



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, Ohio 43402

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Laura H. Powell, Acting Director

Re: International Fuel Systems, Inc.
Hancock County
Hazardous Waste
Return to Compliance

January 12, 2007

Mr. Jim Hemminger, Manager
International Fuel Systems, Inc.
421 Enterprise Avenue
Findlay, Ohio 44840

Dear Mr. Hemminger:

Thank you for your December 11, 2006, response to Ohio EPA's November 27, 2006, Notice of Violation letter. International Fuel Systems, Inc., (IFS) submitted a copy of the IFS Universal Waste Standard Operating Procedure to be followed in order to manage your universal waste. In addition, IFS submitted a copy of a letter by Heritage-Crystal Clean, LLC, who will be handling the transportation and recycling of your universal waste.

The status of the violation previously cited follows:

1. OAC Rule 3745-52-11: Waste Evaluation

Any person who generates a waste, as defined in OAC Rule 3745-51-02 must determine if that waste is a hazardous waste.

IFS has failed to properly evaluate the spent fluorescent bulbs and other light bulbs generated at the facility.

IFS is currently disposing of their fluorescent bulbs in the trash. IFS must cease immediately disposing of their fluorescent bulbs as non-hazardous waste in the local landfill until a proper waste evaluation has been completed **or** manage the used fluorescent light bulbs as universal waste. If IFS chooses to conduct a waste evaluation, a representative sample of this waste must be taken and analyzed to show constituents present and at what concentrations. IFS must ensure that the laboratory chosen to perform this sampling utilizes the proper method(s) to evaluate these bulbs. IFS must sample the fluorescent bulbs to determine the concentration of mercury (D009), lead (D008) and cadmium (D006) as listed in OAC 3745-51-24 following the method as outlined in U.S. EPA's SW-846. IFS may run total concentration for these constituents as a screening tool. If the concentration is detected for any of the listed heavy metals at or above the regulatory limit, a TCLP may be required to ensure these constituents are not present above the Ohio EPA regulatory levels.

Mr. Jim Hemminger
January 12, 2007
Page Two

If the bulbs are determined to be hazardous through a proper waste evaluation, IFS will have to manage their bulbs either as 1) a universal waste (OAC Chapter 3745-273) or 2) as a hazardous waste under Ohio's generator standards (OAC Chapter 3745-52). IFS may recycle their bulbs if they are hazardous or non-hazardous. Ohio EPA would encourage this option as a pollution prevention alternative.

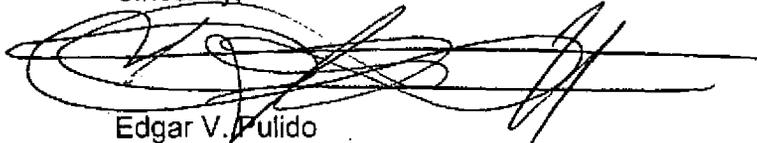
This violation has been abated.

This documentation demonstrates that IFS has adequately **abated** the violation discovered during Ohio EPA's November 2, 2006, inspection.

For additional information regarding the management of hazardous and universal wastes and pollution prevention alternatives, you may refer to our website at www.epa.state.oh.us/dhwm.

Should you have any questions or if I can be of assistance, please contact me at (419) 373-3015.

Sincerely,



Edgar V. Pulido
Division of Hazardous Waste Management

/cs

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

ec: John Pasquarette, DHWM, NWDO
Ed Pulido, DHWM, NWDO

<p>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.</p>
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