



State of Ohio Environmental Protection Agency

FILE COPY

STREET ADDRESS:

Central District Office

MAILING ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 728-3778 FAX: (614) 728-3898
www.epa.state.oh.us

P.O. Box 1049
Columbus, OH 43216-1049

April 11, 2008

Mr. Don Phillips
Fleet Mobile Service, Inc.
24 Cedar Park Boulevard
Pataskala, OH 43062

Re: **Fleet Mobile Service (non-notifier)**
Licking County

Dear Mr. Phillips:

Thanks to Bonnie and several other workers for assisting during my revisit to your facility at 24 Cedar Park Boulevard in Pataskala on April 9, 2008. The purpose of my visit was to follow up on unresolved compliance issues from my original inspection on April 3, 2007 (as identified in the notice of violation letter dated April 13, 2007). Some phone conversations and a fax reminder in the interim time had not yielded the requested information.

The two violations noted in my original inspection have now been resolved:

1. **Used Oil Container and Tank Marking, OAC rule 3745-279-22(C):**
The 250-gallon storage tank inside of the building, as well as at least eight 55-gallon drums of used oil inside and outside of the building have been marked with the words "used oil". A stencil was made and will be used to mark any other containers or tanks for this purpose.
2. **Waste Evaluation, OAC rule 3745-52-11.**
Contents of about six drums in the building and storage yard were checked with help from a hazardous waste service vendor and were found to contain mostly oil and fuel which could be burned in the used oil space heater on site. Water from the mixtures was separated by decanting.

In addition, the following comments are also offered:

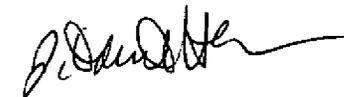
- ▶ While not necessarily hazardous waste, any water decanted from oil/fuel/water mixtures should be managed carefully since it may pollute ground waters if disposed of near septic or well systems. I recommend that any such materials be held and sent to a used oil recycler who can process and manage them safely in accordance with the applicable regulatory requirements.

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

- ▶ Spent lead acid batteries were being accumulated for the core trade-in exchange value. At the time of my revisit, about 45 spent lead-acid batteries were being accumulated on a pallet outside the shop building and up to 10 others at assorted other locations. Lead is a toxic metal, and the liquid contents of such batteries is corrosive. The plastic casing of at least one of the batteries was cracked open. During my visit, the broken battery was temporarily wrapped in plastic to protect it until a bucket could be found to properly contain it. Other businesses have successfully employed an old pickup truck bed and cap to safely collect their used batteries. More protective measures are still strongly advised.
- ▶ An 8-foot long fluorescent lamp tube (luckily, unbroken) was sticking out of a pile near the used batteries. Bonnie moved it to a safe temporary location inside the building. A box of fluorescent lamp tubes was being stored in one of the old Cintas trucks parked on the site. Waste lamps contain hazardous mercury; they must be collected in a properly marked container or box (see enclosed guidance sheet) for management as universal waste.
- ▶ I found a discarded truck fuel filter on the ground near the driveway entrance, still mostly full of about 8 ounces of liquid fuel. I gave it to a worker, to drain into the used oil tank. Such items need to be properly collected and managed, or may cause storm water or ground water pollution.
- ▶ Housekeeping issues at the site remain a problem. Four solid waste trash bins out by the street when I arrived were full, and one was tipped over, with trash scattered in the street right of way. Many scrap metal items and various containers and parts were scattered on the unpaved areas on three sides of the building. Scrap metal should be collected in a bin which may be obtained from commercial metal recyclers. Access and aisle space for emergencies was poor at best, due to over 12 vehicles and many related parts wedged into the small area. A larger site or building might better accommodate activities of this scale.

Thank you for your efforts to address these matters. If you have any questions now or in the future about such matters, do not hesitate to call me at (614) 728-3885.

Sincerely,



J. David Hohmann
Environmental Specialist
Division of Hazardous Waste Management
Central District Office

c: Tammy McConnell, DHWM/CO
Stan Robinson, City of Pataskala
CDO File

Notice: Ohio EPA's failure to list specific deficiencies/violations in this letter does not relieve your company from general obligations to comply with all applicable regulations.