



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korteski, Director

Re: Steve Grabke's Body Shop
Lucas County
OHR000161877
Hazardous Waste
Return to Compliance

November 29, 2010

Mr. Steve Grabke, President
Steve Grabke's Body Shop, Inc.
6653 Angola Road
Holland, Ohio 43528

Dear Mr. Grabke:

Thank you for your November 15, 2010, response to Ohio EPA's November 4, 2010, Partial Return to Compliance letter. My review of the documentation submitted reveals that Grabke's Body Shop, Inc. (Grabke's) has adequately demonstrated abatement of the violations cited in the October 12, 2010, Notice of Violation (NOV) letter.

The following is a summary of the violations cited in the October 12, 2010, NOV as a result of our September 29, 2010, inspection and your compliance with respect to it:

1. Waste Evaluation, OAC Rule 3745-52-11:

Any person who generates a waste must determine if that waste is a hazardous waste by using generator knowledge or by testing the waste.

- a) At the time of the inspection, Grabke's did not have waste evaluation documentation for the spent paint booth filters. Grabke's has historically disposed of this spent material as a non-hazardous waste. Grabke's must immediately cease disposing of the waste paint booth filters as non-hazardous waste until a proper waste evaluation has been completed.

Grabke's must obtain a representative sample of the spent paint booth filter waste stream and have it analyzed for Toxic Characteristic Leaching Procedure (TCLP) Resource Conservation and Recovery Act (RCRA) metals (SW-846 Method 1311/6010) and volatile organics (SW-846 Method 1311/8260). To abate this violation, Grabke's must submit a copy of the analytical results to Ohio EPA. Once analytical results have been reviewed, Ohio EPA will advise you on proper disposal options as well as plans for the future management of this waste stream.

The results Grabke's submitted on 10/26/10 were only for TCLP metals analysis. Grabke's must collect an adequate representative sample of the spent paint booth filters and complete the volatile organics analysis (SW-846 Method 1311/8260). The submitted analytical results for TCLP metals indicate that the spent paint booth filters are non-hazardous for metals.

On November 15, 2010, Grabke's submitted, via electronic mail, a copy of the analytical results for the volatile organics analysis of the spent paint booth filters. The submitted analytical results for TCLP organics indicate that the spent paint booth filters are also non-hazardous for organics, as well as metals. Grabke's can manage this waste stream as a solid waste. This portion of the violation has been abated.

If Grabke's has any changes made to their painting process, Ohio EPA recommends an updated waste evaluation be conducted on the spent paint booth filters.

- b) In addition, Grabke's failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility.

Hazardous bulbs are considered "spent materials" and remain hazardous waste even when recycled. Hazardous waste lamp generators have the option of handling their lamps as hazardous waste or as universal waste. Managing hazardous waste lamps under the universal waste rules eases certain regulations imposed on generators of spent lamps.

Grabke's must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If Grabke's plans to manage the spent fluorescent bulbs when generated as universal waste, please submit the name of the facility where you plan to recycle the bulbs. Managing the spent fluorescent bulbs as universal waste eliminates the need for analytical testing.

Grabke's 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 (memo or sign-in sheets) that this has been completed.

On October 27, 2010, Grabke's submitted a copy of the "Fluorescent Lamps Written Program" that was put in place to manage the spent lamps as universal waste. Universal waste training was given on October 21, 2010, to the employees who will be responsible for managing the spent lamps. Also submitted was a copy of the sign in sheet listing the names of the employees who attended the training. Grabke's will manage all spent fluorescent bulbs as universal waste.

Grabke's intends to ship the universal waste lamps off-site for recycling at Environmental Recycling in Bowling Green, Ohio. This portion of the violation has been abated.

This violation has been completely abated.

Mr. Steve Grabke, President
November 29, 2010
Page 3

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."

Grabke's had one 55-gallon drum of used oil that was not properly labeled.

At the time of my inspection, Grabke's properly labeled the one 55-gallon drum with the words "used oil".

This violation was previously abated in the Notice of Violation letter dated October 12, 2010.

Ohio EPA has helpful information about compliance assistance and pollution prevention at the following web address: <http://www.epa.ohio.gov/ocapp>. In addition, you can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>.

Should you have any questions or if I can be of assistance, please contact me at (419) 373-3066.

Sincerely,



Melissa L. Boyers
Division of Hazardous Waste Management

//lr

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
DHWM, NWDO 2010 Lucas County General File

Notice:

Ohio's 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.