Division of Hazardous Waste Management

/csl

cc: Colleen Weaver, DHWM, NWDO
Kara Reynolds, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
DHWM, NWDO Auglaize County File: Post Printing Co.

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.