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1. Article Addressed to:

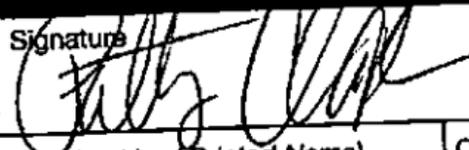
  
 MR CHUCK GEORGE  
 INTERSTATE FORD  
 125 ALEX ROAD  
 MIAMISBURG OH 45342

2. Article Number

*(Transfer from service label)***COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X


 Agent Addressee

B. Received by (Printed Name)

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4. Restricted Delivery? (Extra Fee)

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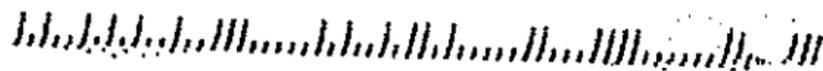
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Ohio EPA - SWPD  
Cathy Altman  
401 E 5<sup>th</sup> St  
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MR CHUCK GEORGE  
INTERSTATE FORD  
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MIAMISBURG OH 45342

See Reverse for Instructions

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- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
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State of Ohio Environmental Protection Agency

003  
CA  
File

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Dayton, Ohio 45402

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www.epa.state.oh.us

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

July 17, 2008

**Certified Mail**

Mr. Chuck George  
Interstate Ford  
125 Alex Road  
Miamisburg, Ohio 45342

RE: Partial Return to Compliance Letter  
Interstate Ford - OHD986980274

Dear Mr. George:

On July 16, 2008, Ohio EPA conducted a return to compliance inspection of Interstate Ford. Diania Ringer and Dennis Dever represented Interstate Ford. Jeff Stark and I represented Ohio EPA. Based on the inspection, Interstate Ford has adequately abated the following violations discovered during the February 25, and March 6, 2008 inspections:

1. **Ohio Revised Code (ORC) 3734.02(E)(2)&(F)**
2. **Hazardous waste determination, Ohio Administrative Code (OAC) 3745-52-11**
3. **Manifest – general requirements, OAC 3745-52-20(A)**
4. **Testing, tracking, and recordkeeping requirements for generators, treaters, and disposal facilities, OAC 3745-270-07(A)**

The following violations were discovered during the return to compliance inspection:

1. **Accumulation time of hazardous waste, OAC 3745-52-34(D)(5)(b):** The generator must post the following information next to the telephone:
  - (i) The name and telephone number of the emergency coordinator;
  - (ii) Location of fire extinguishers and spill control material, and, if present, fire alarm(s); and
  - (iii) The telephone number of the fire department, unless the facility has a direct alarm.

Mr. Chuck George  
July 17, 2008

Interstate Ford failed to comply with this regulation by not having the required information posted next to the telephone in the Body Shop. **Therefore, Interstate Ford is in violation of OAC 3745-52-34(D)(5)(b).**

During the inspection, Ms. Ringer posted the required information. **Therefore, Interstate Ford is no longer in violation of OAC 3745-52-34(D)(5)(b).**

2. **Inspections, OAC 3745-66-74:** The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The owner or operator must record inspections in an inspection log or summary.

Interstate Ford failed to comply with this regulation by not including in the weekly inspection the hazardous waste container in the Body Shop. **Therefore, Interstate Ford is in violation of OAC 3745-66-74.**

To return to compliance, please submit to Ohio EPA two weeks worth of inspections.

I have enclosed two guidance documents on fluorescent lamps, "Fluorescent Lamps: What You Should Know" and "Universal Waste Rules for Handlers of Lamps."

If you have any questions, please call me at (937) 285-6093.

Sincerely,



Cathy L. Altman  
Division of Hazardous Waste Management

cc: Dinah Crawford, DHWM-SWDO/SWDO File  
Dennis Dever, Service Manager, Interstate Ford  
Diania Ringer, Body Shop Manager, Interstate Ford

**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.

**HAZARDOUS WASTE MANIFEST**

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number <b>003422148 JJK</b>
------------------------	--------------	-----------------------------	---

5. Generator's Name and Mailing Address  
Generator's Site Address (if different than mailing address)

Generator's Phone:  
6. Transporter 1 Company Name U.S. EPA ID Number

7. Transporter 2 Company Name U.S. EPA ID Number

8. Designated Facility Name and Site Address U.S. EPA ID Number  
*Clean Water Living*

Facility's Phone:

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
		No.	Type			
1.						
2.						
3.						
4.						

14. Special Handling Instructions and Additional Information

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offerer's Printed/Typed Name Signature Month Day Year

16. International Shipments  Import to U.S.  Export from U.S. Port of entry/exit: Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials  
Transporter 1 Printed/Typed Name Signature Month Day Year  
Transporter 2 Printed/Typed Name Signature Month Day Year

18. Discrepancy  
18a. Discrepancy Indication Space  Quantity  Type  Residue  Partial Rejection  Full Rejection

Manifest Reference Number: U.S. EPA ID Number

18b. Alternate Facility (or Generator) U.S. EPA ID Number

Facility's Phone:  
18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)  
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a  
Printed/Typed Name Signature Month Day Year

GENERATOR  
INT'L  
TRANSPORTER  
DESIGNATED FACILITY



<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>	1. Generator ID Number <b>OHD986380274</b>	2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>3E 1-877-674-4093</b>	4. Manifest Tracking Number <b>003422148 JJK</b>
---	---	--------------------------	---	---

5. Generator's Name and Mailing Address <b>INTERSTATE FORD 125 S. ALEX ROAD MIAMISBURG, OH 45342 Generator's Phone: 937-868-0781</b>	Generator's Site Address (if different than mailing address) <b>INTERSTATE FORD 125 S. ALEX ROAD MIAMISBURG, OH 45342</b>
---	--

6. Transporter 1 Company Name <b>PERMA FIX OF DAYTON</b>	U.S. EPA ID Number <b>OH0004274031</b>	937-268-8501
---	---	--------------

7. Transporter 2 Company Name	U.S. EPA ID Number	003422148 JJK
-------------------------------	--------------------	---------------

8. Designated Facility Name and Site Address <b>PERMA FIX OF DAYTON 300 CHEROKEE DRIVE DAYTON, OH 45427 Facility's Phone: 937-268-6501</b>	U.S. EPA ID Number <b>OH0004274031</b>
---	---

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
X	1. Waste Paint related material, 3, UN1263, PGI (D001)	1	DM	55	GAL	D001		
X	2. Waste Paint related material (THINNERS, SOLVENTS), 3, UN1263, PGI (D001, F003, F005)	3	DM	150	GAL	D001	F003	F005
	3. Non-Regulated Material...	10	DM	500	GAL			
	4. Non-Regulated Material...							

14. Special Handling Instructions and Additional Information			
9a.1: <b>AD57879</b>	1. ERG 128	SO #: <b>70100143</b>	Ref #: <b>INTE57</b>
9a.2: <b>AD57870</b>	2. ERG 128	Doc #: <b>DD125852</b>	
9a.3: <b>AD57872</b>	3. ERG	Notes (if Any):	
9a.4: <b>AD57871</b>	4. ERG		

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name <b>Dennis E. DeVer</b>	Signature <i>Dennis E. DeVer</i>	Month Day Year <b>13 13 08</b>
--	-------------------------------------	-----------------------------------

16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.	Part of entry/exit: Date leaving U.S.:
--	---

17. Transporter Acknowledgment of Receipt of Materials		
Transporter 1 Printed/Typed Name <b>Ken Bilko</b>	Signature <i>Ken Bilko</i>	Month Day Year <b>13 13 08</b>
Transporter 2 Printed/Typed Name	Signature	Month Day Year

18. Discrepancy					
18a. Discrepancy Indication Space	<input type="checkbox"/> Quantity	<input type="checkbox"/> Type	<input type="checkbox"/> Residue	<input type="checkbox"/> Partial Rejection	<input type="checkbox"/> Full Rejection
Manifest Reference Number:					

18b. Alternate Facility (or Generator)	U.S. EPA ID Number
Facility's Phone:	
18c. Signature of Alternate Facility (or Generator)	Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)			
1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a		
Printed/Typed Name <b>Kim Black</b>	Signature <i>Kim Black</i>	Month Day Year <b>10 13 08</b>

1

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number <b>003492149 JJK</b>
---	------------------------	--------------	-----------------------------	---

5. Generator's Name and Mailing Address \_\_\_\_\_ Generator's Site Address (if different than mailing address) \_\_\_\_\_

Generator's Phone: \_\_\_\_\_

6. Transporter 1 Company Name \_\_\_\_\_ U.S. EPA ID Number \_\_\_\_\_

7. Transporter 2 Company Name \_\_\_\_\_ U.S. EPA ID Number \_\_\_\_\_

8. Designated Facility Name and Site Address \_\_\_\_\_ U.S. EPA ID Number \_\_\_\_\_

Facility's Phone: \_\_\_\_\_

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
		No.	Type			
1.						
2.						
3.						
4.						

14. Special Handling Instructions and Additional Information \_\_\_\_\_

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name \_\_\_\_\_ Signature \_\_\_\_\_ Month \_\_\_\_\_ Day \_\_\_\_\_ Year \_\_\_\_\_

GENERATOR

16. International Shipments  Import to U.S.  Export from U.S. Port of entry/exit: \_\_\_\_\_ Date leaving U.S.: \_\_\_\_\_

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name \_\_\_\_\_ Signature \_\_\_\_\_ Month \_\_\_\_\_ Day \_\_\_\_\_ Year \_\_\_\_\_

Transporter 2 Printed/Typed Name \_\_\_\_\_ Signature \_\_\_\_\_ Month \_\_\_\_\_ Day \_\_\_\_\_ Year \_\_\_\_\_

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space  Quantity  Type  Residue  Partial Rejection  Full Rejection

Manifest Reference Number: \_\_\_\_\_

18b. Alternate Facility (or Generator) \_\_\_\_\_ U.S. EPA ID Number \_\_\_\_\_

Facility's Phone: \_\_\_\_\_

18c. Signature of Alternate Facility (or Generator) \_\_\_\_\_ Month \_\_\_\_\_ Day \_\_\_\_\_ Year \_\_\_\_\_

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. \_\_\_\_\_ 2. \_\_\_\_\_ 3. \_\_\_\_\_ 4. \_\_\_\_\_

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name \_\_\_\_\_ Signature \_\_\_\_\_ Month \_\_\_\_\_ Day \_\_\_\_\_ Year \_\_\_\_\_



1  
2

531A

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number OH10020000274	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number <b>0034??149 JJK</b>			
5. Generator's Name and Mailing Address MUNICIPALITY OF 6300 W. STATE WILMINGTON, OH 45391				Generator's Site Address (if different than mailing address) MUNICIPALITY OF 100 S. W. EX. ROAD MUNICIPALITY OF				
6. Transporter 1 Company Name MUNICIPALITY OF		U.S. EPA ID Number OH10020000274		7. Transporter 2 Company Name MUNICIPALITY OF		U.S. EPA ID Number		
8. Designated Facility Name and Site Address ENVIRONMENTAL ENTERPRISES 400 SPRING CREEK AVE MUNICIPALITY OF				U.S. EPA ID Number OH100337101				
9a. HM		9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers		11. Total Quantity	12. Unit Wt./Vol.	
				No. Type				
1.		MUNICIPALITY OF WASTE (D007)		1 05		50	GA	
2.								
3.								
4.								
14. Special Handling Instructions and Additional Information MUNICIPALITY OF								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offeror's Printed/Typed Name Thomas E. Decker				Signature <i>Thomas E. Decker</i>		Month 5	Day 3	Year 08
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:								
17. Transporter Acknowledgment of Receipt of Materials								
Transporter 1 Printed/Typed Name KFA				Signature <i>[Signature]</i>		Month 3	Day 3	Year 08
Transporter 2 Printed/Typed Name				Signature		Month	Day	Year
18. Discrepancy								
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
18b. Alternate Facility (or Generator)				Manifest Reference Number: U.S. EPA ID Number				
Facility's Phone:								
18c. Signature of Alternate Facility (or Generator)						Month	Day	Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1.		2.		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a								
Printed/Typed Name				Signature		Month	Day	Year
						3	7	08



11



**OHD986980274-004-06/18/2008**

**Hazardous Waste**

**NOV**

**MONTGOMERY**

**INTERSTATE FORD INC**

**06/18/2008**

**SENDER: COMPLETE THIS SECTION**

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

**MR TIMOTHY D HOFFMAN  
COOLIDGE WALL  
33 WEST FIRST STREET  
DAYTON OH 45402**

2. Article Number  
(Transfer from service label)

7007 0220 0001 2491 8759

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

**X****DENZIL CONNORS** Agent Addressee

B. Received by (Printed Name)

*Denzil Connors*

C. Date of Delivery

D. Is delivery address different from item 1?

 Yes

If YES, enter delivery address below:

 No

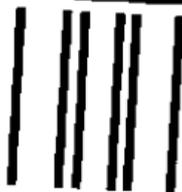
3. Service Type

 Certified Mail Express Mail Registered Return Receipt for Merchandise Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

 Yes

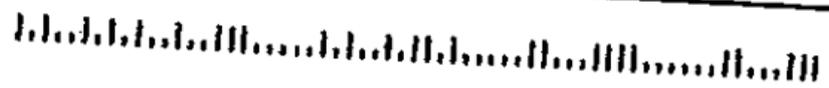
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CATHY ALTMAN DHWM  
401 EAST FIFTH STREET  
DAYTON OH 45402**



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Total Postage & Fees	\$

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 City, State, ZIP+4  
 DAYTON, OH 45402

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- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "*Restricted Delivery*".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

**IMPORTANT: Save this receipt and present it when making an inquiry.**

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047



State of Ohio Environmental Protection Agency

**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

207  
004

June 18, 2008

**Certified Mail**

Mr. Timothy D. Hoffman  
Coolidge Wall  
33 West First Street  
Dayton, Ohio 45402

RE: Interstate Ford

Dear Mr. Hoffman:

Thank you for your letter of April 16, 2008, responding to my correspondence of March 24, 2008. In that letter, I summarized the results of my complaint investigation, including Interstate Ford's violation of Ohio Revised Code (ORC) sections 3734.02(E) and (F). I'd like to take this opportunity to clarify the violation of ORC sections 3734.02(E) and (F).

In the April 2008, response pertaining to the violation of ORC sections 3734.02(E) and (F), you state that Interstate manages its hazardous waste in accordance with OAC chapter 3745-52 as a generator of hazardous waste, not a TSD and therefore, Interstate has not violated ORC sections 3734.02(E) and (F). Regarding violation numbers two through four of my letter, you respond, in part, "Interstate has, since June 2006, disposed of in the regular trash approximately 75 pucks that weighed about 360 pounds. Due to its constituents (Toluene and MEK) it should have been handled as an F005 waste." Thank you for the information clarifying the management of the pucks. As you point out, the pucks are a listed hazardous waste (F005). As such, the pucks may not be placed in the regular trash and may not be sent off-site to a solid waste facility for disposal. Rather, the pucks must be managed on-site as a hazardous waste and manifested off-site to a hazardous waste permitted facility. Interstate's management of the hazardous waste pucks since June 2006 constitutes violations of ORC section 3734.02(F). That section states, in relevant part, that no person shall . . . transport or cause to be transported any hazardous waste identified or listed under this chapter and rules adopted under it to any other premises, except at or to a facility operating under an Ohio hazardous waste permit or a facility in another state operating under a permit issued in accordance with RCRA.

Mr. Timothy D. Hoffman  
June 18, 2008

Please be advised, due to the seriousness of the violations, Interstate Ford is being referred to the Division of Hazardous Waste Management's Enforcement Committee for enforcement consideration. If you have any questions, please call me at (937) 285-6093.

Sincerely,



Cathy L. Altman  
Division of Hazardous Waste Management

cc: Charles George, Interstate Ford  
Harry Sarvis, Manager, Compliance Assurance Section, DHWM, CO  
Todd Anderson, Legal

**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.