



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**

February 9, 2009

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

Dear Mr. Geary:

Please thank Ellen Lebay for accompanying me during the Ohio Environmental Protection Agency's (Ohio EPA's) February 2, 2009, compliance evaluation inspection of the United States Postal Service, Bucyrus Post Office (BPO) located at 301 South Poplar Street, Bucyrus, Ohio. I inspected BPO 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 (OAC). During the inspection, I also helped you identify ways to prevent pollution by reducing waste.

This letter will explain the violations I found, what you need to do to correct the violations, other general concerns I have, what you need to do to respond to my general concerns, and the pollution prevention opportunities I identified.

BPO is a United States post office. Mail is received, hand sorted, and sent out from the facility. At the time of the inspection, BPO did not generate hazardous waste at this site. However, BPO does generate spent lamps.

Ohio EPA found the following violations of Ohio's hazardous waste laws. 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:***

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Ohio EPA has not found any violations of Ohio's hazardous waste laws at this time. However, after speaking with Ellen Lebay, it is unclear how BPO is managing the spent lamps generated at the facility. Currently BPO ships the spent lamps to the Mansfield Post Office twice a year. Once the spent lamps are shipped to Mansfield, it is unclear if the lamps are sent to a destination facility to be recycled or are disposed of in another manner.

Within 30 days of receipt of this letter, BPO must submit information describing what happens to the spent lamps once they reach the Mansfield Post Office. If these lamps are sent off-site to be recycled, then BPO must state where the lamps are sent (including a name, address, and phone number of the destination facility) and submit a receipt, bill of lading, and/or contract between the facilities showing that the lamps are being recycled. If other disposal methods are being utilized for the lamps (such as crushing, disposed of via the local landfill, etc.), BPO must describe the process of disposal in detail and why the lamps are being shipped from BPO to Mansfield.

During the inspection, Ohio EPA gave the following fact sheets to BPO for more information concerning universal waste: Universal Waste Rules for Handlers of Lamps, dated June 2005; and Fluorescent Lamps: What You Should Know, dated January 2007.

General Concern:

It is unclear why BPO has a hazardous waste identification number. John Savage, the site contact person listed in the database, no longer works at the facility. After speaking with several people during the inspection, it was concluded that the number may have been used to dispose of lead paint waste generated during remodeling the building. BPO is not currently remodeling the building. However, remodeling has taken place various times over the past years.

In the future, if BPO generates enough lead paint waste or other hazardous waste in one month to become a small quantity generator of hazardous waste (generating more than 220 pounds of hazardous waste but less than 2200 pounds of hazardous waste per month) or a large quantity generator of hazardous waste (generating 2200 pounds or more of hazardous waste per month), then BPO must notify Ohio EPA of the change in hazardous waste generator status. To do this, BPO must complete and submit the form titled Notification of Regulated Activity Form to Ohio EPA's Division of Hazardous Waste. For more information the fact sheet titled Hazardous Waste Generator Categories And Episodic Generation, dated March 2007, has been enclosed.

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As we discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce, or altogether eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp.html>. If you would like to be considered for an in-depth on-site pollution prevention assessment, or if you would like more information about pollution prevention assessments, please contact me at (419) 373-3065.

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign up for this free service. You can find more information at the following web site: www.epa.state.oh.us/dhwm/listserv.html. Please feel free to share this with your colleagues.

Enclosed you will find a copy of the checklists that were completed during the inspection. Should you have any questions, please feel free to call me at (419) 373-3065. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

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 42402.

Sincerely,



Kara Reynolds
Environmental Specialist
Division of Hazardous Waste Management

/csi

Enclosures

cc: Colleen Weaver, DHWM, NWDO
Kara Reynolds, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
'DHWM, NWDO Crawford County File: Crawford County General'

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.

Ohio Environmental Protection Agency
**RCRA SUBTITLE C SITE
 IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to kristina.durnell@epa.state.oh.us
 or mail it to Kristina Durnell, Central Office

Site EPA ID No.	EPA ID Number: OHR 000 014 654	
Site Name	Name: United States Postal Service, Bucyrus Post Office	Website: (Optional)
Site Location Information	Street Address: 301 South Poplar Street	State: OH
	City, Town, or Village: Bucyrus	Zip Code: 44820
	County Name: Crawford	
Site Land Type (check only one)	Private <input type="checkbox"/>	County <input type="checkbox"/>
	District <input type="checkbox"/>	Federal <input checked="" 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: Bill	MI: Last Name: Geary
	Phone Number: 419-562-6308	Phone Number Extension:
Additional names can be recorded in number 12	E-Mail Address: William.J.Geary@usps.gov	Fax Number Extension:
	Fax Number:	
Only provide address information if it is different than the site address	Street or P.O. Box:	
	City, Town or Village:	Zip Code:
	State:	
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: United States Postal Service	Date Became Owner (mm/dd/yyyy):
	Owner Type: Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input checked="" type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	
	Street or P.O. Box: 301 South Poplar Street	Owner Phone #: 419-562-6308
	City, Town or Village: Bucyrus	Country: USA Zip Code: 44820
	State: Ohio	Date Became Operator (mm/dd/yyyy):
	Name of Site's Operator:	
	Operator Type: Private <input 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"/>	
	Street or P.O. Box:	Operator Phone #:
	City, Town or Village:	United States Zip Code:
	State:	

VIOLATIONS CITED? Yes No

TYPE OF HANDLER- A MINIMUM OF ONE BOX MUST BE CHECKED		
<input checked="" type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<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"/> Recycler of Hazardous Waste | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace |
| <input type="checkbox"/> Underground Injection Control Facility | <input type="checkbox"/> Small Quantity On-Site Burner Exemption |
| <input type="checkbox"/> Hazardous Waste Transporter | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | |

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED)

(CHECK ALL BOXES THAT APPLY)

- | | |
|---|---|
| <input 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 if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. 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: **Ellen Lebay**
Tanks Yes No Other Comments: **They do generate spent lamps, but managemnt is unclear at**
Containers Yes No **this time.**

Name of Inspector(s)

Name of Inspector(s)

Date of Inspection/Time

(mm/dd/yyyy) (hh:mm)

Kara Reynolds

2/2/2009 10:15 AM

OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Owner, Operator, or an Authorized Representative

Name and Title (Print)

Date (mm/dd/yyyy)