



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Independent Auto Body Plus
Hazardous Waste
Complaint # 2686
Richland County
Return to Compliance

December 15, 2008

Mr. Keith Shellhouse
Independent Auto Body Plus
4952 Plymouth Springmill Road
Shelby, Ohio 44875

Dear Mr. Shellhouse:

On October 25, 2007, Ohio EPA sent you a letter requesting more information about several of your operations resulting from an August 31, 2007, complaint investigation. No response to this letter was received. Thus, on May 6, 2008, Ohio EPA sent you a Notice of Violation (NOV) as a result of an April 15, 2008, compliance evaluation inspection. On July 23, 2008, Ohio EPA issued you a second NOV as no response was received. On August 20, 2008, I conducted another site visit. As this time, we set up a date to return to sample your paint booth filters.

On September 26, 2008, I received via fax a Material Safety Data Sheet (MSDS) for the solvent you utilize at your facility from API in Mansfield (the retailer from which you buy your solvent). Based on this MSDS, the solvent you utilize is an F005 hazardous waste. Thus, Independent Auto Body Plus (Independent) is a conditionally exempt small quantity generator of hazardous waste.

On October 9, 2008, Kara Reynolds & I came to your facility to sample your paint booth filters. On November 3, 2008, Ohio EPA received this analytical from the sampling of your paint booth filters indicating that these are a non-hazardous waste.

In addition, on October 9, 2008, you stated that you will be managing your fluorescent bulbs as universal waste and will be recycling your bulbs with Gem City Environmental Recycling in Cleveland, Ohio.

My review of this documentation reveals that Independent has adequately demonstrated abatement of the violations listed below discovered during the April 15, 2008, compliance evaluation inspection as a result of the August 31, 2007, complaint investigation as outlined below:

Violation	Date Violation Observed	Date Violation Abated
1. OAC Rule 3745-52-11 Waste Evaluation.	April 15, 2008	September 26, 2008
2. OAC 3745-279-22 (C) (1) Used oil storage requirements - proper labels.	April 15, 2008	April 15, 2008

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Independent has also satisfied the Area of Concerns noted in the May 6, 2008, NOV as outlined below:

1. Satisfied with the information received on October 9, 2008.
2. Satisfied with the sampling of the paint booth filters and the analytical results on November 3, 2008.

Independent shall note the following:

Independent currently is re-using the solvent/paint waste they generate as a valid ingredient for a rust inhibitor which you make and utilize on-site. You stated to me that at one time you sometimes had taken approximately 5-gallons of waste solvent/paint (F005) a year to API, a retail hardware store where you purchase your solvent in Mansfield, for them to recycle in their on-site still. API is not a treatment, storage, and disposal facility (TSDf) for hazardous waste. (In addition, you stated you only took this there when API was under different ownership and you have not taken since the store has become API). I told you at this time you must not take your waste there. You stated you do not currently do this and only had done this a couple of times. Please note that taking your solvent/paint waste, no matter the quantity, to an unpermitted TSDf is a serious violation of Ohio's hazardous waste laws. Independent must ensure in the future if you ever have hazardous waste in which you need to dispose of, you must have it picked up and disposed at a permitted TSDf or you could incur possible serious violations.

No response to this letter is necessary. If you should have any questions, please feel free to call me at (419) 373-3082.

Sincerely,



Amber M. Hicks
Division of Hazardous Waste Management

/csl

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
DHWM, NWDO File: Independent Auto Body Plus

ec: Amber Hicks, DHWM, NWDO

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.