



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

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www.epa.state.oh.us

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

Re: Soft Touch Car Wash
Lucas County
DHWM, NWDO
Complaint #2812

October 1, 2008

Mr. Craig Pencheff
Soft Touch Car Wash
6307 Monroe Street
Sylvania, Ohio 43560

Dear Mr. Pencheff:

On September 11, 2008, Amber Hicks and I, representing the Ohio Environmental Protection Agency (Ohio EPA), investigated a complaint and conducted a compliance evaluation inspection at Soft Touch Car Wash (STCW) located at 6307 Monroe Street, Sylvania, Ohio. According to the complaint received by Ohio EPA, the complainant alleged that rinse water from the car wash and waste paint was being disposed of via the sewer. The complainant also stated that scum from the automated loader is being placed into the dumpster for disposal and this scum smells like oil. We also inspected STCW to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). This letter will explain the validity of the complaint and your compliance with Ohio's hazardous waste rules and regulations.

STCW is a car wash and gas station. No car maintenance or painting takes place at this location. Used oil is not generated regularly at this site. At the time of the investigation, dirty water from the car wash and gas pump filters were the only wastes being generated at the site. Spent lamps have not yet been generated since you took ownership of the property.

Complaint

Upon arrival to the site, you explained to Ohio EPA that you have owned the site for approximately four years but you know the previous owner very well as you worked for him at the site prior to purchasing the property. The car wash is composed of four pits that hold wash water. A system in the pits allows solids to drop out of the wash water and the "clean" wash water is "filtered" out and used again. The solids that are accumulated from the wash water were previously removed by a hired company and disposed of before you purchased the property. However, since you have owned the site, the pits have not been cleaned out and thus these solids have not been generated. The "dirty" water from the car washing operation goes to the sewer. However, you were unsure if it was a sanitary sewer or a storm sewer but thought it was the sanitary sewer since the property is located in the city of Sylvania.

When STCW cleans the solids out of the pits, this waste stream must be evaluated prior to disposal per OAC 3745-52-11. STCW must obtain a chemical analysis of a representative sample of this waste stream. STCW will need to contract the services of an environmental laboratory to analyze this material. STCW must at least determine the concentrations of the Resource Conservation and Recovery Act (RCRA) metals and volatile organic compounds (VOCs) in the waste. If this waste stream can be considered a liquid as defined in OAC Rule 3745-51-21, then the flashpoint and pH of the material must also be evaluated. Based on the results of this analysis, STCW should properly manage this waste stream and dispose of it at an appropriate facility. STCW should retain a copy of the hazardous waste manifest or bill of lading from the disposal of this material. STCW should also keep a copy of the analytical results on file to show this waste has been properly evaluated. For more information, the following fact sheets have been enclosed: Identifying Your Hazardous Waste, dated November 2006; and Use of Generator Knowledge in Complying with OAC Rule 3745-52-11 Hazardous Waste Evaluation, dated July 18, 2005.

STCW does not paint at this location nor does any car maintenance take place at this site. You did not put any waste paint or used oil down the sewer system. Used oil is not regularly generated at this site; however, you do have hydraulic machines that use hydraulic oil. In the past, one of these machines broke and some hydraulic oil was spilled. Rags were used to clean up the spilled oil and then were thrown into the trash. However, it was unclear to Ohio EPA if this spill occurred during the time you owned the property or while you worked there as an employee. In the future, any wastes generated as the result of a spill or any other activity on-site, must be evaluated to identify any hazardous characteristics.

You stated that spent lamps have not been generated since you purchased the property. Ohio EPA explained during the inspection that STCW needed to know if the lamps were considered hazardous waste prior to disposing of them in the landfill. Ohio EPA recommended the spent lamps be recycled by STCW. For more information, Ohio EPA gave you the following fact sheets during the inspection: Fluorescent Lamps: What You Should Know, dated January 2007; Universal Waste Rules for Handlers of Lamps, dated June 2005; and Computer, Fluorescent Lamp and Ballast Recyclers, dated July 2008.

At the time of the inspection, Ohio EPA did not observe any hazardous waste violations. This complaint is considered closed.

General Concerns:

- A. **Used Oil:** Even though STCW does not generate used oil on a regular basis, STCW is responsible for properly evaluating any used oil-contaminated material prior to disposal. This includes material generated from a broken hydraulic line. While Ohio EPA would normally require STCW to sample this material at this time to ensure it is a non-hazardous waste, since this waste is not generated on a regular basis a sample is not available at this time and may not be available within this year. The material safety data sheet (MSDS) for this product does not indicate that it is a hazardous waste. However, STCW should be advised that if this waste stream is generated again, then STCW must obtain a chemical analysis of a representative sample of the used oil-contaminated material prior to disposal. STCW will need to contract the services of an environmental laboratory to analyze this material. STCW must at least determine the concentrations of RCRA metals in the waste prior to disposal. For more information, the fact sheet titled The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil, dated April 2006, has been enclosed.

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- B. **Gas Pump Filters:** During the inspection, you stated that Oscar Larson picks up the gas pump filters. You were unsure, but thought he may be letting them dry out before disposing of them in the trash. Please provide Ohio EPA with the following information: name, address and phone number of the company associated with Oscar Larson and the disposal of STCW's gas pump filters; how often the filters are changed; how many filters are changed at one time (how many pumps are at the station); a copy of any receipts from the company for the gas pump filter pick-up; if the filters are considered hazardous waste; a detailed description of where the filters are taken once they leave the STCW property and what happens to them. STCW should submit this information to Ohio EPA **within 30 days of receipt of this letter.**

The Division of Hazardous Waste Management (DHWM) has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign up for this free service. You can find more information at <http://www.epa.state.oh.us/dhwm/listserv.html>. Please feel free to share this information with your colleagues.

You can find copies of the rules and other information at <http://www.epa.state.oh.us/dhwm>. Ohio EPA has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp.html>.

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

Sincerely,



Kara Reynolds
Environmental Specialist II
Division of Hazardous Waste Management

/cs

Enclosures

pc: Colleen Weaver, Supervisor, DHWM, NWDO
Kara Reynolds, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
DHWM, NWDO File: Lucas County General 2007¹-

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.

Ohio Environmental Protection Agency
RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM

For Ohio EPA use only

E-mail this completed form to kristina.durnell@epa.state.oh.us
or mail it to Kristina Durnell, Central Office

Site EPA ID No.	EPA ID Number:								
Site Name	Name: Soft Touch Car Wash					Website: (Optional)			
Site Location Information	Street Address: 6307 Monroe Street								
	City, Town, or Village: Sylvania					State: OH			
	County Name: Lucas					Zip Code: 43560			
Site Land Type (check only one)	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
NAICS code(s) www.census.gov/epcd/www/naics.html									
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Craig			MI:	Last Name: Pencheff				
	Phone Number: 419-509-9891					Phone Number Extension:			
	E-Mail Address:								
	Fax Number:					Fax Number Extension:			
	Street or P.O. Box:								
	City, Town or Village:					State:			
						Country:		Zip Code:	
Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner:				Date Became Owner (mm/dd/yyyy): 2004				
	Owner Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: 6307 Monroe Street								
	City, Town or Village: Sylvania					Owner Phone #: 419-509-9891			
	State: Ohio					Country: USA		Zip Code: 43560	
	Name of Site's Operator:				Date Became Operator (mm/dd/yyyy):				
	Owner Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box:								
	City, Town or Village:					Operator Phone #:			
	State:					Country:		Zip Code:	
Violations Cited?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No								
Type of Generator									
<input type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste					
<input type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)									
Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Underground Injection Control Facility				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste									

Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply))			
<input type="checkbox"/> Small Quantity Handler of Universal Waste		<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	
<input type="checkbox"/> Destination Facility for Universal Waste			
(Check all boxes below that apply for each of the three types of facilities above)		Used Oil Activities (Indicate Type(s) of Activity(ies))	
	Managed	<input type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.			
Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.			
Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments:
Containers	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Kara Reynolds		Amber Hicks	9/11/2008 11:03 AM
OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.			
Signature of Owner, Operator, or an Authorized Representative		Name and Title (Print)	Date (mm/dd/yyyy)

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Soft Touch Car Wash Facility Type: Unknown at this time Date of Inspection: 09-11-2008

EPA ID#:

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	Car Washing	Dirty Water	Unknown	Sewer		
2	Broken Hydraulic Machine	Oil Contaminated Material	Minimal	Landfill		
3	Maintenance	Spent Lamps	Not Generated Yet			
4	Maintenance	Used gas pump filters	Unknown		More information requested	
5	Maintenance	Solids from wash water pits	Not Generated Yet			
6						

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REMARKS-GENERAL INFORMATION

General Process Information: See Attached Letter.

Regulatory/Enforcement History (if applicable): N/A

Additional P2 remarks and information: See Attached Letter.

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.
Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other: N/A