



Environmental  
Protection Agency

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

Re: Central Collision  
Lucas County  
OHR000102087  
Hazardous Waste  
2<sup>nd</sup> NOV

March 3, 2011

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

Dear Mr. Mayer:

On August 3, 2010, I conducted a hazardous waste compliance evaluation inspection of Central Collision located in Toledo, Ohio. I inspected Central Collision to determine its 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. On August 12, 2010, I sent you a Notice of Violation (NOV) letter outlining the violations. On December 15, 2010, I contacted you via telephone to find out a time frame for when you plan to sample and analyze your paint booth filters. You stated that you would have this done by January 1, 2011. As of this date, I have not received this information from you. At this time, I must have a response as to when you will have the paint booth filters analyzed and I also need the date when you started accumulating your spent fluorescent tube lamps.

The following is the current status of the violations cited during my inspection:

**1. 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.

Ohio EPA will review the submitted waste evaluation information and determine if there is a change in Central Collision's generator status. Additional violations may be cited based upon your determined generator status. You will be notified of any additional violations in a separate letter.

- 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.

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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.

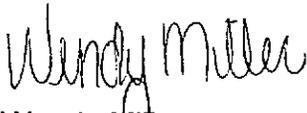
Central Collision did not have the box of lamps dated.

**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. You must have a method in place to track the one year, for example, you could label the box with the date the first bulb went in.

Another way to abate this violation, is that you could also have the bulbs recycled and send me a copy of the receipt. At the time of my inspection, I gave you fact sheets on universal waste lamps and recycling.

You must respond to this letter within the next **seven (7) days** to let me know the schedule for sampling. If you should have any questions or if I can be of assistance, please contact me at (419) 373-3114.

Sincerely,



Wendy Miller  
Division of Hazardous Waste Management

/llr

pc: Cindy Lohrbach, DHWM, NWDO  
Colleen Weaver, DHWM, NWDO  
~~DHWM-NWDO 2011 Lucas County General File~~

ec: Wendy Miller, DHWM, NWDO