



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

Re: Frontier Communications
OHD981192180
Wood County
Hazardous Waste
Return to Compliance

June 20, 2013

Mr. Jim Fox
Frontier Communications
300 West Gypsy Lane
Bowling Green, Ohio 43402

Dear Mr. Fox:

Thank you for your May 14, 2013, response to Ohio EPA's March 18, 2013, Notice of Violation-Partial Return to Compliance (NOV-PRTC) letter. Frontier Communications (Frontier) located at 541 Sand Ridge Road, in Bowling Green, Ohio, submitted universal waste management documentation. My review of the documentation submitted reveals that Frontier has adequately demonstrated abatement of all of the violations cited in the March 18, 2013, NOV-PRTC.

The following is a summary of the violations cited in the March 18, 2013, NOV-PRTC as a result of Ohio EPA's March 1, 2013, inspection and your compliance with respect to each:

1. 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."

Frontier had two portable used oil containers in the maintenance shop that were not properly labeled "used oil".

This violation was previously abated on March 5, 2013.

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.

Frontier did not store the spent fluorescent lamps in containers that were closed. Specifically, Frontier had two boxes of spent fluorescent lamps located on the shelf in the storage room that were open.

This violation was previously abated on March 1, 2013.

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".

Frontier did not have the two boxes of spent fluorescent lamps located on the shelf in the storage room properly labeled.

This violation was previously abated on March 1, 2013.

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.

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

On May 14, 2013, Frontier 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. In talking with Frontier employees, Mr. Dan Farrell and Ms. Brenda Comstock, spent lamps are stored at the Gypsy Lane location for only a day before being placed on a truck that is going to the Frontier Michigan warehouse. The new procedures submitted will track the originating department and the date will now ensure that the spent lamps are sent off-site for recycling within one year.

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.

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

On May 14, 2013, Frontier 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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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.

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

This violation was previously abated on March 1, 2013.

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
Ms. Brenda Comstock, Frontier Communications, Gypsy Lane

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