



Environmental
Protection Agency

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

Re: The Mold Shop, Inc.
Lucas County
OHR000163469
Hazardous Waste
Return to Compliance

May 2, 2011

Mrs. Donna Wagner
The Mold Shop, Inc.
8520 West Central Avenue
Sylvania, Ohio 43560

Dear Mrs. Wagner:

Thank you for contacting the Ohio EPA on April 27, 2011, in response to Ohio EPA's February 17, 2011, Notice of Violation/Partial Return to Compliance letter. Our discussion and the information you provided reveals that The Mold Shop, Inc. (hereafter referred to as TMS) has adequately demonstrated abatement of the violations cited in the February 17, 2011, Notice of Violation (NOV) / Partial Return to Compliance (PRTC) letter.

The following is a summary of the violations cited in the February 17, 2011, NOV/PRTC as a result of our February 10, 2011, inspection and your compliance with respect to each:

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

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

TMS must immediately cease disposing of the fluorescent lamps as non-hazardous waste until a proper waste evaluation has been completed. 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.

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A copy of Fluorescent Lamps: What You Should Know, was given to Mr. Pruss at the time of my inspection. I recommend that you review this document and contact me if you have any questions.

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.

Basically, you can run analytical to determine if the spent bulbs contain mercury, lead, or cadmium (if you would like to continue to dispose of them) OR you can choose to manage them through the universal waste rules by recycling. When the bulbs are recycled as a universal waste, they are not considered a hazardous waste. You must ensure that the spent bulbs are recycled within one year of being generated and that you keep documentation showing the bulbs were recycled.

In addition, you must label the box containing the burned out bulbs (prior to recycling) with the words "universal waste lamps". To abate this violation, TMS must confirm how you plan to manage the spent bulbs in the future and where they will be recycled if you choose to handle them as universal waste.

On April 27, 2011, I spoke with you regarding your plans for the future management of spent fluorescent bulbs. You stated that TMS plans to manage the spent fluorescent bulbs as universal waste. TMS has contacted Environmental Recycling (ER) in Bowling Green, Ohio, and plans to have the spent fluorescent bulbs recycled at their facility. TMS plans to have the bulbs generated at the facility sent to ER once every six months for recycling.

With this information, this violation has been abated.

2. OAC Rule 3745-279-22(C)(1): Labeling:

Containers, aboveground tanks, and fill pipes used for underground storage tanks shall be labeled or marked clearly with the words "used oil."

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TMS had one 55-gallon drum that was not properly labeled. A copy of the fact sheet, The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil, was given to Mr. Pruss at the time of my inspection. Please review this information and contact me if you have any questions.

At the time of my inspection, TMS properly labeled the 55-gallon drum with the words "used oil".

This violation was previously abated on February 10, 2011.

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/>.

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

Sincerely,



Melissa L. Boyers
Division of Materials & Waste Management

/llr

pc: Cindy Lohrbach, DMWM, NWDO
Colleen Weaver, DMWM, NWDO
~~DMWM-FW, NWDO-2011-Lucas County General File~~

ec: Melissa Boyers, 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.