



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Central Avenue Strip Shop
OHD 987052156
Lucas County
Complaint # 2612
Notice of Violation

March 30, 2007

Mr. Dan McKie
Central Avenue Strip Shop
8035 W. Central Avenue
Toledo, Ohio 43617

Dear Mr. McKie:

On March 6, 2007, Melissa Boyers and I conducted a complaint investigation and a compliance evaluation of Central Avenue Strip Shop, 8035 W. Central Avenue in Toledo, Ohio. The complaint investigation was conducted due to a complaint received at this office on January 11, 2007. The complainant alleged that chemicals are being poured on to the ground and also areas which drain to a septic system.

The purpose of our investigation was to determine your 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).

Central Avenue Strip Shop (hereafter referred to as CASS) is in the business of stripping and refinishing wood furniture. CASS uses dichloromethane (1826 Flo-Strip by Chemisphere) to strip the wood parts (also known as methylene chloride). After being immersed in dichloromethane, the part is then power-washed which generates a wastewater. The wastewater goes to a sump and is pumped through to a holding tank. The wastewater in the holding tank is evaporated rather than discharged into a septic system. The dichloromethane dip tank is replenished as needed. Sludge is occasionally (1-2 times a year) shoveled out and put into a 55-gallon drum. Currently there is about 7-8 inches of dried paint sludge in the drum.

CASS also generates a small amount of dirt from the metal screens inside the spray guns. These screens capture any dirt or particulates that are actually in the products being sprayed. The screens may be changed every 1-2 years as the spray guns are dedicated to one lacquer or finish material. The guns themselves are cleaned with thinner (D001, F005) and produce about half a pint every 1-2 years.

CASS is presently operating as a Conditionally Exempt Small Quantity Generator. This means you generate less than 25 gallons of hazardous waste per month. CASS has not had to ship any hazardous waste off site due to such slow generation and the rapid evaporation of the dichloromethane.

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

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

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

- a) CASS failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility.

CASS must immediately cease disposing of the fluorescent bulbs as non-hazardous waste until a proper waste evaluation has been completed. Fluorescent bulbs typically contain mercury, lead or cadmium.

During our inspection, I provided you with a fact sheet regarding fluorescent lamps and a list of fluorescent lamp and ballast recyclers. Please review this information and contact me if you have any questions.

Basically, you could run analytical to determine if the bulbs contain mercury, lead, or cadmium (if you would like to continue to dispose of them) OR you can choose to handle them through the **universal waste rules by recycling**. When the bulbs are recycled as a universal waste, they are not considered a hazardous waste. You must ensure that they are recycled within one year of being generated and that you keep documentation showing this. Also, you must label the box containing the burned out bulbs (prior to recycling) with the words "universal waste".

To abate this portion of the violation, CASS must submit to Ohio EPA documentation on how you plan to properly manage your fluorescent bulbs.

- b) CASS has never had the wastewater in the holding tank properly evaluated. This wastewater is generated when the stripper is being power-washed off of the furniture. You must have this waste analyzed for metals to determine if it would be a hazardous waste.

To abate this portion of the violation I will need you to run analytical on the wastewater for metals as described in the following paragraph:

Sample the wastewater that is currently in the tank. You must take a representative sample and submit it to a laboratory. Most laboratories are familiar with Ohio EPA testing methods. You can find several environmental firms/consultants in the yellow pages. You should have the lab run the Toxicity Characteristic Leaching Procedure (TCLP), SW-846, Method 1311 for RCRA metals and flash point. Please let me know when you will be sampling as I may come to your facility at that time.

Once you receive the analytical results back, we can determine if the water recycling / recirculating of the power wash water will be an option. Please do not begin recycling until we have discussed the results.

CASS has not analyzed the waste material from the dichloromethane strip tank. This waste is considered to be hazardous waste because it consists of spent solvent. Due to the way the solvent is used, it is considered to be a listed hazardous waste and will already carry the waste code F002. What you do not know at this time is whether this solvent sludge contains metals such as lead from the removal of paint used prior to the 1970s. When you are ready to ship this hazardous waste off site you must have the "paint chip" like sludge analyzed for metals using the same method as above. (TCLP SW-846 Method 1311 for RCRA metals) OR you can assume the waste has some metals in it and use knowledge to say that it contains lead which is a D008. (Since the waste is already hazardous, this would be simply adding the waste code of lead based on the possibility it could be in the sludge).

Suggestions:

- ☞ Close all product containers that are not in use to avoid losing material
- ☞ Use a lid on the strip tank to avoid evaporation of your stripping product
- ☞ Keep hazardous waste in a closed and labeled container to avoid accidental spills
- ☞ Contact our non-regulatory compliance assurance person, Ron Nabors at 419-373-3147 to see if he has suggestions for improving water consumption and less volatile chemicals within your process.
- ☞ Continue to recycle cardboard

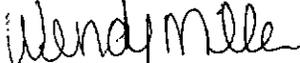
No evidence of chemicals or used oil being dumped behind the garage was noted. We did not observe any facility procedures to substantiate the complaint. Therefore, the complaint investigation is considered closed.

You can find copies of rules, recycling lists, fact sheets and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address:
<http://www.epa.state.oh.us/ocapp/ocapp.html>

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I have enclosed copies of the checklist completed during the inspection as well as some relevant fact sheets. If you have any questions, please contact me at (419) 373-3114.

Sincerely,



Wendy Miller
Division of Hazardous Waste Management

/llr

Enclosures

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
CDHWM-NWDO File