



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

LR-8J

MAY 12 2010

Mr. Todd Hendrick  
Compliance Officer  
Environmental Recycling Group  
527 East Woodland Circle  
Bowling Green, Ohio 43402

Re: Status of Current TSCA Storage Approval

Dear Mr. Hendrick:

On March 22, 2010, the U.S. Environmental Protection Agency received your request to continue for an additional ten years for your current approval which expires on June 27, 2010, to commercially store polychlorinated biphenyls (PCBs).

Because Environmental Recycling (ER) submitted a timely, complete, and adequate notice of intent to continue the June 27, 2000 approval, the approval and its conditions remain in effect beyond the approval expiration date until EPA completes its review of the submitted information and makes a final determination regarding whether the approval is to be renewed.

If you have any questions on this matter, please call me or Steve Johnson, of my staff, at (312) 886-1330.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary S. Setnicar".

Mary S. Setnicar  
Acting Chief, RCRA Branch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JUN 27 2000

R-19J

Michael Dolkowski, President  
Environmental Recycling  
P.O. Box 167  
527 East Woodland Circle  
Bowling Green, Ohio 43402

Re: Commercial PCB Storage Approval

Dear Mr. Dolkowski:

We are issuing the enclosed document, entitled "Approval to Commercially Store Polychlorinated Biphenyls (PCBs)," to Environmental Recycling of Bowling Green, Ohio. We find that Environmental Recycling has completely and adequately satisfied the regulatory requirements specified in the Federal PCB regulations, 40 CFR Section 761.65, Storage for Disposal, authorized under the Toxic Substances Control Act (TSCA). This approval allows Environmental Recycling to commercially store PCB waste for disposal.

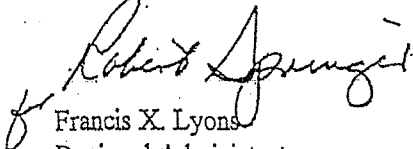
This approval is effective today and remains effective for ten (10) years. However, we may suspend or revoke this approval at any time, as specified in the approval conditions and/or when we have reason to believe that continuing the operation of this facility presents an unreasonable risk to human health or the environment. Failure of Environmental Recycling to meet any portion of this approval could result in civil and/or criminal penalties.

You and your company, Environmental Recycling, must comply with all applicable provisions of the TSCA and Federal PCB regulations.

Furthermore, this approval does not relieve Environmental Recycling of the responsibility to comply with all other Federal, State and local regulations and ordinances for operation and maintenance of the facility.

Please contact Priscilla Fonseca, of my staff, at (312) 886-1334, if you have any questions regarding this matter.

Sincerely,

  
Francis X. Lyons  
Regional Administrator

Enclosure

cc: Christopher Jones; Director (w/enclosure)  
Ohio Environmental Protection Agency

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604

IN THE MATTER OF: ) APPROVAL TO COMMERCIALY  
ENVIRONMENTAL RECYCLING ) STORE POLYCHLORINATED  
BOWLING GREEN, OHIO ) BIPHENYLS (PCBs)

AUTHORITY

This approval is issued pursuant to Section 6(e)(1) of the Toxic Substances Control Act of 1976, Public Law No. 94-469, and the Federal PCB regulations, 40 CFR § 761.65(d).

BACKGROUND

Section 6(e)(1) of the Toxic Substances Control Act (TSCA) requires that the United States Environmental Protection Agency (U.S. EPA) promulgate rules for the disposal of PCBs. Rules implementing TSCA Section 6(e) were published in the May 31, 1979, Federal Register (44 FR 31542) and re-codified in the May 6, 1982, Federal Register (47 FR 19527). Those rules also regulated the storage of PCB waste prior to disposal under the TSCA Section 6(e)(1) disposal authority for PCBs. Amendments to those rules were published in the December 21, 1989, Federal Register (54 FR 52746).

The current rules for PCB storage facilities are codified at 40 CFR § 761.65, Storage for Disposal. Those rules require, among other things, that facilities which store PCB waste generated by others, in quantities greater than 500 gallons, obtain a U.S. EPA approval. The December 21, 1989, Federal Register designated the U.S. EPA Regional Administrator of the region in which the storage facility is located (or the Director, Chemical Management Division [CMD], if the commercial storage area is ancillary to a facility approved for disposal by the Director, CMD) as the approval authority for commercial PCB storage facilities.

Environmental Recycling operates as a commercial recycling facility. It provides complete packaging, transport and recycling services for fluorescent lights, mercury devices, electronic equipment, and batteries. It has a Hazardous Waste Hauler Permit under EPA I.D. Number OHR000034025. Environmental Recycling applied for an approval to commercially store PCB material, such as PCB containing oil in drums or contained in electrical equipment, for disposal.

On April 14, 1999, Environmental Recycling submitted a commercial PCB storage application to U.S. EPA. After a technical adequacy review of the application, the U.S. EPA sent a Notice of Deficiencies (NOD) on November 9, 1999, notifying Environmental Recycling of deficiencies in the application. In response to the NOD, the facility submitted a revised application on

January 5, 2000. After further technical review of the revised application and the subsequent information submitted in support of the application, the U.S. EPA has determined that the final revised application is in compliance with the regulatory requirements, outlined at 40 CFR § 761.65, Storage for Disposal.

#### APPLICABLE REGULATIONS

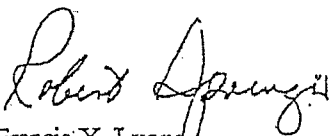
The conditions of this approval were developed in accordance with the applicable provisions of 40 CFR Part 761 and the October 18, 1989, TSCA Guidance Manual for Commercial PCB Storage Facility Applications.

#### APPROVAL

Approval is hereby granted to Environmental Recycling, 527 East Woodland Circle, Bowling Green, Ohio (EPA, ID # OHR 000 034 025), to commercially store PCBs and PCB items for disposal, subject to the Approval Conditions stated herein, and based on the information described in the final approved application.

This approval shall become effective on the date of signature and shall expire ten (10) years from the date of signature, unless revoked, suspended, or terminated in accordance with the Approval Conditions stated herein.

This approval does not relieve Environmental Recycling from compliance with all applicable Federal, State and local regulatory requirements, including the Federal PCB regulations at 40 CFR Part 761.

  
for Francis X. Lyons  
Regional Administrator

6/27/00  
Date