



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

October 26, 2011

**ROSS COUNTY
GENERAL FILE
(THREE-C BODY SHOP)
DMWM/SEDO
OHR000037770**

Mr. Kevin Darst
Three-C Body Shop
2300 Briggs Road
Columbus, OH 43223

Dear Mr. Darst:

I received your response to my September 19, 2011 Notice of Violation letter (NOV) on October 20, 2011. The documentation you submitted included photographs of properly closed and labeled universal waste containers and a March 2011 manifest for disposal of hazardous waste paint related material. My review of this documentation reveals that you have adequately demonstrated abatement of the following violations discovered during the September 13, 2011 inspection of the Chillicothe facility:

- (1) OAC Rule 3745-273-13 (D)(1), Waste Management Standards for Small Quantity Handlers of Universal Waste;**
- (2) OAC Rule 3745-273-14(E), Labeling/Marking Standards for Small Quantity Handlers of Universal Waste; and**
- (3) OAC Rule 3745-279-22 (C) and (D), Used Oil Storage Requirements for Generators.**

However, Three-C Body Shop must still address the following comments:

GENERAL COMMENTS

- (a) In your response received on October 20, 2011, you submitted a photograph of used oil containers labeled as "universal waste used oil". Please note that used oil is not a universal waste and should be labeled only with the words "used oil".
- (b) During the September 13, 2011 inspection, we observed spent paint booth filters contained in unclosed plastic bags which, according to you, were being accumulated onsite prior to being manifested offsite as a hazardous waste to Heritage Crystal Clean. In your October 20, 2011 response, you stated that the spent filters were now being stored in a closed receptacle and were currently being evaluated by Chemical Solvents, Inc. Please submit a copy of the current waste evaluation from Chemical Solvents, as well as the previously requested last several manifests for disposal of the filters. Please also include an estimate of the volume of filters that is being generated each month.

- (c) During the inspection, we were informed that a new paint and paint gun cleaning system is being used. According to our conversation immediately following the inspection, you stated that the new paint gun cleaning system should generate very small volumes of filter cake, which you said would be a hazardous waste. However, in your October 20, 2011 response, you said that this waste stream had recently been profiled as nonhazardous. Please submit a copy of the recent waste profile, which was not included in your response.
- (d) As previously requested, please submit receipts for the most recent offsite shipment of universal waste from the Chillicothe facility, and a description of how you track the length of time universal waste has been accumulating onsite. The following links will provide information on how to properly manage your universal waste spent lamps, and a list of lamp recyclers:

<http://www.epa.ohio.gov/portals/32/pdf/LampGuidance.pdf>

<http://epawebapps.epa.state.oh.us/Recyclers/jsp/results.jsp?category=33>

Please submit documentation addressing the above comments within 15 days of the date of this letter. Should you have any questions, please feel free to call me at (740) 380-5293.

Sincerely,



Donna Goodman
District Representative
Division of Materials and Waste Management

DG/mlm

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.