



**Environmental
Protection Agency**

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

Re: Speckman Automotive, Inc.
Auglaize County
OHR000013086
Hazardous Waste
Return to Compliance

September 26, 2011

Mr. Craig Speckman
Speckman Automotive, Inc.
415 South Wayne Street
St. Marys, Ohio 45885

Dear Mr. Speckman:

Thank you for your September 12, 2011, response to Ohio EPA's August 29, 2011, Notice of Violation/Partial Return to Compliance (NOV/PRTC) letter. My review of the documentation submitted reveals that Speckman Automotive, Inc. (Speckman) has adequately demonstrated abatement of the violations cited in the August 29, 2011, NOV/PRTC.

The following is a summary of the violations cited in the August 29, 2011, NOV/PRTC as a result of my August 17, 2011, inspection and your compliance with respect to each:

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

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

Speckman must immediately cease disposing of the fluorescent lamps as non-hazardous waste until a proper waste evaluation has been completed. Incandescent, fluorescent, metal halide, neon, high-intensity discharge, high-pressure sodium and mercury-vapor lamps could be hazardous waste when discarded. Fluorescent lamps may contain up to 40 milligrams (mg) of mercury, depending on the brand and manufacturer. Lamps may also contain lead and cadmium. Many lamps exhibit a characteristic of toxicity for heavy metals when disposed.

A copy of Fluorescent Lamps: What You Should Know, was given to you at the time of my inspection. I recommend that you review this document and contact me if you have any questions.

Hazardous bulbs are considered "spent materials" and remain hazardous waste even when recycled. Hazardous waste lamp generators have the option of handling their lamps as hazardous waste or as universal waste. Managing hazardous waste lamps under the universal waste rules eases certain regulations imposed on generators of spent lamps.

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, Speckman 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 September 12, 2011, Speckman submitted information regarding the future management of the spent fluorescent bulbs. Speckman will manage the spent fluorescent bulbs as universal waste. Speckman has a container labeled "universal waste lamps" and will send them to Mesco Electrical Supply (Mesco). On September 14, 2011, I spoke with Joel Hagerman at Mesco and he stated that they take the universal waste lamps to U.S.A. Lamp & Ballast Recycling in Cincinnati to be recycled.

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."

Speckman had one 55-gallon drum that was not properly labeled.

At the time of my inspection, Speckman properly labeled the 55-gallon drum with the words "used oil". A copy of the fact sheet, The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil, was given to you at the time of my inspection. Please review this information and contact me if you have any questions.

This violation was previously abated on August 17, 2011.

3. OAC Rule 3745-279-24, Off-Site Shipment:

Generators shall ensure that their used oil is transported only by transporters who have obtained an EPA identification number.

Speckman has been giving the used oil they generated to DH Automotive who is burning it in their on-site burner.

Mr. Craig Speckman
September 26, 2011
Page Three

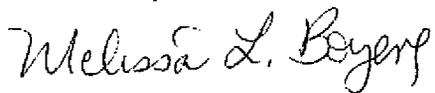
Speckman must immediately cease giving used oil to any person or transporter who does not have an EPA identification number. To abate this violation, Speckman must notify Ohio EPA with how you plan to manage your used oil in the future and provide the applicable documentation for review. In addition, Speckman may want to look into recycling the used oil filters rather than managing them as a solid waste.

On September 12, 2011, Speckman submitted information regarding the future management of used oil. Speckman generates used oil from the maintenance and repair of their delivery trucks. Speckman has decided to no longer service the delivery trucks on-site and plans to take them to a used oil service facility. Speckman plans to have Safety Kleen pick up the partial 55-gallon drum of used oil currently on-site and it will be burned for energy recovery.

With this information, this violation has been abated.

If you have any questions or I can be of assistance, please contact me at (419) 373-3066.

Sincerely,



Melissa L. Boyers
Division of Materials & Waste Management

/cs

pc: Cindy Lohrbach, DMWM, NWDO
Colleen Weaver, DMWM, NWDO
DMWM-HW, NWDO, 2011 Auglaize County, General File

ec: Melissa Boyers, DMWM, NWDO

Notice:

Ohio's 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.