



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.ohio.gov

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

Re: OHD009866187
Atlas Trucking
Hancock County
NOV

April 22, 2010

Mr. Jeff Fischbach
Atlas Trucking
181 Stanford Parkway
Findlay, Ohio 45840

Dear Mr. Fischbach:

On April 7, 2010, Gary Deutschman and I, representing the Ohio Environmental Protection Agency (Ohio EPA) conducted a hazardous waste compliance evaluation inspection of Atlas Trucking (Atlas) located at 181 Stanford Parkway in Findlay, Ohio. We inspected Atlas 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. Pollution prevention options were also discussed during this inspection. This letter will explain the violation found and what you need to do to correct it.

Atlas provides movement of household goods via truck and offers storage to local facilities or others in need of temporary storage options. Atlas currently disposed of fluorescent lamps in the solid waste dumpster. Atlas Trucking does not generate any other hazardous waste.

The following violation of Ohio's hazardous waste rules were observed and noted during the inspection. 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. OAC Rule 3745-52-11, Waste Evaluation:

Any person who generates a waste must determine if that waste is a hazardous waste by using generator knowledge or by testing the waste.

Atlas failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent lamps generated at the facility.

Atlas must immediately cease disposing of the fluorescent lamps as non-hazardous waste until a proper waste evaluation has been completed. Fluorescent lamps typically contain mercury, lead or cadmium.

Mr. Jeff Fischbach
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During our inspection, I provided you with a fact sheet regarding fluorescent lamps and a list of fluorescent lamp and ballast recyclers.

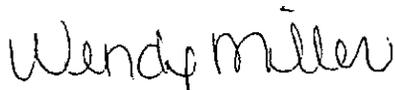
Basically, you could run analytical to determine if the bulbs contain mercury, lead, or cadmium (if you would like to continue to dispose of them) OR you can choose to handle them through the **universal waste rules** by **recycling**. When the lamps are recycled as a universal waste, they are not considered a hazardous waste. You must ensure that they are recycled within one year of being generated and that you keep documentation showing this. Also, you must label the box containing the burned out bulbs (prior to recycling) with the words "universal waste lamps".

To abate this violation, please confirm how you plan to manage the lamps.

You can find copies of the rules and other information on the division's web page at <http://www.epa.ohio.gov/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.ohio.gov/opp>.

Should you have any questions or if I can be of assistance, please contact me at (419) 373-3114.

Sincerely,



Wendy Miller
Division of Hazardous Waste Management

/llr

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
C:\DHWM\NWDO.City.of.Findlay\File — 3

| | | |
|--|---|-----------------------|
| Send to Central Office <input type="checkbox"/> | Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM | For Ohio EPA use only |
|--|---|-----------------------|

Completed verification forms required to be submitted to CO should be e-mailed to kristina.durnell@epa.state.oh.us.

| | | |
|--|---|------------------------|
| Site EPA ID No. | EPA ID Number: OHD009866187 | |
| Site Name | Name: Atlas Trucking | Website: (Optional) |
| Site Location Information | Street Address: 181 Stanford Parkway | |
| | City, Town, or Village: Findlay | State: OH |
| | County Name: Hancock | Zip Code: 45840 |
| Site Land Type (check only one) | 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"/> | |
| NAICS code(s) www.census.gov/epcd/www/naics.html | | |

| | | | |
|---|-------------------------|-------------------------|-----------------------------|
| Facility Representative | First Name: Jeff | MI: | Last Name: Fischbach |
| Additional names can be recorded in number 12 | Title: | | |
| | Phone Number: | Phone Number Extension: | |
| | E-Mail Address: | | |
| Only provide address information if it is different than the site address | Fax Number: | Fax Number Extension: | |
| | Street or P.O. Box: | | |
| | City, Town or Village: | | |
| | State: | Zip Code: | |

| | | | | |
|---|-----------------------------|----------------------------------|---------------------------------------|-----------------------------------|
| Legal Owner And Operator of the Site. 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"/> |
| | Street or P.O. Box: | | Federal <input type="checkbox"/> | Indian <input type="checkbox"/> |
| | City, Town or Village: | | Municipal <input type="checkbox"/> | State <input type="checkbox"/> |
| | State: | | Other <input type="checkbox"/> | Owner Phone #: |
| | Name of Site's Operator: | | Date Became Operator (mm/dd/yyyy): | |
| | Operator Type: | Private <input type="checkbox"/> | County <input type="checkbox"/> | District <input type="checkbox"/> |
| | Street or P.O. Box: | | Federal <input type="checkbox"/> | Indian <input type="checkbox"/> |
| | City, Town or Village: | | Municipal <input type="checkbox"/> | State <input type="checkbox"/> |
| | State: | | Other <input type="checkbox"/> | Operator Phone #: |
| | | | Country | Zip Code: |

| | |
|--------------------------|---|
| VIOLATIONS CITED? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
|--------------------------|---|

| | | |
|--|--|---|
| TYPE OF HANDLER - MARK "X" AS APPROPRIATE | | |
| <input checked="" type="checkbox"/> Not a HW Generator | <input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input type="checkbox"/> Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). <i>Check the box for the applicable generator status and provide a comment.</i> | <input type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input 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 |

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

- | | |
|---|--|
| <input type="checkbox"/> Hazardous Waste Transporter | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace |
| <input type="checkbox"/> Hazardous Waste Transfer Facility | <input type="checkbox"/> Small Quantity On-Site Burner Exemption |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Recycler of Hazardous Waste | <input type="checkbox"/> Underground Injection Control Facility |
| | <input type="checkbox"/> Receives Hazardous Waste from Off-site |

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY))

- | | |
|---|---|
| <input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste | <input type="checkbox"/> Destination Facility for Universal Waste |
| <input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more) | |

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

- Batteries
 Pesticides
 Mercury containing equipment
 Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))

- Used Oil Generator
 Used Oil Transporter
 Used Oil Transfer Facility
 Used Oil Processor
 Used Oil Re-refiner
 Off-Specification Used Oil Burner
 Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
 Used Oil Fuel Marketer to Off-Specification Used Oil Burner

Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

Announced Yes No Additional Facility Representatives:
 Tanks Yes No
 Containers Yes No

Name of Inspector(s)
 Wendy Miller

Name of Inspector(s)
 Gary Deutschman

Date of Inspection/Time
 (mm/dd/yyyy) (hh:mm)
 04/07/2010 2:00 pm

Comments:

Fluorescent lamps cited for being improperly disposed. Facility rep plans to recycle in future-this is reflected on this form.