



Environmental
Protection Agency

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

Re: Hudson Automotive
Lucas County
RTC

July 29, 2011

Mr. Amos Chesser
Hudson Automotive
6415 Angola Road
Holland, Ohio 43528

Dear Mr. Chesser:

On July 12, 2011, Melissa Boyers and I visited your facility to do a follow up inspection to check on the status of the violations found during Ohio EPA's September 29, 2010, inspection. I sent you a Notice of Violation letter dated October 6, 2010, but did not receive a response to my letter.

The following is the status of the violations that were observed and noted during our inspection:

1. Used Oil Labeling, OAC Rule 3745-279-22(C)(1):

Containers, aboveground tanks, and fill pipes used for underground storage tanks shall be labeled or marked clearly with the words "used oil".

Hudson had a 250 gallon storage tank, sixteen 55-gallon drums and two containers that were not labeled with the words "Used Oil".

During our site visit on July 12, 2011, we verified that the tank was properly labeled "Used Oil". Drums were not in use at the time of our visit. Therefore, this violation is considered abated.

2. Universal Waste Management, OAC Rule 3745-273-13(D)(1):

Universal waste lamps must be in closed containers which are adequate to prevent breakage.

Hudson was not keeping spent lamps in a closed box or container at the time of inspection.

During our site visit on July 12, 2011, the lamps were in a closed box. Therefore, this violation is considered abated.

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3. Universal Waste Labeling, OAC Rule 3745-273-14(E):

All spent lamps, containers or packages must be labeled with the words "universal waste lamps", "waste lamps" or "used lamps".

Hudson did not have lamps in containers or boxes labeled with the words "universal waste lamps", "waste lamps" or "used lamps".

During our site visit on July 12, 2011, you labeled the lamps with the words "Universal Waste Lamps".

Therefore, this violation is considered abated.

4. Universal Waste, Accumulation Time, OAC Rule 3745-273-15(C):

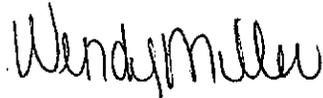
All containers or packages holding universal waste lamps must be labeled with the earliest date that any spent lamp was put into the container or package.

Hudson did not have the container or box labeled with the date that bulbs began accumulating.

During our site visit on July 12, 2011, you labeled the lamps with a date and indicated that you will be recycling the lamps through Gross Electric. (This must be done by September 29, 2011 to remain in compliance.) Therefore, this violation is considered abated.

Hudson Automotive has abated all violations noted during our September 29, 2010, inspection. Should you have any questions or if I can be of assistance, please contact me at (419) 373-3114.

Sincerely,



Wendy Miller
Division of Materials and Waste Management

pc: Cindy Lohrbach, DMWM, NWDO
Colleen Weaver, DMWM, NWDO
DMWM:HW, NWDO Lucas County General File