



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

Re: City of Ashland, City Services/Street
Department
OHD986971620
Ashland County
Return to Compliance

April 4, 2013

Mr. Jerry Mack, Director
Ashland City Street Division
310 West 12th Street
Ashland, Ohio 44805

Dear Mr. Mack:

Thank you for your March 14, 2013, response to Ohio EPA's February 27, 2013, Notice of Violation letter (NOV). You submitted the following information:

- Information stating that you will now be managing your lamps as universal waste and recycling with Vexor Technology;
- Information stating that you will now be utilizing cloth rags which are to be laundered by Cintas thus implementing a pollution prevention alternative;
- Information pertaining to the management of your pit/trench sludge from the carwash bay area/tank. This pit was cleaned out on February 20, 2013, by A-1 Septic Tank Service LLC;
- A picture showing that the drum which collects used oil from the draining of used oil filters and your 275-gallon for used oil storage have been labeled "Used Oil";
- Information stating that spent gas pump filters will be properly drained, crushed and sent to metal scrap yard facility thus implementing a pollution prevention alternative.

On March 29, 2013, we spoke via telephone. You stated at this time that the waste from the car wash bay has been picked up by a vendor for at least the last 3-4 years. I stated that you will still need to sample this waste to ensure that it is non-hazardous. You stated you understood and that you would have it sampled upon the next generation (you estimated in 3-4 months) and you would then send this analysis to me. You stated you have already contacted Ream & Haager Laboratories about conducting this analysis. I then emailed you additional information pertaining to what you need to sample/analyze the carwash bay trench for (as outlined in your NOV), an electronic copy of the NOV as well as a list of commercial environmental laboratories.

Mr. Jerry Mack
April 4, 2013
Page 2

My review of this information reveals that City of Ashland, City Services/Street Department (Ashland) has adequately demonstrated abatement of the violations discovered during the February 6, 2013, inspection as listed below:

Violation	Date Violation Observed	Date Violation Abated
1. OAC Rule 3745-52-11 Waste Evaluation	February 6, 2013	March 14, 2013
2. OAC Rule 3745-279-22(C)(1) Used oil storage requirements - proper labels.	February 6, 2013	March 14, 2013

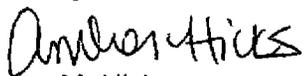
You have also satisfied the Area of Concern noted in my NOV with your March 14, 2013, response.

Although waste evaluation of the carwash bay trench/tank material has not yet been completed, Ashland has committed to analyzing this waste and submitting analysis upon generation of the waste. Thus, upon the next generation of the carwash bay trench/tank waste, and the waste evaluation has been performed, please submit the analytical information from sampling to me. Your results must document if the waste is hazardous or not. If it is hazardous, you must explain what treatment, storage, or disposal facility you will send it to.

No response to this letter is necessary. Should you have any questions, please feel free to call me at (419) 373-3082 or email me at amber.hicks@epa.ohio.gov.

You can find copies of the rules and other information on the division's web page at <http://epa.ohio.gov/dmwm/Home.aspx>.

Sincerely,



Amber M. Hicks
Division of Materials and Waste Management

/cg

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.