



Environmental  
Protection Agency

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

Re: Cobra Equipment  
OHD987054079  
RTC

September 28, 2010

Mr. Tim York  
Cobra Equipment  
1038 North Holland-Sylvania Road  
Toledo, Ohio 43615

Dear Mr. York:

On August 10, 2010, I contacted you regarding Ohio EPA's Notice of Violation (NOV) letter which was sent to Cobra Equipment on February 25, 2010. I called you to confirm how you will be managing your spent fluorescent lamps and also for more information on your parts washer.

You will be managing fluorescent lamps as a universal waste. You stated that you will be taking them to Gross Electric who then transports them to Environmental Recycling. Additionally, we discussed your parts washer. You have not had it serviced and only add solvent when needed.

The following is a summary of the violations found and the current status:

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

On August 10, 2010, you stated that you will be recycling your spent fluorescent lamps as Universal Waste at Gross Electric. You do not have any bulbs in storage at this time. We discussed again what the requirements are for bulbs as far as labeling, storing, and recycling. **Therefore, this violation is considered abated.**

**2. Labeling of Used Oil, OAC 3745-279-22(C) :**

At the time of our inspection, February 17, 2010, you properly labeled the tank and drum with the words "Used Oil", therefore, **this violation was previously abated.**

On August 12, 2010, you submitted to me a material safety data sheet (MSDS) on your parts washer solvent. In reviewing the MSDS, I noted that you are using an ignitable solvent. This means that when your solvent is spent, it would be considered a hazardous waste (D001) if you dispose of it.

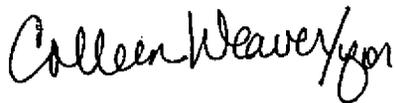
Mr. Tim York  
September 28, 2010  
Page 2

You stated that you do not take any solvent out from the parts washer but only add. Please be aware that if you generate any filters, sludges, or any other waste, they must be evaluated per OAC Rule 3745-52-11. You also have a used oil burner on-site.

At this time, all of the violations cited during our February 17, 2010, compliance evaluation inspection have been abated.

Should you have any questions, please feel free to call me at (419) 373-3114.

Sincerely,



Wendy Miller  
Division of Hazardous Waste Management

/llr

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