



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 #2790**
Holland Body Shop
Lucas County
Hazardous Waste
OHD 135 399 509
Return to Compliance

September 22, 2008

Mr. Rick Farnol, Owner
Holland Body Shop
1740 Eber Road, Unit C
Holland, Ohio 43528

Dear Mr. Farnol:

Thank you for your August 13, 2008, and September 8, 2008, responses to Ohio EPA's July 15, 2008, Notice of Violation letter. Holland Body Shop (HBS) submitted documentation showing that the spent bulbs will be managed as universal waste and that Chemtron Corporation will be picking them up for recycling. My review of this documentation reveals that HBS has adequately demonstrated abatement of all of the violations discovered during the July 2, 2008, complaint investigation and compliance evaluation inspection.

The following is a summary of the violations cited and your compliance with respect to each:

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.

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

HBS must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If HBS 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 HBS plans to manage the spent fluorescent bulbs as universal waste, please submit photographic documentation showing the storage containers properly closed, labeled, and dated. HBS must also properly train employees, who handle or have responsibility for managing universal waste, on waste handling and emergency procedures relative to their responsibilities and send me documentation that this has been completed. In addition, HBS must submit the name of the facility where you plan to recycle the bulbs.

On September 8, 2008, HBS submitted a copy of the waste profile sheet that was completed by Chemtron Corporation (Chemtron) for the management of the spent fluorescent bulbs as universal waste. On September 15, 2008, I spoke with Mr. George Scott at Chemtron, who verified that the fluorescent bulbs will be shipped to Environmental Recycling in Bowling Green, Ohio, for recycling.

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In addition, Charlene Farnol, HBS, met with the facility employees to review how the spent fluorescent bulbs are to be managed. They were notified to contact her to arrange a pick-up by Chemtron to have them recycled.

With this information, this violation is considered abated.

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."

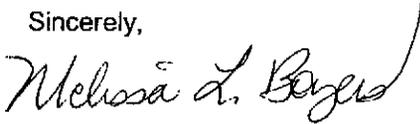
HBS had two 55-gallon drums of used oil located inside the building that were not properly labeled.

HBS properly labeled the drums with the words "used oil" at the time of our inspection. A Fact Sheet outlining the Used Oil Regulations for generators was given to Ken Manns at the time of our investigation. I recommend that you review this document and contact me if you have any questions.

Therefore, this violation is considered abated.

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
Kristina Durnell, 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.