



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

Re: Walgreens Distribution Center
OHR000148973
Wood County
Hazardous Waste
Return to Compliance

March 28, 2013

Mr. Steve Kneller
Distribution Center Manager
Walgreen Company
28727 Oregon Road
Perrysburg, Ohio 43551

Dear Mr. Kneller:

Thank you for your December 7, 2012, and March 15, 2013, responses to Ohio EPA's November 19, 2012, Notice of Violation (NOV) letter. Walgreens Distribution Center (WDC) submitted waste evaluation and universal waste management documentation. My review of the documentation submitted reveals that WDC has adequately demonstrated abatement of all of the violations cited in the November 19, 2012, NOV.

The following is a summary of the violations cited in the November 19, 2012, NOV as a result of Ohio EPA's November 7, 2012, inspection and your compliance with respect to each:

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

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

At the time of the inspection, WDC did not have waste evaluation documentation for the sand bag filter generated in the operation of the parts washer. The filter is changed approximately once every three months. WDC has historically disposed of this spent material as a non-hazardous/solid waste. WDC must immediately cease disposing of the spent sand bag filter as non-hazardous waste until a proper waste evaluation has been completed.

On March 15, 2013, WDC submitted the waste analysis results for the spent sandbag filter from the parts washer. The submitted analytical results indicate that the spent sandbag filter is a non-hazardous waste. The sandbag filter may be managed as a solid waste.

With this information, this violation has been abated.

2. 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.

WDC did not store the spent fluorescent lamps in containers that were structurally sound or closed. Specifically, WDC had approximately 20 boxes of spent fluorescent lamps located outside the tote wash room that were open.

On December 7, 2012, WDC submitted photographic documentation showing the spent fluorescent lamps located outside the tote wash room now stored in containers that are properly closed.

With this information, this violation has been abated.

3. 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".

WDC did not have the boxes of spent fluorescent lamps located outside the tote wash room properly labeled.

On December 7, 2012, WDC submitted photographic documentation showing the spent fluorescent lamps located outside the tote wash room now stored in containers that are properly labeled.

With this information, this violation has been abated.

4. 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.

WDC was unable to demonstrate the length of time the spent fluorescent lamps have been on-site. WDC was able to demonstrate when the universal waste lamps were last shipped off-site, but was not tracking the date when the accumulation began.

On December 7, 2012, WDC submitted a copy of the bill of lading for the spent fluorescent lamps that were shipped on November 30, 2012, to Everlights in Chicago, IL, for recycling.

With this information, this violation has been abated.

5. 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.

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

In order to correct this violation, WDC shall establish a written procedure for how you plan to track the length of time the universal waste is accumulated on-site. WDC shall submit a copy of this procedure to Ohio EPA, NWDO.

On December 7, 2012, WDC submitted a copy of the new Universal Waste Handling procedures they have put in place to track the length of time universal waste is accumulated on-site.

With this information, this violation has been abated.

6. 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.

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

In order to correct this violation, WDC must describe, through a training outline, how it will thoroughly familiarize (train) its universal waste fluorescent bulb handlers in proper handling and emergency procedures. WDC must submit some form of documentation demonstrating that this training has been accomplished. The training must also include compliance with all rules for the handling of universal waste bulbs and the corrective actions for all violations of universal waste rules, cited above. Copies of two universal waste guidance documents were given to you at the time of our inspection. Please review this information and contact me if you have any questions.

On December 7, 2012, WDC submitted a copy of the sign-in sheets to document employee attendance at the universal waste training that was conducted on 11/29/12 and 11/30/12.

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/>.

Mr. Steve Kneller
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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

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.