Ohio | Environmental Protection Agency

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

Re: Hastings Body Shop
OHR000122028
Putnam County
Hazardous Waste/Used Oil
Complaint #2299
Return to Compliance

September 1, 2011

Mr. Kelly Hastings
507 Fairfield Drive
Lima, Ohio 45805

Dear Mr. Hastings:

On June 1, 2010, I returned to Hastings Body Shop (facility) at Road 8P in Columbus Grove, Putnam County, and met with you. I was able to verify that you had distilled the remaining waste paint related solvent and transferred the used oil in two 5-gallon pails and one 250-gallon tank into the tank inside the shop (which is labeled with the words "Used Oil"). You stated that you would not be operating any kind of business at the facility.

Therefore, Hastings Body Shop abated the violations of ORC Section 3734.02(E) & (F), OAC Rule 3745-51-03(G)(3), 3745-52-11, 3745-279-22(C)(1), 3745-279-23, 3745-279-24 and 3745-279-22(A)(B) & (D) on June 1, 2010. All the violations observed during Ohio EPA's July 8, 2004, inspection and first cited in Ohio EPA's July 21, 2004, Notice of Violation letter have been abated. No further injunctive relief will be required for this site. This case is closed.

If you have any questions, please feel free to contact me at (419) 373-3074.

Sincerely,

Don North

Don North
District Representative
Division of Materials and Waste Management

/llr

pc: Colleen Weaver, DMWM, NWDO
Cindy Lohrbach, DMWM, NWDO
Jeff Vance, Columbus Grove Village Administrator
DMWM-HW, NWDO, Putnam County, Hastings Body Shop File
ec: Don North, DMWM, NWDO
Tammy Heffelfinger, DMWM, CO

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.

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402-9398

419 | 352 8461
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OHR000158808

Hazardous Waste

RTC

PUTNAM

HOEHN CABINETS INC

OhioEPA
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: Hoehn Cabinets
Putnam Co.
RTC

June10, 2010

Mr. Ed Hoehn
Hoehn Cabinets, Inc.
188 W. Canal Street
P.O. Box 95
Ottoville, Ohio 45876

Dear Mr. Hoehn:

On May 27, 2010, I attempted to meet with you regarding Ohio EPA's December 3, 2009, Notice of Violation (NOV) letter. Because you were not available, I spoke with you by telephone on June 1, 2010. In our conversation, you indicated that you will be collecting any paint and solvent sludge in the future in five gallon buckets and they will be disposed of as hazardous waste. Because it will take years to accumulate very much hazardous waste, you will not be disposing of the hazardous waste anytime soon. We discussed that you could continue to collect as a conditionally exempt small quantity generator (CESQG). A CESQG can collect up to 1,000 kilograms or about 300 gallons of waste on-site before you must dispose of the hazardous waste.

You have adequately addressed all violations cited during our November 10, 2009, hazardous waste compliance evaluation inspection (CEI) .

The following is a summary of violations found during my CEI that have been corrected:

1. **Unpermitted Disposal, ORC § 3734.02(F)**

   Hoehn Cabinets has disposed of hazardous waste paint gun cleanout sludge as a solid waste. The paint gun is cleaned out using lacquer thinner. Lacquer thinner is used to clean the paint gun when you switch from topcoat to sealer material or you have an order for a specific paint. Thinner is continually re-used and sludge eventually builds up in the container. The sludge dries out and is disposed of as solid waste.

   Based on my review of the material safety data sheets of the Klean Strip lacquer thinner that you are using and my discussion with the manufacturer, W.M. Barr, the thinner you are using is a hazardous waste once it is no longer usable. Any sludge build up in the container would be considered an F005 listed hazardous waste. This determination is due to the contents of the thinner which include greater than 50% toluene and some acetone.

You stated that it takes months to generate approximately two inches of F005 sludge material. Hoehn Cabinets must immediately stop disposing of waste paint gun cleanout sludge as solid waste. You can continue to generate and accumulate the sludge but in the future it must be managed as a hazardous waste.

On June 1, 2010, you also stated that the sludge was previously disposed of as solid waste and was picked up by Porter Sanitation of Oakwood, Ohio. Porter Sanitation confirmed that all of the solid waste they pick up is disposed of at Defiance County Landfill.

Although no further action is being required by Ohio EPA at this time, be advised that due to the nature of the violation, Ohio EPA may require clean up action pursuant to OAC rules 3745-55-11 through 3745-55-20 and OAC rules 3745-55-42 through 3745-55-47 at this site.

On June 1, 2010, we discussed your future management of hazardous waste sludge, therefore, this violation is considered abated.

2. **Universal Waste Labeling, OAC Rule 3745-273-14(E):** previously abated on November 10, 2009

3. **Universal Waste, Accumulation Time, OAC Rule 3745-273-15(C):** previously abated on November 10, 2009

If you have any questions, please feel free to call me at (419)373-3114.

Sincerely,

Wendy A. Miller
Division of Hazardous Waste Management

/lb

cc: Cindy Lohrbach, DHWM-NWDO
File Copy, Putnam County (w/original enclosure)
Colleen Weaver, DHWM-NWDO

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