



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: Costco Wholesale #1007
Lucas County
OHR000140715
Hazardous Waste
Notice of Violation

February 19, 2010

Mr. Bill Koza, Manager
Costco Wholesale #1007
3405 West Central Avenue
Toledo, Ohio 43606

Dear Mr. Koza:

On February 2, 2010, I conducted a compliance evaluation inspection at Costco Wholesale #1007 (Costco) located at 3405 West Central Avenue in Toledo, Ohio. I inspected Costco 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 (OAC). Pollution prevention options were also discussed during this inspection. This letter will explain the violation found and what you need to do to correct this violation.

During my visit, I met with Linda Sabo, Linda Hammer and spoke with Terri Churchill by telephone. I also inspected the facility operations, and reviewed written documentation. Costco is a membership warehouse club that sells brand-name merchandise. Costco generates silver from the one-hour photo lab processing department that is shipped off-site to be reclaimed. Costco also operates a gas station at this location and may generate gasoline related waste due to spills or filters from the pumps. Costco does not offer vehicle maintenance at this location and does not generate used oil. Costco has not generated spent fluorescent lamps but plans to manage them as universal waste when generated. A copy of Fluorescent Lamps: What You Should Know, is enclosed for your review. At the time of my inspection, Costco was operating as a non-generator of hazardous waste.

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. OAC Rule 3745-52-11: Waste Evaluation

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

Costco failed to have waste evaluation documentation for the spent absorbent pads that are used to clean up small gasoline spills at the gas station.

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Costco has routinely disposed of these pads as solid waste. Wastes derived from the recovery of gasoline may be hazardous for the characteristic of ignitability (D001) and for the toxicity characteristic for benzene (D018).

Costco must obtain a representative sample of the spent absorbent pads and have it analyzed for Toxicity Characteristic Leaching Procedure (TCLP) benzene (SW-846 Method 1311/8260B). To abate this violation, Costco must submit a copy of the analytical results to Ohio EPA. Once analytical results have been reviewed, Ohio EPA will advise Costco on proper disposal options as well as plans for the future management of this waste stream. A copy of the fact sheet Identifying Your Hazardous Waste, is enclosed for your review.

Enclosed you will find a copy of the checklists that were completed during the inspection.

Ohio EPA has helpful information about compliance assistance and pollution prevention at the following web address: <http://www.epa.ohio.gov/ocapp>. In addition, you can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>.

If you have any questions or I can be of assistance, please contact me at (419) 373-3066.

Sincerely,



Melissa L. Boyers
Division of Hazardous Waste Management

/llr

Enclosures

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
☛DHWM, -NWDO-Lucas County File (w/original enc.) - - - - -

ec: Melissa Boyers, DHWM, NWDO

Notice:

Ohio's 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.

Send to Central Office <input checked="" type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to kristina.durnell@epa.state.oh.us.

Site EPA ID No.	EPA ID Number: OHR000140715	
Site Name	Name: Costco Wholesale #1007	Website: (Optional)
Site Location Information	Street Address: 3405 W. Central Avenue	
	City, Town, or Village: Toledo	State: OH
	County Name: Lucas	Zip Code: 43606
Site Land Type (check only one)	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"/>	
NAICS code(s) www.census.gov/epcd/www/naics.html	44719	812922

Facility Representative	First Name: Bill	MI:	Last Name: Koza
Additional names can be recorded in number 12	Phone Number: 419-381-5000	Phone Number Extension:	
	E-Mail Address:		
	Fax Number:	Fax Number Extension:	
Only provide address information if it is different than the site address	Street or P.O. Box:		
	City, Town or Village:		Zip Code:
	State:		

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: Costco Wholesale Corporation		Date Became Owner (mm/dd/yyyy): 4/23/2007	
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District	Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>		
	Street or P.O. Box: 999 Lake Drive		Owner Phone #:	
	City, Town or Village: Issaquah		Country:	Zip Code: 98027
	State: WA		Date Became Operator (mm/dd/yyyy):	
	Name of Site's Operator:	Operator Type: <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District	Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	
	Street or P.O. Box:		Operator Phone #:	
	City, Town or Village:		Country	Zip Code:
	State:			

VIOLATIONS CITED?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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TYPE OF HANDLER - MARK "X" AS APPROPRIATE	
<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"/> Underground Injection Control Facility <input type="checkbox"/> Hazardous Waste Transporter <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace <input type="checkbox"/> Small Quantity On-Site Burner Exemption <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED)

(CHECK ALL BOXES THAT APPLY)

- Small Quantity Handler of Universal Waste Destination Facility for Universal Waste
 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 or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

Announced Yes No Additional Facility Representatives: **Lisa Simpson, 425-313-6275**
 Tanks Yes No
 Containers Yes No

Name of Inspector(s) **Melissa Boyers** Name of Inspector(s) _____ Date of Inspection/Time (mm/dd/yyyy) (hh:mm) **02/2/2010 1:30 PM**

Comments:

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Costco Wholesale #1007 Facility Type: LQG/SQG/CESQG/TSD EPA ID#: OHR000140715

Description of Waste				On-Site Management			Off-Site Management
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, etc)</small>	Waste Generated <small>(e.g. sludge, spent solvent, ash, etc)</small>	EPA Waste Code	QTY Generated per Month	Type of Accumulation/Storage <small>(e.g. container, tank, etc)</small>	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Waste Location <small>(Include map if possible)</small>	Name, state, and type of activity occurring at the facility.
1 Lighting	Spent Fluorescent Bulbs						Managed as universal waste
2 One hour photo lab processing	Silver					Photo Lab Area	Sent to Hallmark Refining Corp. in Mount Vernon, WA to be reclaimed.
3 Cardboard compactor	Hydraulic oil		One time spill – 75 gal.			Warehouse area	Petro-Chem
4 Gasoline Station	Spent absorbent pads		Varies				Currently managed as solid waste

5	Gasoline Station	Spent filters from the gas pumps	D018, but can be recycled if properly drained first	None to date				
6								
7								
8								
9								