



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

Re: Wilson Cylinder Head Repair  
OHR000176024  
Lucas County  
Hazardous Waste  
**Notice of Violation –  
Partial Return to Compliance**

June 26, 2013

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

Dear Mr. Wilson & Mr. Fall:

Thank you for your June 3, 2013, response to Ohio EPA's, February 1, 2013, Notice of Violation (NOV) letter. The violations cited were discovered during my January 16, 2013, inspection at Wilson Cylinder Head Repair (WCHR). The documents you submitted included waste evaluation documentation.

The analytical results, submitted on June 3, 2013, in response to the waste evaluation violation (#1), indicate that the spent glass bead blasting material is hazardous due to the presence of lead at 51.1 parts per million (ppm), which is above the regulatory limit of 5.0 ppm. WCHR also collected a sample of the grease/sludge from the bottom of the big and small hot water/detergent parts washers that are currently in use at the facility. These parts washers are cleaned out approximately once a year which is to occur sometime in the next three or four months. The analytical results, submitted on June 3, 2013, indicate that the grease/sludge from the bottom of the big parts washer is hazardous due to the presence of lead at 62.0 ppm, which is above the regulatory limit of 5.0 ppm, and the grease/sludge from the bottom of the small parts washer is non-hazardous.

Based upon the analytical results for the spent glass bead blasting material and grease/sludge from the bottom of the big parts washer, Ohio EPA has determined that as of June 3, 2013, WCHR is in violation of the following additional Ohio hazardous waste law:

**2. ORC Section 3734.02 (F): Unlawful Transportation:**

No person shall store, treat, or dispose of hazardous waste identified or listed under this chapter and rules adopted under it, regardless of whether generated on or off the premises where the waste is stored, treated, or disposed of, or transport or cause to be transported any hazardous waste identified or listed under this chapter and rules adopted under it to any other premises, except at or to any of the following: (1) A hazardous waste facility operating under a permit issued in accordance with this chapter; (2) A facility in another state operating under a license or permit issued in accordance with the "Resource Conservation and Recovery Act of 1976" 90 Stat. 2806, 42 U.S.C.A. 6921, as amended.

- a) WCHR unlawfully transported characteristic hazardous waste to other than a permitted hazardous waste facility.

WCHR has historically disposed of the spent glass bead blasting material, which is hazardous for lead, as a non-hazardous/solid waste via Republic Services to the Vienna Junction Landfill for disposal. A solid waste landfill such as Vienna Junction is not permitted to accept hazardous waste for treatment, storage, or disposal. WCHR has always managed this waste stream as a non-hazardous/solid waste and generates approximately two gallons of material every three or four months.

WCHR has ceased disposing of the spent glass bead blasting material at a solid waste landfill. On June 12, 2013, I spoke with Mr. Bob Fall who stated that the facility will store the spent glass bead blasting material in a satellite drum and manage it as a hazardous waste.

- b) WCHR unlawfully transported characteristic hazardous waste to other than a permitted hazardous waste facility. WCHR has historically disposed of the spent parts washer grease/sludge, which is hazardous for lead, as a non-hazardous/solid waste via Republic Services to the Vienna Junction Landfill for disposal. A solid waste landfill such as Vienna Junction is not permitted to accept hazardous waste for treatment, storage, or disposal. WCHR has always managed this waste stream as a non-hazardous/solid waste and generates approximately three gallons of grease/sludge when the parts washers are cleaned out once or twice a year.

WCHR has ceased disposing of the spent grease/sludge at a solid waste landfill. On June 12, 2013, I spoke with Mr. Bob Fall who stated that when the big parts washer is cleaned out, the grease/sludge will be managed as a hazardous waste.

On June 12, 2013, I also discussed with Mr. Fall the need to properly evaluate the spent grease/sludge from the small parts washer when it is generated. The sample collected on May 6, 2013, was collected from the small parts washer while currently in use and prior to the grease/sludge being removed and deemed a waste. Therefore, the analytical results submitted on June 3, 2013, cannot be used for the purpose of characterizing this waste as non-hazardous prior to disposal. WCHR may choose to use generator knowledge based upon the analytical results for the big parts washer grease/sludge and manage this waste stream as a hazardous waste. WCHR would then dispose of the spent grease/sludge from the small parts washer along with the spent grease/sludge from the big parts washer in lieu of additional analytical analysis.

The following is a summary of the violation discovered during my January 16, 2013, inspection and cited in the February 1, 2013, NOV letter and your compliance with respect to it:

**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.

On June 3, 2013, WCHR submitted a copy of the analytical results for the spent glass bead blasting material. The TCLP analytical results indicate that the spent glass bead blasting material is hazardous due to the presence of lead at 51.1 ppm, which is above the regulatory limit of 5.0 ppm. WCHR will need to manage this waste stream as a hazardous waste. WCHR will collect the spent glass bead blasting material in a satellite container and dispose of it as a hazardous waste (D008).

*With this information, this portion (a) of the violation has been abated.*

- 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.

On June 3, 2013, WCHR submitted a copy of the analytical results for the grease/sludge from the bottom of the big parts washer. The TCLP analytical results indicate that the grease/sludge currently in the bottom of the big parts washer is hazardous due to the presence of lead at 62.0 ppm, which is above the regulatory limit of 5.0 ppm. WCHR will need to manage this waste stream, when generated, as a hazardous waste. WCHR will collect the grease/sludge from the bottom of the big parts washer in a satellite container and dispose of it as a hazardous waste (D008).

*With this information, this portion (b) of the violation has been abated.*

**WCHR has completely abated this violation.**

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 is a fact sheet on how to select a treatment/storage/disposal facility to handle your hazardous waste and a list of Ohio commercial facilities that accept hazardous waste. Please review this information prior to shipping your hazardous waste off-site for disposal.

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

/cg

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