



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

Re: Autobahn Garage, LLC  
Hancock County  
Hazardous Waste  
OHR000165431  
Return to Compliance

March 12, 2013

Mr. Tab Tanner  
Autobahn Garage, LLC  
415 North Main Street  
Suite #2  
Findlay, Ohio 45840

Dear Mr. Tanner:

Thank you for your responses to Ohio EPA's October 5, 2011, Notice of Violation letter (NOV) and January 27, 2012, Partial Return to Compliance letter (PRTC). You submitted the following:

January 31, 2012: via email, a form documenting record of shipment of used oil; information pertaining to the Chlor-D-Tect kit you have acquired to perform your halogen testing and that you will be managing your lamps as universal waste for recycling.

October 3, 2012: fax with the analytical results to determine whether the used oil from three businesses is on-specification. According to this analytical from Alloway dated June 7, 2012, the used oil from Laube and Shop are on-specification for arsenic, cadmium, chromium and lead as listed in OAC Rule 3745-279-11 and as required as a used oil marketer. In addition, you submitted the results of the total halogen content testing for the used oil from the three businesses listed above. The results indicated that the used oil was below 1000 ppm.

On October 25, 2012, and March 7, 2013, I called you. At this time, we discussed the analytical you submitted to me on October 3, 2012. According to this analytical, Air Port's [Bluffton Flying Service (BFS)] sample of used oil contained 951 mg/kg of lead which is well above the 100 ppm (mg/kg) allowable regulatory level for burning of used oil, thus the used oil from BFS is off-specification and you may not burn it in your on-site used oil burner. When we discussed this on October 25, 2012, you stated you would not burn this oil and would inquire to BFS as to why their used oil contained so much lead. During our phone conversation on March 7, 2013, you stated that BFS was unsure as to why there was so much lead in their used oil.

They are collecting their used oil and you plan to take another sample, but you have not sampled yet. Based on this re-sample, you will either burn (if on-specification) or if off-specification I stated that BFS will need to find a used oil recycler to pick up their used oil. In addition, you stated that you have not burnt the used oil generated from BFS. I stated that you must have the used oil from BFS picked up by a licensed used oil recycler (you stated you would have Heartland Petroleum pick-up) and that you may not burn this off-specification oil under any circumstances. You stated you understood.

My review of the January 31, 2012, and October 3, 2012, documentation reveals that Autobahn Garage, LLC (Autobahn) has adequately demonstrated abatement of the following violations discovered during the September 14, 2011, compliance evaluation inspection (CEI) as listed below:

<b>Violation</b>	<b>Date Violation Observed</b>	<b>Date Violation Abated</b>
1. OAC Rule 3745-279-23 - On-Site burning of used oil.	September 14, 2011	December 6, 2011 *
2. OAC Rule 3745-279-31(B)(2) - Used Oil Collection Centers must register with Ohio EPA.	September 14, 2011	December 6, 2011 *
3. OAC Rule 3745-279-42(A) - Notification.	September 14, 2011	December 6, 2011 *
4. OAC Rule 3745-279-43(A) (1-4) - Used oil transportation.	September 14, 2011	December 6, 2011 *
5. OAC Rule 3745-279-44(A) - Rebuttable presumption for used oil transporters.	September 14, 2011	October 3, 2012
6. OAC Rule 3745-279-46(A)(1-5)(D) - Tracking of used oil by transporters.	September 14, 2011	January 31, 2012

\*see 1-27-12 PRTC

In addition you have satisfied the Area of Concern I) and II) with your October 3, 2012, and January 31, 2012, responses, respectively.

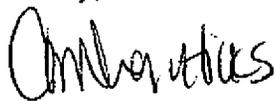
Mr. Tab Tanner  
March 12, 2013  
Page 3

Please note that Autobahn did not submit the flash point test for the three businesses listed above. Since the halogen contents are below 1000 ppm it is unlikely they will have a flash point less than 100 degrees Fahrenheit, but it is still required for Autobahn to determine this if Autobahn intends to burn other business's used oil. Autobahn should conduct a flash point test for the three businesses listed above (as well as to ensure that they conduct for any other businesses in the future) to ensure compliance with this rule (to be on-specification all used oil burned from other businesses must have a flash point of at least 100 degrees Fahrenheit). *This information will be required to be demonstrated by Autobahn if the facility is inspected again by the Division of Materials and Waste Management.* You stated you would have the used oil sampled for flash point and once you re-sample BFS's used oil, you will submit the analysis for all to me.

Please reference the email sent to you on 3-1-12 and 4-16-12 which outlines the testing requirements for a used oil marketer (requirements listed in the emails) as well the fact sheet Burning Used Oil in a Space Heater – For Businesses given to you during the September 14, 2011, CEI (I have enclosed this fact sheet with this letter again). In addition, as required per U.S. EPA, Autobahn should likewise ensure that any used oil that is burned in their on-site used oil burner from other businesses contains less than 2 ppm PCBs.

No response to this letter is necessary. If you should have any questions, please feel free to call me at (419) 373-3082.

Sincerely,



Amber M. Hicks  
Division of Materials and Waste Management

/llr

Enclosure

pc: Lisa Gifford, DMWM, NWDO  
Colleen Weaver, DMWM, NWDO ;  
ec: Amber Hicks, DMWM, NWDO  
Colleen Weaver, DMWM, 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.