



Re: Perrysburg High School  
Wood County  
Hazardous Waste  
**Return to Compliance**

February 1, 2013

Mr. Norm Drogmiller  
Maintenance & Custodial Supervisor  
Perrysburg Schools  
1200 Flagship Drive  
Perrysburg, Ohio 43551

Dear Mr. Drogmiller:

Thank you for your November 30, 2012, and January 11, 2013, responses to Ohio EPA's October 12, 2012, Notice of Violation (NOV) letter. Perrysburg High School (PHS) submitted universal waste receipts, photographs, and training documentation. My review of the documentation submitted reveals that PHS has adequately demonstrated abatement of all of the violations cited in the October 12, 2012, NOV.

The following is a summary of the violations cited in the October 12, 2012, NOV as a result of Ohio EPA's September 24, 2012, inspection and your compliance with respect to each:

**1. OAC Rule 3745-273-13(D)(1): Universal Waste: Fluorescent Lamp Management:**

A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

PHS did not store the spent fluorescent lamps in containers that were structurally sound or closed. Specifically, PHS had one spent fluorescent lamp in the maintenance room that was leaning against the wall.

**On January 11, 2013, PHS submitted documentation regarding the spent fluorescent lamp located in the high school building maintenance room. You stated that this lamp was taken to the maintenance department building. On October 2, 2012, you submitted photographic documentation of the spent fluorescent lamps collected from all of the Perrysburg Department of Education buildings that are now stored in containers that are properly closed.**

***With this information, this violation has been abated.***

**2. OAC Rule 3745-273-14(E): Universal Waste: Fluorescent Lamp Labeling:**

Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste - Lamps", "Waste Lamps" or "Used Lamps".

PHS did not have the spent fluorescent lamp located in the maintenance room properly labeled.

On January 11, 2013, PHS submitted documentation regarding the spent fluorescent lamp located in the high school building maintenance room. You stated that this lamp was taken to the maintenance department building. On October 2, 2012, you submitted photographic documentation of the spent fluorescent lamps collected from all of the Perrysburg Department of Education buildings that are now stored in containers that are properly labeled.

*With this information, this violation has been abated.*

**3. OAC Rule 3745-273-15(A): Accumulation Time for Universal Waste Batteries and Lamps:**

A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler.

PHS was not able to demonstrate the length of time the universal waste lamp was being accumulated on-site.

On November 30, 2012, PHS submitted a copy of the invoice for the spent fluorescent lamps that were shipped off-site for recycling on November 5, 2012. The spent fluorescent lamps were picked up by Mr. Lightbulb and transported to Environmental Recycling in Bowling Green, Ohio.

*With this information, this violation has been abated.*

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

A small quantity handler of universal waste who accumulates universal waste shall be able to demonstrate the length of time the universal waste has been accumulated.

PHS was not able to demonstrate the length of time the universal waste lamp was being accumulated on-site.

On January 11, 2013, PHS submitted a copy of the written procedures that have been put in place to track the length of time universal waste is accumulated on-site.

*With this information, this violation has been abated.*

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**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.

PHS has not ensured that all employees are thoroughly familiar with proper waste handling and emergency procedures.

**On November 30, 2012, PSMD submitted copies of the sign-in sheets to document employee attendance at the universal waste training that was conducted on October 23, 2012.**

***With this information, this violation has been abated.***

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/>.

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 Materials and Waste Management

/cg

pc: Lisa Gifford, DMWM, NWDO  
Colleen Weaver, DMWM, NWDO

ec: Colleen Weaver, DMWM, NWDO (scanned e-copy)  
Melissa Boyers, DMWM, NWDO

**Notice:**

Ohio's 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.