



**Environmental  
Protection Agency**

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

Re: Toledo Lucas County Public Library  
Lucas County  
OHD048782569  
Hazardous Waste  
Notice of Violation

December 29, 2010

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

Dear Mr. Oswanski:

On December 9, 2010, I conducted a compliance evaluation inspection at the Toledo Lucas County Public Library (Toledo Library) located at 325 Michigan Street in Toledo, Ohio. I inspected the Toledo Library 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). Pollution prevention options were also discussed during this inspection. This letter will explain the violation found and what you need to do to correct this violation.

During my visit, I spoke with you regarding your operations. In 2006, the Toledo Library notified as a conditionally exempt small quantity generator and obtained a hazardous waste ID # for the disposal of waste(s) generated during the clean-out and re-coating of a boiler cooling tower. Spent fluorescent lamps are managed as a solid waste. At the time of my inspection, the Toledo Library was operating as a non-generator of hazardous waste.

I found 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:**

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.

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/>.

Enclosed you will find a copy of the checklists that were completed during the inspection.

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

/llr

Enclosures

pc: Cindy Lohrbach, DHWM, NWDO  
Colleen Weaver, DHWM, NWDO  
~~DHWM, NWDO 2010 Lucas County General File (w/original enc.)~~

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.

Send to Central Office <input type="checkbox"/>	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE</b> <b>IDENTIFICATION/VERIFICATION FORM</b>	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to paula.canter@epa.state.oh.us.

<b>Site EPA ID No.</b> <b>Site Name</b>	EPA ID Number: <b>OHD048782569</b>		Website: <b>toledolibrary.org</b> (Optional)
<b>Site Location Information</b>	Name: <b>Toledo Lucas County Public Library</b>		
<b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	Street Address: <b>325 Michigan Avenue</b>		State: <b>OH</b>
Private <input type="checkbox"/>	County <input checked="" type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>
Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
City, Town, or Village: <b>Toledo</b>	County Name: <b>Lucas</b>		
Zip Code: <b>43604</b>			

<b>Facility Representative</b>  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: <b>Charles</b>	MI:	Last Name: <b>Oswanski</b>
Title: <b>Superintendent of F&amp;O's</b>	Phone Number: <b>419-2595309</b>		
E-Mail Address:	Phone Number Extension:		
Fax Number: <b>419-255-1332</b>	Fax Number Extension:		
Street or P.O. Box:			
City, Town or Village:			
State:	Zip Code:		

<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner:		Date Became Owner (mm/dd/yyyy):	
Owner Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>
Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
Street or P.O. Box:				
City, Town or Village:	Owner Phone #:		Zip Code:	
State:	Country:			
Name of Site's Operator:	Date Became Operator (mm/dd/yyyy):			
Operator Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>
Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
Street or P.O. Box:				
City, Town or Village:	Operator Phone #:		Zip Code:	
State:	Country:			

<b>VIOLATIONS CITED?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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<b>TYPE OF HANDLER - MARK "X" AS APPROPRIATE</b>		
<input checked="" type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
<input type="checkbox"/> Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). <i>Check the box for the applicable generator status and provide a comment.</i>	<input type="checkbox"/> Small Quantity Generator (SQG)	<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
	<input type="checkbox"/> U.S. Importer of Hazardous Waste	<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator



## PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

**Facility Name:** Toledo Lucas County Public Library     
 **Facility Type:** LQG/SQG/CESQG/TSD     
 **EPA ID#:** OHD048782569

Description of Waste				On-Site Management			Off-Site Management
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	Waste Generated (e.g. sludge, spent solvent, ash, etc)	EPA Waste Code	QTY Generated per Month	Type of Accumulation/Storage (e.g. container, tank, etc)	Type of On-Site Treatment (recycle, wwt, etc)	Waste Location (Include map if possible)	Name, state, and type of activity occurring at the facility.
1	Lighting	Spent Fluorescent Bulbs					Currently managed as solid waste. Facility was given fact sheets for universal waste lamps.
2	Clean-out and re-coating of cooling tower	Clean-up solvent	D001, D002, D035	One time occurrence			
3							
4							