



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

Re: Warner Automotive
OHD981779374
Conditionally Exempt Small Quantity
Generator
Hancock County, NWDO
PRTC

September 16, 2010

Mr. Bruce Herrig, Service Manager
Warner Automotive
1060 Bright Road
Findlay, Ohio 45840

Dear Mr. Herrig:

On April 7, 2010, Wendy Miller and I inspected Warner Automotive's Buick, Pontiac, GMC and Nissan dealership located at 1060 Bright Road in Findlay, Ohio. As a result of the inspection, Warner Automotive was issued a notice of violation letter dated April 16, 2010.

On June 22, 2010, I conducted a follow-up inspection at Warner Automotive and obtained a sample of the oily sludge generated from your water based parts washer. On July 15, 2010, I received a copy of the analysis for the oily sludge I obtained from your water based parts washer machine.

My June 22, 2010, follow-up inspection reveals that Warner Automotive has adequately demonstrated abatement of the following violations discovered during the April 7, 2010, inspection:

- 1.b. OAC Rule 3745-52-11, Hazardous Waste Determination:** "oily sludge from water based parts washer.

The analysis of the oily sludge from the water based parts washer dated July 15, 2010, indicates that the oily sludge does not exhibit any hazardous waste characteristics. Therefore, Warner Automotive may continue to mix this sludge with the used oil generated at the facility.

- 1.c. OAC Rule 3745-52-11, Hazardous Waste Determination:** fluorescent lamps.

On June 22, 2010, Warner Automotive demonstrated that the facility has begun managing spent fluorescent lamps as universal waste destined for recycling.

- 2. OAC Rule 3745-279-22(C)(1), Marking of Used Oil Containers:**

This violation was abated at the time of the April 7, 2010, inspection.

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Warner Automotive has failed to submit documentation demonstrating the paint filters generated in the facility body shop have been evaluated to determine if the filters are hazardous waste. as requested in Ohio EPA's April 16, 2010, NOV letter. Therefore, Warner Automotive remains in violation of the following hazardous waste law:

1.a. OAC Rule 3745-52-11, Hazardous Waste Determination: paint filters.

Warner Automotive has failed to evaluate the paint filters from the facility paint booth to determine if they are hazardous waste

To abate this violation, Warner Automotive must analyze a representative sample of the spent paint filters for total volatile organic compounds (VOC's) and Resource Conservation and Recovery Act (RCRA) metals using methods as outlined in U.S. EPA's SW-846. This information should be submitted to my attention at the Ohio EPA within 30 days of receipt of this letter.

Warner Automotive should not dispose of any spent paint filters until analysis of the samples has been received.

Please submit documentation demonstrating abatement of the above outstanding violation to this office within 30 days of your receipt of this letter.

Should you have any questions, please feel free to call me at (419-373-3056).

Sincerely,



Gary S. Deutschman
Environmental Specialist III
Division of Hazardous Waste Management

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pc: Brian Miller, Warner Automotive Body Shop Manager
Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, Supervisor, DHWM, NWDO
DHWM, NWDO File-General File, Hancock County

ec: Gary Deutschman, 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.