



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: **Complaint #2607**
Voll Frame & Alignment Inc.
Lucas County
Hazardous Waste
Return to Compliance

April 25, 2008

Mr. Dan Reynolds, Owner
Voll Frame & Alignment Inc.
455 Terminal
Toledo, Ohio 43613

Dear Mr. Reynolds:

Thank you for your April 17, 2008, response to Ohio EPA's April 11, 2008, 2nd Notice of Violation letter. My review of this documentation reveals that Voll Frame & Alignment Inc. (Voll's) has adequately demonstrated abatement of all of the violations discovered during the December 18, 2007, compliance evaluation inspection.

The following is a summary of the violations cited and your compliance with respect to each:

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.
Voll'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.

Please be aware that incandescent, fluorescent, metal halide, neon, high-intensity discharge, high-pressure sodium and mercury-vapor lamps could be hazardous waste when discarded. Fluorescent lamps may contain up to 40 milligrams (mg) of mercury, depending on the brand and manufacturer. Lamps may also contain lead and cadmium. Many lamps exhibit a characteristic of toxicity for heavy metals when disposed.

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

Mr. Dan Reynolds
April 25, 2008
Page 2

Your letter dated April 16, 2008, indicated that Voll's plans to manage the spent fluorescent bulbs as universal waste. The bulbs will be managed by Mr. Lightbulb located in Toledo, Ohio. On April 21, 2008, I spoke with Sharon at Mr. Lightbulb and she confirmed that your facility has contacted them to manage your universal waste. According to Mr. Lightbulb, no bulbs have been picked up from your location to date. Mr. Lightbulb stated that they will either pick up your spent bulbs or have you drop them off at their location. Please note, universal waste handlers can transport their universal waste lamps to either another universal waste handler or to a universal waste destination facility if they comply with the universal waste transporter requirements in OAC rules 3745-273-50 through 3745-273-56.

Based upon the information submitted, it appears that Voll's is properly managing the spent fluorescent bulbs as universal waste. Compliance with this regulation may be verified during a future inspection.

With this information, this violation is considered abated.

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."

Voll's had several containers that were not properly labeled. Specifically, the used oil storage tank located inside the shop, one poly 55-gallon drum located outside and two carboys, one in the garage and one outside were not properly labeled.

Voll's properly labeled the tank, drum and carboys with the words "used oil" at the time of our investigation. A Fact Sheet outlining the Used Oil Regulations for generators is enclosed, please contact me if you have any questions.

Therefore, this violation is considered abated.

Ohio EPA has helpful information about compliance assistance and pollution prevention at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp.html>.

In addition, you can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

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
/csl

pc: Cindy Lohrbach, DHWM, NWDO Colleen Weaver, DHWM, NWDO
Tammy McConnell, DHWM, CO 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.