



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

Re: Professional Transportation, Inc.
OHD163576572
Wood County
Hazardous Waste
Return to Compliance

September 13, 2013

Ms. Debra Carmack, General Manager
Professional Transportation, Inc.
3700 East Morgan Avenue
Evansville, Indiana 47715

Dear Ms. Carmack:

Thank you for your August 13, 2013, August 20, 2013, and August 30, 2013, responses to Ohio EPA's July 18, 2013, Notice of Violation/Partial Return to Compliance (NOV-PRTC) letter. Professional Transportation, Inc. (PTI) located at 30801 Drouillard Road in Walbridge, Ohio, submitted universal waste documentation. My review of the documentation submitted reveals that PTI has adequately demonstrated abatement of all of the violations cited in the July 18, 2013, NOV-PRTC.

The following is a summary of the violations cited in the July 18, 2013, NOV-PRTC as a result of Ohio EPA's July 9, 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.

PTI did not store the spent fluorescent lamps in containers that were closed. Specifically, PTI had one box of spent fluorescent lamps located in the supply room that was open.

At the time of our inspection, PTI closed the box of spent fluorescent lamps located in the supply room.

This violation was previously abated on July 9, 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".

PTI did not have one box of spent fluorescent lamps located in the supply room properly labeled.

At the time of our inspection, PTI properly labeled the box of spent fluorescent lamps located in the supply room.

This violation was previously abated on July 9, 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.

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

On August 30, 2013, PTI submitted, via electronic mail, a copy of the invoice for the spent fluorescent lamps that were shipped off-site for recycling on August 30, 2013. The spent fluorescent lamps were picked up by Safety Kleen and will be transported to Clean Harbors in Spring Grove, 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.

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

On August 20, 2013, PTI submitted, via electronic mail, a letter which outlines how the building owner, Village of Walbridge, that PTI leases from will be managing all spent lamps. No universal waste will be stored at PTI and the Village of Walbridge plans to store the spent lamps in properly labeled and dated containers located in the maintenance building.

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.

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

On August 20, 2013, PTI submitted, via electronic mail, a copy of a memo which outlined what information was presented to all of the branch employees regarding the proper management of universal waste.

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
Ken Frost, Chief of Police & Administrator, Village of Walbridge

ec: Colleen Weaver, DMWM, NWDO
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.