



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Sylvania Schools – Transportation Dept.
OHR000153148
Lucas County
Hazardous Waste-CESQG
Return to Compliance

September 3, 2009

Mr. Joe Kahl, Transportation Director
Sylvania Schools – Transportation Dept.
7400 Cougar Lane
Sylvania, Ohio 43560

Dear Mr. Kahl:

Thank you for your September 1, 2009, response to Ohio EPA's March 27, 2009, Notice of Violation letter. The information you submitted included documentation for the management of universal waste. My review of the documentation submitted reveals that Sylvania Schools Transportation Department (Sylvania Schools) has adequately demonstrated abatement of all of the violations cited in the March 27, 2009, NOV letter.

The following is a summary of the violations cited in the March 27, 2009, NOV and your compliance with respect to each:

1. 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."

Sylvania Schools had one 55-gallon drum of used oil located in the bus maintenance area that was not properly labeled. This drum contained the used oil generated when the used oil filters were crushed.

Sylvania Schools properly labeled the 55-gallon drum with the words "used oil" at the time of our inspection. 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. Please review this information and contact me if you have any questions.

Therefore, this violation is considered abated.

2. 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.

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

Sylvania Schools properly placed all the spent fluorescent lamps in containers that were closed at the time of our inspection.

Therefore, this violation is considered abated.

3. 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".

Sylvania Schools did not have their spent fluorescent lamps properly labeled.

Sylvania Schools properly labeled the storage boxes with the words "Universal Waste - Lamps", at the time of our inspection.

Therefore, this violation is considered abated.

4. OAC Rule 3745-273-15(C): Accumulation Time for Universal Waste Batteries and Lamps:

A small quantity handler of 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.

Sylvania Schools was not able to demonstrate the length of time the universal waste lamps were accumulated. There were no dates on the spent fluorescent lamps currently in storage.

Sylvania Schools properly labeled the universal waste lamp storage boxes with the accumulation start date. Sylvania Schools is now aware that the accumulation start date needs to be placed on the box when the first spent fluorescent lamp is placed inside.

Therefore, this violation is considered abated.

5. 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.

Sylvania Schools has not ensured that all employees are thoroughly familiar with proper waste handling and emergency procedures. Sylvania Schools' employees have historically placed the spent fluorescent lamps into cardboard boxes for storage until they are picked up and taken to the maintenance department located at the Burnham building. Enclosed for your review is a copy of a letter sent to Mr. Alan Bacho, Director of Facilities & Operations for the Sylvania Schools dated November 4, 2005.

In order to correct this violation, Sylvania Schools must describe, through a training outline, how it will thoroughly familiarize (train) its universal waste fluorescent lamp handlers in proper handling and emergency procedures. Sylvania Schools must submit some form of documentation demonstrating that this training has been accomplished. The training must also include compliance with all rules for the handling of universal waste lamps and the corrective actions for all violations of universal waste rules, cited above. Copies of two universal waste guidance documents were given to Ms. D.J. Fouts at the time of our inspection. Please review this information and contact me if you have any questions.

On September 1, 2009, Sylvania Schools submitted copies of two memos that were given to all Sylvania School custodians and custodial coordinators in 2005. Mr. Alan Bacho, Director of Facilities and Operations, stated that Ms. D.J. Pankop-Fouts is the custodian and coordinator at the Support Services Facility and has received both of the memos and is now following the proper procedures for the management of universal waste lamps.

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Ohio EPA recommends that Sylvania Schools conduct an annual review of all applicable regulations (universal waste, used oil, etc.) to ensure future compliance with the hazardous waste laws.

With this information, this violation has been abated.

If you have any questions or I can be of assistance, please contact me at (419) 373-3066. You can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>.

Sincerely,



Melissa L. Boyers
Division of Hazardous Waste Management

/csi

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
Mr. Alan Bacho, Director of Facilities & Operations, Sylvania Schools
DHWM, NWDO Lucas County General File

ec: Melissa Boyers, DHWM, NWDO

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.