



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

Re: USF Holland  
OHR000110841  
Wood County  
Hazardous Waste  
**Return to Compliance**

March 1, 2013

Mr. Todd Weadock, Terminal Manager  
USF Holland  
20820 Midstar Drive  
Bowling Green, Ohio 43402

Dear Mr. Weadock:

Thank you for your February 5, 2013, and February 20, 2013, responses to Ohio EPA's January 18, 2013, Notice of Violation/Partial Return to Compliance (NOV/PRTC) letter. USF Holland (Holland) submitted universal waste documentation. My review of the documentation submitted reveals that Holland has adequately demonstrated abatement of all of the violations cited in the January 18, 2013, NOV/PRTC.

The following is a summary of the violations cited in the January 18, 2013, NOV/PRTC as a result of Ohio EPA's January 4, 2013, 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.

Holland did not store the spent fluorescent lamps in containers that were closed. Specifically, Holland had two boxes of spent fluorescent lamps in the storage area that were open.

*This violation was previously abated on January 4, 2013.*

**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".

Holland did not store the spent fluorescent lamps in containers that were properly labeled. Specifically, Holland had two boxes of spent fluorescent lamps in the storage area that were not labeled.

***This violation was previously abated on January 4, 2013.***

**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.

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

**On February 5, 2013, Holland submitted a copy of the invoice for the spent fluorescent lamps that were shipped off-site for recycling on January 23, 2013. The spent fluorescent lamps were shipped to Environmental Management Inc., in Guthrie, OK for recycling.**

***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.

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

**On February 20, 2013, Holland submitted a copy of the written procedure that has 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.

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

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**On February 20, 2013, Holland submitted documentation that only two employees, Sue Ellen Hanson and Todd Weadock, will be responsible for the management of universal waste. Sue Ellen and Todd have both reviewed the universal waste fact sheets and are fully aware of the universal waste management requirements.**

***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

/llr

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

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

**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.