

**Environmental
Protection Agency**

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

Re: Imperial Truck Refinishing
OHR000168112
Hazardous Waste
Complaint #3136
Richland County
Return to Compliance

May 22, 2012

Mr. David Hornickel, Owner
Imperial Truck Refinishing
910 Park Avenue East
Mansfield, Ohio 44905

Dear Mr. Hornickel:

On March 20, 2012, Ohio EPA (Gary Deutschman and the writer) conducted sampling of spent sandblasting media at your facility and at the residential home of Jeremy Dickerson located at 368 8th Avenue, Mansfield, Ohio as well as a paint booth filter from your facility painting booth as outlined in your March 20, 2012, Notice of Violation (NOV).

On April 2 and April 6, 2012, I received analytical data via email from TestAmerica North Canton with the results of this sampling. These results indicate that the spent sandblasting media both at your facility and at the residential home are non-hazardous, and that your paint booth filters are also a non-hazardous waste.

Based on this analytical, Imperial Truck Refinishing (Imperial Truck) has abated the violation observed during my February 29, 2012, investigation as outlined below:

Violation	Date Violation Observed	Date Violation Abated
1. OAC Rule 3745-52-11 Waste Evaluation.	February 29, 2012	A.) April 2 & 6, 2012; B.) April 6, 2012

The sand blast media which you generate from your business, though non-hazardous, is a solid waste which must be managed and disposed of properly. Imperial Truck may not allow this waste to be placed onto the ground in the back of its shop for disposal and likewise, Imperial Truck may not haul this waste to Jeremy Dickerson's residence (or to any other residence) for disposal of this waste. In the future, this waste must be taken to a licensed solid waste landfill for disposal.

Mr. David Hornickel, Owner
May 22, 2012
Page 2

Imperial Truck must dig up the sand blast media which to date has been disposed of at the back of your facility, and at Mr. Dickerson's property. After all of this material has been dug up from both sites, you must dispose of the non-hazardous sand blast media at a RCRA Subtitle D Solid Waste Landfill. You may need to contact your local landfill to see if they would require any additional testing of the waste prior to disposal. For further information pertaining to the disposal of your non-hazardous sand blast media, please contact Tyler Madeker, Division of Materials and Waste Management (solid waste) at 419-373-3078 or tyler.madeker@epa.state.oh.us.

In addition, on May 9, 2012, you submitted two hazardous waste manifests from the pick-up of your painting waste (D001, F003, F005) from 1998 and 2000, in response to the Area of Concern outlined in my March 20, 2012, NOV. On May 10, 2012, I spoke with Angie at Clean Water, Ltd (fka Perma-Fix of Dayton), your hazardous waste hauler, and she stated that you have not had another pick-up of waste since 2000.

During the complaint investigation on February 29, 2012, I observed one (1) full drum and one (1) drum ¼ full on-site. If you have had more recent pick-ups of hazardous waste you should ensure to keep this documentation of these pick-ups on-site for at least three years. Please note that if it is discovered that you are not properly disposing of your hazardous waste (having it picked up by a licensed hazardous waste hauler) this is a serious violation of Ohio's hazardous waste laws and could keep lead to possible escalated enforcement. Likewise, Imperial Truck Refinishing is a conditionally exempt small quantity generator (CESQG) of hazardous waste (D001, F003, F005). On May 16, 2012, I called and left you a message stating that as a CESQG of hazardous waste you may accumulate on-site no more than 2200 pounds of waste (roughly 5.5 drums) of hazardous waste on-site before becoming a small quantity generator (SQG) of hazardous waste. A SQG has a much increased regulatory burden. Thus, you should avoid accumulating on-site at any one time more than the limits above. Please consult the U.S. EPA guidance Managing Your Hazardous Waste – A Guide for Small Businesses (page 7) which I gave to you during the February 29, 2012, investigation for the hazardous waste requirements for a CESQG.

With the May 9, 2012, submittal of your hazardous waste manifests, you have satisfied the area of concern as outlined in my March 20, 2012, NOV.

Pollution Prevention

You stated during the February 29, 2012, investigation that you utilize as much as four bags of sandblast per day. There may be an alternative to this material/process (a re-useable media or a way to collect the material you currently utilize, filter and re-use this material).

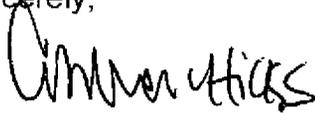
Mr. David Hornickel, Owner
May 22, 2012
Page 3

This could be a substantial cost savings to you both in terms of product purchases and disposal fees. In addition, your waste generation may decrease. Ron Nabors from the Office of Compliance Assistance and Pollution Prevention (OCAPP) may be able to assist you in finding a pollution prevention alternative to your current sandblasting process.

No response to this letter is necessary however you should contact Tyler Madeker for assistance in the removal and disposal of the sand blast media at your facility and at 368 8th Avenue, Mansfield, Ohio, as outlined above.

If you should have any questions, please feel free to call me at (419) 373-3082 or email me at amber.hicks@epa.state.oh.us.

Sincerely,



Amber M. Hicks
Division of Materials and Waste Management

//lr

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

ec: Amber Hicks, DMWM, NWDO
Colleen Weaver, DMWM, NWDO
Tyler Madeker, DMWM, NWDO
Tom Cikotte, DAPC, 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.