



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

June 27, 2007

RE: THREE S EXPRESS, INC.
CESQG
MAHONING COUNTY
NOV / PRTC

David Savaet
Three S Express, Inc.
P.O. Box 244
11282 South Avenue
North Lima, OH 44452

Complaint # 6938
and inspected 6/18/07

Dear Mr. Savaet:

On June 15, 2007, I visited your facility, located at 11023 South Avenue in North Lima, representing the Ohio EPA's Division of Hazardous Waste Management to conduct a complaint investigation regarding drum storage reported at this location. The inspection was performed relative to compliance with Ohio hazardous waste laws found in chapters 3734 of the Ohio Revised Code (ORC) and 3745 of the Ohio Administrative Code (OAC).

This facility is generally inactive and used for storage of equipment and materials. You reported that the drums of concern were empties and that they had been flattened and sent off as scrap steel. There are several containers currently onsite for used oil and roll-off boxes for scrap metal. There is evidence of used oil staining the ground around the perimeter of a container on the east side at the back of the building.

VIOLATIONS

1. **OAC 3745-279-22(C)(2), Used Oil Storage Requirements for Generators (Labels):** Two outdoor tanks or containers where used oils are stored were not labeled as "used oil" per the rule.

During the inspection this violation was abated when you properly labeled the containers.

2. **OAC 3745-279-22(D), Response to Releases of Used Oil:** "Upon the detection of a release of used oil to the environment, a generator shall...clean up and manage properly the released used oil..."

There is an oily area of ground adjoining the southern of two tank containers that are located outside at the back of the building.

To abate this violation, remove and properly dispose all stained soil and gravel. Contaminated soil and gravel containing only **used oil** may be disposed as a solid waste. Provide in writing that the leak or source release has been eliminated or corrected and that a best management practice is in place so that any leaks or releases are avoided or promptly addressed. Provide **written verification and photographs** that shows the oil stained area has been cleaned up and the generated waste properly disposed. Provide receipts and/or analytical data that demonstrates proper disposal as needed.

CONCERNS and RECOMMENDATIONS

The following concerns and recommendations were noted that may require your action:

- 1) **Fluorescent and high intensity discharge lamps** - These lamps can be considered hazardous waste due to their mercury and lead content, unless determined otherwise. You must evaluate your lamps and dispose or recycle them properly. Lamps that would be considered a hazardous waste must either be disposed as a hazardous waste or managed as a universal waste and sent for recycling.

Please indicate in writing whether you intend to manage lamps as a universal waste or hazardous waste. You must make proper disposal of all lamps that could be considered hazardous waste.

Spent lamps that are recycled are not subject to the hazardous waste rules. Refer to the Ohio EPA Fact Sheet "Universal Waste Rules for Handlers of Lamps": http://www.epa.state.oh.us/dhwm/pdf/Universal_Waste_Rules_for_Handlers_of_Lamps.pdf, and a list of lamp recyclers at: <http://www.epa.state.oh.us/dhwm/pdf/comp.lamp.ballast.list.pdf> and <http://www.epa.state.oh.us/dhwm/pdf/LampGuidance.pdf>. These guidance sheets are also enclosed.

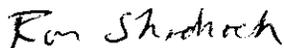
- 2) If you store more than 1,320 gallons of petroleum or non petroleum oils you may be required to develop a Spill Prevention Control and Countermeasure (SPCC) plan. Enclosed is a Fact Sheet: *Understanding of SPCC Requirements*. This fact sheet is also found at <http://www.epa.state.oh.us/ocapp/sb/publications/spcc.pdf>. Additional information may be found at: <http://www.epa.gov/oilspill/spcc.htm> and at: <http://www.epa.gov/oilspill>. You may contact Bruce Miller of the Ohio EPA's Division of Emergency Response at (330) 963-1211, for further information regarding this matter.

Please submit the requested documentation to my attention **within 30 days** of receipt of this letter.

You can find copies of the rules and other information on the DHWM's web page at <http://www.epa.state.oh.us/dhwm>. Other useful information from Ohio EPA about pollution prevention may be found at <http://www.epa.state.oh.us/opp/>.

Should you have any questions, please feel free to contact me at (330) 963-1146 or at ron.shadrach@epa.state.oh.us.

Sincerely,



Ronald J. Shadrach
Environmental Specialist II
Division of Hazardous Waste Management

RJS:ddw
Enclosures

ec: Frank Popotnik, Ohio EPA, DHWM, NEDO
Harry Sarvis, Ohio EPA, DHWM, CO

<p>NOTICE: Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.</p>
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Ohio Environmental Protection Agency
**RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to
tammy.mcconnell@epa.state.oh.us or mail it to Tammy
McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: CESQG								
3. Site Name	Name: Three S Express, Inc.					Website: (Optional)			
4. Site Location Information	Street Address: 11023 South Avenue								
	City, Town, or Village: North Lima					State: OH			
	County Name: Mahoning					Zip Code: 44452			
5. Site Land Type (check only one)	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
6. NAICS code(s) www.census.gov/epcd/www/naics.html									
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: David			MI:	Last Name: Savaet				
	Phone Number: 330-549-3931					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	Name of Site's Legal Owner:								
	Date Became Owner (mm/dd/yyyy):								
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box:								
	City, Town or Village:					Owner Phone #:			
	State:					Country:		Zip Code:	
	Name of Site's Operator:								
	Date Became Operator (mm/dd/yyyy):								
	Owner Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box:								
City, Town or Village:					Operator Phone #:				
State:					Country:		Zip Code:		
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Not Regulated				<input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste					
<input type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)									
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Underground Injection Control Facility									

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))			
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste		<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	
<input type="checkbox"/> Destination Facility for Universal Waste			
Check all boxes below that apply for each of the three types of facilities above		10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
	Managed	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the 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.			
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.			
Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments: Used oil tanks and containers present.
Containers	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Ron Shadrach, DHWM, NEDO			6/15/2007 14:45
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)

Three S Express, Inc. CESQG
11023 South Ave, N. Lima
Mahoning County

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# ___
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# 1
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# 1
- 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# 3
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A ___ RMK# 1
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# ___

WASTE EVALUATION

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

C:\Documents and Settings\RShadrach\My Documents\Folder\Complaints\Three S Express\Three S used oil chklist.wpd

REMARKS

1. Need to verify tank condition. Tank not visible for inspection due to cover. Minor release present could be from operation and not leaking. Either way need to identify source and correct.
2. Containers were not labeled per the rule. Used oil labels applied during the inspection. Corrected.
3. Apparent minor release to the ground needs cleaned up. Proper disposal made. If "used oil" only may dispose cleanup soil and residue/debris as solid waste.

WASTE DISPOSAL AND RECYCLING COMPANIES IN NORTHEAST OHIO

NOTE: Ohio EPA does not endorse specific products or companies.

Check these sites for the most complete and up-to-date information:

<http://www.epa.state.oh.us/dhwm/guidancedocs.html#recycle>

<http://www.epa.state.oh.us/ocapp/recycle.html>

<http://www.cuyahogaswd.org/business/>

HAZARDOUS WASTE COMPANIES (November 2005)

Agmet Metals, Inc., Oakwood Village, OH 440-439-7400 <http://www.agmetmetals.com>

BizMat Center, Akron, OH 330-535-6677 <http://www.bizmatcenter.org>

(only for generators of 220 lbs. of hazardous waste per month or less (CESQG))

Chemical Solvents, Cleveland, OH (216) 741-9310 <http://www.chemicalsolvents.com>

Chemtron Corp., Avon, OH (440) 937-6348 <http://www.chemtron-corp.com>

Clean Harbors, Cleveland, OH (216) 429-2402 <http://www.cleanharbors.com>

Envirite Corp., Canton, OH 330-456-6238 <http://www.envirite.com>

General Environmental Management, Cleveland, OH (216) 621-3694 <http://www.gemenv.cc>

Hukill Chemical Corp., Bedford, OH (440) 232-9400 <http://www.hukill.com>

Reserve Environmental, Ashtabula, OH 440-992-2162

Ross Incineration Services, Grafton, OH 440-728-2200 <http://www.rossenvironmental.com>

Safety-Kleen Systems Inc., Brunswick, OH (330) 273-3111 <http://www.safety-kleen.com>

Von Roll America, Inc., East Liverpool, OH 330-385-7336

USED OIL TRANSPORTERS (December 2005)

Akron Canton Waste Oil, Canton, OH (330) 456-5311

Beaver Petroleum, Canton, OH (330) 454-2242

B.B.N. Oil Recycling, Bedford Heights, OH (440) 786-1888

Chemical Solvents, Cleveland, OH (216) 741-9310 <http://www.chemicalsolvents.com>

Chemtron Corp., Avon, OH (440) 937-6348 <http://www.chemtron-corp.com>

Commercial Ullman Lubricants, Cleveland, OH (216) 441-7200

Everclear, Austintown, OH (888) 888-3208

Enviroclean Services, Wooster, OH (330) 264-8080

Environmental Specialists, Youngstown, OH (330) 530-0700

Homan Oil, Cleveland, OH (216) 631-0477

Hukill Chemical Corp., Bedford, OH (440) 232-9400 <http://www.hukill.com>

M&M Oil Recycling, Bedford, OH (440) 439-9402

PennOhio Corporation, Ashtabula, OH (440) 992-7906

Rice Oil Company, Akron, OH (800) 589-7423

Safety-Kleen Systems Inc., Brunswick, OH (330) 273-3111 <http://www.safety-kleen.com>

INDUSTRIAL LAUNDRY COMPANIES (December 2004)

Coyne Textile Service, Cleveland, Ohio (216) 268-5800

Universal Fuller Company, Cleveland, Ohio (216) 431-8100

Van-Dyne Crotty, Inc., Mentor, Ohio (440) 205-2561

Tartan Textiles Service Inc., Youngstown, OH (330) 746-6543

Industrial Glove: Cleveland, OH (216) 641-8200

TESTING LABORATORIES (June 2006)

Summit Environmental, Akron, OH (330) 253-8211

EA Group, Mentor, OH (800) 875-3514

GEO Analytical, Twinsburg, OH (330) 963-6990