



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 Korteski, Director

Re: Treadway Chrysler Dodge Jeep
OHD 018 026 757
Used Oil Generator
Hancock County, NWDO
PRTC

June 3, 2010

Mr. Nelson Treadway, Owner
Treadway Chrysler Dodge Jeep
10305 U.S. Route 224 West
Findlay, Ohio 45840

Dear Mr. Treadway:

Thank you for your May 19, 2010, response to my May 17, 2010, notice of violation (NOV) letter. Your response included a management plan for your spent fluorescent lamps.

My review of this documentation reveals that Treadway Chrysler Dodge Jeep has adequately demonstrated abatement of the following violation discovered during the May 3, 2010 inspection:

1. **OAC Rule 3745-52-11, Hazardous Waste Determination:** Spent fluorescent lamps

Your May 19, 2010, response indicates that Treadway Chrysler Dodge Jeep is now managing spent fluorescent lamps as universal waste. Your spent fluorescent lamps will be recycled at Environmental Recycling located in Bowling Green, Ohio.

Treadway Chrysler Dodge Jeep remains in violation of the following:

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..."

Treadway Chrysler Dodge Jeep has failed to evaluate the spent oily waste generated from the aqueous parts cleaning unit (CUDA machine) in the service department prior to mixing with used oil generated on-site. The mixture is burned on-site in three used oil heaters.

Treadway Chrysler Dodge Jeep should not dispose of the oily sludge discharged from the aqueous parts washer located in the service department until a proper evaluation of the oily sludge has been conducted. The oily sludge should be analyzed for pH, 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.

Mr. Nelson Treadway
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With your consent, Ohio EPA obtained a sample of the oily sludge generated from the aqueous parts washer on May 27, 2010. You will be notified when the analysis is completed.

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

/cs

pc: Philip Price, Service Manager, Treadway Chrysler Jeep Dodge
Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, Supervisor, DHWM, NWDO
~~DHWM, NWDO File - General file, Hancock 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 applicable regulations.