



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468  
www.epa.state.oh.us

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

Re: **Complaint #2607**  
Voll Frame & Alignment Inc.  
Lucas County  
Hazardous Waste  
2<sup>nd</sup> Notice of Violation

April 11, 2008

Mr. Dan Reynolds, Owner  
Voll Frame & Alignment Inc.  
455 Terminal  
Toledo, Ohio 43613

Dear Mr. Reynolds:

On December 18, 2007, the Ohio Environmental Protection Agency (Ohio EPA) conducted a compliance evaluation inspection of Voll Frame & Alignment Inc. (Voll's) located at 455 E. Terminal in Toledo, Ohio. On January 7, 2008, you were sent a Notice of Violation (NOV) letter which outlined the violations we found and what you needed to do to correct these violations. To date, Voll's has failed to respond to the initial NOV letter and the violations cited remain outstanding.

The following is a summary of the violations cited in the NOV which was sent to you on January 7, 2008:

1. **OAC Rule 3745-52-11: Waste Evaluation:** Any person who generates a waste must determine if that waste is a hazardous waste by using generator knowledge or by testing the waste.

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

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.

Please be aware that 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.

Voll's must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If Voll's decides to conduct waste sampling, please notify me at least seven days prior to the sampling event date, so that a representative from Ohio EPA can be present to observe the sampling and to split samples if necessary. If Voll's plans to manage the spent fluorescent bulbs as universal waste, please submit photographic documentation showing the storage containers properly closed, labeled, and dated. Voll's must also properly train employees, who handle or have responsibility for managing universal waste, on waste handling and emergency procedures relative to their responsibilities. In addition, Voll's must submit the name of the facility where you plan to recycle the bulbs.

X

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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."

Voll's had several containers that were not properly labeled. Specifically, the used oil storage tank located inside the shop, one poly 55-gallon drum located outside and two carboys, one in the garage and one outside were not properly labeled.

Voll's properly labeled the tank, drum and carboys with the words "used oil" at the time of our investigation. A Fact Sheet outlining the Used Oil Regulations for generators is enclosed, please contact me if you have any questions.

***Therefore, this violation is considered abated.***

Please submit documentation demonstrating abatement of the above outstanding violation to this office within **15 days** of receipt of this letter.

Ohio EPA has helpful information about compliance assistance and pollution prevention at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp.html>.

In addition, you can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

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

Sincerely,



Melissa L. Boyers  
Division of Hazardous Waste Management

/csl

pc: Cindy Lohrbach, DHWM, NWDO  
Tammy McConnell, DHWM, CO  
Colleen Weaver, DHWM, NWDO  
(DHWM, NWDO 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.