



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: Washington Local Schools
OHR000019067
Lucas County
Hazardous Waste-CESQG
Return to Compliance

October 6, 2009

Mr. John Bettis
Washington Local Schools-Bus Garage
5201 Douglas Road
Toledo, Ohio 43613

Dear Mr. Bettis:

Thank you for your September 1, 2009, and October 5, 2009, responses to Ohio EPA's April 8, 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 Washington Local Schools Bus Garage (WLS) has adequately demonstrated abatement of all of the violations cited in the April 8, 2009, NOV letter.

The following is a summary of the violations cited in the April 8, 2009, NOV and your compliance with respect to each:

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

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

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

WLS must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If WB decides to conduct waste sampling, please notify me at least seven days prior to the sampling event date, so that a representative from Ohio EPA can be present to observe the sampling and to split samples if necessary. If WB plans to manage the spent fluorescent bulbs as universal waste, please submit photographic documentation showing the storage containers properly closed, labeled, and dated. WLS 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 submit this documentation. In addition, WLS must submit the name of the facility where you plan to recycle the bulbs.

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On September 1, 2009, WLS submitted photographic documentation showing the storage containers for the universal waste lamps properly labeled, dated, and closed. Philip Services/Cousins picks up the spent fluorescent bulbs and transports them to Environmental Recycling (ER) in Bowling Green where they are recycled. WLS submitted a copy of the invoice for the last shipment of lamps that were sent to ER on 7/22/09. On October 5, 2009, WLS submitted a copy of the training memo that was given to all operation service personnel regarding the proper management of universal waste lamps.

With this information, this violation is considered 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."

WLS had one used oil cart located in the bus maintenance area that was not properly labeled. This cart stores the used oil generated when the oil is changed in the busses and before it is added to the underground storage tank.

WLS properly labeled the cart 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.

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
/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