



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

Re: Complaint #2523 and #2573  
Travel Centers of America  
Auglaize County  
Hazardous Waste  
**Return to Compliance**

December 13, 2007

Mr. Tom Panos, Owner  
Travel Centers of America  
1775 Bellefontaine Street  
Wapakoneta, Ohio 45895

Dear Mr. Panos:

Thank you for your April 27, 2007, November 7, 2007, and November 13, 2007, responses to Ohio EPA's April 13, 2007, 2<sup>nd</sup> Notice of Violation letter. My review of this documentation reveals that Travel Centers of America (TCA) has adequately demonstrated abatement of all of the violations discovered during the October 23, 2006, complaint investigation.

The following is a summary of the violations cited and your compliance with respect to each:

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

Any person who generates a waste must determine if that waste is a hazardous waste by using generator knowledge or by testing the waste.

- a. TCA failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility. Mr. Ilic stated that Mr. Doug Parmer did all the maintenance work for your facility. I contacted Mr. Parmer to find out what he was doing with the fluorescent bulbs he removes from your facility. He stated that he stores them in his shed and when he has a full barrel he takes them to Sims Brothers, Inc. Mr. Parmer was not sure what Sims Brothers, Inc. was doing with the spent bulbs.

TCA must immediately cease giving the fluorescent bulbs to Mr. Parmer until a proper waste evaluation has been completed. Fluorescent bulbs typically contain mercury and other heavy metals. Hazardous bulbs are considered "spent materials" and remain hazardous waste even when recycled. Hazardous waste lamp generators have the option of handling their lamps as hazardous waste or as universal waste.

Managing hazardous waste lamps under the universal waste rules eases certain regulations imposed on generators of spent lamps. Enclosed is a Fact Sheet outlining the universal waste rules for handlers of lamps and a list of fluorescent bulb recyclers. Please review this information and contact me if you have any questions. A copy of this information was also mailed to Mr. Parmer.

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TCA must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If TCA decides to conduct waste evaluation, please notify me at least seven days prior to the sampling event date, so that a representative from Ohio EPA can be present to observe the sampling and to split samples if necessary. If TCA plans to manage the spent fluorescent bulbs as universal waste, please submit photographic documentation showing the storage container properly labeled and dated. In addition, TCA must submit the name of the facility where you plan to recycle the bulbs.

**On April 27, 2007, TCA submitted information regarding the management of fluorescent bulbs. TCA plans to have Sarcom, Inc. located in Lewis Center, Ohio broker the bulbs for recycling. TCA plans to manage the spent fluorescent bulbs as universal waste. Compliance with the universal waste rules may be assessed during a future visit to your facility.**

***With this information, this violation is considered abated.***

- b. TCA failed to have waste evaluation documentation for the wash water generated from power washing the oil change pit. TCA has historically disposed of this waste stream by pumping it directly onto the ground outside the service bay door.

TCA must immediately cease disposing of the wash water until a proper waste evaluation has been completed. TCA must begin collecting the wash water in a container. TCA must obtain a representative sample of the waste and have it analyzed for Toxicity Characteristic Leaching Procedure (TCLP) Resource Conservation and Recovery Act (RCRA) metals (SW-846 Method 1311/6010) and volatile organics (SW-846 Method 1311/8260).

To abate this violation, TCA must submit a copy of the analytical results as well as whether the waste is hazardous or non-hazardous and the appropriate waste code(s) to Ohio EPA. Once analytical results have been reviewed, Ohio EPA will advise TCA on proper disposal options for this waste stream.

**On November 13, 2007, TCA submitted via electronic mail a copy of the analytical results for the collected wash water. The analytical results indicate that this waste stream is non-hazardous. TCA is advised to contact your local public owned treatment works to determine how this wash water can be properly disposed of in the future.**

***With this information, this violation is considered abated.***

2. **OAC Rules 3745-279-22(C)(1) and 3745-279-45(G): Labeling:**

Containers, aboveground tanks, and fill pipes used for underground storage tanks shall be labeled or marked clearly with the words "used oil."

TCA's 525-gallon blue poly storage tank located outside next to the bay door was not properly labeled.

TCA properly labeled the storage tank with the words "Used Oil" at the time of our investigation.

*Therefore, this violation is considered abated.*

3. **OAC Rule 3745-279-22(D)(3): Storage:**

Upon detection of a release of used oil, a generator shall clean up and manage properly the released used oil and other materials.

The area surrounding the 525-gallon blue poly used oil storage tank had evidence of spilled oil. The gravel and dirt was visibly stained from the oil. In addition, the area located outside the bay door was visibly stained from TCA pumping the wash water from the oil change pit directly onto the ground.

TCA must clean up the used oil and all visibly contaminated soil/gravel from the area around the 525-gallon blue poly storage tank and the area located outside the bay door. TCA must evaluate the contaminated soil to determine if it is a characteristic hazardous waste. TCA must obtain a representative sample of the waste and have it analyzed for Toxicity Characteristic Leaching Procedure (TCLP) Resource Conservation and Recovery Act (RCRA) metals (SW-846 Method 1311/6010).

To abate this violation, TCA must submit a copy of the analytical results as well as whether the waste is hazardous or non-hazardous and the appropriate waste code(s) to Ohio EPA. Once analytical results have been reviewed, Ohio EPA will advise TCA on proper disposal options for this waste stream. TCA must also submit photographic documentation to demonstrate that the used oil and stained soil in this area have been cleaned up.

**On November 6, 2007, Ohio EPA conducted a site visit and verified that the area surrounding the used oil storage tank was properly cleaned up. On November 13, 2007, TCA submitted via electronic mail a copy of the analytical results for the soil that was removed from the area surrounding the used oil storage tank. The analytical results indicate that this waste stream is non-hazardous. The stained soil sampled is considered a solid waste.**

**As a used oil generator, TCA is required to: store used oil in containers or above ground tanks that are in good condition (no severe rusting, apparent structural defects or deterioration) and not leaking. These containers or above ground tanks must be labeled with the words "Used Oil." If leaks are detected the generator must: stop the release; contain the release; clean up and manage properly the released used oil and other materials related to the release; and, if necessary, repair or replace any leaking containers or tanks prior to returning them to service.**

*With this information, this violation is considered abated.*

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Should you have any questions or if I can be of assistance, please contact me at (419) 373-3066.

Sincerely,

*Wendy Miller for*

Melissa L. Boyers  
Division of Hazardous Waste Management

/cs

pc: Cindy Lohrbach, DHWM, NWDO  
Colleen Weaver, DHWM, NWDO  
~~DHWM, NWDO Auglaize County General~~ File

ec: Melissa Boyers, DHWM, NWDO File

**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.