



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Franklin Body Shop, Inc.
OHD 986 981 165
Richland County
DHWM, NWDO
Complaint 2821
Return to Compliance

March 11, 2009

Mr. Dennis Brown
Franklin Body Shop, Inc.
19 South Adams Street
Mansfield, Ohio 44902

Dear Mr. Brown:

Thank you for sending the letter in response to the Ohio Environmental Protection Agency's (Ohio EPA's) Notice of Violations (NOVs) dated December 16, 2008, and February 4, 2009. The letter was received by Ohio EPA on February 26, 2009, and was dated February 24, 2009, by Franklin Body Shop, Inc. (FBSI). The documentation submitted includes analytical results from the waste paint booth filters, spent sand from the stationary sandblasting machine, and spent sand from the handheld sandblasting gun.

After reviewing the submitted documentation, FBSI will remain a conditionally exempt small quantity generator of hazardous waste since all evaluated waste streams are non-hazardous wastes. At the time of the inspection, FBSI was generating only one hazardous waste stream, waste paint related material (D001, D035, F003, F005).

My review of the documentation reveals that FBSI has abated all violations discovered during the November 25, 2008, compliance evaluation inspection as listed below.

Violations:

1. **Ohio Administrative Code (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..."

FBSI failed to evaluate the following waste streams to determine if they were a hazardous waste in accordance with OAC Rule 3745-52-11, prior to sending them off site: a) waste paint booth filters, b) spent sand from the stationary sandblasting machine, and c) spent sand from the handheld sandblasting gun.

On February 26, 2009, Ohio EPA received documentation that included analytical results from the sampling of waste paint booth filters, spent sand from the stationary sandblasting machine, and spent sand from the handheld sandblasting gun. These results show that all three waste streams are considered non-hazardous wastes.

Therefore, these violations are considered abated on February 26, 2009.

General Concern:

- A. **Parts Washer:** During the inspection, Ohio EPA observed a parts washer that was empty in the basement of the facility. FBSI stated that this parts washer had been purchased at an auction many years ago and had never been utilized.

This general concern serves as a reminder to FBSI and is considered addressed.

Should you have any questions or if I can be of assistance, please contact me at (419) 373-3065.

Sincerely,

Kara M Reynolds

Kara Reynolds
Environmental Specialist
Division of Hazardous Waste Management

/l/r

pc: Colleen Weaver, DHWM, NWDO
Kara Reynolds, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
DHWM, NWDO Richland County File: Franklin Body Shop

NOTICE:

Ohio 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.