



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

Re: Soft Touch Car Wash
Lucas County
Hazardous Waste
Complaint #3188
RTC

July 31, 2013

Mr. Craig Pencheff
Soft Touch Car Wash
6307 Monroe Street, A
Sylvania, Ohio 43560

Dear Mr. Pencheff:

Thank you for your July 18, 2013, fax regarding the pit/trench sludge waste that was analyzed. On August 29, 2012, I conducted a complaint investigation and hazardous waste compliance evaluation inspection of Soft Touch Car Wash (hereafter referenced as STCW) located in Sylvania, Ohio. I sent Notice of Violation letters dated September 7, 2012, December 6, 2012, and April 23, 2013.

The following is the current status of the violation cited during my inspection:

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.

STCW must conduct a proper waste evaluation. This will determine how the sludge will have to be disposed of in the future. Since you stated this clean out happens at least two times per year, STCW should be able to obtain a sample in the near future.

To do a proper waste evaluation, STCW must obtain a representative sample of the pit/trench sludge and have it analyzed for Toxic Characteristic Leaching Procedure (TCLP) Resource Conservation and Recovery Act (RCRA) metals (SW-846 Method 1311/6010) and volatile organics (SW-846 Method 1311/8260).

To abate this violation, STCW must submit a copy of the analytical results to me. Once analytical results have been reviewed, I will advise you on proper disposal options as well as plans for the future management of this waste stream. STCW should be able to determine from the lab results if the waste is hazardous or non-hazardous.

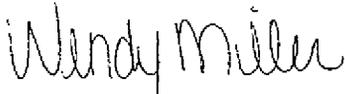
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On July 18, 2013, STCW submitted analytical results for a sample of the pit/trench sludge. The analytical completed by Alloway shows that this material is non-hazardous waste. It can be disposed of as a solid waste. You may want to check with your waste management company to determine how this can be best managed in the future so that it does not leak or run out of the dumpster, etc. Most landfills cannot accept wet sludge type wastes without further solidifying it.

STCW has abated the violation cited in my September 7, 2012 letter. Ohio EPA's Division of Materials and Waste Management considers this complaint to be closed.

If you have any questions, please contact me by telephone at (419)373-3114 or by e-mail at wendy.miller@epa.state.oh.us

Sincerely,



Wendy Miller
Division of Materials and Waste Management

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pc: Lisa Gifford, DMWM, NWDO
(Colleen Weaver, DMWM, NWDO)
ec: Colleen Weaver, DMWM, NWDO
Wendy Miller, DMWM, NWDO