



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Central Collision
Lucas County
OHR000102087
Hazardous Waste
RTC

July 29, 2011

Mr. Bob Mayer
Central Collision
7939 West Central Avenue
Toledo, Ohio 43617

Dear Mr. Mayer:

Thank you for responding to my August 12, 2010, and March 1, 2011, Notice of Violation (NOV) letters. You submitted analytical results for your paint booth filters on July 6, 2011. Based on these results, you can continue to dispose of these filters as non-hazardous waste unless your process or paint/solvent products you are using change. If anything changes, you may need to re-evaluate your filters.

The following is the current status of the violations cited during my August 3, 2010, inspection:

Waste Evaluation, OAC Rule 3745-52-11:

- 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, Central Collision did not have waste evaluation documentation for the spent paint booth filters. Central Collision has historically disposed of this spent material as a non-hazardous waste. Central Collision must immediately cease disposing of the waste paint filters as non-hazardous waste until a proper waste evaluation has been completed.

Central Collision 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, Central Collision must submit a copy of the analytical results to Ohio EPA. Once analytical results have been reviewed, Ohio EPA will advise you on proper disposal options as well as plans for the future management of this waste stream.

On July 6, 2011, you submitted analytical results showing that your paint booth filters are non-hazardous. Therefore, this violation is considered abated.

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- b) In addition, Central Collision failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility.

This portion of the violation was previously abated as you stated you will be using Environmental Recycling in the future.

2. OAC Rule 3745-279-22(C)(1): Labeling:

Containers, aboveground tanks, and fill pipes used for underground storage tanks shall be labeled or marked clearly with the words "used oil."

Central Collision had three drums and two 5-gallon cans of used oil that were not properly labeled.

At the time of my inspection, Central Collision properly labeled all of the containers with the words "used oil". Therefore, this violation is considered abated.

3. Universal Waste Labeling, OAC Rule 3745-273-14(E):

All lamps, containers or packages must be labeled with the words "universal waste lamps", "waste lamps" or "used lamps".

Central Collision did not have the box of lamps labeled properly.

You properly labeled the box with the words "universal waste lamps" at the time of inspection. Therefore, this violation is considered abated.

4. Universal Waste, Accumulation Time, OAC Rule 3745-273-15(C):

All containers or packages holding universal waste lamps must be labeled with the earliest date that any spent lamp was put into the container or package.

Central Collision did not have the box of lamps dated.

To abate this violation, you must let me know what date that you determine the bulbs began accumulating. You will have a year from that date to recycle the bulbs.

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During our telephone conversation on July 22, 2011, you indicated your bulbs will be recycled at Environmental Recycling. You have 2-3 lamps that will be recycled. You will send me a receipt copy once they are recycled. Therefore, this violation is considered abated.

Central Collision has abated all violations found during my August 3, 2011, compliance evaluation inspection. Should you have any questions, please contact me at (419) 373-3114.

Sincerely,



Wendy Miller
Division of Materials and Waste Management

/llr

pc: Cindy Lohrbach, DMWM, NWDO
Colleen Weaver, DMWM, NWDO
DMWM-HW, NWDO-Central Collision.File 

ec: Wendy Miller, DMWM, NWDO