



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

**Re: Whiteford Kenworth**  
OHD109170092  
Conditionally Exempt Small Quantity Generator  
Wood County, NWDO  
PRTC

April 7, 2009

Mr. Tim Rowe, Service Manager  
Whiteford Kenworth  
12650 Eckel Junction Road  
P. O. Box 387  
Perrysburg, Ohio 43551

Dear Mr. Rowe:

I received your responses to my February 13, 2009, Notice of Violation (NOV) letter on February 9, 2009, and March 23, 2009. The documentation you submitted included photographs of your used oil containers and documentation demonstrating that you have contracted with a service to recycle your spent fluorescent light bulbs.

My review of the March 23, 2009, documentation reveals that Whiteford Kenworth has adequately demonstrated abatement of the following violations discovered during the February 2, 2009, inspection:

- 1(b). **OAC Rule 3745-52-11, Waste Evaluation (spent fluorescent lamps)**
2. **OAC Rule 3745-279-22(C)(1) – Marking of Used Oil Containers**

In your March 23, 2009, correspondence, you stated that Whiteford Kenworth has contacted Safety Kleen to sample and analyze your oily sludge generated from your parts washer distillation unit as requested in Ohio EPA's February 13, 2009, NOV letter. As of the date of this letter, Ohio EPA has not received the results of this analysis. Therefore, Whiteford Kenworth remains in violation of the following hazardous waste laws:

- 1(a). **OAC Rule 3745-52-11, Hazardous Waste Determination:** "Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste..."

Whiteford Kenworth failed to evaluate the distilled parts washer waste prior to mixing with the used oil generated at the facility. Whiteford Kenworth must evaluate the distilled parts washer waste for the characteristics for metals, total organic compounds and flash point.

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

Should you have any questions, please feel free to call me at (419) 3733056). You can find copies of the rules and other information on the division's web page at: <http://www.epa.state.oh.us/dhwm/>.

Sincerely,



Gary S. Deutschman  
Environmental Specialist III  
Division of Hazardous Waste Management

/cs

pc: Cindy Lohrbach, DHWM, NWDO  
Colleen Weaver, Supervisor, DHWM, NWDO  
DHWM, NWDO File = Whiteford Kenworth file, Wood County

ec: Gary Deutschman, DHWM, NWDO