



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

Re: Crozier Body Shop
OHD986980514
Wood County
Hazardous Waste
Partial Return to Compliance

June 27, 2013

Mr. Bob Ackerman, Owner
Crozier Body Shop
13146 Main Street
P. O. Box 312
Weston, Ohio 43569

Dear Mr. Ackerman:

Thank you for your June 10, 2013, response to Ohio EPA's May 9, 2013, Notice of Violation-Partial Return to Compliance (NOV-PRTC) letter. You submitted information regarding universal waste, used oil, and waste evaluation. My review of the documentation submitted reveals that Crozier Body Shop (CBS) located at 13146 Main Street in Weston, Ohio, has demonstrated abatement of two of the three violations cited in the May 9, 2013, NOV-PRTC.

The following is a summary of the violations cited in the May 9, 2013, NOV-PRTC as a result of our April 30, 2013, inspection and your compliance with respect to each:

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, CBS did not have waste evaluation documentation for the spent paint booth filters. CBS has historically disposed of this spent material as a non-hazardous/solid waste. CBS must immediately cease disposing of the waste paint booth filters as non-hazardous waste until a proper waste evaluation has been completed.

CBS must obtain a representative sample of the spent paint booth filter waste stream and have it analyzed for Toxic Characteristic Leaching Procedure (TCLP) Resource Conservation and Recovery Act (RCRA) metals (SW-846 Method 1311/6010C) and volatile organics (SW-846 Method 1311/8260B). To abate this portion of the violation, CBS must submit a copy of the analytical results to Ohio EPA.

On June 6, 2013, I spoke with you regarding the status of the paint booth filter waste evaluation. You stated that the filters currently in use in the paint booth would not need to be changed for approximately four to six weeks. CBS plans to have the spent paint booth filters analyzed and will submit the analytical results to Ohio EPA for review.

CBS must keep the Ohio EPA updated on the status of changing out the paint booth filters. CBS should be able to provide waste evaluation documentation to Ohio EPA for review by July 20, 2013.

This portion of the violation (a) has not been abated and therefore remains outstanding.

- b) In addition, CBS failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility.

On June 10, 2013, CBS submitted information regarding the management of spent fluorescent lamps. CBS plans to manage spent lamps, when generated, as universal waste. CBS will ship the spent lamps to Environmental Recycling in Bowling Green, Ohio where they will be recycled. CBS has a box properly labeled and will add the accumulation start date when the first spent lamp is added in order to track the one-year storage limit.

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

This violation has not been completely abated.

2. Labeling: OAC Rule 3745-279-22(C)(1):

Containers, aboveground tanks, and fill pipes used for underground storage tanks shall be labeled or marked clearly with the words "used oil."

CBS had one 5-gallon bucket of used oil that was not properly labeled.

This violation was previously abated on April 30, 2013.

3. Off-Site Shipment: OAC Rule 3745-279-24:

Generators shall ensure that their used oil is transported only by transporters who have obtained an EPA identification number.

CBS has been giving the used oil they generate to the Shamrock Gas Station located across the street from the body shop.

On June 10, 2013, CBS submitted a copy of the receipt for the 5-gallon container of used oil picked up for recycling by Chemtron on May 13, 2013.

With this information, this violation has been abated.

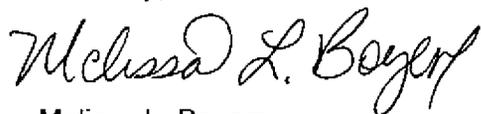
Please submit documentation demonstrating abatement of the above outstanding violation (number 1a) to this office no later than July 20, 2013.

Mr. Bob Ackerman
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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/>.

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
Colleen Weaver, DMWM, NWDO

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

Notice:

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, CBS is requested to submit written correspondence of the steps that will be taken by