



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.ohio.gov

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

Re: Rich Ford Lincoln Mercury
OHD017506809
Conditionally Exempt
Small Quantity Generator
Fulton County, NWDO
NOV

December 11, 2009

Mr. Duane Short, Service Manager
Rich Ford Lincoln Mercury
904 Stryker Street
Archbold, Ohio 43502

Dear Mr. Short:

On November 30, 2009, I inspected Rich Ford Lincoln Mercury's facility located at 904 Stryker Street in Archbold, Ohio. I inspected Rich Ford Lincoln Mercury to determine the facility's compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). My inspection included a tour of the facility service department and body shop as well as a review of facility records. I also helped Rich Ford Lincoln Mercury identify ways to prevent pollution by reducing waste the facility generates.

Rich Ford Lincoln Mercury is a full service automotive dealership which operates a service shop and auto body repair facility at the 904 Stryker Street location. Facility records reviewed during this inspection indicate that Rich Ford Lincoln Mercury has been generating approximately 12 gallons per year of (D001 ignitable/ D008 lead/ D039 tetrachloroethylene) spent parts washer solvent in the service department and approximately 5 gallons per month of (D001 ignitable/ D035 methyl ethyl ketone/ F003 spent non halogenated solvent /F005 spent non halogenated solvent) spent paint gun cleaning solvent in the body shop in 2009. The parts washer solvent is changed on an annual basis and mixed with used oil generated at the facility. The spent paint gun cleaning solvent is accumulated in a five gallon drum in the body shop and transferred to a fifty five gallon container located in a storage shed located behind the facility prior to disposal at an off-site permitted hazardous waste treatment, storage or disposal facility. Rich Ford Lincoln Mercury is operating as a conditionally exempt small quantity generator of hazardous waste.

Rich Ford Lincoln Mercury also generates spent lead acid automotive batteries that are exchanged with new batteries by a battery wholesaler, used oil which is either burned on-site in a used oil heating unit located in the service area or shipped off-site for recycling, used oil filters which are sent off-site for disposal, used anti-freeze/coolant which is sent off-site for recycling, used automotive tires which are sent off-site for shredding, used paint filters which are managed as solid waste and spent fluorescent light bulbs which are also managed as solid waste.

I found the following violations of Ohio's hazardous waste laws. In order to correct these violations you must do the following and send me the required information **within 30 days** of your receipt of this letter:

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..."

- a. Rich Ford Lincoln Mercury has failed to evaluate the paint filters from the paint booth to determine if they are hazardous waste. Rich Ford Lincoln Mercury currently manages the spent paint filters as solid waste and disposes of the spent filters in a solid waste dumpster.

To abate this violation, Rich Ford Lincoln Mercury must analyze a representative sample of the spent paint filters for total volatile organic compounds (VOC's) and Resource Conservation and Recovery Act (RCRA) metals using methods as outlined in U.S. EPA's SW-846. This information should be submitted to my attention at the Ohio EPA within 30 days of receipt of this letter.

- b. Rich Ford Lincoln Mercury has failed to evaluate the spent fluorescent lamps used throughout the facility to determine if they are hazardous waste. Rich Ford Lincoln Mercury currently manages the spent lamps as solid waste and disposes of the spent lamps in a solid waste dumpster.

Rich Ford Lincoln Mercury must immediately cease disposing of the spent lamps as non-hazardous waste until a proper waste evaluation has been completed. The spent lamps typically contain mercury and other heavy metals which could make them a hazardous waste.

Rich Ford Lincoln Mercury has the option of handling spent 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 fluorescent lamps.

To abate this violation, Rich Ford Lincoln Mercury must choose one of the following options for the spent lamps:

i. **Disposal Option:**

Rich Ford Lincoln Mercury may manage the lamps as a hazardous waste. Rich Ford Lincoln Mercury must sample each type and brand of lamp used at the facility for RCRA metals using a Toxicity Characteristic Leaching Procedure (TCLP) test. Rich Ford Lincoln Mercury must ensure that all spent lamps that are determined to be hazardous waste are disposed of at a permitted hazardous waste disposal facility.

Rich Ford Lincoln Mercury must submit all analytical results to Ohio EPA along with a description of how the spent lamps will be managed or,

ii. **Recycling Option:**

In lieu of evaluating and disposing of the spent lamps, Rich Ford Lincoln Mercury may manage spent lamps as universal waste. Universal waste spent lamps must be stored in a closed and labeled container. This container must be properly labeled with the wording "Universal Waste Lamp(s)", "Waste Lamp(s)", or "Used Lamp(s)". Rich Ford Lincoln Mercury must also track the accumulation of the spent lamps to ensure spent lamps are not stored for greater than 365 days. This can be accomplished with recycling receipts or by marking the container with the accumulation start date (the day the first spent lamp is placed in the container).

No spent lamps were in storage at the time of the inspection.

Ohio EPA recommends that spent lamps be managed as a universal waste and recycled. If Rich Ford Lincoln Mercury should choose the recycling option, you should submit to me the name of the recycling facility Rich Ford Lincoln Mercury intends to use.

During the inspection I provided you with the following fact sheets on spent lamps: Universal Waste Rules for Handlers of Lamps, dated June 2005; Fluorescent Lamps: What You Should Know, dated January 2007; and Computer, Fluorescent Lamp and Ballast Recyclers, dated April 2008 for your use.

To abate this violation, Rich Ford Lincoln Mercury must identify how the facility intends to properly manage the facility's spent lamps. This information should be submitted to my attention at the Ohio EPA within 30 days of receipt of this letter.

As we discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce or eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs as well as regulatory requirements. During the inspection, we observed potential pollution prevention (P2) opportunities associated with your operations. In addition to recycling the fluorescent lamps, P2 options that you may want to evaluate for these operations include the substitution of a water based solvent for the solvent based parts washer solvent currently used and the substitution of water based paints for solvent based paints in the facility body shop. Facility records indicate that your facility generates approximately 6 gallons of hazardous waste each month. You may also want to consider the use of a second used oil burner for heating the facility body shop. A second used oil burner may reduce your heating costs and the need to periodically ship used oil off-site for recycling.

Mr. Duane Short, Service Manager
December 11, 2009
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The Ohio Department of Development's Office of Energy Efficiency may be able to help with energy efficiency issues. Their website is at: <http://development.ohio.gov/cdd/oe>.

If you would like a free, non-regulatory on-site pollution prevention assessment or if you would like more information about pollution prevention, please contact me at the number listed below. Ohio EPA has helpful information about this at the following web address:
<http://epa.ohio.gov/ocapp>.

Enclosed you will find a copy of the checklists that we completed as a result of the inspection. Should you have any questions, please feel free to call me at (419-373-3056). You can find copies of the rules and other information on the division's web page at:
<http://epa.ohio.gov/dhwm>.

Sincerely,



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

/llr

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, Supervisor, DHWM, NWDO
DHWM;NWDO File - Fulton County General
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: OHD017506809 Name: Rich Ford Lincoln Mercury		Website: richfordsales.dealerconnection.com (Optional)	
	Street Address: 904 Stryker Street City, Town, or Village: Archbold County Name: Fulton		State: OH Zip Code: 43502	
	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"/>		
	44110	441310	441310	

Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Duane	MI:	Last Name: Short
	Phone Number: 419-445-7460 E-Mail Address: Fax Number: Street or P.O. Box: City, Town or Village: State		Phone Number Extension: Fax Number Extension: 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: Archbold Sales & Service Inc.		Date Became Owner (mm/dd/yyyy): 1990	
	Owner Private County District Type: <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Federal Indian Municipal State Other <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Street or P.O. Box: 904 Stryker Street City, Town or Village: Archbold State: Ohio	
	Owner Private County District Type: <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Federal Indian Municipal State Other <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Name of Site's Operator: Rich Ford Lincoln Mercury Date Became Operator (mm/dd/yyyy):	
	Street or P.O. Box: 904 Stryker Street City, Town or Village: Archbold State: Oh	Operator Phone #: 800-682-7460 United States Zip Code: 43502		

VIOLATIONS CITED? Yes No

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

<input type="checkbox"/> Not a HW Generator	<input checked="" 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

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 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

Batteries
 Pesticides
 Mercury containing equipment
 Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))

Used Oil Generator
 Used Oil Transporter
 Used Oil Transfer Facility
 Used Oil Processor
 Used Oil Re-refiner
 Off-Specification Used Oil Burner
 Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
 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 RCRA Info source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

D039
D008
D001
D035
F003
F005

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 type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments: Used Oil stored in containers Facility is going to begin
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	managing lamps as Universal Waste after inspection.

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Gary Deutschman		11/30/2009

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)

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤ 100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

WASTE EVALUATION

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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GENERATOR CLASSIFICATION

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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TREATMENT OF HAZARDOUS WASTE

4.	Does the generator treat hazardous waste in a:	
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

#3 – Rich Ford Lincoln Mercury must evaluate the used paint filters and spent fluorescent lamps to determine if they are hazardous waste.

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: For example, used oil contaminated scrap metal stored in a pile.

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

ON-SITE BURNING IN SPACE HEATER

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

GENERATOR TRANSPORTATION

11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
12.	If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator. [3745-279-24]			
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

COLLECTION CENTERS AND AGGREGATION POINTS

13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.

OAC 3745-266-80 SPENT LEAD ACID BATTERIES BEING RECLAIMED

1.	Has the handler of reclaimed batteries notified Ohio EPA or US EPA of regulated waste activity?		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
2.	Are the handler's batteries reclaimed through regeneration (such as by electrolyte replacement)?		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
<i>NOTE: If yes, the handler is subject to OAC Chapter 3745-51 and OAC rule 3745-52-11</i>					
3.	Are the handler's batteries reclaimed other than through regeneration?		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	If yes, does the handler:			
	i.	Generate, collect, and/or transport these batteries?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	ii.	Store these batteries but is not the reclaimer?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	iii.	Store these batteries before reclaiming them?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	iv.	Not store these batteries before reclaiming them?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<i>NOTE: If the answer to any question 3ai through 3aiv is yes, the handler is subject to OAC Chapters 3745-51 and 3745-270, and OAC rule 3745-52-11. If the handler stores batteries before reclaiming them, the handler is subject to permitting requirements (e.g., general or interim standard facilities). Complete other appropriate checklists (e.g., LDR, TSD).</i>					
4.	Has the handler adequately evaluated all waste generated at their facility?		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name:	Facility Type: CESQG	Date of Inspection: 11/30/09	EPA ID #: OHD017506809
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Rich Ford Lincoln Mercury

<i>Waste Generated</i>			<i>On- or Off-Site Management</i>		<i>P2 Activities</i>	
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 applic.</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	Parts Cleaning D001/ D008/ D039 Spent Solvent	12 gallons / year	Mixed w/Used Oil & Burned for Energy Recovery			Solvent Substitution/
2	Battery Replacement Spent Lead Acid Batteries	10 – 20 Batteries		Fort Meigs Auto Electric, 6610 Fairfield Drive, Suite D, Northwood, Ohio 43619	Regeneration and smelting	
3	Oil Change Used Oil	500 gallons	Burning in one on-site heating unit.	DISC Environmental Services, 151 East Andrus Road, Northwood, Ohio 43619	Used for heating value	
4	Oil Change Used Filters Oil	55 gallons		DISC Environmental Services, 151 East Andrus Road, Northwood, Ohio 43619	Recycle metal content	

5	Coolant Replacement	Used Anti-freeze	50 -100 gallons		Safety Kleen, 5148 Tractor Road, Toledo, Ohio	Recycled	
6	Lighting	Spent Fluorescent Light Bulbs	Varies		Disposed as Solid Waste		Recycling
7	Air Conditioning Re-charge	Spent Freon	Varies	Captured and Re-generated on-site			
8	Tire Replacement	Used Tires	70-80 Tires		Bob's Tire Service, 2316 Blairmont, Toledo, Ohio 43614	Shredding	
	Paint Booth	Paint Filters	2 times/ year		Disposed as Solid Waste		
	Paint Booth	D001/D035/F003/F005 Spent Solvent /Paint Sludge	5 gallons		Chemtron Corporation, 35850 Schneider Court, Avon, Ohio 44011	Re-Use of Solvent or fuels blending	

REMARKS-GENERAL INFORMATION

General Process Information: Automotive Service and Auto Body Shop. Retailer of Ford Automobiles.

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information: Rich Ford Lincoln Mercury should consider recycling the fluorescent lamps, evaluate the substitution of a water based solvent for the solvent based parts washer solvent currently used and the substitution of water based paints for solvent based paints in the facility body shop. Rich Ford Lincoln Mercury may also want to consider the use of a second used oil burner for heating the facility body shop. A second used oil burner may reduce facility heating costs and the need to periodically ship used oil off-site for recycling.

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 <http://epa.ohio.gov/ocapp>

Other: