



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Accubuilt, Inc.
Allen County
OH0 001 002 781
Status of Compliance

July 6, 2009

Mr. Bill Jones, Director of Engineering
Accubuilt, Inc.
2550 Central Point Parkway
Lima, Ohio 45804

Dear Mr. Jones:

During a recent review of Agency databases, it was discovered that violations from an Ohio EPA inspection at Accubuilt conducted on March 16, 2005, were not returned to compliance. You submitted the analytical data June 15, 2005, requested as a result of failure to evaluate waste violations cited as a result of that inspection. After reading your letter and reviewing the documents you submitted, the status of each violation as outlined in Ohio EPA's April 13, 2005, Notice of Violation letter is as follows:

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

Any person who generates a waste in the state of Ohio must determine if that waste is a hazardous waste in accordance with the criteria for hazardous waste as set forth in Chapter 3745-51 of the Ohio Administrative Code (OAC).
Accubuilt failed to adequately evaluate the following waste streams:

- a. Gasoline and brake fluid mixture waste generated at the stripping station. As of the March 16, 2005, inspection, this waste was disposed of as a hazardous waste (D002). A compliance evaluation inspection conducted on May 18, 2009, revealed that this waste stream is no longer generated. During the inspection, you stated that the generated gasoline recovered from the dismantled vehicles is saved and reused and the brake fluid is managed as used oil.
- b. Waste oil. This waste was generated during the dismantling of the vehicles to be converted. The analytical results received at Ohio EPA Northwest District Office on June 15, 2005, indicated that this waste was not hazardous. This waste is being managed as used oil.

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- c. Dust collector waste. The analytical results received at Ohio EPA Northwest District Office on June 15, 2005, indicated that this waste stream, generated in the air handling units, is not a hazardous waste and it will be managed as a solid waste.

These violations have been abated.

Therefore, Accubuilt has abated all violations observed during the March 16, 2005, inspection. Accubuilt remains a small quantity generator of hazardous waste.

Should you have any questions or if I can be of assistance, please contact me at (419) 373-3015.

Sincerely,



Edgar V. Pulido
Division of Hazardous Waste Management

/cs

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
DHWM;NWDO:File:Accubuilt, Inc.

ec: Ed Merriman, DHWM, NWDO
Ed Pulido, DHWM, NWDO

<p>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.</p>
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