



State of Ohio Environmental Protection Agency

Northwest District Office

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Bowling Green, OH 43402-9398

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

Re: SLI
OHR000038661
Hazardous Waste
Lucas County
NOV/RTC

March 11, 2009

Mr. Larry Lemerand
The Sign Lady, Inc.
6033A Telegraph Road
Toledo, Ohio 43612

Dear Mr. Lemerand:

On February 25, 2009, Gary Deutschman and I conducted a hazardous waste compliance evaluation inspection of The Sign Lady, Inc (hereafter SLI) located in Toledo, Ohio on behalf of the Ohio Environmental Protection Agency (Ohio EPA). This inspection was conducted in order to determine SLI's compliance with Ohio's hazardous waste laws as adopted under Chapter 3745 of the Ohio Administrative Code (OAC) and Chapter 3734 of the Ohio Revised Code (ORC). The Agency's inspection included a tour of your facility and a review of any waste handling.

SLI provides screen printing and various sign/banner printing on various substrates. SLI does not currently generate any hazardous waste. SLI uses a solvent based ink for which a small amount of lacquer thinner is used to clean off squeegees using a shop rag. The rag contains very little solvent and is almost immediately dry. The shop rags would not be considered ignitable waste and are not a hazardous waste based on the Material Safety Data Sheets provided. SLI does generate Universal Waste fluorescent bulbs and will be recycling those with Environmental Recycling in Bowling Green, Ohio.

The following violations of Ohio's hazardous waste laws were observed and noted during the inspection:

1) Universal Waste Fluorescent Bulb Labeling, OAC Rule 3745-273-14(E):

All packages and containers holding spent fluorescent bulbs are to be labeled with the words "Universal Waste – Lamps", "Waste Lamps" or "Used Lamps".

SLI did not label universal waste fluorescent bulbs that were being stored with the words "Universal Waste – Lamps", "Waste Lamps" or "Used Lamps".

Mr. Larry Lemerand
March 12, 2009
Page 2

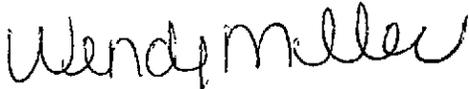
To abate this violation, you must submit a photograph of the universal waste bulb containers properly labeled with the words "Universal Waste – Lamps", "Waste Lamps" or "Used Lamps".

On March 8, 2009, you submitted a digital photograph documenting that the bulbs are being stored in a box which is properly labeled "Universal Waste Bulbs". On March 11, 2009, I sent you an email stating that you should change the labeling to Universal Waste Lamps. **Therefore, this violation is considered abated.**

You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/opp>.

Enclosed you will find a copy of the checklists that Ohio EPA completed during the inspection. Should you have any questions, please feel free to call me at (419) 373-3114.

Sincerely,



Wendy Miller
Division of Hazardous Waste Management

/llr

Enclosures

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
DHWM-NWDO File (w/original enclosure) ;

NOTE: Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: SLI, Inc
 Facility Type:
 Date of Inspection: 2/25/09
 EPA ID#: OHR000058661

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	Clean up - squeegees	shoprags (non-haz)		solid waste		
2	Spent bulbs	universal waste	recycle	Environmental Recycling		
3						
4						
5						
6						
7						
8						

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more

Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No N/A ___ RMK# ___
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes No N/A ___ RMK# ___

UNIVERSAL WASTE LAMPS

Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]

Yes No N/A ___ RMK# ___

3. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes ___ No N/A RMK# ___
4. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)] Yes ___ No N/A ___ RMK# ___

NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

5. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes No ___ N/A ___ RMK# ___
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes ___ No N/A RMK# ___

NOTE: Accumulation is defined as date generated or date received from another handler.

6. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes No N/A RMK#
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes No N/A RMK#
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes No N/A RMK#
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes No N/A RMK#
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes No N/A RMK#
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes No N/A RMK#
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes No N/A RMK#
Paperwork showing last pick up of all Univ. Waste

EMPLOYEE TRAINING

7. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] Yes No N/A RMK#

RESPONSE TO RELEASES

8. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes ___ No N/A RMK# ___
9. Is the material released characterized? [3745-273-17(B)] Yes ___ No N/A RMK# ___
10. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes ___ No N/A RMK# ___

OFF-SITE SHIPMENTS

NOTE: If a SQUWH self-transportes waste, then they must comply with the Universal Waste transporter requirements.

11. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes No N/A ___ RMK# ___

NOTE: SQUWHs are prohibited to send waste to any other facility.

12. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes No N/A ___ RMK# ___
13. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No N/A ___ RMK# ___
14. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:

- a. Receive the waste back? [3745-273-18(E)(1)] Yes___ No___ N/A X RMK#___
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes___ No___ N/A X RMK#___
15. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following: Yes ___ No N/A X RMK#___
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes___ No___ N/A X RMK#___
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes___ No___ N/A X RMK#___
16. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes ___ No N/A X RMK#___
17. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes ___ No N/A X RMK#___

EXPORTS

18. Is waste being sent to a foreign destination? If so: Yes___ No X N/A ___ RMK#___
- a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes___ No N/A X RMK#___
- b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's **Acknowledgment of Consent** as defined in 3745-52-50 to -52-57? [3745-273-20(B)] Yes ___ No N/A X RMK#___
- c. Is a copy of U.S. EPA's **Acknowledgment of Consent** provided to the transporter? [3745-273-20(C)] Yes ___ No N/A X RMK#___

REMARKS