



**Environmental  
Protection Agency**

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

Re: Toledo Sign Co.  
Lucas County  
OHR000114199  
Hazardous Waste  
**Notice of Violation**

December 29, 2010

Mr. Dan Fink  
Toledo Sign Company  
2021 Adams Street  
Toledo, Ohio 43624

Dear Mr. Fink:

On December 9, 2010, the Ohio Environmental Protection Agency (Ohio EPA) conducted a compliance evaluation inspection of Toledo Sign Company (hereafter referred to as TSC) located at 2021 Adams Street in Toledo, Ohio. I inspected TSC 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 violations that were found and what you need to do to correct these violations.

During my visit, I spoke with you, observed your facility operations and reviewed paperwork. TSC is a sign manufacturing facility. Paint waste solvent (D001, D035, F003, F005) is stored in a 55-gallon drum which is stored inside a locked trailer located behind the building. No used oil is generated at the facility. TSC has one paint booth and the filters generated are currently managed as a solid waste. Spent fluorescent lamps are managed as a solid waste. Shop rags are also managed as a solid waste. At the time of my inspection, TSC was operating as a conditionally exempt small quantity generator (CESQG) 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:**

- 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.

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](mailto:paula.canter@epa.state.oh.us).

<b>Site EPA ID No.</b> <b>Site Name</b>	EPA ID Number: <b>OHD000114199</b>		Website: (Optional)
<b>Site Location Information</b>	Name: <b>Toledo Sign Co.</b>		Street Address: <b>2021 Adams Street</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>	City, Town, or Village: <b>Toledo</b>	State: <b>OH</b>	
Private <input checked="" 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"/>	County Name: <b>Lucas</b>		Zip Code: <b>43624</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>Wendy</b>	MI:	Last Name: <b>Jones</b>
Title:	Phone Number: <b>419-244-4444</b>		
E-Mail Address:	Phone Number Extension:		
Fax Number: <b>419-244-6546</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"/>
Street or P.O. Box:	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
City, Town or Village:	Owner Phone #:		Zip Code:	
State:	Country:		Zip Code:	
Name of Site's Operator:	Date Became Operator (mm/dd/yyyy):		Operator Phone #:	
Operator Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>
Street or P.O. Box:	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
City, Town or Village:	Operator Phone #:		Zip Code:	
State:	Country:		Zip Code:	

**VIOLATIONS CITED?**  Yes  No

**TYPE OF HANDLER - MARK "X" AS APPROPRIATE**

<input 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). Check the box for the applicable generator status and provide a comment.	<input type="checkbox"/> Small Quantity Generator (SQG)	<input checked="" 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



**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: <100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.  
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.  
LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or 1 Kg. of acutely hazardous waste in a calendar month.  
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

**WASTE EVALUATION**

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes  No  N/A

**GENERATOR CLASSIFICATION**

2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes  No  N/A

*NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.*

**OFF-SITE SHIPMENT OF HAZARDOUS WASTE**

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] PSC Yes  No  N/A

**TREATMENT OF HAZARDOUS WASTE**

4. Does the generator treat hazardous waste in a:
- a. Container that meets 3745-66-70 to 3745-66-77? Yes  No  N/A
  - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes  No  N/A
  - c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes  No  N/A
  - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes  No  N/A

*NOTE: Complete appropriate checklist for each unit.*

*NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.*

*NOTE: If waste is treated to meet LDRs, use LDR checklist.*

**REMARKS**

#1 - Fluorescent Bulbs, Spent Paint Booth Filters & Spent Shop Rags

## PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Toledo Sign Co.      Facility Type: LQG/SQG/CESQG/TSD      EPA ID#: OHR000144199

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 managing as a solid waste.
2	Painting	Spent Solvent	D001, D035, F003, F005	5 gallons	55-gallon drum	Located in an outside locked trailer located behind the facility.	PSC. Last pick-up of two 55-gallon drums was on 12/4/06.
3	Painting	Spent Paint Booth Filters		Booth Filters changed once every 6 weeks			Currently managing as a solid waste.
4	Sign Mfg. & Clean-up	Shop rags/towels					Currently managed as solid waste.