



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490  
www.epa.state.oh.us

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korteski, Director

May 29, 2007

**JEFFERSON COUNTY  
GENERAL FILE  
(J AND J CHEVY BUICK FORD)  
DHWM/SEDO  
OHD982617086**

Mr. Robert Willett  
J and J Chevy Buick Ford  
1515 Franklin Avenue  
Toronto, Ohio 43964

Dear Mr. Willett:

On May 15, 2007, John Rochotte and I inspected J and J Chevy Buick Ford's (J and J) facility in Toronto, Ohio to determine J and J's compliance with Ohio's hazardous waste and used oil laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC).

During the inspection, we also helped you identify ways to prevent pollution by reducing waste. This letter will explain the violation found and provide general comments, including information on the pollution prevention opportunity we identified.

**Violation**

We found the following violations of Ohio's used oil laws:

- (1) ***OAC Rule 3745-279-22(C), Used Oil Storage Requirements for Generators:***  
Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

At the time of the inspection, J and J was storing used oil in a 250-gallon tank and in 55-gallon drums. The tank and drums were not marked with the words "Used Oil." During the inspection, J and J labeled the tank and drums "Used Oil", returning J and J to compliance with this rule.

**Comments**

- (a) J and J was inspected as a conditionally exempt small quantity generator (CESQG) of hazardous waste. CESQG's are those that generate less than 220 pounds of hazardous waste in a calendar month. J and J is very close to generating over 220 pounds of hazardous waste and becoming a small quantity generator (SQG).

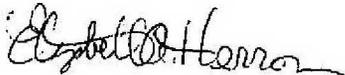
Mr. Robert Willett  
J and J Chevy Buick Ford  
May 29, 2007  
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As we discussed during the inspection, SGQ's are subject to more regulatory requirements. Enclosed with this letter is a summary table of generator requirements broken down by generator category. This table illustrates the advantages of remaining a CESQG. J and J should monitor their generation rates carefully and be aware that if at any point J and J becomes an SQG additional regulations, beyond those covered in this inspection, will apply.

- (b) To keep regulatory burden as low as possible, Ohio EPA recommends that J and J actively pursue ways to reduce the amount of waste generated to keep from moving into a higher generator category. One possible way to reduce hazardous waste generation is by recycling the solvent used to clean your paint guns. The fact sheet *On-Site Solvent Recycling Equipment* has been enclosed for your consideration. For additional help with reducing your solvent usage or selecting solvent recycling equipment contact Ohio EPA's Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.
- (c) J and J uses fluorescent lamps for lighting in their facility. Spent fluorescent lamps can contain enough mercury, lead, cadmium and barium to make them a characteristic hazardous waste. Ohio EPA recommends that all fluorescent lamps be recycled as a Universal Waste. If you do not recycle your lamps you must evaluate them to determine if they are a hazardous waste or a solid waste and manage them accordingly. Lamps managed as a hazardous waste must be sent off-site for disposal by a permitted treatment storage and disposal facility. For more detailed information on the regulation of fluorescent lamps and the Universal Waste Rules review the enclosed fact sheet titled *Fluorescent Lamps: What you Should Know*.

Enclosed you will find a copy of the checklist that completed during the inspection. Should you have any questions, please feel free to call me at (740) 380-5248. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/opp>.

Sincerely,



Elizabeth A. Herron  
Environmental Specialist  
Division of Hazardous Waste Management

EAH/mlm

Enclosures

**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.**

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](mailto:tammy.mcconnell@epa.state.oh.us) or mail it to Tammy  
McConnell, Central Office

Site EPA ID No.	EPA ID Number: OHD982617086								
Site Name	Name: J and J Chevy Buick Ford				Website: (Optional)				
Site Location Information	Street Address: 1515 Franklin Ave.								
	City, Town, or Village: Toronto				State: OH				
	County Name: Jefferson				Zip Code: 43964				
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"/>	
NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>									
Facility Representative  Additional names can be recorded in number 12  Only provide address information if it is different than the site address.	First Name: Robert			MI:	Last Name: Willett				
	Phone Number: 740 537-2418				Phone Number Extension:				
	E-Mail Address:								
	Fax Number:				Fax Number Extension:				
	Street or P.O. Box:								
	City, Town or Village:			State:		Country:		Zip Code:	
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 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 #:		Zip Code:		
	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 #:		Zip Code:		
	State:			Country:		Zip Code:			
Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
Type of Generator									
<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)									
Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Underground Injection Control Facility				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste									

Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply))					
<input 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)			Used Oil Activities (Indicate Type(s) of Activity(ies))		
	Generated	Accumulated	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner	
Batteries	<input type="checkbox"/>	<input 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"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner	
Thermostats	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor		
Lamps	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner		
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.					
D001	D035	F003	F005		
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:		Walt Thomas
Tanks	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Other Comments:		
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No			
Name of Inspector(s)		Name of Inspector(s)		Date of Inspection/Time (mm/dd/yyyy) (hh:mm)	
Elizabeth Herron		John Rochotte		5/15/2007 2:00 PM - 3:00 PM	
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)

## PROCESS, WASTE, P2 SUMMARY SHEET

**Facility Name:** J and J Chevy Buick Ford   
**Facility Type:** CESQG   
**Date of Inspection:** 5-15-07   
**EPA ID#:** OHD982617086

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	collision repair painting  paint waste  D001, D035, F003, F005,	23 gallons (based on average from 2-27-06 to 2-19-07), accumulated in 55-gallon drums, stored in the paint mix area of collision repair shop		Petro-Chem Processing, Detroit Michigan MID980615298		gun washing unit  solvent distillation
2	maintenance of customer vehicles  used oil  not hazardous	tanks and 55-gallon drums in vehicle maintenance area	part of the used oil is used in an oil burning furnace that heats the area where cars are cleaned	Environmental Specialists Inc, McDonald, Ohio  processed for use as "on specification" used oil fuels		
3	maintenance of customer vehicles  coolant  not hazardous	55 gallon drums in vehicle maintenance area		Environmental Specialists Inc, McDonald, Ohio		

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
4 maintenance of customer vehicles	used oil filter recycling (metal recycling)	stored in 55-gallon drums in maintenance area		Environmental Specialists Inc, McDonald, Ohio	recycled	
5 parts washers	not hazardous flash above 140	total of 2 parts washers, one is located in each of the maintenance sections of the building		Environmental Specialists Inc, McDonald, Ohio		
6 maintenance of customer vehicles	lead acid batteries recycled- codes not applicable	varies		AC Delco Canton and Dover Ohio	recycled	
7 maintenance of customer vehicles	scrap metal not hazardous	collected in roll-off box located outside at the rear of the building		Six Recycling, Ohio	recycled	

### REMARKS-GENERAL INFORMATION

**General Process Information:**

J and J Chevy Buick Ford is an vehicle dealership. J and J's business includes an on-site service center for vehicle repair, maintenance, and body work. The body shop portion of the dealership generates hazardous waste. The body shop works on an average of 20 vehicles each month.

**Regulatory/Enforcement History (if applicable):** This is the facility's first hazardous waste inspection.

## CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS

CESQG:  $\leq 100$  Kg. (Approximately 25-30 gallons) of waste in a calendar month or  $< 1$  Kg. of acutely hazardous waste.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG:  $\geq 1,000$  Kg. (~300 gallons) of waste in a calendar month or  $\geq 1$  Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

### WASTE EVALUATION

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

### GENERATOR CLASSIFICATION

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

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.

### OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes  No  N/A

### TREATMENT OF HAZARDOUS WASTE

- a. Container that meets 3745-66-70 to 3745-66-77? Yes  No  N/A
- b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes  No  N/A
- c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes  No  N/A
- d. Containment building that meets 3745-256-100 to 3745-256-102? Yes  No  N/A

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

## USED OIL GENERATOR REQUIREMENTS

*NOTE: (Short Version) - 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  NA
- 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  NA
2. Is used oil being used as a dust suppressant? [3745-279-12(B)]  Yes  No  NA
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)?  Yes  No  NA

### 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  NA
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  NA
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  NA
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]  Yes  No  NA
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  NA
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  NA
- b. Contained the release?  Yes  No  NA
- c. Cleaned up and properly managed the used oil and other materials?  Yes  No  NA
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary?  Yes  No  NA

10. Does the generator burn used oil in used oil fired space heaters? [3745-279-23] If so:
- 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  NA
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?  Yes  No  NA
- c. Are the combustion gases from heater vented to the ambient air?  Yes  No  NA
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  NA

### 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  NA
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]  Yes  No  NA
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  NA

### WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11]  Yes  No  NA

### REMARKS