



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

**RE: Larry Schaaf Auto Sales  
Auglaize County  
DHWM, NWDO  
Complaint #2645  
Return to Compliance**

October 18, 2007

Mr. Jim Heistan  
Larry Schaaf Auto Sales  
1525 Celina Road  
St. Marys, OH 45885

Dear Mr. Heistan:

Thank you for sending the response to the Ohio Environmental Protection Agency's (Ohio EPA's) Notice of Violation (NOV) dated September 26, 2007. Ohio EPA received the response from Larry Schaaf Auto Sales (LSAS) on October 5, 2007. This response was not dated by LSAS. My review of all the documentation submitted reveals that LSAS has adequately demonstrated abatement of the violations discovered during the September 13, 2007, inspection, and cited in the September 26, 2007, NOV.

The following is a summary of the violations cited and the facility's compliance with respect to each violation:

1. **OAC Rule 3745-273-14 (E): Labeling/markings-standards for small quantity handlers of universal waste:** "Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)."

LSAS failed to mark the container holding their fluorescent bulbs with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)."

To abate this violation, LSAS must label the appropriate container with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)." LSAS must document this by photographing the properly labeled containers and submitting the photographs to Ohio EPA's Northwest District Office within 30 days of receipt of this letter.

**LSAS submitted photographic documentation on October 5, 2007, that the facility properly labeled the appropriate containers with the words "Used Lamps."**

*With this information, this violation is considered abated.*

2. **OAC Rule 3745-273-13(D)(1): Waste management-standards for small quantity handlers of universal waste:** "A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions."

LSAS failed to store the universal waste lamps in a closed container.

In order to abate this violation, LSAS must immediately close the container holding universal waste lamps. LSAS should document that this container is closed by photographing the closed container and submitting this photograph to Ohio EPA's Northwest District Office within 30 days of receipt of this letter.

**LSAS submitted photographic documentation on October 5, 2007, that the facility immediately closed the containers holding used lamps.**

*With this information, this violation is considered abated.*

Should you have any questions or if I can be of assistance, please contact me at (419) 373-3065.

Sincerely,



Kara Reynolds  
Environmental Specialist  
Division of Hazardous Waste Management

/lb

cc: Colleen Weaver, DHWM, NWDO  
Kara Reynolds, DHWM, NWDO  
Cindy Lohrbach, DHWM, NWDO  
~~DHWM, NWDO Auglaize County File~~; Auglaize County General

ec: Gary Deutschman, 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.