



**Environmental
Protection Agency**

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

Re: D.C. Collision
OHD986985224
Wood County
Hazardous Waste
Return to Compliance

July 19, 2012

Mr. Dallas Coppeler, Owner
D. C. Collision
5182 Sugar Ridge Road
Pemberville, Ohio 43450

Dear Mr. Coppeler:

Thank you for your May 3, 2012, and June 13, 2012, responses to Ohio EPA's March 26, 2012, Notice of Violation (NOV) letter. D.C. Collision (hereafter referenced as DCC) submitted waste evaluation documentation and information regarding universal waste. My review of the documentation submitted reveals that DCC has adequately demonstrated abatement of the violations cited in the March 26, 2012, NOV.

The following is a summary of the violation cited in the March 26, 2012, NOV as a result of Ohio EPA's March 14, 2012, inspection and your compliance with respect to it:

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

Any person who generates a waste must determine if that waste is a hazardous waste by using generator knowledge or by testing the waste.

- a) At the time of the inspection, DCC did not have waste evaluation documentation for the spent paint booth filters. DCC has historically disposed of this spent material as a non-hazardous waste. DCC must immediately cease disposing of the waste paint booth filters as non-hazardous waste until a proper waste evaluation has been completed.

On May 3, 2012, DCC submitted the waste analysis results for the spent paint booth filters. The submitted analytical results indicate that the spent paint booth filters are a non-hazardous waste. These filters may be managed as a solid waste. *With this information, this portion of the violation has been abated.*

- b) In addition, DCC failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility. DCC changed over to T8 bulbs in July 2011. Spent fluorescent bulbs that were removed in July 2011, were placed in the storage area above the paint storage room and have been there ever since.

Mr. Dallas Coppeler, Owner
July 19, 2012
Page 2

On June 13, 2011, DCC submitted a copy of the bill of lading for the 87 spent fluorescent bulbs that were taken to Environmental Recycling in Bowling Green, Ohio, for recycling. I spoke with Dale at your facility on May 17, 2012, who stated that spent fluorescent lamps will be managed as universal waste. Please note that when you begin accumulating spent fluorescent bulbs be sure you place them in a container that is marked with the date when the first spent bulb was placed into the container. In addition, all packages and containers holding spent fluorescent lamps/bulbs are to be labeled with the words "Universal Waste - Lamps", "Waste Lamps" or "Used Lamps". *With this information, this portion of the violation has been abated.*

This violation has been completely abated.

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/>.

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

//lr

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

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