



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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

October 7, 2008

Bob Cherry
Ravenna Township Trustee
6115 South Spring Street
Ravenna, Ohio 44266

**RE: FORMER NORTHEAST AUTO RECYCLING PROPERTY, PORTAGE COUNTY
PROPERTY TRANSFER, RETURN TO COMPLIANCE**

Dear Mr. Cherry:

On September 23, 2008 Ohio EPA's Division of Hazardous Waste Management (DHWM) conducted an inspection of the former Northeast Auto Recycling property located at 6651 Cleveland Road in Ravenna, Ohio. When in operation, Northeast Auto Recycling was an automobile recycling yard and a non-notifier for hazardous waste in the state of Ohio. Ohio EPA conducted a complaint investigation and compliance evaluation inspection of the facility on April 4, 2002. Based upon the results of that inspection and subsequent follow-up inspections, Ohio EPA sent the operator, Ted Zalewski, multiple Notice of Violation (NOV) letters, to which Mr. Zalewski failed to satisfactorily respond. After the facility went out of business these violations cited remained outstanding.

On April 27, 2006 the Ravenna Township Trustees (Ravenna Township) took possession of the Northeast Auto Recycling property with the intent to clean up the property for reuse by the township. Upon learning on the property sale, Ohio EPA contacted Ravenna Township and informed them of the outstanding violations and the possible property ownership liabilities that may exist. Ohio EPA has provided the township with guidance documents and advised individuals working on the project to keep all receipts and paperwork regarding the any wastes or materials ship off site for recycling or disposal.

The September 23, 2008 inspection included a walkthrough of the property and the remaining buildings and a review of documentation regarding the sale, disposal and recycling of materials removed from on site during the clean-up activities.

Based on the observations made during the walkthrough and a review of the documentation, Ohio EPA has determined the following violations cited in Ohio EPA's NOV letters have been adequately abated and the facility is hereby returned to compliance:

**OAC Rule 3745-273-14(A) Labeling/marking- Standards for Small Quantity
Handlers of Universal Waste**
**OAC Rule 3745-273-15(C) Accumulation Time Limits - Standards for Small
Quantity Handlers of Universal Waste**
OAC Rule 3745-279-22(C)(1) Used oil storage requirements for generators

Ohio EPA has the following comment regarding the drain pipe observed at the rear of the property:

On October 3, 2008 Ohio EPA's DHWM met with Dan Bogoevski from the Division of Surface Water (DSW) storm water unit, regarding the outfall witnessed coming from drain pipe at the back of the property. Mr. Bogoevski accompanied me during one of my follow-up inspections at the property while it was still in operation and observed the drain pipe at that time.

Based upon my discussion with Mr. Bogoevski and my observation that the small amount of outfall coming from the pipe appeared to be clean, with no oil sheen, generated no foam, odor or discoloration, and it is the position of Ohio EPA that the drain pipe is not discharging any industrial waste water, process water or oil contaminated storm water. Ohio EPA therefore considers the issue of the source of the outfall no longer a concern.

Should you have any questions, please feel free to call me at (330) 963-1181.

Sincerely,



Suzanne Prusnek
Environmental Specialist
Division of Hazardous Waste Management

SP:ddw

cc: Natalie Oryshkewych, DHWM, NEDO, OEPA
ec: Frank Popotnik, DHWM, NEDO, OEPA
Dan Bogoevski, DSW, NEDO, OEPA

NOTICE: Failure to list specific deficiencies in this communication does not relieve Ravenna Township from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve Ravenna Township from liability for any past or present violations of the state's hazardous waste laws.