



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

Re: Wauseon Service Center  
(Toledo Edison)  
Fulton County  
OHD000720474  
Hazardous Waste  
**Return to Compliance**

June 8, 2010

Mr. Bob Gerken, Supervisor  
First Energy/Toledo Edison  
6099 Angola Road  
MS 2320  
Holland, Ohio 43528

Dear Mr. Gerken:

Thank you for your May 15, 2010, response to Ohio EPA's April 12, 2010, Notice of Violation (NOV) letter. Wauseon Service Center (WSC) previously submitted documentation on April 9, 2010, and March 29, 2010. The information you submitted included universal waste documentation. My review of the documentation submitted reveals that WSC has adequately demonstrated abatement of all of the violations cited in the April 12, 2010, NOV.

The following is a summary of the violations cited in the April 12, 2010, NOV as a result of my March 25, 2010, inspection and your compliance with respect to each:

**1. OAC Rule 3745-273-13(D)(1): Universal Waste: Fluorescent Lamp Management:**

All lamps/bulbs being managed as a universal waste must be stored in packages that are structurally sound and adequate to prevent breakage. The packages/containers must be closed.

WSC did not store the spent fluorescent lamps in containers that were closed.

**On April 9, 2010, WSC submitted, via electronic mail, photographs showing the fluorescent bulb container now properly closed.**

***With this information, this violation is considered abated.***

**2. OAC Rule 3745-273-14(E): Universal Waste: Fluorescent Lamp Labeling:**

All packages and containers holding spent fluorescent lamps/bulbs are to be labeled with the words "Universal Waste - Lamps", "Waste Lamps" or "Used Lamps".

WSC did not have the container of spent fluorescent bulbs properly labeled. WSC properly labeled and dated the container of spent fluorescent bulbs at the time of our inspection.

***With this information, this violation has been abated.***

**3. OAC Rule 3745-273-16: Universal Waste Employee Training:**

A small quantity handler of universal waste shall ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relative to their responsibilities during normal facility operations and emergencies.

WSC has not ensured that all employees are thoroughly familiar with proper waste handling procedures.

In order to correct this violation, WSC must describe, through a training outline, how it will thoroughly familiarize (train) its universal waste fluorescent bulb handlers in proper handling procedures. WSC must submit some form of documentation to demonstrate that this training has been accomplished (i.e. sign-in sheet, training memo). The training must also include compliance with all rules for the handling of universal waste bulbs and the corrective actions for all violations of universal waste rules, cited above. Copies of two universal waste guidance documents are enclosed. Please review this information and contact me if you have any questions.

**On May 15, 2010, WSC submitted a copy of the training material presented to the employees regarding the proper management of universal waste lamps. You indicated that the universal waste rules document created by WSC would be read to all personnel during the morning safety focus meetings. WSC plans to manage all spent fluorescent bulbs as universal waste. WSC has arranged to ship the universal waste lamps off-site for recycling at Environmental Recycling in Bowling Green, Ohio.**

***With this information, this violation is considered abated.***

**4. OAC Rule 3745-279-22(C)(1): Labeling:**

Containers, aboveground tanks, and fill pipes used for underground storage tanks shall be labeled or marked clearly with the words "used oil."

WSC had one black portable used oil container that was not properly labeled. A copy of the fact sheet, The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Use Oil, was given to you at the time of our inspection.

**On March 29, 2010, WSC submitted, via electronic mail, photographs showing the black portable used oil container now properly labeled "Used Oil".**

Mr. Bob Gerken, Supervisor  
June 9, 2010  
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***With this information, this violation is considered 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/>.

Should you have any questions or if 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 Fulton County General File~~

ec: Melissa Boyers, DHWM, NWDO