



Environmental
Protection Agency

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

Re: **Trinco Auto Service
Crawford County
DMWM, NWDO
Complaint 3060
Partial Return to Compliance**

August 15, 2011

Mr. Michael Robinett
Trinco Auto Service
1650 Marion Road
Bucyrus, Ohio 44820

Dear Mr. Robinett:

Thank you for sending the letter in response to the Ohio Environmental Protection Agency's (Ohio EPA's) Notices of Violation (NOVs) dated April 26, 2011, and July 6, 2011. The letter was received by Ohio EPA on July 12, 2011, and includes a brief description of work conducted at the site. The letter received by Ohio EPA on July 12, 2011, did not contain enough information to abate any outstanding violations therefore, I conducted a follow-up site visit on August 3, 2011.

The following is a summary of the violations observed during the April 12, 2011, complaint investigation at Trinco Auto Service (TAS) and the facility's compliance with respect to each violation. **Please submit the required information within 30 days of receipt of this letter.**

Violations:

1. **Ohio Administrative Code (OAC) Rule 3745-279-22 (D), Used Oil Requirements for Generators:** "Response to releases. Upon detection of a release of used oil to the environment... a generator must perform the following cleanup steps: (1) Stop the release; (2) Contain the released used oil; (3) Clean up and manage properly the released used oil and other materials; and (4) If necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service."

TAS failed to clean up and properly manage the used oil in the drum/tote storage area behind the main building.

TAS must immediately begin properly cleaning up used oil releases in a timely manner.

Ohio EPA revisited the site on August 3, 2011. You stated that you had attempted to clean the area. The area that was not covered with asphalt (soil/gravel storage area) appeared to be contaminated with used oil and needs to be removed to clean up all visible used oil contamination. It was difficult to decipher if the used oil contamination on top of the asphalt area had been properly cleaned due to the recent rain. Ohio EPA will not require TAS to remove the asphalt. However, Ohio EPA suggests that oil dry or kitty litter be placed over the asphalt to soak up any remaining used oil and that the material be swept up and disposed of properly .

TAS must clean up all visible contamination located in the drum/tote storage area behind the main building. To abate this violation, within 30 days of receipt of this letter, TAS shall submit pictures of the used oil storage area showing the used oil contamination has been properly cleaned up and that no visual contamination exists. TAS should also submit information as to where the used oil contaminated soil was disposed that may include bills of lading, disposal receipts, or other documents.

2. **OAC Rule 3745-52-11, Hazardous Waste Determination:** "Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste..."

During the inspection, Ohio EPA observed twenty two 55-gallon drums and one 30-gallon drum behind the main building. Eight of these drums were empty. However, you did not know the contents of the other drums.

On August 3, 2011, Ohio EPA revisited the site. You stated that you had given some empty drums away and consolidated some used oil drums into the used oil totes on site. Ohio EPA observed 18 drums on site. Six of these drums were empty. According to you, 1 drum contained cardboard (which Ohio EPA observed), 5 drums contained used oil, 4 drums contained asphalt material (product), 1 drum contained antifreeze (which was recycled through Z&Z Oil), and 1 drum contained sand blasting media (product) from your other business.

Therefore, this violation is considered abated on August 3, 2011.

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Should you have any questions, please feel free to call me at (419) 373-3065. Please send all correspondence **within 30 days of receipt of this letter** to Ohio EPA, Northwest District Office, Attn: Kara Reynolds, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,

Kara Reynolds

Kara Reynolds
Environmental Specialist
Division of Materials and Waste Management

/llr

pc: Colleen Weaver, DMWM, NWDO
Kara Reynolds, DMWM, NWDO
Cindy Lohrbach, DMWM, NWDO
DMWM/HW, NWDO Crawford County File: Trinco Auto Service

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.