



**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

Re: Ginger, Inc.  
OHD081218000  
Lucas County  
Hazardous Waste  
**Notice of Violation**

January 5, 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 inspected Ginger 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). My inspection included observations of facility operations.

Ginger manufactures filter cartridges for aquarium filters, packages fish food and packages pet water bottles. The process for making filter cartridges includes cutting sheet plastic, heat sealing the plastic, fabric and activated carbon, packaging the cartridges, labeling and shipping. The scrap plastic is recycled through the manufacturer. Ginger also recycles its paper and packaging materials.

Ginger operates a very small print shop for making package labels. A solvent blend is used on cloth rags to clean the printing press rollers and other printer components. The rags are placed into a safety can and are cleaned by Domestic Linen of Detroit, Michigan. Only two to three 5-gallon cans of press wash are purchased each year. It is called Wash V-120 by Day International, Inc. Ohio EPA could not determine Ginger's hazardous waste generator status at the time of the inspection, since no one could explain the dark room operations. Once Ohio EPA determines Ginger's generator status, you will be notified in a separate letter. Ginger generates, at least, the following wastes:

1. Waste Lamps: Ginger has been placing its spent eight and four foot lamps in the trash.

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As a result of my inspection, I found, at least, 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:

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

A generator must determine whether its waste is hazardous by testing the waste according to the methods set forth in rules 3745-51-20 to 3745-51-24.

Ginger has failed to evaluate its spent lamps (all types), according to this rule and has been placing them in the trash. In order to abate this violation, Ginger must evaluate its spent lamps. Instead of obtaining a sample of the lamps and having the sample analyzed in a laboratory, Ginger may elect to manage its spent lamps (all types) as Universal Waste (recycling). During a conversation with you by phone on December 21, 2010, we discussed these two options and you indicated you would like to manage your spent lamps as Universal Waste. The requirements for Universal Waste lamps include:

- Immediately cease placing spent lamps into the trash;
- Place spent lamps into containers that are structurally sound and closed;
- Label the containers with the words "Used Lamps";
- Document the length of time that the spent lamps are stored (date the container);
- Store spent lamps for no longer than one year;
- Inform all employees with the responsibility to collect spent lamps of these requirements; and
- Ship the spent lamps to a lamp recycler (please refer to the list of recyclers enclosed with this letter).

In order to abate this violation, please explain how you intend to manage your spent lamps and to comply with the requirements listed above. Indicate how you will package the lamps, label the containers, date the containers and inform your employees of the requirements. Please submit photos demonstrating that this has been done. Also, please indicate where you will ship the Universal Waste lamps to.

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.

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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. I have enclosed copies of the following documents to assist you in properly managing your spent lamps: Fluorescent Lamps: What You Should Know and Computer, Fluorescent Lamp and Ballast Recyclers. I recommend that you review these documents carefully and contact me if you have any questions. The first document describes the rules you must follow in order to manage lamps as a universal waste.

### **Request for Information**

During Ohio EPA's inspection on December 15, 2010, no one was able to explain the dark room operations. When I spoke with you by phone on December 21, 2010, you were not able to sufficiently explain your dark room operations. You stated that a man named Ken was responsible for the dark room work but you could not remember his last name or phone number. You said he only works part time for Ginger. Therefore, **within 30 days** of your receipt of this letter, Ginger must explain, in detail, the complete dark room process, including the chemicals used, the steps in the process, all the equipment used, the waste generated, the amount of waste generated per month (or some other time period), the characteristics of the waste and the disposal facility used for the waste. Ginger must submit a Material Safety Data Sheet (MSDS) for each chemical used, the laboratory analysis for the waste(s) generated, the waste shipping papers or manifests and the name and phone number for the dark room operator.

You may be able to further reduce the waste your company generates. If you find ways to recycle, reduce or altogether eliminate the amount of waste that your company generates you may be able to reduce your treatment and disposal costs and you may possibly reduce your regulatory requirements. I have enclosed copies of Pollution Prevention Opportunities, a worksheet that can help you recognize opportunities for reducing waste and conserving energy at your business, and the fact sheets Management of Electronic Waste from Businesses and Battery Recyclers/Brokers & Disposal Facilities. Please review this information and contact me if you have any questions.

I encourage you to schedule a pollution prevention assessment for your business because there are often many opportunities for businesses like yours to reduce waste and save money. If you wish to talk about an assessment or if you have other questions about pollution prevention, please feel free to contact Ron Nabors at 419-373-3147 or the Office of Compliance Assistance and Pollution Prevention (OCAPP) at (614) 644-3469. There is no charge for an assessment.

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The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service.

You can find more information at the following Web link [http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc\\_serve.php?2=subscriptionpage](http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage). Please feel free to share this information with your colleagues.

If you have any questions, please feel free to contact me at (419) 373-3074. I have enclosed copies of the checklists that I completed during the inspection. You can find copies of the rules and other information on the division's web page at <http://www.epa.ohio.gov>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.ohio.gov/ocapp>.

Sincerely,



Don North  
District Representative  
Division of Hazardous Waste Management

/llr

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

ec: Don North, 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.