



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Wilson Cylinder Head Repair
Lucas County
Hazardous Waste
Notice of Violation

February 1, 2013

Mr. Dennis Wilson & Mr. Bob Fall
Wilson Cylinder Head Repair
3519 Jackman Road
Toledo, Ohio 43612

Dear Mr. Wilson & Mr. Fall:

On January 16, 2013, Wendy Miller and I conducted a compliance evaluation inspection at Wilson Cylinder Head Repair (WCHR) located at 3519 Jackman Road, in Toledo, Ohio. We inspected WCHR 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). Pollution prevention options were also discussed during this inspection. This letter will explain the violation we found and what you need to do to correct this violation.

WCHR specializes in automotive cylinder head repairs. One parts washer is serviced by Vesco. The facility has one hot water/detergent parts washer that is used on a very limited basis. The water evaporates over time as the washer is used and the grease/sludge that generates in the bottom is cleaned out approximately once a year. No painting is conducted on-site, no used oil is generated, and shop towels are laundered by Aramark or Cintas.

The facility operates one glass bead blasting machine. The spent glass bead blast media used to clean the cylinders is managed as a solid waste. The facility has fluorescent lighting that was installed by Southern Exposure and fluorescent bulbs have a five year warranty. Spent lamps will be managed as universal waste when generated. At the time of our inspection, WCHR was operating as a conditionally exempt small quantity generator of hazardous waste.

We found the following violation of Ohio's hazardous waste laws:

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, WCHR did not have waste evaluation documentation for the spent glass bead blasting material. WCHR has historically disposed of this spent material as a non-hazardous waste by placing it in the solid waste dumpster.

WCHR must immediately begin collecting the spent glass bead blasting material as it is generated by the blasting machine.

ERT must obtain a representative sample of the spent glass bead blasting waste stream and have it analyzed for Toxic Characteristic Leaching Procedure (TCLP) Resource Conservation and Recovery Act (RCRA) metals (SW-846 Method 1311/6010). To abate this violation, WCHR 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.

TCLP is an acronym for Toxicity Characteristic Leachate Procedure, which will simulate your waste in a landfill and will determine if it is considered hazardous or not. This will test for Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium and Silver which may have come off of the metal pieces you are sandblasting.

Ohio EPA may use the data you collect, in part, to make regulatory decisions concerning the waste(s) tested. A data review process, referred to as data validation, may be utilized to confirm the validity of the data. This data validation can include a review of the following components: sampling techniques, sample containers, representativeness of sample, laboratory test methods, laboratory data completeness, and documentation of holding time(s), chain(s) of custody and quality assurance/quality control (QA/QC) data. Please include data sufficient for Ohio EPA to perform the data validation review. Information on conducting a data validation can be obtained from Ohio EPA's web page:
http://www.epa.state.oh.us/dhwm/tier_i_data_validation_manual.html.

- b) At the time of the inspection, WCHR did not have waste evaluation documentation for the grease/sludge that is generated when the hot water/detergent parts washer is cleaned out approximately once a year. WCHR has historically disposed of this spent material as a non-hazardous waste by placing it in the solid waste dumpster.

WCHR must immediately begin collecting, in a container, the grease/sludge generated when the hot water/detergent parts washer is cleaned. In the future, (when there is enough) WCHR must take a representative sample of the grease/sludge, have it analyzed for TCLP RCRA metals (SW-846 Method 1311/6010), and submit a copy of the analytical results to Ohio EPA. Do not dispose of the grease/sludge in the solid waste dumpster until you determine if it is hazardous or not.

WCHR does not need to clean out the hot water/detergent parts washer and therefore does not have any waste grease/sludge to sample at this time. To abate this violation, WCHR must submit to Ohio EPA a written plan which outlines how you will properly collect, store, and evaluate all spent materials prior to disposal. Copies of Identifying Your Hazardous Waste, and a partial list of Environmental Laboratories are enclosed. I recommend that you review this information and contact me if you have any questions.

Ohio EPA will review the submitted waste evaluation information and determine if additional violations need to be cited due to a possible change in your generator status. You will be notified of any additional violations in a separate letter.

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Ohio EPA will issue an EPA ID number to track our inspection activity. WCHR cannot use this number for manifesting hazardous waste shipments. If WCHR wants to use an EPA ID number for manifesting and other hazardous waste, used oil or universal waste activities, you must complete and submit a Notification of Regulated Waste Activity form (*EPA Form 9029 (Rev. 11/2002)*) to Ohio EPA. This form is available on our web page at <http://www.epa.state.oh.us/dhwm/notiform.html> or you can call me at (419) 373-3066 or the Division of Materials and Waste Management, Central Office, RIS at (614) 644-2977 and we will mail you a copy.

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/>.

Enclosed you will find a copy of the checklists that were completed during the inspection.

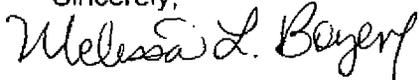
WCHR needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within **14 days** of receipt of this letter, WCHR is requested to provide documentation to this office including the steps taken to abate the violation cited above.

Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to melissa.boyers@epa.ohio.gov.

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, WCHR is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

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 Materials and Waste Management

/llr

Enclosures

pc: Lisa Gifford, DMWM, NWDO
Colleen Weaver, DMWM, NWDO
ec: Colleen Weaver, DMWM, NWDO (scanned e-copy)
Melissa Boyers, DMWM, NWDO

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.

Send to Central Office <input type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to RCRAInfoData@epa.state.oh.us.

Site EPA ID No. Site Name Site Location Information Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html	EPA ID Number: Name: Wilson Cylinder Head Repair Website: (Optional) <hr/> Street Address: 3519 Jackman Road City, Town, or Village: Toledo State: OH County Name: Lucas Zip Code: 43612 <table style="width:100%; border: none;"> <tr> <td style="border: none;">Private</td> <td style="border: none;">County</td> <td style="border: none;">District</td> <td style="border: none;">Federal</td> <td style="border: none;">Indian</td> <td style="border: none;">Municipal</td> <td style="border: none;">State</td> <td style="border: none;">Other</td> </tr> <tr> <td style="border: none;"><input checked="" type="checkbox"/></td> <td style="border: none;"><input type="checkbox"/></td> </tr> </table>	Private	County	District	Federal	Indian	Municipal	State	Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>						
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Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Dennis MI: Last Name: Wilson Title: Phone Number: 419-473-2101 Phone Number Extension: E-Mail Address: Fax Number: Fax Number Extension: Street or P.O. Box: City, Town or Village: State: Zip Code:
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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: <table style="width:100%; border: none;"> <tr> <td style="border: none;">Owner Type:</td> <td style="border: none;">Private</td> <td style="border: none;">County</td> <td style="border: none;">District</td> <td style="border: none;">Federal</td> <td style="border: none;">Indian</td> <td style="border: none;">Municipal</td> <td style="border: none;">State</td> <td style="border: none;">Other</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/></td> </tr> </table> Date Became Owner (mm/dd/yyyy): Street or P.O. Box: City, Town or Village: State: Owner Phone #: Zip Code: Name of Site's Operator: Date Became Operator (mm/dd/yyyy): <table style="width:100%; border: none;"> <tr> <td style="border: none;">Operator Type:</td> <td style="border: none;">Private</td> <td style="border: none;">County</td> <td style="border: none;">District</td> <td style="border: none;">Federal</td> <td style="border: none;">Indian</td> <td style="border: none;">Municipal</td> <td style="border: none;">State</td> <td style="border: none;">Other</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/></td> </tr> </table> Street or P.O. Box: City, Town or Village: State: Operator Phone #: Zip Code:	Owner Type:	Private	County	District	Federal	Indian	Municipal	State	Other	<input type="checkbox"/>	Operator Type:	Private	County	District	Federal	Indian	Municipal	State	Other	<input type="checkbox"/>																
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VIOLATIONS CITED? Yes No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). <i>Check the box for the applicable generator status and provide a comment.</i>	<input type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator <input type="checkbox"/> U.S. Importer of Hazardous Waste <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator
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PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Wilson Cylinder Head Repair **Facility Type:** LQG/SQG/CESQG/TSD **EPA ID#:**

Description of Waste				On-Site Management			Off-Site Management
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	Waste Generated (e.g. sludge, spent solvent, ash, etc)	EPA Waste Code	QTY Generated per Month	Type of Accumulation / Storage (e.g. container, tank, etc)	Type of On-Site Treatment (recycle, wwt, etc)	Waste Location (Include map if possible)	Name, state, and type of activity occurring at the facility.
1	Lighting	Spent Fluorescent Bulbs				None in storage at time of the inspection	Southern Exposure installed the lighting fixtures and there is a 5 yr. warranty on the bulbs.
2	Sandblasting	Spent Sandblasting Material	52-11 Cited	They empty the tray 3-4 times a year.		Self-contained collection drawer on the bottom of the blasting unit. Approx. 15 lbs. of material when the tray is full.	Currently managing as a solid waste. Spent material is placed in a bag and put in the solid waste dumpster.
3	Part Washing	Spent Mineral Spirits	D001	15-gallons		Parts Washer	Vesco services the parts washer a monthly basis.
4	Cleaning out the hot water wash tank	Grease/sludge	52-11 Cited	2-3 gallons generated once a year		Hot water wash tank	Currently managed as a solid waste. Spent grease/sludge is placed in the solid waste dumpster.

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
 NOTE: To convert from gallons to pounds: $\text{Amount in gallons} \times \text{Specific Gravity} \times 8.345 = \text{Amounts in pounds}$.

Safety Equipment Used:

WASTE EVALUATION

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Spent Sandblasting Material and Grease/Sludge	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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GENERATOR CLASSIFICATION

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Vesco	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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TREATMENT OF HAZARDOUS WASTE

4.	Does the generator treat hazardous waste in a:	
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

MIX HAZARDOUS WASTE WITH USED OIL Not a used oil generator

5.	Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>