



**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lea Fisher, Lt. Governor  
Chris Korfeski, Director

Re: Eddie's Collision Center  
OHD038708863  
Fulton County  
Hazardous Waste  
**Return to Compliance**

November 9, 2010

Mr. Rick Shehorn, Owner  
Eddie's Collision Center  
135 West Linfoot Street  
Wauseon, Ohio 43567

Dear Mr. Shehorn:

Thank you for your November 1, 2010, response to Ohio EPA's September 28, 2010, Notice of Violation (NOV) letter. My review of the documentation submitted reveals that Eddie's Collision Center has adequately demonstrated abatement of the violation cited in the September 28, 2010, NOV letter.

The following is a summary of the violation cited in the September 28, 2010, NOV as a result of our September 21, 2010, inspection and your compliance with respect to it:

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

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

At the time of the inspection, Eddie's Collision Center did not have waste evaluation documentation for the spent paint filters. Eddie's Collision Center has historically disposed of this spent material as a non-hazardous waste.

Eddie's Collision Center must immediately cease disposing of the waste paint filters as non-hazardous waste until a proper waste evaluation has been completed.

Eddie's Collision Center must obtain a representative sample of the spent paint booth filter waste stream and have it analyzed for Toxic 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, Eddie's Collision Center must submit a copy of the analytical results to Ohio EPA.

**On November 1, 2010, Eddie's Collision Center submitted the waste analysis results for the paint booth filters. The submitted analytical results indicate that the spent paint booth filters are a non-hazardous waste. These filters may be managed as a solid waste. This portion of the violation has been abated.**

- b) In addition, Eddie's Collision Center failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility. Eddie's Collision Center was disposing of their spent fluorescent lamps as solid waste.

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.

Please be aware that incandescent, fluorescent, metal halide, neon, high-intensity discharge, high-pressure sodium and mercury-vapor lamps could be hazardous waste when discarded. Fluorescent lamps may contain up to 40 milligrams (mg) of mercury, depending on the brand and manufacturer. Lamps may also contain lead and cadmium. Many lamps exhibit a characteristic of toxicity for heavy metals when disposed.

Eddie's Collision Center must cease disposing of the spent fluorescent lamps in the solid waste dumpster and submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If Eddie's Collision Center plans to manage the spent fluorescent bulbs when generated as universal waste, please submit the name of the facility where you plan to recycle the bulbs. Managing the spent fluorescent bulbs as universal waste eliminates the need for analytical testing.

Eddie's Collision Center must also properly train employees, who handle or have responsibility for managing universal waste, on waste handling and emergency procedures relative to their responsibilities and send me documentation (memo or sign-in sheets) that this has been completed.

**On November 1, 2010, Eddie's Collision Center submitted information regarding the future management of your spent fluorescent bulbs. Eddie's Collision Center plans to manage the spent fluorescent bulbs as universal waste and have them recycled at Environmental Recycling in Bowling Green, Ohio. You also stated in your response that you will be the only person handling the spent fluorescent bulbs and that you have reviewed the fact sheets provided by Ohio EPA. This portion of the violation has been abated.**

***With this information, this violation has been completely abated.***

Ohio EPA has helpful information about compliance assistance and pollution prevention at the following web address: <http://www.epa.ohio.gov/ocapp>. In addition, you can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>.

Mr. Rick Shehorn, Owner  
November 9, 2010  
Page 3

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

Sincerely,



Melissa L. Boyers  
Division of Hazardous Waste Management

//lr

pc: Cindy Lohrbach, DHWM, NWDO  
Colleen Weaver, DHWM, NWDO  
DHWM, NWDO 2010 Fulton County General File

ec: Melissa Boyers, 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.