



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

September 16, 2008

RE: CONNEAUT COLLISION CENTER  
OHD 981 795 842  
RTC

Mr. Bill Herb  
Conneaut Collision Center  
378 E. Main Road  
Conneaut, OH 44030

**CERTIFIED MAIL**

Dear Mr. Herb:

The purpose of this letter, in part, is to inform Conneaut Collision Center (CCC) of Ohio EPA's serious concern regarding the violation of the State's hazardous waste law which has occurred at the facility.

As you are aware, Ohio EPA's Division of Hazardous Waste Management (DHWM) has documented that Conneaut Collision Center (CCC) was in violation of Ohio Revised Code §3734.02(F) for not ensuring delivery of hazardous waste to an off-site, permitted, Treatment, Storage, and Disposal Facility (TSDF). Specifically, Ohio EPA discovered that CCC was transporting its waste paint and solvent hazardous waste (D001, F003, F005) to a competitor's body shop. This competitor then recovered solvent from the material using a distillation unit. CCC therefore illegally transported hazardous waste to a facility not operating under a hazardous waste facility installation and operation permit.

It is imperative that CCC maintain compliance with Ohio's hazardous waste laws and regulations. Further, be advised that violations of the state's hazardous waste laws and regulations may result in enforcement actions against CCC, including the assessment of civil penalties.

On September 4, 2008, Mr. Tom Roth of Ohio EPA's Northeast District Office visited your facility and verified that CCC has purchased a distillation unit for solvent recovery and to reduce your hazardous waste generation. At the time of his visit the unit was new and had not been used. CCC also had 6 - five gallon containers full of mixed paint and solvent waste being accumulated pending distillation.

In light of the purchase of the distillation unit, CCC is hereby returned to compliance with the violation listed in Tom Roth's April 2, 2007 notice of violation letter. **Please be advised** that the still bottoms generated by the distillation unit are hazardous waste and must be properly managed and disposed of at a permitted TSDF.

A useful compliance guide for assistance with Ohio EPA's environmental regulations applicable to auto body shops can be found on the internet at:  
**[www.epa.state.oh.us/ocapp/sb/publications/collisionrepair.pdf](http://www.epa.state.oh.us/ocapp/sb/publications/collisionrepair.pdf)**

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Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides compliance and pollution prevention assistance on environmental issues related to air, land, and water. If desired, this can include an onsite assessment of your operations with a resulting report containing waste minimization and energy conservation suggestions. They can be contacted at 800-329-7518 or at:  
**<http://www.epa.state.oh.us/ocapp/ocapp.html>**

Should you have any questions regarding this or other environmental matters, please contact Tom Roth at (330) 963-1231.

Sincerely,



Natalie Oryshkewych  
Environmental Manager  
Division of Hazardous Waste Management

NO:ddw

cc: Tom Roth, DHWM, NEDO  
ec: Harry Courtright, DHWM, NEDO  
Harry Sarvis, DHWM, CO

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used: Fire Extinguishers

**WASTE EVALUATION**

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes  No  N/A

**GENERATOR CLASSIFICATION**

2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes  No  N/A

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

**OFF-SITE SHIPMENT OF HAZARDOUS WASTE**

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes  No  N/A

**TREATMENT OF HAZARDOUS WASTE**

a. Container that meets 3745-66-70 to 3745-66-77? Yes  No  N/A

b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes  No  N/A

c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes  No  N/A

d. Containment building that meets 3745-256-100 to 3745-256-102? Yes  No  N/A

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

**REMARKS**