



Environmental
Protection Agency

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

Re: Toledo Sign Co.
Lucas County
OHR000114199
Hazardous Waste
Return to Compliance

February 10, 2011

Mr. Brad Heil, President
Toledo Sign Company
2021 Adams Street
Toledo, Ohio 43624

Dear Mr. Heil:

Thank you for your February 1, 2011, response to Ohio EPA's December 29, 2010, Notice of Violation (NOV) letter. My review of the documentation submitted reveals that Toledo Sign Company (hereafter referred to as TSC) 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:

- a. At the time of the inspection, TSC did not have waste evaluation documentation for the spent shop rags/towels. TSC pours the lacquer thinner on the paper towels and uses them to clean off the manufactured signs.

TSC has historically disposed of this spent material as a non-hazardous waste. TSC must immediately cease disposing of the spent shop rags as non-hazardous waste until a proper waste evaluation has been completed. TSC must evaluate this waste stream to determine whether the towels would be a characteristic hazardous waste.

TSC must obtain a representative sample of the spent shop rags and have it analyzed for Toxic Characteristic Leaching Procedure (TCLP) Resource Conservation and Recovery Act (RCRA) metals (SW-846 Method 1311/6010) and volatile organics (SW-846 Method 1311/8260). To abate this violation, TSC must submit a copy of the analytical results to Ohio EPA. Once analytical results have been reviewed, Ohio EPA will advise you on proper disposal options as well as plans for the future management of this waste stream.

On February 1, 2011, TSC submitted a copy of the analytical results for the spent shop rags. The submitted analytical results indicate that the spent shop rags are non-hazardous for organics and metals.

TSC can manage this waste stream as a solid waste or recycle them by having them laundered. This portion of the violation has been abated.

- b. At the time of the inspection, TSC did not have waste evaluation documentation for the spent paint booth filters. TSC has historically disposed of this spent material as a non-hazardous waste. TSC must immediately cease disposing of the waste paint booth filters as non-hazardous waste until a proper waste evaluation has been completed.

TSC must obtain a representative sample of the spent paint booth filter waste stream and have it analyzed for Toxic Characteristic Leaching Procedure (TCLP) Resource Conservation and Recovery Act (RCRA) metals (SW-846 Method 1311/6010) and volatile organics (SW-846 Method 1311/8260). To abate this violation, TSC must submit a copy of the analytical results to Ohio EPA. Once analytical results have been reviewed, Ohio EPA will advise you on proper disposal options as well as plans for the future management of this waste stream.

On February 1, 2011, TSC submitted a copy of the analytical results for the spent paint booth filters. The submitted analytical results indicate that the spent paint booth filters are non-hazardous for organics and metals. TSC can manage this waste stream as a solid waste. This portion of the violation has been abated.

If TSC has any changes in their painting process, Ohio EPA recommends that an updated waste evaluation be conducted on the spent paint booth filters.

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

TSC 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.

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.

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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, TSC 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.

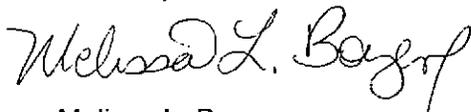
On February 1, 2011, TSC submitted information regarding the future management of the spent fluorescent bulbs. TSC will manage all spent fluorescent bulbs as universal waste and store them for up to one year in properly labeled and dated containers. TSC intends to ship the universal waste lamps off-site for recycling at Environmental Recycling in Bowling Green, Ohio. This portion of the violation has been abated.

This violation has been completely 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

/llr

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
~~DHWM, NWDO.2011-Lucas County General File~~

ec: Melissa Boyers, DHWM, NWDO

Notice:

Ohio's 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.