



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
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

October 19, 2009

Re: **Firestone Complete Auto Care**
OH0000443879
Used Oil & Small Quantity
Universal Waste Generator
Erie County, NWDO
RTC

Mr. Glenn Blackwell, General Manager
Firestone Complete Auto Care
4320 Milan Road
Sandusky, Ohio 44870

Dear Mr. Blackwell:

On September 15, 2009, I inspected Firestone Complete Auto Care's facility located at 4320 Milan Road in Sandusky, Ohio. I conducted follow-up inspections at the facility on October 2, 2009 and October 15, 2009.

As a result of my October 2, 2009, and October 15, 2009 follow-up inspections, Firestone Complete Auto Care has abated the violation discovered during the September 15, 2009, inspection as listed below:

Letter Citation #	Rule Citation
1.	OAC Rule 3745-279-22(C)(1), Marking of Used Oil Containers: Return to Compliance (RTC) 10/2/2009

In addition to the above violation Ohio EPA had the following concern:

1. **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..."



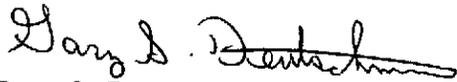
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At the time of the September 15, 2009, inspection Firestone could not identify the name of the company that removes spent fluorescent bulbs from the facility or what that company does with the bulbs after they are removed from the facility.

On October 15, 2009, Ohio EPA observed that spent fluorescent lamps are stored in a closed and labeled container and verified that the spent lamps are recycled by Veolia Environmental Services located in Port Washington, WI.

Should you have any questions, please feel free to call me at (419-373-3056).

Sincerely,



Gary S. Deutschman
Environmental Specialist III
Division of Hazardous Waste Management

/lb

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, Supervisor, DHWM, NWDO
~~DHWM, NWDO File - General File, Erie County~~

ec: Gary Deutschman, DHWM, NWDO

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.

Ohio Environmental Protection Agency
**RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to kristina.durnell@epa.state.oh.us
or mail it to Kristina Durnell, Central Office

Site EPA ID No. Site Name Site Location Information Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html	EPA ID Number: OH0000443879 Name: Firestone Complete Auto Care Website: firestonecompleteautocare.com (Optional) Street Address: 4320 Milan Road City, Town, or Village: Sandusky County Name: Erie State: OH Zip Code: 44870 Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> 441310 441320 81111
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Tom MI: Last Name: Schippel Phone Number: 419-625-6571 Phone Number Extension: E-Mail Address: Fax Number: 419-625-4070 Fax Number Extension: Street or P.O. Box: City, Town or Village: State: Zip Code:
Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: BFS Retail & Commercial Operations LLC Date Became Owner (12/06/2001): Owner Type: Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> Street or P.O. Box: 535 Marriott Cr. Attn Tax Dept 9 th Floor City, Town or Village: Nashville Owner Phone #: State: TN Country: Zip Code: 37214 Name of Site's Operator: Date Became Operator (mm/dd/yyyy): Owner Type: Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> Street or P.O. Box: City, Town or Village: Operator Phone #: State: United States Zip Code:

VIOLATIONS CITED? Yes No

TYPE OF HANDLER - A MINIMUM OF ONE BOX MUST BE CHECKED

<input checked="" type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input type="checkbox"/> Conditionally Exempt Small Quantity Generator <input type="checkbox"/> U.S. Importer of Hazardous Waste <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator
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TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)	
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Underground Injection Control Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY))	
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES	
<input type="checkbox"/> Batteries	
<input type="checkbox"/> Pesticides	
<input type="checkbox"/> Mercury containing equipment	
<input checked="" type="checkbox"/> Lamps	

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))	
<input checked="" type="checkbox"/> Used Oil Generator	
<input type="checkbox"/> Used Oil Transporter	
<input type="checkbox"/> Used Oil Transfer Facility	
<input type="checkbox"/> Used Oil Processor	
<input type="checkbox"/> Used Oil Re-refiner	
<input type="checkbox"/> Off-Specification Used Oil Burner	
<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil	
<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner	

Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAinfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.			
Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Other Comments:
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Gary Deutschman		9/15/2009

OPTIONAL CERTIFICATION: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Owner, Operator, or an Authorized Representative	Name and Title (Print)	Date (mm/dd/yyyy)

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Firestone
 Facility Type: Used Oil/ Fluorescent Bulbs
 Date of Inspection: 9/15/09
 EPA ID #: OH0 000 443 879

Waste Generated

On- or Off-Site Management

P2 Activities

Process/Activity Generating Waste <small>(e.g. plating bath, machining baghouse, painting, general maintenance, etc.)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applicable</small>	QTY Generated per Month, Type of Accumulation <small>(container, tank, etc.) and location of waste accumulation area</small>	Type of On-Site Treatment <small>(recycle, wwt, etc.)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1 Oil Change	Used Oil	500 gallons		Safety Kleen, Brunswick Ohio 330-273-3111- Bulked	Re-refined in Buffalo, NY	
2 Oil Change	Used Oil Filters	30 filters		Safety Kleen, Brunswick Ohio 330-273-3111- Bulked	Recycle metal content in Astoria, IL	
3 Coolant Replacement	Used Anti-freeze	25 gallons		Safety Kleen, Brunswick Ohio 330-273-3111- Bulked	Re-refined in East Chicago, IN	
4 Tire Replacement	Used Tires	40		Liberty Tire Service, 14864 Lincoln Street, SE, Minerva, Ohio 44657	Shredded	

5	Air Conditioning Re-charge	Spent Freon	Varies	Captured and Re-generated on-site			
6	Battery Replacement	Spent Lead Acid Batteries	5-10		Interstate Battery, 320 N. Mulberry Street, Mansfield Ohio 44902 – Smelted by Johnson Controls in Indiana 419-526-1570	Old Batteries Smelted for Recovery of Lead.	
7	Lighting	Spent Fluorescent Light Bulbs			Veolia Environmental Services, 1275 Mineral Springs Drive, Port Washington, WI 53074	Recycled	
8							

REMARKS-GENERAL INFORMATION

General Process Information:

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes* _____ No _____

*If yes, refer promptly to your district P2 coordinator. Office of Compliance Assistance and Pollution Prevention – 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other: