



**Environmental  
Protection Agency**

Jon R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

November 23, 2011

**RE: EXCALIBUR AUTO BODY  
OH0 000 334 037  
LAKE COUNTY  
RETURN TO COMPLIANCE**

Mitch Rudolph  
Excalibur Auto Body, Inc.  
30520 Lakeland Blvd.  
Willowick, OH 44094

Dear Mr. Rudolph:

I have received your November 21, 2011, fax which responded to the violations and concerns I found during my August 1, 2011, inspection of Excalibur Auto Body (Excalibur) located at 37035 and 37047 Code Ave. in Willoughby, Ohio. As outlined below you have documented a correction of these issues.

1. **OAC Rule 3745-52-11 – Hazardous waste determination.**  
Your letter states that waste lamps are now being collected in a labeled box and that they will eventually be shipped to be recycled.
2. **Ohio Revised Code (ORC) 3734.02(F) – Transporting hazardous waste to an unpermitted facility.**  
Your fax included a copy of a manifest for the September 2, 2011, shipment of 750 pounds of hazardous waste paint related materials from 37047 Code Ave. to Safety-Kleen, Smithfield, Kentucky. Also included was a manifest for the September 2, 2011, shipment of 1000 pounds of hazardous waste paint related materials from 37035 Code Ave. to Safety-Kleen, Smithfield, Kentucky. It is my understanding that these shipments included the drum I saw in the back room, the blue metal drum by the trash dumpster, the blue plastic drum outside by the back wall of the building, and the three drums in the tall weeds behind the building. If this is not the case, please let me know. You also told me on the phone that you will no longer ship hazardous waste to your Lakeland Blvd. facility to be distilled.

The shipments mentioned above total about 1750 pounds of hazardous waste. It is my understanding that this facility normally generates less than 220 pounds of hazardous per calendar month. This makes you a conditionally exempt small quantity generator. One thing you need to be aware of is that if you have more than 2,200 pounds of hazardous waste on site at one time, then you would need to follow additional small quantity generator rules. One of these additional rules is that you can only accumulate your waste for 180 days or less.

Mitch Rudolph  
Excalibur Auto Body, Inc.  
November 23, 2011  
Page 2

If you have any questions, please contact me at (330) 963-1217, or [robert.almquist@epa.state.oh.us](mailto:robert.almquist@epa.state.oh.us).

Sincerely,



Robert Almquist  
Division of Materials and Waste Management

RA:bo

ec: Frank Popotnik, DMWM, NEDO  
Natalie Oryshkewych, DMWM, NEDO  
Jeff Mayhugh, DMWM, CO

cc: Marlene Kinney, DMWM, NEDO

Notice:

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