



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Perrysburg Collision & Auto Repair
Wood County
OHD986980456
Hazardous Waste
Return to Compliance

June 7, 2010

Mr. Fred Lange and Mr. Mike Kervin, Owners
Perrysburg Collision & Auto Repair
135 West Third Street
Perrysburg, Ohio 43551

Dear Mr. Lange and Mr. Kervin:

Thank you for your May 20, 2010, response to Ohio EPA's April 21, 2010, Notice of Violation (NOV) letter. The information you submitted included waste analysis documentation that was completed for the spent paint booth filters, universal waste and used oil documentation. My review of the documentation submitted reveals that Perrysburg Collision & Auto Repair (PC) has adequately demonstrated abatement of all of the violations cited in the April 21, 2010, NOV.

The following is a summary of the violations cited in the April 21, 2010, NOV as a result of my April 1, 2010, inspection and your compliance with respect to each:

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

PC 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). You must notify me at least seven days prior to the sampling event date so that a representative from Ohio EPA can be present to observe the sampling and to split samples if necessary. To abate this violation, PC 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.

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Ohio EPA will review the submitted waste evaluation information and determine if there is a change in PC'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.

On May 20, 2010, PC submitted the waste analysis results for the paint booth filters. The submitted analytical results indicate that the spent paint booth filters are a non-hazardous waste. These filters may be managed as a solid waste.

With this information, this violation has been abated.

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

Hazardous bulbs are considered "spent materials" and remain hazardous waste even when recycled. Hazardous waste lamp generators have the option of handling their lamps as hazardous waste or as universal waste. Managing hazardous waste lamps under the universal waste rules eases certain regulations imposed on generators of spent lamps.

Please be aware that incandescent, fluorescent, metal halide, neon, high-intensity discharge, high-pressure sodium and mercury-vapor lamps could be hazardous waste when discarded. Fluorescent lamps may contain up to 40 milligrams (mg) of mercury, depending on the brand and manufacturer. Lamps may also contain lead and cadmium. Many lamps exhibit a characteristic of toxicity for heavy metals when disposed. A copy of Fluorescent Lamps: What You Should Know, was given to you at the time of my inspection. I recommend that you review this document and contact me if you have any questions.

PC must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If PC plans to manage the spent fluorescent bulbs when generated as universal waste, please submit the name of the facility where you plan to recycle the bulbs.

PC must also properly train employees, who handle or have responsibility for managing universal waste, on waste handling and emergency procedures relative to their responsibilities and send me documentation (memo or sign-in sheets) that this has been completed.

On May 20, 2010, PC submitted a copy of the training material presented to the applicable employees regarding the proper management of universal waste lamps. Your training memo indicated that the two of you will be the only employees who will be responsible for the management of universal waste. PC plans to have Chemtron pick up the spent fluorescent bulbs and take them off-site for recycling.

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PC must ensure that the universal waste bulbs are properly labeled. In the picture you submitted the box is labeled "used bulbs". Universal waste lamps or their containers must be clearly marked "Universal Waste Lamp(s)", "Waste Lamp(s)" or "Used Lamp(s)". Your compliance with the universal waste regulations may be assessed at a future unannounced inspection.

With this information, this violation has been abated.

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."

PC had two 275-gallon storage tanks and two 55-gallon drums of used oil that were not properly labeled.

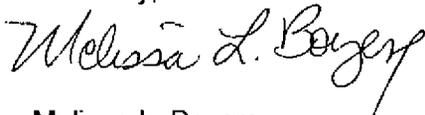
At the time of my inspection, PC properly labeled the two 275-gallon storage tanks and the two 55-gallon drums with the words "used oil".

Therefore, this violation is considered abated.

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/>.

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

Sincerely,



Melissa L. Boyers
Division of Hazardous Waste Management

/cs

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
DHWM, NWDO 2010-Wood County File

ec: Melissa Boyers, DHWM, NWDO