



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: White Family Collision Center  
Lucas County  
OHR000012591  
Hazardous Waste  
**Return to Compliance**

September 3, 2009

Mr. Dave Ignatowicz, Manager  
White Family Collision Center  
5328 West Alexis  
Sylvania, Ohio 43560

Dear Mr. Ignatowicz:

Thank you for your August 24, 2009, response to Ohio EPA's June 26, 2009, Notice of Violation letter. The information you submitted included analytical results for the paint booth filters and documentation for the management of universal waste. My review of the documentation submitted reveals that White Family Collision Center (WFCC) has adequately demonstrated abatement of all of the violations cited in the June 26, 2009, NOV letter.

The following is a summary of the violations cited in the June 26, 2009, NOV and your compliance with respect to each:

**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, WFCC did not have waste evaluation documentation for the spent paint filters. WFCC has historically disposed of this spent material as a non-hazardous waste. WFCC must immediately cease disposing of the waste paint filters as non-hazardous waste until a proper waste evaluation has been completed.

WFCC 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).

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You must 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. To abate this violation, WFCC 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.

**On August 18, 2009, WFCC had Mr. Doug Ervin with Brighten Analytical collect a sample of the spent paint booth filters for proper waste analysis. I was on-site to oversee this sampling event. On August 24, 2009, WFCC submitted, via electronic mail, the waste analysis results for the paint booth filters. The submitted analytical results indicate that the spent paint booth filters are a non-hazardous waste. These filters may be managed as a solid waste.**

- b) In addition, WFCC 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.

WFCC must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If WFCC 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, WFCC can manage the spent fluorescent bulbs as universal waste. If WFCC plans to manage the spent fluorescent bulbs as universal waste, please submit photographic documentation showing the storage containers properly closed, labeled, and dated

WFCC 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, WFCC must submit the name of the facility where you plan to recycle the bulbs.

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On August 18, 2009, I reviewed with you how you plan to manage your spent fluorescent bulbs. WFCC plans to manage them as universal waste and has a collection box in place that was provided by Heritage Environmental/Crystal Clean. A memo was sent to all of the employees notifying them who would be responsible for the management of the spent bulbs. In addition, WFCC conducted training with Tim Vincent, Al Kinsey, and Jerome Ramsey, regarding their responsibilities in managing the spent bulbs as universal waste.

*With this information, this violation has been completely 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."

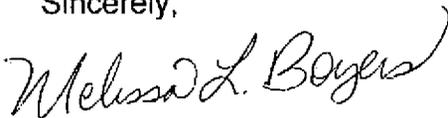
WFCC had two 55-gallon drums of used oil that were not properly labeled.

At the time of my inspection, WFCC properly labeled the two 55-gallon drums with the words "used oil". A copy of the fact sheet, The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Use Oil, was given to you at the time of my inspection. Please review this information and contact me if you have any questions.

*Therefore, this violation is considered abated.*

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

/llr

pc: Cindy Lohrbach, DHWM, NWDO  
Colleen Weaver, DHWM, NWDO  
Sandra Lauch, Dave White Chevrolet, HR Manager  
DHWM, NWDO White Family Collision Center File ↵

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