



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korfeskí, Director

Re: Valleywood Golf Club
Lucas County
OHD987053923
Hazardous Waste
Return to Compliance

January 4, 2011

Mr. Terry Gaylord, Director of Golf
Valleywood Golf Club
13501 Airport Highway
Swanton, Ohio 43558-8550

Dear Mr. Gaylord:

Thank you for your November 16, 2010, response to Ohio EPA's July 14, 2010, Notice of Violation/Partial Return to Compliance (NOV/PRTC) letter. In addition, I spoke with you on November 5, 2010, and sent you another copy of the NOV/PRTC letter via electronic mail. My review of the documentation submitted reveals that Valleywood Golf Club (Valleywood) has adequately demonstrated abatement of the remaining violation cited in the July 14, 2010, NOV/PRTC letter.

The following is a summary of the violations cited in the July 14, 2010, NOV/PRTC as a result of the July 2, 2010, inspection and your compliance with respect to each:

1. Waste Evaluation, OAC Rule 3745-52-11:

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

Hazardous bulbs are considered "spent materials" and remain hazardous waste even when recycled. Hazardous waste lamp generators have the option of handling their lamps as hazardous waste or as universal waste. Managing hazardous waste lamps under the universal waste rules eases certain regulations imposed on generators of spent lamps.

Please be aware that incandescent, fluorescent, metal halide, neon, high-intensity discharge, high-pressure sodium and mercury-vapor lamps could be hazardous waste when discarded. Fluorescent lamps may contain up to 40 milligrams (mg) of mercury, depending on the brand and manufacturer. Lamps may also contain lead and cadmium. Many lamps exhibit a characteristic of toxicity for heavy metals when disposed.

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Valleywood must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If Valleywood plans to manage the spent fluorescent bulbs when generated as universal waste, please submit the name of the facility where you plan to recycle the bulbs. Managing the spent fluorescent bulbs as universal waste eliminates the need for analytical testing.

Valleywood must also properly train employees, who handle or have responsibility for managing universal waste, on waste handling and emergency procedures relative to their responsibilities and send me documentation (memo or sign-in sheets) that this has been completed.

On November 16, 2010, Valleywood submitted, via electronic mail, information regarding the future management of the spent fluorescent bulbs. Valleywood plans to manage the spent fluorescent bulbs as universal waste and has obtained a container from Waste Management that is labeled "waste lamps". The container of spent fluorescent bulbs will be stored in a locked room and will be picked up for recycling when full or if the date on the container approaches one year. You stated that you will be the only one managing the spent fluorescent bulbs. Please note that you must ensure that employees are properly trained on the universal waste rules prior to managing the spent fluorescent bulbs in your absence.

With this information, this violation has been abated.

2. 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."

Valleywood had three 55-gallon drums of used oil that were not properly labeled.

At the time of our inspection, Valleywood properly labeled the three 55-gallon drums with the words "used oil".

This violation was previously abated in the NOV/PRTC letter dated July 14, 2010.

Valleywood has abated all of the violations cited in the July 14, 2010, NOV/PRTC letter.

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/>.

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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

/cs

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
~~DHWM, NWDO-2010-Lucas County General File~~

ec: Melissa Boyers, DHWM, NWDO