



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.ohio.gov

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

Re: Valvoline Instant Oil Change Store #3888
Lucas County
OHR000130153
Hazardous Waste
Return to Compliance

January 14, 2010

Mr. Craig Kretz, Assistant Manager
Valvoline Instant Oil Change Store #3888
6529 West Central Avenue
Toledo, Ohio 43617

Dear Mr. Kretz:

Thank you for your December 28, 2009, response to Ohio EPA's November 2, 2009, Notice of Violation letter. The information you submitted included documentation for the management of universal waste. My review of the documentation submitted reveals that Valvoline Instant Oil Change Store #3888 (Valvoline) has adequately demonstrated abatement of the violation cited in the November 2, 2009, NOV letter.

The following is a summary of the violation cited in the November 2, 2009, NOV as a result of our October 22, 2009, 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.

Valvoline failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility. Ohio EPA spoke with Dad-Patchen Electrical Company and they stated that any spent fluorescent bulbs removed from fixtures at your facility are left on-site.

Valvoline must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If Valvoline 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. Valvoline must also properly train employees, who handle or have responsibility for managing universal waste, on waste handling and emergency procedures relative to their responsibilities. Please review the universal waste requirements with the appropriate employees and send me documentation that this has been completed.

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On December 28, 2009, Valvoline submitted information on how they plan to manage the spent fluorescent lamps generated at this facility. Valvoline plans to manage the spent lamps as universal waste and has arranged to have the lamps brokered for recycling by Gross Electric, Inc. Valvoline included a copy of the receipt from Gross Electric for 33 lamps that were sent to them on December 17, 2009, for recycling. Mr. Eric Archambeau, General Manager, will be the only employee to handle the spent lamps. Mr. Archambeau has reviewed the fact sheets provided by Ohio EPA and is aware of the regulations that apply to his facility.

With this information, this violation is considered abated.

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

/lb

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

ec: Melissa Boyers, DHWM, NWDO