



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Rd.  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468  
www.epa.state.oh.us

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

**RE: United States Postal  
Service, Bucyrus Post  
Office  
OHR 000 014 654  
Crawford County  
DHWM, NWDO  
Return to Compliance**

March 24, 2009

Mr. Bill Geary  
United States Postal Service, Bucyrus Post Office  
301 South Poplar Street  
Bucyrus, Ohio 44820

Dear Mr. Geary:

Thank you for sending the electronic mail and fax in response to the Ohio Environmental Protection Agency's (Ohio EPA's) Notice of Violation (NOV) dated March 13, 2009. Both documents were sent by United States Postal Service, Bucyrus Post Office (BPO) and received by Ohio EPA on March 17, 2009. The documentation submitted includes photographs of the universal waste lamp containers and other information concerning the universal waste lamp recycling.

After reviewing the submitted documentation, BPO will still be considered a non-generator of hazardous. However, BPO will still generate universal waste lamps and may generate new waste streams in the future that may be considered hazardous waste. At this time, BPO's hazardous waste identification number will be inactive for hazardous waste activities, but will remain active for universal waste activities.

My review of the documentation reveals that BPO has abated all violations discovered during the February 2, 2009, compliance evaluation inspection as listed below.

**Violations:**

1. **Ohio Administrative Code (OAC) Rule 3745-273-13(D)(1), Waste management-standards for small quantity handlers of universal waste:** "A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps.

Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions."

BPO failed to store the universal waste lamps located in the basement in a closed container.

**On March 17, 2009, Ohio EPA received photographic documentation that BPO has properly contained the spent lamps in closed containers. Ohio EPA also received photographic documentation that verifies the basement has been properly cleaned up and no longer creates a hazard.**

*Therefore, this violation is considered abated on March 17, 2009.*

- 2. OAC Rule 3745-273-14(E), Labeling/marking-standards for small quantity handlers of universal waste:** "Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)."

BPO failed to mark the containers holding the spent lamps with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)."

**On March 17, 2009, Ohio EPA received photographic documentation that BPO has properly labeled the spent lamps containers with the words "Waste Lamps".**

*Therefore, this violation is considered abated on March 17, 2009.*

- 3. OAC Rule 3745-273-15(C), Accumulation time limits-standards for small quantity handlers of universal waste:** "A small quantity handler of universal waste who accumulates universal waste shall be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received..."

BPO failed to demonstrate the length of time the universal waste has been accumulated from the date it became a waste.

**On March 17, 2009, Ohio EPA received photographic documentation that BPO has properly labeled the spent lamps containers with the accumulation start date.**

*Therefore, this violation is considered abated on March 17, 2009.*

Mr. Bill Geary  
March 24, 2009  
Page Three

**General Concerns:**

- A. **Recycling Receipt:** BPO submitted information that USA Lamp & Ballast Recycling Inc. is the destination facility for the universal waste lamps. However, BPO has not submitted a receipt, bill of lading, and/or contract between the facilities showing that the lamps are being recycled at this facility.

**On March 17, 2009, Ohio EPA received documentation that the universal waste lamps at BPO are shipped to the Mansfield Post Office. From Mansfield, the universal waste lamps are shipped to the Cleveland Post Office. USA Lamp & Ballast Recycling then picks up the universal waste lamps from the Cleveland Post Office to be recycled.**

**No further information needs to be submitted for this general concern. This general concern is considered addressed on March 17, 2009.**

Should you have any questions, please feel free to call me at (419) 373-3065.

Sincerely,

*Kara Reynolds*

Kara Reynolds  
Environmental Specialist  
Division of Hazardous Waste Management

/lb

cc: Colleen Weaver, DHWM, NWDO  
Kara Reynolds, DHWM, NWDO  
Cindy Lohrbach, DHWM, NWDO  
~~DHWM, NWDO Crawford County File # US Postal Service Bucyrus~~

**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.