



State of Ohio Environmental Protection Agency

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File

Southwest District Office

401 E. Fifth St.
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

December 12, 2008

Re: Quikstop Oilube #308
Kemper Road Facility
OHR000151258
Hamilton County, SWDO
Return to Compliance

Mr. Jeff A. Simmons, President
Specialty Automotive Services, Inc.
5981 Peoples Lane
Burlington, Kentucky 41005-9578

Dear Mr. Simmons:

Thank you for your November 15, 2008 response to Ohio EPA's October 20, 2008 notice of violation letter. The documentation you submitted included photographic documentation demonstrating the used oil containers located at the Quikstop Oilube #308 facility have been labeled with the words "Used Oil", all residual used oil and florescent lamp debris have been removed from in and around the dumpster, and you have elected to manage your used lamps as universal waste.

My review of this documentation along with a return to compliance inspection in which Tom Koch and I conducted on December 8, 2008 with Chris Mains reveals that Quikstop Oilube #308 has now abated all violations discovered during the initial October 7, 2008 inspection as listed below.

| Letter Citation # | Rule Citation |
|-------------------|---|
| A.1. | OAC Rule 3745-52-11, Hazardous Waste Determination |
| A.2. | OAC Rule 3745-273-11 (A), Prohibitions - Standards for Small Quantity Handlers of Universal Waste |
| A.3. | OAC Rule 3745-279-22 (C)(1), Used Oil Storage Requirements for Generators, Labels |

Fluorescent Lamps

Quikstop Oilube has elected to handle its waste lamps as universal waste. Therefore, your company must evaluate your fluorescent lamps to determine if they are hazardous before they are thrown into the dumpster. If the lamps are hazardous, they cannot be thrown into the dumpster under any circumstances. Due to the fact that all fluorescent lamps contain mercury, Ohio EPA strongly encourages you to recycle your lamps by managing them under Ohio's universal waste rules. If you manage your lamps as a universal waste, you must:

- package the lamps in a manner that minimizes breakage and the containers must be designed to contain potential releases due to breakage (this could be the same packaging in which new lamps are shipped from the manufacturer);

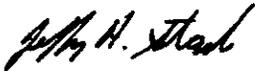
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- mark the universal waste lamps or their containers with the words "Universal Waste Lamp(s)," "Waste Lamp(s)" or "Used Lamp(s);"
- develop a method that clearly demonstrates the length of time the lamps have been accumulated from the date they became a waste or are received; and
- ensure delivery of the lamps to another universal waste handler (a business managing universal waste) or a permitted destination facility. A list of permitted destination facilities is included with this letter.

In addition to Ohio EPA's list of commercial facilities that accept hazardous waste, we have also created a list of lamp recyclers. A list of lamp recyclers is included with this letter. Two of the Ohio facilities listed on our fluorescent lamp recyclers (universal waste destination facilities) list have permits; Environmental Recycling and U.S.A. Lamp and Ballast Recycling. The remaining Ohio facilities can act as universal waste handlers, but you must ensure delivery to a permitted destination facility. This list should not be viewed as an endorsement or approval of these facilities by Ohio EPA. For more information on how to properly manage hazardous waste lamps, see the attached universal waste lamp handlers guidance document, "Universal Waste Rules for Handlers of Lamps."

If you should have any questions, please feel free to contact me at (937) 285-6456.

Sincerely,



Jeffery H. Stark
District Representative
Division of Hazardous Waste Management

Enclosures

~~Dinah Crawford, SWDO=DHWM/SWDO, File~~

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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.