



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Jones Auto Shop
Williams County
DHWM, NWDO
Complaint 2561
Return to Compliance

November 28, 2007

Mr. Coy Jones
Jones Auto Shop
509 East North Street
West Unity, Ohio 43570

Dear Mr. Jones:

Thank you for sending the response to the Ohio Environmental Protection Agency's (Ohio EPA's) Notice of Violation (NOV) dated October 25, 2007. Ohio EPA received the response from Jones Auto Shop (JAS) on November 14, 2007. This response was dated November 13, 2007, by JAS. My review of all the documentation submitted reveals that JAS has adequately demonstrated abatement of the violation discovered during the October 11, 2007, inspection, and cited in the October 25, 2007, NOV.

The following is a summary of the violation cited and the facility's compliance with respect to each violation:

Violation

1. **OAC Rule 3745-279-22 (C)(1), 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."

JAS failed to mark their used oil tank located behind the building and all used oil drums with the words "Used Oil."

In order to correct this violation, JAS must immediately mark the used oil tank and all used oil drums with the words "Used Oil." JAS must then document that this violation has been abated by photographing the tank and drums and sending a copy of these pictures to Ohio EPA's Northwest District Office within 30 days of receipt of this letter.

JAS submitted photographic documentation on November 14, 2007, that the facility properly labeled the appropriate containers with the words "Used Oil."

With this information, this violation is considered abated.

General Concerns

- A. During the complaint investigation, Ohio EPA noted that the 30 gallon drum of used oil inside the building was located near a floor drain. The current location of the used oil drum could cause JAS to be liable for a release to the environment in the event that the drum of used oil spilled or leaked, causing a release to the floor drain.

To avoid this potential liability, Ohio EPA recommends that this drum immediately be moved to a different location inside the building that is not near drains, cracks, or other compromised areas of the floor. JAS should send a description of the new location of the drum to Ohio EPA within 30 days of receipt of this letter. If JAS chooses to place the used oil directly into the tank instead of using a drum inside the building, then JAS should state this in your response to Ohio EPA.

JAS submitted photographic documentation that the drum of used oil has been moved away from the drain. JAS also submitted a letter stating the intention to discontinue use of the smaller used oil containers altogether. This general concern has been addressed.

- B. According to Ohio Administrative Code (OAC) Rule 3745-279-24, titled Off-site shipments of used oil by generators, "generators must ensure that their used oil is transported only by transporters who have obtained U.S. EPA identification numbers." Used oil generators have three options for handling their used oil: 1) Generators must have their used oil transported by an entity that has a U.S. EPA identification number and ensure their used oil is recycled; 2) Generators may transport less than 55-gallons of their own used oil to a registered used oil collection center; or 3) Generators may burn its own used oil in an on-site space heater as long as all applicable requirements are met.

During the inspection I spoke with you about taking your used oil to a registered used oil collection center. I also gave you the Registered Used Oil Collection Centers list dated May 19, 2005. JAS should submit the name of the registered used oil collection center that you plan on using. If JAS decides to handle their used oil in one of the other two ways listed above, then JAS should describe how this will take place.

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JAS submitted a letter containing the name of two facilities that JAS will use to properly manage the used oil at the site. This general concern has been addressed.

Should you have any questions or if I can be of assistance, please contact me at (419) 373-3065.

Sincerely,

Kara Reynolds

Kara Reynolds
Environmental Specialist
Division of Hazardous Waste Management

/llr

Enclosure

pc: Colleen Weaver, DHWM, NWDO
Kara Reynolds, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
~~DHWM, NWDO Williams County File: Williams County General~~
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 all applicable regulations.