



**Environmental  
Protection Agency**

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

Serial No. - County Governor / File

**Re: Don's Automotive Group**  
OHD018421594  
Conditionally Exempt Small Quantity Generator  
Fulton, NWDO  
RTC

September 1, 2010

Mr. Don Hayati, President  
Don's Automotive Group  
720 North Shoop Avenue  
P.O. Box 208  
Wauseon, Ohio 43567

Dear Mr. Hayati:

I received your response to my June 7, 2010, Notice of Violation (NOV) letter on July 2, 2010. The documentation you submitted included photographs of the new hazardous waste accumulation containers located in your facility body shop. On August 19, 2010, I conducted a follow-up visit at your facility to determine your progress in abating the violations I observed during my May 4, 2010, inspection.

My August 19, 2010, follow-up inspection and my review of your June 7, 2010, documentation reveals that Don's Automotive Group has adequately demonstrated abatement of all violations discovered during the May 4, 2010, inspection:

**1. Unlawful Transportation, ORC § 3734.02(F) – Distillation Bottoms**

During my August 19, 2010, follow-up inspection, I observed that Don's Automotive Group has replaced the paint gun cleaner distillation unit with two Safety Kleen gun cleaning machines. One of these gun cleaners is dedicated to water-based paint guns and the other is dedicated to solvent-based paint guns. The solvent-based paint gun cleaner generates approximately 15 gallons of F003/F005/D001/D035/D005/D006/D007/ D008 hazardous waste every four to five weeks. These spent solvents are managed as hazardous waste by Safety Kleen.

Although no further action is being required by Ohio EPA at this time, be advised that due to the nature of past violations (causing F003/F005 hazardous waste distillation bottoms to be transported to a facility other than a permitted treatment, storage or disposal facility), Don's Automotive Group may be subject to enforcement by the Ohio EPA which could include a monetary fine and/or a requirement for a clean-up action pursuant to OAC rules 3745-55-11 through 3745-55-20 and OAC rules 3745-55-42 through 3745-55-47 at this site.

**2a. OAC Rule 3745-52-11, Hazardous Waste Determination: - paint filters**

During my August 19, 2010 follow-up inspection, I reviewed the analysis of your paint filters provided to me by Winston Nichols. My review of this analysis indicates that your paint filters do not exhibit any hazardous waste characteristics. Therefore, Don's Automotive Group may continue to dispose of the paint filters as solid waste.

Mr. Don Hayati  
September 1, 2010  
Page Two

**2b. OAC Rule 3745-52-11, Hazardous Waste Determination: - parts washer solvent**

During my August 19, 2010, follow-up inspection, I reviewed your documentation which indicates that Don's Automotive Group has contracted with Safety Kleen to enter into their continued use program. Safety Kleen removed the former parts washer from the facility and disposed of the spent parts washer solvent as F001/F005 hazardous waste. Safety Kleen has installed a new parts washer which is managed by Safety Kleen in their continued use program.

**2c. OAC Rule 3745-52-11, Hazardous Waste Determination: - paint gun cleaner distillation solids**

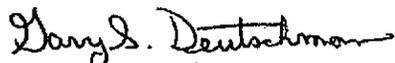
During my August 19, 2010, follow-up inspection I observed that Don's Automotive Group has replaced the paint gun cleaner distillation unit with two Safety Kleen gun cleaning machines. One of these gun cleaners is dedicated to water-based paint guns and the other is dedicated to solvent-based paint guns. The solvent-based paint gun cleaner generates approximately 15 gallons of F003/F005/D001/D035/D005/D006/D007/D008 hazardous waste every four to five weeks. These spent solvents are managed as hazardous waste by Safety Kleen.

**2d. OAC Rule 3745-52-11, Hazardous Waste Determination: - fluorescent lamps**

During my August 19, 2010, follow-up inspection I observed documentation demonstrating that Don's Automotive Group has begun managing spent fluorescent lamps as universal waste. The spent universal waste lamps generated at Don's Automotive Group will be recycled at Environmental Recycling.

If you should have any questions, please feel free to contact me at (419)373-3056.

Sincerely,



Gary S. Deutschman  
Environmental Specialist III  
Division of Hazardous Waste Management

/cs

pc: Winston Nichols, Don's Automotive Group Body Shop Manager  
Jeff Harman, Don's Automotive Group Service Manager  
Cindy Lohrbach, DHWM, NWDO  
Colleen Weaver, Supervisor, DHWM, NWDO  
Harry Sarvis, Manager, CAS, DHWM, CO  
DHWM, NWDO File - Don's Automotive File, Fulton County  
ec: Gary Deutschman, DHWM, NWDO

**NOTICE:**

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with applicable regulations.