



**Environmental
Protection Agency**

John R. Kasich, **Governor**

Mary Taylor, **Lt. Governor**

Scott J. Nally, **Director**

Re: Schultz Automotive Repair
Fulton County
OHD 982 646 150
Hazardous Waste
Return to Compliance

February 24, 2012

Mr. Paul Schultz
Schultz Automotive Repair
301 Palmwood Street
Delta, Ohio 43515

Dear Mr. Schultz:

Thank you for your February 17, 2012, telephone response to Ohio EPA's January 9, 2012, 2nd Notice of Violation/Partial Return to Compliance (2nd NOV/PRTC) letter. During our telephone conversation, you provided information regarding the management of your spent fluorescent bulbs. My review of the information provided reveals that Schultz Automotive Repair (Schultz) has adequately demonstrated abatement of the violations cited in the September 15, 2011, NOV/PRTC letter.

The following is a summary of the violations cited in the September 15, 2011, NOV/PRTC letter as a result of my August 25, 2011, inspection and your compliance with respect to each:

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

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

Basically, you can run analytical to determine if the bulbs contain mercury, lead, or cadmium (if you would like to continue to dispose of them as solid waste) OR you can choose to handle them through the **universal waste rules** by **recycling**. When lamps are recycled as a universal waste, they are not considered a hazardous waste. You must ensure that the bulbs are recycled within one year of being generated and maintain this paperwork to demonstrate compliance. Also, you must label the box containing the burned out bulbs (prior to recycling) with the words "universal waste lamps".

To abate this violation, Schultz must confirm how you plan to manage the lamps in the future and where they will be recycled if you choose to handle them as universal waste.

On November 9, 2011, I spoke with you regarding your plans for managing spent fluorescent bulbs. You stated that you plan to take your spent bulbs to Dyer & McDermott, Inc. in Wauseon, Ohio for recycling. On November 9, 2011, I contacted Dyer & McDermott, Inc. to verify your plans. Dyer & McDermott, Inc., does not broker spent fluorescent bulbs, they only sell new bulbs. On November 10, 2011, I mailed you a list of fluorescent bulb recyclers.

On February 17, 2012, Schultz reported that they will manage the spent fluorescent bulbs as universal waste. The bulbs, when generated, will be picked up by Environmental Recycling in Bowling Green, Ohio, for recycling.

With this information, this violation has been abated.

2. OAC Rule 3745-279-22(C)(1), Labeling:

Containers, aboveground tanks, and fill pipes used for underground storage tanks shall be labeled or marked clearly with the words "used oil."

Schultz had two 55-gallon drums and two portable carboys that were not properly labeled.

At the time of my inspection, Schultz properly labeled the two 55-gallon drums and the two portable carboys with the words "used oil".

This violation was previously abated on August 25, 2011.

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/>.

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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 Materials and Waste Management

/llr

pc: Cindy Lohrbach, DMWM, NWDO
Colleen Weaver, DMWM, NWDO

ec: Colleen Weaver, DMWM, NWDO (scanned e-copy)

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.