



Environmental
Protection Agency

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

SR
FILE COPY

June 30, 2011

Ms. Kristina Banner
Southern Auto Sales
2415 S. High St.
Columbus, OH 43207

Re: **Southern Auto Sales**
Franklin County
Non-Notifier

OH 000164509

Dear Ms. Banner:

On June 7, 2011, I conducted a complaint investigation of your 2415 S. High St. facility in Columbus, Ohio to determine its compliance with Ohio's hazardous waste laws and Used Oil Rules as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). The complainant stated that the facility was illegally dumping oil.

Southern Auto Sales is in violation of the following Ohio used oil rules. In order to correct these violations you must do the following and send me the required information **within 30 days of your receipt of this letter.**

1. Used Oil Generator Standards (OAC 3745-279-22 (C))

Containers and aboveground tanks used to store used oil at generator facilities shall be labeled or marked clearly with the words "Used Oil." At the time of the inspection the containers being used to collect oil from engine blocks and drip pans were not labeled with the words "Used Oil."

Southern Auto Sales needs to label the used oil containers and submit a photo to me.

2. Used Oil Generator Standards [OAC 3745-279-22(D)]

The generator upon detection of a release of used oil must clean up and properly manage the used oil and other materials. The ground around the used oil drums and dumpster was heavily stained with oil, as well as a few areas in the north driveway.

Oil spill-affected area(s) must be cleaned up promptly. Remove all visibly stained soils and manage them properly. They may be treated at a special facility or disposed as solid waste. Please submit photos to me showing final cleanup around the used oil storage area.

Ms. Kristina Banner
Sothern Auto Sales
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Enclosed you will find a copy of the checklists that we completed as a result of the inspection. Should you have any questions, please feel free to call me at (614-728-3884). You can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dmwm/>.

Sincerely,



Peter Maneff
District Representative
Division of Materials and Waste Management
Central District Office

Enclosure

c: CDO File

PM/nsm SouthernAuto SalesComplaint

| | | |
|----------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|-----------------------|
| Send to Central Office <input type="checkbox"/> | Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM | For Ohio EPA use only |
|----------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|-----------------------|

Completed verification forms required to be submitted to CO should be e-mailed to paula.canter@epa.state.oh.us.

| | | |
|--------------------------------------------------------------------------------------------------------------------|---------------------------------------------|------------------------------------|
| Site EPA ID No. Site Name | EPA ID Number: Non-Notifier | |
| Site Location Information | Name: Southern Auto Sales | Website: (Optional) |
| Site Land Type (check only one) | Street Address: 2415 S. High St. | |
| NAICS code(s) www.census.gov/epcd/www/naics.html | City, Town, or Village: Columbus | State: OH |
| | County Name: Franklin | Zip Code: 43207 |
| | Private <input checked="" type="checkbox"/> | County <input type="checkbox"/> |
| | District <input type="checkbox"/> | Federal <input type="checkbox"/> |
| | Indian <input type="checkbox"/> | Municipal <input type="checkbox"/> |
| | State <input type="checkbox"/> | Other <input type="checkbox"/> |

| | | | | | |
|---------------------------------------------------------------------------|-----------------------------|--|-----------------------------------|--------------------------|--|
| Facility Representative | First Name: Kristina | | MI: | Last Name: Banner | |
| Additional names can be recorded in number 12 | Title: manager | | Phone Number: 614-443-3819 | | |
| Only provide address information if it is different than the site address | Phone Number Extension: | | E-Mail Address: | | |
| | Fax Number: | | Fax Number Extension: | | |
| | Street or P.O. Box: | | City, Town or Village: | | |
| | State: | | Zip Code: | | |

| | | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|---------------------------------------------|------------------------------------------------------|-----------------------------------|----------------------------------|
| Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page | Name of Site's Legal Owner: Consolidated Acquisitions | | Date Became Owner (mm/dd/yyyy): 07/01/2002 | | |
| | Owner Type: | Private <input checked="" type="checkbox"/> | County <input type="checkbox"/> | District <input type="checkbox"/> | Federal <input type="checkbox"/> |
| | Indian <input type="checkbox"/> | Municipal <input type="checkbox"/> | State <input type="checkbox"/> | Other <input type="checkbox"/> | |
| | Street or P.O. Box: | | City, Town or Village: | | |
| | State: | | Owner Phone #: | | Country: USA |
| | Name of Site's Operator: Southern Auto Sales | | Date Became Operator (mm/dd/yyyy): | | |
| | Operator Type: | Private <input checked="" type="checkbox"/> | County <input type="checkbox"/> | District <input type="checkbox"/> | Federal <input type="checkbox"/> |
| | Indian <input type="checkbox"/> | Municipal <input type="checkbox"/> | State <input type="checkbox"/> | Other <input type="checkbox"/> | |
| | Street or P.O. Box: | | City, Town or Village: | | |
| | State: OH | | Operator Phone #: | | Country: USA |
| | Zip Code: | | Zip Code: | | |

VIOLATIONS CITED? Yes No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

| | | |
|--------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> Not a HW Generator | <input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 | <input type="checkbox"/> Large Quantity Generator (LQG) |
| | <input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment. | <input type="checkbox"/> Small Quantity Generator (SQG) |
| | | <input type="checkbox"/> Conditionally Exempt Small Quantity Generator |
| | | <input type="checkbox"/> U.S. Importer of Hazardous Waste |
| | | <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator |

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

- | | |
|-------------------------------------------------------------------------|------------------------------------------------------------------------|
| <input type="checkbox"/> Hazardous Waste Transporter | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace |
| <input type="checkbox"/> Hazardous Waste Transfer Facility | <input type="checkbox"/> Small Quantity On-Site Burner Exemption |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Recycler of Hazardous Waste | <input type="checkbox"/> Underground Injection Control Facility |
| <input type="checkbox"/> 72-Hour Recycler | <input type="checkbox"/> Receives Hazardous Waste from Off-site |

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED)

(CHECK ALL BOXES THAT APPLY)

- | | |
|-------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|
| <input type="checkbox"/> Small Quantity Handler of Universal Waste | <input type="checkbox"/> Destination Facility for Universal Waste |
| <input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more) | |

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

- Batteries
 Pesticides
 Mercury containing equipment
 Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))

- Used Oil Generator
 Used Oil Transporter
 Used Oil Transfer Facility
 Used Oil Processor
 Used Oil Re-refiner
 Off-Specification Used Oil Burner
 Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil
 Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

- College or University
 Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
 Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

Waste Codes for Federally Regulated Hazardous Wastes: Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRA Info source record, you do not need to list them. Instead just indicate the date of the most recent source record.

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

- | | | | |
|------------|------------------------------|----------------------------------------|--------------------------------------|
| Announced | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Additional Facility Representatives: |
| Tanks | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | |
| Containers | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | |

Name of Inspector(s)
Peter Maneff

Name of Inspector(s)

Date of Inspection/Time
 (mm/dd/yyyy) (hh:mm)
06/07/2011

Comments:

PROCESS DESCRIPTION SECTION

Give a general process description (include all processes done at the facility)

Southern Auto Sales, 2415 S. High St. is a used car lot doing minor repair work on the cars they are prepping to sell. The repair shop generates approximately 5 gallons of waste oil per month which is taken to Autozone. The facility stores used oil in 55 gallon drums in the rear of the property.

WASTE ACTIVITIES SUMMARY SECTION

For each of the processes listed above that generate a waste give the following information: (1) name of process generating waste, (2) name or description of waste generated, (3) EPA waste codes, (4) quantity generated per month, (5) type of accumulation container used, (6) waste accumulation location in facility, (7) type of on-site treatment (if used), (8) name of off-site management facility (9) type of activity occurring at off-site management facility and (10) P2 activities

Used oil, stored in 55 gallon drums, taken to Autozone or Advanced.

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

NOTE: 1. A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

2. Inspectors can check BUSTR's web-site at https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at: https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp.

PROHIBITIONS

| | | |
|----|-----------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| 1. | Does the generator manage used oil in a surface impoundment or waste pile? If yes: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: For example, used oil contaminated scrap metal stored in a pile.

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| 2. | Is used oil used as a dust suppressant? [3745-279-12(B)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 3. | Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

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|----|-------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| 4. | Does the generator mix hazardous waste with used oil? If so, | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

| | | |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| 5. | Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|

NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

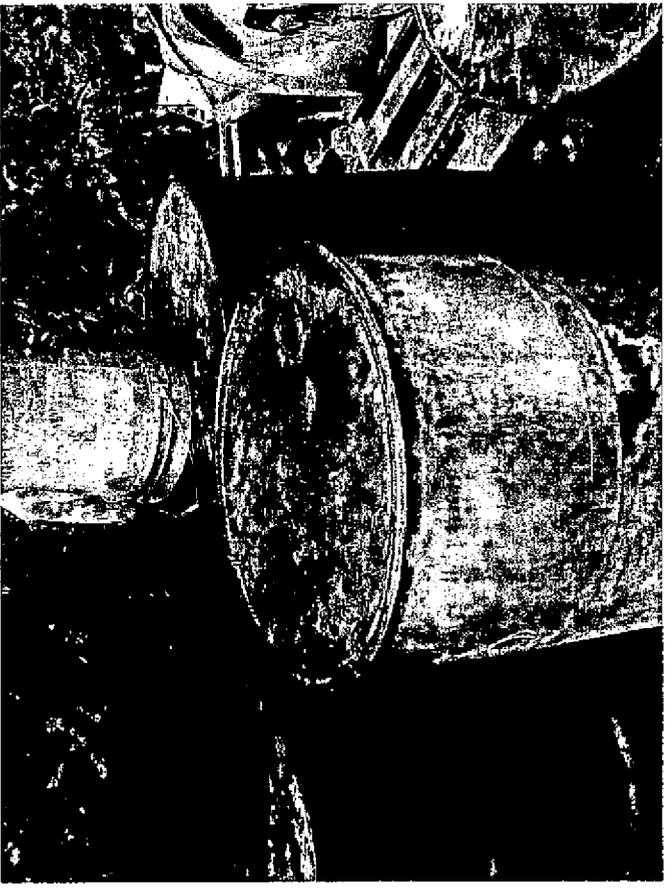
| | | |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| 6. | Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 7. | Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 8. | Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 9. | Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| a. | Stopped the release? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Contained the release? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Cleaned up and properly managed the used oil and other materials? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| d. | Repaired or replaced the containers or tanks prior to returning them to service, if necessary? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

| ON-SITE BURNING IN SPACE HEATER | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| 10. | Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: | |
| a. | Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| c. | Are the combustion gases from heater vented to the ambient air? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| <i>NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).</i> | | |
| GENERATOR TRANSPORTATION | | |
| 11. | Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 12. | If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] | |
| a. | Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| <i>NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).</i> | | |
| COLLECTION CENTERS AND AGGREGATION POINTS | | |
| 13. | Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 14. | Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 15. | Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| <i>NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.</i> | | |

Southern Auto Sales, Used oil
overflowing onto the ground.



Southern Auto Sales, Used oil
overflowing onto the ground.





Complaint No. 4097
 Sequence No. 0
 DERR Spill No.

Complaint Investigation Summary

Received By: RATH, DMWM

Date Received: 05/25/2011 Time Received: 1030

| | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Complainant:</p> <p>Name: ANON</p> <p>Address:</p> <p>City/State: ,</p> <p>Zip:</p> <p>Phone #'s: Home Work</p> <p>Confidential: N</p> | <p>Suspected Source:</p> <p>Name: SOUTHERN AUTO SALES</p> <p>Address: 2415 S. HIGH ST.</p> <p>City/State: COLUMBUS, OH</p> <p>Zip: 43207</p> <p>Phone: (614) 443-3819</p> <p>Contact:</p> <p>Township:</p> <p>County: FRANKLIN</p> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Statement of Complaint: (Describe location, type of material, quantity, areas affected etc.)

Friend of employee of Southern Auto Sales reports that the company dumps lots of oil out back. Believes that the EPA would be horrified if they saw the mess.

Investigated By: DAPC: DERR: DHWM: DSIWM: DSW: DDAGW:

Date Investigated: 06/07/2011

Investigated By: PETER MANEFF, DMWM

Watershed:

Investigation Summary:

Found used oil spilled on the ground around the used oil storage area and throughout the yard. NOV issued June 30, 2011

Action:

Date Action Taken: / /

Date Referred: / /

Final Action Date: / /

Referred To: