

**Environmental
Protection Agency**

Ohio Department of Environmental Protection
1975 East Broad Street, Columbus, Ohio 43261
614.644.6300
www.epa.ohio.gov

October 18, 2010

Bob Wolf
Star Complete Auto
975 East 185th Street
Cleveland, Ohio 44119

**RE: STAR COMPLETE AUTO SERVICE, CUYAHOGA COUNTY, COMPLAINT #7318,
SECOND NOTICE OF VIOLATION**

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 185th 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 lifts 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.

On September 15, 2010, you contacted this office stating that you were having the pits pumped that day, and inquiring whether we had to come out to observe the process, because you were going to have a contractor fill in the pits with concrete the next day or two after pumping them out.

I returned your call later the same day, and informed you that we did not have to be on site to observe, but requested you submit photographic documentation showing the pits to be empty prior to filling them in with concrete and documentation demonstrating the oil from the three vehicle lift pits has been legally disposed or recycled.

STAR COMPLETE AUTO SERVICE
OCTOBER 18, 2010
PAGE – 2 –

As of this date, October 15, 2010, this office has not received any of the requested documentation regarding the used oil and three vehicle pits.

To demonstrate abatement of this violation, please submit to this office the following documentation:

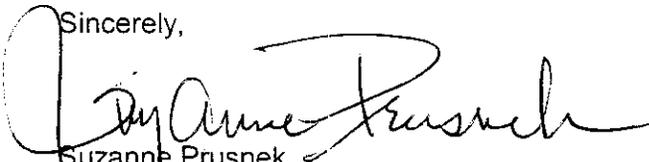
- photographic documentation showing the pits to be empty prior to filling them in with concrete,
- documentation demonstrating the oil from the three vehicle lift pits has been legally disposed or recycled.

Please submit all documentation to my attention at this office within **fifteen (15)** days of receipt of this letter.

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