



Environmental
Protection Agency

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

Re: Premier Auto Detail
Lucas County
OHD016799843
Hazardous Waste
Return to Compliance

March 18, 2011

Mr. Nassim Elhaf
Premier Auto Detail
6417 Angola Road
Holland, Ohio 43528

Dear Mr. Elhaf:

Thank you for your March 11, 2011, response to Ohio EPA's December 3, 2009, Notice of Violation (NOV) letter. The Ohio EPA also spoke with you at your facility on July 20, 2010, and gave you another copy of the NOV letter. On March 9, 2011, I spoke with your employee, Ali, and also sent an electronic mail to your facility. In addition, I spoke with you on March 11, 2011. My review of the documentation submitted and the information received during our telephone conversation reveals that Premier Auto Detail (Premier) has adequately demonstrated abatement of the violation cited in the December 3, 2009, NOV.

The following is a summary of the violation cited in the December 3, 2009, NOV as a result of Ohio EPA's November 18, 2009, inspection and your compliance with respect to it:

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

Any person who generates a waste must determine if that waste is a hazardous waste by using generator knowledge or by testing the waste.

Premier failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility.

Premier must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If Premier 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. Premier must also properly train employees, who handle or have responsibility for managing universal waste, on waste handling and emergency procedures relative to their responsibilities. Please review the universal waste requirements with the appropriate employees and send me documentation that this has been completed.

On March 11, 2011, Premier submitted information, via electronic mail, regarding plans for the management of spent fluorescent bulbs. In addition, I spoke with you on March 11, 2011, to obtain some clarification and additional information.

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Premier has not generated any spent fluorescent bulbs to date and is in the process of trying to sell this property. You stated that if any spent bulbs are generated prior to the sale of the building, you would change them and manage them as universal waste. Premier plans to contact Environmental Recycling in Bowling Green to have the bulbs recycled when generated. Premier was urged to contact Ohio EPA if any assistance is needed if/when any spent fluorescent bulbs are generated.

With this information, this violation has been 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

/llr

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
~~DHWM;NWDO-2011-Lucas County General File~~

ec: Melissa Boyers, 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.