



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: Katz Collision, Inc.
Lucas County
OHD084566314
Hazardous Waste-CESQG
Return to Compliance

July 20, 2009

Mr. Patrick Jansen
Katz Collision, Inc.
5420 Alger Drive
Sylvania, Ohio 43560

Dear Mr. Jansen:

Thank you for your July 9, 2009, response to Ohio EPA's June 25, 2009, Notice of Violation (NOV) letter. The information you submitted included documentation for the management of your spent fluorescent bulbs as universal waste. My review of the documentation submitted reveals that Katz Collision, Inc. (Katz) has adequately demonstrated abatement of the violation cited in the June 25, 2009, NOV letter.

The following is a summary of the violation cited in the June 25, 2009, NOV and your compliance with respect to it:

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.

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

Katz must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If Katz 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. In lieu of conducting sampling, Katz can manage the spent fluorescent bulbs as universal waste. If Katz plans to manage the spent fluorescent bulbs as universal waste, please submit photographic documentation showing the storage containers properly closed, labeled, and dated. Katz 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, Katz must submit the name of the facility where you plan to recycle the bulbs.



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On July 9, 2009, Katz submitted information regarding the future management of the spent fluorescent bulbs. Katz plans to manage the spent bulbs as universal waste and submitted a photograph of the box that will be used to store the spent bulbs. It was unclear by the photo if in the box there were new or spent bulbs. In addition, the box was not properly labeled for the storage of spent fluorescent bulbs. Katz also stated that all of the employees have been instructed on how to manage the universal waste.

On July 16, 2009, the Ohio EPA made a site visit to verify your compliance with the universal waste rules. The box contained new fluorescent bulbs obtained from Gross Electric. Katz plans to begin using this box when any universal waste is generated. Once full, Gross Electric will pick up the box and deliver it to Environmental Recycling in Bowling Green where they will be recycled. Katz was notified how to properly label and date the box when the first spent bulb is placed inside. No universal waste bulbs were in storage at the time of our site visit.

With this information, 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

/lb

pc: Cindy Lohrbach, DHWM, NWDO
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.