



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Eval. PPH
Ent. PPH

November 17, 2011

Mr. Jay Nawman
City Wide Towing & Recovery
930 Dayton Avenue
Springfield, Ohio 45506

OH RPPH 146 PPH

RE: City Wide Towing & Recovery complaint

Dear Mr. Nawman:

Thank you for accompanying George Strobel and myself on November 1, 2011 during Ohio EPA's complaint investigation of City Wide Towing & Recovery in Springfield, Ohio. The investigation was conducted as a result of a complaint received at our office concerning the improper handling of automotive fluids at the site. During the investigation Ohio EPA did note the following violation of Ohio's hazardous waste laws:

1. **Used oil storage requirements for generators, Ohio Administrative Code (OAC) 375-279-22 (D)(1)(2)(3):** Response to releases. Upon detection of a release of used oil to the environment a generator must perform the following cleanup steps:
 - (1) Stop the release;
 - (2) Contain the released used oil;
 - (3) Clean up and manage properly;
 - (4) If necessary, repair or replace any leaking used oil storage containers or tank prior to returning them to service.

City Wide Towing & Recovery failed to comply with this rule in that used oil was released to the ground near the area where motors get pulled and are mounded up in the middle of the property. The soils around this area had a lot of staining and pooling of used oil and other automotive fluids. **The areas where there is staining or pooling need to be cleaned up to a visual standard.**

Under OAC rule 3745-279-10(C), the residue from the cleanup can be managed one of two ways:

- (1) As a used oil if the cleanup residue is burned for energy recovery;
- (2) As a waste, requiring the generator to comply with OAC rule 3745-52-11 (evaluation of waste), then manage the used oil/residue as appropriate based on the results of characterization.

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City Wide Towing & Recovery also needs to document how they are capturing their automotive fluids from vehicles prior to crushing and how they will cleanup any future releases to the environment.

Please submit documentation to this office by December 30, 2011 resolving this violation. Please find attached a copy a copy of "Environmental Compliance Guide for Auto Repair Shops". The document references auto repair shops, however, the information also applies to environmental concerns and requirements for salvage yards. Should you have any questions, please feel free to call me at (937) 285-6070. You can find copies of the rules and other information on the division's web page at: <http://www.epa.state.oh.us/dhwm/>.

Sincerely,



Jeff Smith
District Representative
Division of Materials and Waste Management

JS/tf

cc: DMWM/SWDO File