



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Perrysburg Schools
Maintenance Department
OHR000175125
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 October 2, 2012, and November 30, 2012, and January 11, 2013, responses to Ohio EPA's September 21, 2012, Notice of Violation (NOV) letter. Perrysburg Schools Maintenance Department (PSMD) submitted universal waste receipts, photographs, and training documentation. My review of the documentation submitted reveals that PSMD has adequately demonstrated abatement of all of the violations cited in the October 2, 2012, NOV.

The following is a summary of the violations cited in the October 2, 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.

PSMD did not store the spent fluorescent lamps in containers that were structurally sound or closed. Specifically, PSMD had several containers of spent fluorescent lamps in the mezzanine area that were open. PSMD also had several spent fluorescent lamps lying on the shelves in the mezzanine area that were not properly stored in a container.

In addition, spent fluorescent lamps were located on the main floor of the maintenance building stored in a small trash container and a shopping cart.

On October 2, 2012, PSMD submitted photographic documentation of the spent fluorescent lamps from the main floor and mezzanine area 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".

PSMD did not have the containers of spent fluorescent lamps located on the main floor and in the mezzanine area properly labeled. In addition, PSMD had several spent fluorescent lamps lying on the shelves in the mezzanine area and stored in a small trash container and shopping cart on the main floor that were not properly labeled.

On October 2, 2012, PSMD submitted photographic documentation of the spent fluorescent lamps from the main floor and mezzanine area 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.

PSMD was not able to demonstrate the length of time the universal waste lamps were being accumulated on-site.

On November 30, 2012, PSMD 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.

PSMD was not able to demonstrate the length of time the universal waste lamps were being accumulated on-site.

On January 11, 2013, PSMD 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.

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.

PSMD 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/>.

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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 Materials and Waste Management

/cg

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

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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.