



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Michigan Silk Screen
Lucas County
OHR000002121
Hazardous Waste-CESQG
Return to Compliance

April 21, 2010

Mr. Michael Schnaidt
Michigan Silk Screen
5354 Whiteford Road
Sylvania, Ohio 43560

Dear Mr. Schnaidt:

Thank you for your April 8, 2010, response to Ohio EPA's March 24, 2010, 2nd Notice of Violation (NOV) letter. The information you submitted included information regarding the management of universal waste. My review of the documentation submitted reveals that Michigan Silk Screen (MSS) has adequately demonstrated abatement of the violation cited in the July 22, 2009, NOV letter.

The following is a summary of the violation cited in the July 22, 2009, NOV as a result of our July 16, 2009, inspection and your compliance with respect to it:

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

Any person who generates a waste must determine if that waste is a hazardous waste by using generator knowledge or by testing the waste.

MSS 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.

MSS must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If MSS plans to manage the spent fluorescent bulbs as universal waste, please submit photographic documentation showing the storage containers properly closed, labeled, and dated.

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MSS must also properly train employees, who handle or have responsibility for managing universal waste, on waste handling and emergency procedures relative to their responsibilities and send me documentation that this has been completed. In addition, MSS must submit the name of the facility where you plan to recycle the bulbs.

On April 8, 2010, MSS submitted information regarding the future management of your spent fluorescent bulbs. MSS plans to manage the spent bulbs as universal waste. On April 7, 2010, Gross Electric, Inc. picked up for recycling the spent fluorescent bulbs that you have accumulated since our July 16, 2009, inspection. You also stated in your response that you would be the only person managing the universal waste to ensure its proper management. A copy of Fluorescent Lamps: What You Should Know, is enclosed for future reference as you manage your spent universal waste bulbs.

With this information, this violation has been abated.

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

If you have any questions or I can be of assistance, please contact me at (419) 373-3066.

Sincerely,



Melissa L. Boyers
Division of Hazardous Waste Management

/lb

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

ec: Melissa Boyers, 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.