



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Ginger, Inc.
OHD081218000
Lucas County
Hazardous Waste
Return to Compliance

August 18, 2011

Mr. Tim Mills, Plant Manager
Ginger, Inc.
260 Matzinger Road
Toledo, Ohio 43612

Dear Mr. Mills:

On December 15, 2010, I conducted a compliance evaluation inspection of Ginger, Inc. (Ginger) located at 260 Matzinger Road in Toledo, Ohio. I was accompanied by Supervisor Linda Miller of Ginger, during the inspection. I sent a Notice of Violation letter (NOV), dated January 5, 2011, explaining the violation and the general concern I found and what you needed to do to correct the violation and address the general concern. You provided a response to the NOV dated January 11, 2011. This letter provided information on your management of spent lamps and a response to my general concern. I spoke to you by phone on February 14, 2011, regarding your response to the NOV. Ginger had still not completely responded to the violation and your response to the general concern revealed that Ginger had violated other hazardous waste rules. On April 27, 2011, Ohio EPA sent a new violation letter to you, including two additional violations of Ohio's hazardous waste rules. On May 4, 2011, Ohio EPA received a written response from Ginger. On May 20, 2011, Ginger submitted an email message that included an MSDS for Chemgon and a product description for the waste treatment system.

As long as Ginger generates no more than 100 kilograms of hazardous waste in a month it will be operating as a hazardous waste conditionally exempt small quantity generator.

Below is a summary of the violations cited in Ohio EPA's January 5, and April 27, 2011, Notice of Violation letters and your compliance status with respect to each. Ginger has abated all the violations cited as a result of Ohio EPA's December 15, 2010, inspection.

**1. Waste Evaluation
OAC Rule 3745-52-11**

Ginger failed to evaluate its spent lamps (all types), according to this rule, and had been placing them in the trash.

In your May 4, 2011, response letter you explain that you are the only employee that is allowed to change the light bulbs at Ginger. However, to make sure that all other employees understood this, you held a meeting to explain the proper lamp handling procedures. Attached to your May 4, 2001, response letter is a photo of a closed box of universal waste lamps. Therefore, this violation was abated on May 4, 2011.

Based on the information you provided in your January 11, 2011, letter and the information provided during my February 14, 2011, phone conversation with Ken Moeller, Ohio EPA found, at least, the following additional violations of Ohio's hazardous waste laws:

**2. Waste Evaluation
OAC Rule 3745-52-11**

Ginger has failed to adequately evaluate all of its waste properly. Hazardous waste generated in Ohio must be sent to a permitted hazardous waste treatment, storage or disposal facility.

On May 10, 2011, you explained by phone that Ginger does not generate paint waste or spent antifreeze. You stated that this waste came from your house. Therefore, Ginger is not required to sample and analyze the waste paint and spent antifreeze from your house. You also stated that Ginger generates about one gallon of photographic waste each month.

In your May 4, 2011, response letter you state that "Print press plates are spray washed and all water is collected in tub for recycle."

In your fax dated August 11, 2011, you state the following: "Ginger Inc. will elect to have its waste declared as hazardous because of the characteristic of toxicity of the silver (waste # D011) and corrosivity (waste # D002). The waste developer, waste fixer, plate rinse and useless negatives Ginger uses will be sent to a hazardous waste treatment/storage/disposal facility." You indicated that Ginger would probably use Safety-Kleen to manage the shipment and disposal of the hazardous waste. This statement is acceptable to Ohio EPA. Therefore, this violation was abated on August 11, 2011.

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**3. Used Oil Container Labeling
OAC Rule 3745-279-22(C)(1)**

Ginger failed to label containers of used oil with the words "Used Oil".

Attached to your May 4, 2011, response letter is a photograph of two 1-gallon containers labeled with the words "Used Oil". In this response letter you also list three facilities that you indicate are capable of properly recycling your used oil. Therefore, this violation was abated on May 4, 2011.

If you have any questions, please feel free to contact me at (419) 373-3074.

Sincerely,



Don North
District Representative
Division of Materials and Waste Management

/llr

pc: Colleen Weaver, DMWM, NWDO
Cindy Lohrbach, DMWM, NWDO
~~DMWM-HW, NWDO, Lucas County, Ginger, Inc. File (site was formerly known as Electrotreat Corp.)~~

ec: Don North, DMWM, 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.