



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
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  
Notice of Violation**

March 13, 2009

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

Dear Mr. Geary:

Thank you for submitting the electronic mails in response to the Ohio Environmental Protection Agency's (Ohio EPA's) February 9, 2009, request for information letter. The electronic mails were sent by United States Postal Service, Bucyrus Post Office (BPO) on February 12, 2009, and March 6, 2009. Ohio EPA received the electronic mails on February 12, 2009, and March 6, 2009, respectively. The documentation submitted includes universal waste lamp recycling information.

After review of the additional information from BPO concerning the spent lamp management, Ohio EPA found that BPO was in violation of the following Ohio hazardous waste laws during the February 2, 2009, compliance evaluation inspection. In order to correct these violations you must do the following and send me the required information ***within 30 days of receipt of this letter:***

**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.

In order to abate this violation, BPO must place all fluorescent lamps into closed containers. **Within 30 days of receipt of this letter**, BPO must submit photographs to Ohio EPA that show the lamps have been properly contained in closed containers. BPO should also submit a photograph that shows the overall lamp storage in the basement to verify that the basement has been properly cleaned up and no longer creates a hazard.

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)."

In order to abate this violation, BPO must properly mark the containers of spent lamps with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)." **Within 30 days of receipt of this letter**, BPO must submit photographs to Ohio EPA that show the lamp containers have been properly labeled.

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.

Although BPO submitted information concerning the shipments of spent lamps that were sent to the Mansfield facility, this log does not specifically track the date the universal waste begins to accumulate at the BPO facility. In order to abate this violation, BPO must begin tracking the accumulation start date of the universal waste. **Within 30 days of receipt of this letter**, BPO must submit photographs to Ohio EPA that show the lamp containers have been properly labeled with an accumulation start date.

For more information, the following fact sheets have been enclosed: Universal Waste Rules for Handlers of Lamps, dated June 2005; and Fluorescent Lamps: What You Should Know, dated January 2007.

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**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. **Within 30 days of receipt of this letter**, BPO should submit such paperwork.

Please send all correspondence **within 30 days of receipt of this letter** to Ohio EPA, Northwest District Office, Attn: Kara Reynolds, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,

*Kara Reynolds*

Kara Reynolds  
Environmental Specialist  
Division of Hazardous Waste Management

/lb

Enclosures

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.