



**Environmental
Protection Agency**

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

March 29, 2011

**RE: ADVANTAGE TOWING AND SALVAGE
COMPLAINT #7389
OHD ~~000-001-057~~ 987 052 164 pm
RETURN TO COMPLIANCE
ASHTABULA COUNTY**

Mr. David Horton
Advantage Towing and Salvage
409 Bliss Avenue
Conneaut, OH 44030

Dear Mr. Horton:

Thank you for your March 24, 2011 e-mail response to Ohio EPA's December 13, 2010 notice of violation (NOV) letter. The documentation you submitted included photographic documentation demonstrating the used oil containers had been removed and the used oil spills cleaned up.

In your letter you addressed the issues enumerated in the NOV as follows: Citation #1, you reported Advantage has ceased accepting used oil from other facilities. Citation #2, you reported that all used oil containers are now properly labeled or marked with the words, "Used Oil." Citation #3, regarding releases of used oil observed at the facility, you reported the used oil has been cleaned up. Citation #4, regarding spent batteries, you reported the batteries were labeled.

My review of this documentation reveals that Advantage Towing and Salvage has now abated all violations discovered during the November 1, 2010 inspection as listed below and has returned to compliance with Ohio's hazardous waste, universal waste, and used oil rules.

Letter Citation #	Rule Citation
1.	OAC Rule 3745-279-31; Used oil collection centers
2.	OAC Rule 3745-279-22(C); Container labeling
3.	OAC Rule 3745-279-22(D); Releases
4.	OAC Rule 3745-273-14(A); Universal waste, labels

GENERAL COMMENTS

With regard to the scrap tires observed at various locations throughout the facility property, you reported the tires are currently stored at a specific location on site and Advantage has arranged for Liberty Tire to transport them off site for recycling.

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With regard to spent lamps, you reported Advantage currently has none on site. I have included with this letter Ohio EPA's fact sheet regarding the handling of universal waste lamps.

Should you have any questions, please feel free to contact me at (330) 963-1279.

Sincerely,



Patricia M. Natali
Environmental Specialist
Division of Hazardous Waste Management

PMN/cl
Enclosures

cc: Marlene Kinney, DHWM, NEDO

ec: Frank Popotnik, DHWM, NEDO
Ed D'Amato, DHWM, NEDO
Natalie Oryshkewych, DHWM, NEDO
Harry Sarvis, DHWM, CO
Colum McKenna, DSIWM, NEDO

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with applicable regulations.