



**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Koneski, Director

August 20, 2010

Bob Wolf  
Star Complete Auto  
975 East 185<sup>th</sup> Street  
Cleveland, OH 44119

**RE: STAR COMPLETE AUTO SERVICE, CUYAHOGA COUNTY, COMPLAINT #7318**

Dear Mr. Wolf

On July 23, 2010, Ohio EPA's Division of Hazardous Waste Management (DHWM) conducted a complaint investigation at the Star Complete Auto Service facility located at 975 East 185<sup>th</sup> Street in Cleveland, Ohio. The purpose of this inspection was to investigate the allegations of the complaint. The complaint alleged that Star Complete Auto Service was disposing of used oil from auto repairs in two vehicle lift pits in the floor. Ohio EPA's investigation found a substantial amount of oil in at least two of the three existing pits.

Based upon this investigation, Ohio EPA has determined that Star Complete Auto Services has violated the following state hazardous waste regulation:

**1. 3745-279-22 Used Oil Storage requirements for generators:**

***(A) Storage units. Used oil generators must store used oil in tanks, as defined in rule 3745-279-01 of the Administrative Code; in containers, as defined in rule 3745-279-01 of the Administrative Code; or in units subject to regulation under Chapters 3745-54 to 3745-57 and 3745-205 or Chapters 3745-65 to 3745-69 and 3745-256, and Chapter 3745-270 of the Administrative Code.***

The in ground vehicle lift pits do not meet the criteria required by law for the storage of used oil. Star Complete Auto Body must remove and legally dispose or recycle the used oil.

Star Complete Auto Service collects some of its used oil in a labeled used oil tank and ships it off site for recycling to Environmental Specialists Inc. At the time of this inspection, Ohio EPA recommended having the company you are using now (Environmental Specialists Inc.) pump the used oil out of the vehicle lift pits and send it off for recycling. You stated that after pumping out the used oil out of the pits, you would have a contractor come in and fill the pits with concrete.

STAR COMPLETE AUTO  
AUGUST 20, 2010  
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To demonstrate abatement of this violation, please submit to this office documentation demonstrating the three vehicle lift pits have had the oil removed and legally disposed or recycled.

Please submit all documentation to my attention at this office within thirty (30) days of receipt of this letter.

The Division of Hazardous Waste Management has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link:

[http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc\\_serve.php?2=subscriptionpage](http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage).

Please feel free to share this information with your colleagues.

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

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

ec: Frank Popotnik, DHWM, NEDO, OEPA  
Harry Sarvis, DHWM, CO, OEPA  
Natalie Oryshkewych, DHWM, NEDO, OEPA

E-mail this completed form to <a href="mailto:tammy.mcconnell@epa.state.oh.us">tammy.mcconnell@epa.state.oh.us</a> or mail it to Tammy McConnell, Central Office	<b>Of Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM</b>		For Ohio EPA use only																																			
2. Site EPA ID No.	EPA ID Number:																																					
3. Site Name	Name: Star Complete Auto Repair		Website (optional):																																			
4. Site Location Information	Street Address: 975 E. 185 St.																																					
	City, Town, or Village: Cleveland	State: OH																																				
	County Name: Cuyahoga	Zip Code: 44119																																				
5. Site Land Type (check only one)	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	X																										
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6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	A. 811111		B. 811112																																			
	C. 811191		D.																																			
7. Facility Representative:  Additional names can be recorded in number 12.  Only provide address information if it is different than the site address.	First Name: Bob		MI:	Last Name: Wolf																																		
	Phone Number: 216-486-4141		Phone Number Extension:																																			
	E-Mail Address:																																					
	Fax Number:		Fax Number Extension:																																			
	Street or P.O. Box:																																					
	City, Town or Village:		State:	Country:	Zip Code:																																	
8. 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.	A. Name of Site's Legal Owner:		Date Became Owner (mm/dd/yyyy):																																			
	Owner Type: Mark with an X	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other									<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>		Private	County	District	Federal	Indian	Municipal	State	Other								
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	City, Town, or Village:		Owner Phone #:																																			
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	B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):																																			
Operator Type: Mark with an X	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other									<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>		Private	County	District	Federal	Indian	Municipal	State	Other									
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City, Town, or Village:		Operator Phone #:																																				
State:		Country:	Zip Code:																																			
9. Violations Cited?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No																																			
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)																																						
<input type="checkbox"/> Not Regulated																																						

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

**A. Hazardous Waste Activities**

(choose only one of the following categories)

<input type="checkbox"/>	<b>UNKNOWN:</b> Cited for violation of 3745-52-11	<input type="checkbox"/>	<b>3. Treater, Storer or Disposer of Hazardous Waste</b>
<input type="checkbox"/>	<b>a. Large Quantity Generator (LQG):</b>	<input type="checkbox"/>	<b>4. Recycler of Hazardous Waste</b>
<input type="checkbox"/>	<b>b. Small Quantity Generator (SQG)</b>	<input type="checkbox"/>	<b>5. Exempt Boiler and/or Industrial Furnace</b>
<input checked="" type="checkbox"/>	<b>c. Conditionally Exempt Small Quantity Generator</b>	<input type="checkbox"/>	<b>a. Small Quantity On-site Burner Exemption</b>
<input type="checkbox"/>	<b>d. United States Importer of Hazardous Waste</b>	<input type="checkbox"/>	<b>b. Smelting, Melting, Refining Furnace Exemption</b>
<input type="checkbox"/>	<b>e. Mixed Waste (hazardous and radioactive) Generator</b>	<input type="checkbox"/>	<b>6. Underground Injection Control Facility</b>

<b>B. Universal Waste Activities</b>		<b>C. Used Oil Activities</b>	
<input checked="" type="checkbox"/>	<b>1. Small Quantity Handler of Universal Waste</b> (Indicate types of universal waste generated and/or accumulated (check all boxes that apply):	<input checked="" type="checkbox"/>	<b>1. Used Oil Generator</b>
<input type="checkbox"/>	<b>2. Large Quantity Handler of Universal Waste</b> (accumulates 5,000 kg or more).	<input type="checkbox"/>	<b>2. Used Oil Transporter</b> Indicate Type(s) of Activity(ies)
<input type="checkbox"/>	<b>3. Destination Facility for Universal Waste</b> (Check all boxes below that apply for each of the three types of facilities above.)	<input type="checkbox"/>	Transporter
		<input type="checkbox"/>	Transfer Facility
		<input type="checkbox"/>	<b>3. Used Oil Processor and/or Re-refiner</b> Indicate Type(s) of Activity(ies)
		<input type="checkbox"/>	Processor
		<input type="checkbox"/>	Re-refiner
		<input type="checkbox"/>	<b>4. Off-Specification Used Oil Burner</b>
		<input type="checkbox"/>	<b>5. Used Oil Fuel Marketer -</b> Indicate Type(s) of Activity(ies)
		<input type="checkbox"/>	a. Marketer Who Directs Shipment of Off-Specification Oil
		<input type="checkbox"/>	b. Used Oil to Off-Specification Used Oil Burner

**11. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

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**12. Comments:** Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

N	Announced ?	Additional Facility Representatives:	
N	Tanks?	Other comments:	
N	Containers?		

<b>13.</b>	<b>Name of Inspector(s)</b>	<b>Name of Inspector(s)</b>	<b>Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)</b>
	Frank Zingales		3-21-06 / 1430

**14. OPTIONAL CERTIFICATION.** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of owner, operator, or an authorized representative	Name and Title (Print)	Date (mm-dd-yyyy)

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS**

**WASTE EVALUATION**

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

**GENERATOR CLASSIFICATION**

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

**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.*

**NOTE:** *To convert from gallons to pounds:*

*Amount in gallons x Specific Gravity x 8.345 = Amount in pounds*

**OFF-SITE SHIPMENT OF HAZARDOUS WASTE**

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3745-51-05(G)(3)] Yes  No  N/A  RMK#

**REMARKS**

1. See Ohio EPA's Notice of Violation letter, violation number 1.

## USED OIL INSPECTION CHECKLIST (Short Version)

**NOTE:** *This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.*

### PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes  No  N/A  RMK#\_\_\_\_
- Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes  No  N/A  RMK#\_\_\_\_
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes  No  N/A  RMK#\_\_\_\_
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes  No  N/A  RMK#\_\_\_\_

### USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes  No  N/A  RMK#\_\_\_\_
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  No  N/A  RMK#\_\_\_\_
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes  No  N/A  RMK# 2
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes  No  N/A  RMK#\_\_\_\_
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes  No  N/A  RMK# 2
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes  No  N/A  RMK#\_\_\_\_
- b. Contained the release? Yes  No  N/A  RMK#\_\_\_\_

- c. Cleaned up and properly managed the used oil and other materials? Yes  No  N/A  RMK#\_\_\_\_\_
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes  No  N/A  RMK#\_\_\_\_\_
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes  No  N/A  RMK#\_\_\_\_\_
- 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  No  N/A  RMK#\_\_\_\_\_
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes  No  N/A  RMK#\_\_\_\_\_
- c. Are the combustion gases from heater vented to the ambient air? Yes  No  N/A  RMK#\_\_\_\_\_
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes  No  N/A  RMK#\_\_\_\_\_

**USED OIL COLLECTION CENTERS AND AGGREGATION POINTS**

12. 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  No  N/A  RMK#\_\_\_\_\_
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes  No  N/A  RMK#\_\_\_\_\_
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes  No  N/A  RMK#\_\_\_\_\_

**REMARKS**

2. See Ohio EPA's Notice of Violation letter, violation number 2.

**PROCESS DESCRIPTION / WASTE ACTIVITIES SUMMARY**

**Facility Name:** Star Complete Auto Repair

**Facility Type:** Conditionally Exempt Small Quantity Generator (CESQG)

**EPA ID#:**

**Process Information:** Facility performs automotive repair services.

**Regulatory / Enforcement History:** None to date.

<i>Description of Waste</i>				<i>On-Site Management</i>	<i>Off-Site Management</i>	
<b>Process/Activity Generating Waste</b>		<b>Waste Generated</b>	<b>Waste Code(s)</b>	<b>Quantity Generated</b>	<b>Type of Accumulation</b>	<b>Name, state, and type of activity occurring at the facility.</b>
1.	Auto repair & maintenance	Used Oil			Container-drum, aboveground storage tank	1/19/06 shipment to: Akron Canton Waste Oil
2.	Degreasing/brake cleaning	Spent solvent	F001	CESQG		Awaiting management information.
3.	Auto repair & maintenance	Gas	D001/D018			Returned to gas tank or mixed with used oil.
4.	Auto repair & maintenance	Anti-freeze				Mixed with used oil.
5.	Facility maintenance	Spent lamps				Awaiting waste evaluation information.