



Environmental  
Protection Agency

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

Re: Toledo Lucas County Public Library  
Lucas County  
OHD048782569  
Hazardous Waste  
**Return to Compliance**

February 10, 2011

Mr. Charles Oswanski, Superintendent  
Facilities & Operations  
Toledo Lucas County Public Library  
325 Michigan Street  
Toledo, Ohio 43604-6614

Dear Mr. Oswanski:

Thank you for your January 28, 2011, response to Ohio EPA's December 29, 2010, Notice of Violation (NOV) letter. My review of the documentation submitted reveals that Toledo Lucas County Public Library (Toledo Library) has adequately demonstrated abatement of the violation cited in the December 29, 2010, NOV.

The following is a summary of the violation cited in the December 29, 2010, NOV as a result of my December 9, 2010, inspection and your compliance with respect to it:

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

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

The Toledo Library 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.

A copy of Fluorescent Lamps: What You Should Know, was given to you at the time of our 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, the Toledo Library 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 January 28, 2011, the Toledo Library submitted, via electronic mail, information regarding the future management of your spent fluorescent bulbs. The Toledo Library plans to manage the spent bulbs as universal waste. The Toledo Library's response indicated that the spent fluorescent lamps and HID bulbs would be placed in boxes labeled "Universal Waste Lamps". The Toledo Library intends to ship the universal waste lamps off-site for recycling at Environmental Recycling (ER) in Bowling Green, Ohio. Each of the 19 library branch locations will receive two storage boxes purchased from ER to hold the spent bulbs. In addition, the downtown main library will also have a storage container purchased from ER to collect the spent bulbs. On January 7, 2011, I spoke with Mr. David Scanlan regarding the branch library locations. He indicated that training would be provided to the maintenance personnel responsible for managing the spent bulbs at each branch location and that he would oversee the removal of the storage boxes prior to the one year storage time limit.**

***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/>.

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 Hazardous Waste Management

pc: Cindy Lohrbach, DHWM, NWDO  
Colleen Weaver, DHWM, NWDO  
Mr. David Scanlan, Toledo Lucas County Public Library  
~~DHWM; NWDO 2011-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.