



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.  
Lucas County  
Hazardous Waste-CESQG  
Notice of Violation

March 27, 2009

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

Dear Mr. Kahl:

On March 12, 2009, Wendy Miller and I conducted a compliance evaluation inspection at the Sylvania Schools Transportation Department (Sylvania Schools) located at 7400 Cougar Lane in Sylvania, Ohio. We inspected Sylvania Schools 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). Pollution prevention options were also discussed during this inspection. This letter will explain the violations we found and what you need to do to correct these violations.

During our visit we spoke with you, Mr. Bob Dickerson and Ms. D.J. Fouts, toured your building, observed your operations, and reviewed paperwork. The transportation department building located at 7400 Cougar Lane includes the following areas: maintenance area for the school buses, storage area for the building and grounds equipment, computer/IT operations, and general storage (i.e. choir risers, chairs, tables, cafeteria can goods) for the Sylvania School system.

The maintenance area services the school buses and the building and grounds vehicles which generate used oil. The used oil is stored in a 1,000 gallon underground storage tank. This tank is electronically monitored and at the time of our inspection contained 36 gallons of used oil. DISC Environmental Services picks up the used oil and it is burned for energy recovery. Vesco Oil Corp. services the one parts washer unit located in the bus maintenance area. Sylvania Schools hot drains the used oil filters, crushes them and Vesco Oil Corp. takes them off-site for recycling. Sylvania Schools maintains a storage drum for the used oil drained out of the filters and a storage drum for the crushed used oil filters. Paint spray guns for touch up and spot painting are used. Mr. Bob Dickerson estimated that the facility generates less than five gallons of spent solvent in a month. The spent solvent generated from the cleaning of the paint spray guns is added in with the used oil. Spent batteries are returned to Crown Battery as part of their battery exchange program. Sylvania Schools also generates spent fluorescent lamps which are managed as universal waste. At the time of our inspection, Sylvania Schools was operating as a conditionally exempt small quantity generator (CESQG) of hazardous waste.

We found the following violations of Ohio's hazardous waste and used oil rules. In order to correct these violations you must do the following and send me the required information within 30 days of your receipt of this letter:

**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.

Ohio EPA will issue an EPA ID number to track our inspection activity at this location. Sylvania Schools cannot use this number for manifesting hazardous waste shipments. If Sylvania Schools wants to use an EPA ID number for manifesting and other hazardous waste, used oil or universal waste activities, you must complete and submit a Notification of Regulated Waste Activity form (*EPA Form 9029 (Rev. 11/2002)*) to Ohio EPA. This form is available on our Web page at <http://www.epa.state.oh.us/dhwm/notiform.html> or you can call me at (419) 373-3066 or the Division of Hazardous Waste Management, Central Office, RIS at (614) 644-2977 and we will mail you a copy.

Enclosed you will find a copy of the checklists that were completed during the inspection.

Ohio EPA has helpful information about compliance assistance and pollution prevention at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp.html>. In addition, you can also find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

Mr. Joe Kahl  
March 27, 2009  
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If you have any questions or I can be of assistance, please contact me at (419) 373-3066.

Sincerely,

*Melissa L. Boyers*

Melissa L. Boyers  
Division of Hazardous Waste Management

/csl

pc: Cindy Lohrbach, DHWM, NWDO  
Colleen Weaver, DHWM, NWDO  
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.