



State of Ohio Environmental Protection Agency

## STREET ADDRESS:

## Central District Office

## MAILING ADDRESS:

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50 W. Town St., Suite 700  
Columbus, Ohio 43215

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P.O. Box 1049  
Columbus, OH 43216-1049

July 13, 2009

Mr. Ashot Samuelyan  
A Plus Automotive  
2976 E. 5<sup>th</sup> Ave.  
Columbus, OH 43219

Re: **A Plus Automotive, Inc.**  
**7/7/09 Complaint Investigation**  
**Franklin County** OHR 000156208

Dear Mr. Samuelyan:

Thanks to your employee Mr. Gyndall for his time and assistance during my visit to your facility at 2976 E. 5<sup>th</sup> Avenue on July 7<sup>th</sup>. The purpose of my visit was to investigate a complaint (#3581) that Ohio EPA had received alleging problems with the handling of used oil at your facility. Ohio's laws under Chapter 3745 of the Ohio Administrative Code and Chapter 3734 of the Ohio Revised Code establish a system for safe and responsible management of used oil and hazardous wastes.

I did not see anything to support the allegations of the complaint. However, one violation was noted:

1. **Used Oil Container and Tank Marking, OAC rule 3745-279-22(C):** Containers and tanks of used oil must be clearly labeled or marked, as "Used Oil".

A 250-gallon cubic-yard tote container outside the building, and two mobile caddy containers in the shop, which held what appeared to be used oil, were unmarked.

*Please provide proper labeling/markings of the tanks and send photos showing that you have corrected this problem.*

In addition to the above noted violation, are the following comments and/or concerns:

- A small spill of used oil, from a leaking customer vehicle had been soaked up with absorbent material in front of the shop door. The next step is to sweep up this material and properly dispose of it, usually as solid waste garbage.

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

Mr. Ashot Samuelyan  
A Plus Automotive  
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- Your business appears to be a Conditionally Exempt Small Quantity generator of hazardous waste. For proper and safe management of your paint and solvent waste, this material should be held in closed containers to prevent evaporation losses. Temporary lids were placed on two containers during my visit. A metal screw-in funnel with hinged, latching lid works well on a 55-gallon drum for this type of situation. For safety, I do recommend marking any such drums as "Hazardous waste—paint waste (ignitable)". A hazardous waste transporter can help you send batches of this waste to a permitted treatment, storage and disposal facility.
- Fire code restrictions may apply to containers of paint related products or waste stored inside a building, and checking with the fire marshal is a good idea.
- Two old, bulging drums beside a shed on an adjacent property were reportedly left behind by the previous operator of your facility. At least one of them may contain water. I understand from speaking with you and the owner of the market next door, that you will work together to get the contents of these drums identified and properly disposed of.
- Ohio EPA Division of Air Pollution Control staff may be contacting you about the new paint spray booth at your shop, to ensure that it meets any applicable requirements.

Please send me a response in 30 days, describing corrections made to address the one violation noted above. A photo showing things labeled, would suffice.

If you have any other questions about my visit or this letter, do not hesitate to contact me by phone at (614) 728-3885.

Sincerely,



J. David Hohmann  
Environmental Specialist  
Division of Hazardous Waste Management  
Central District Office

c: CDO File

JDH/nsm A Plus NOV

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

# USED OIL INSPECTION CHECKLIST FOR GENERATORS + COLLECTION CENTERS & AGGREGATION POINTS

## PROHIBITIONS

1. Does the generator manage used oil in a surface impoundment or waste pile? Yes  No  N/A   
If yes: [N/A]
2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes  No  N/A
3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? Yes  No  N/A

## GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil? If so [N/A] Yes  No  N/A
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  N/A
6. Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] Yes  No  N/A
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes  No  N/A
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked as AUsed Oil?@ [3745-279-22(C)] Yes  No  N/A   
*RMK: A tote container outside the building, and two mobile caddy containers in the shop, lacked marking as "Used Oil".*
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]  
*RMK: At the time of the inspection visit, there was no evidence of any releases of used oil to the environment. Supplies in the shop included granular absorbent spill cleanup material.*
- a. Stopped the release? Yes  No  N/A
- b. Contained the release? Yes  No  N/A
- c. Cleaned up and properly managed the used oil and other materials? Yes  No  N/A   
*RMK: A small quantity of oil absorbent granules on the asphalt in front of the shop door which soaked up some oil that had leaked from a customer vehicle, needed to be swept up, although it was not saturated.*
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes  No  N/A

## ON-SITE BURNING IN SPACE HEATER

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: Yes  No  N/A   
[N/A]

## GENERATOR TRANSPORTATION [N/A]

## COLLECTION CENTERS AND AGGREGATION POINTS [N/A]

## CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS

Safety Equipment Used: N/A

### WASTE EVALUATION

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

*RMK: A drum of unknown liquid left behind by the previous owner of the business, was going to be evaluated and disposed of properly according to the new owner of A Plus Automotive, and to an adjacent business owner, upon whose property it was now located.*

### GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg. (approximately 25-30 gallons) of hazardous waste per month? or < 1 Kg. of acutely hazardous waste? Yes  No  N/A

### 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 [N/A]

*RMK: I advised the business to keep containers of hazardous paint-related waste closed to prevent any possible evaporation disposal to the air that could otherwise occur.*

Ohio Environmental Protection Agency  
**RCRA SUBTITLE C SITE  
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to [kristina.durnell@epa.state.oh.us](mailto:kristina.durnell@epa.state.oh.us)  
or mail it to Kristina Dumell, Central Office

<b>Site EPA ID No.</b> <b>Site Name</b>	EPA ID Number: <b>unassigned</b> Name: <b>A Plus Automotive</b>		Website: (Optional)
<b>Site Location Information</b>	Street Address: <b>2976 East 5<sup>th</sup> Avenue</b> City, Town, or Village: <b>Columbus</b> County Name: <b>Franklin</b>		State: <b>OH</b> Zip Code:
<b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	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"/> <b>811121</b> <b>811111</b>		
<b>Facility Representative</b>  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: <b>Ashot</b> MI: _____ Last Name: <b>Samuelyan</b> Phone Number: <b>614-668-1331</b> E-Mail Address: _____ Phone Number Extension: _____ Fax Number: _____ Fax Number Extension: _____ Street or P.O. Box: _____ City, Town or Village: _____ Zip Code: _____ State: _____		
<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: <b>PASCO</b> Owner Private County District Federal Indian Municipal State Other Type: <input checked="" type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: <b>58 Klema Dr.</b> City, Town or Village: <b>Reynoldsburg</b> State: <b>OH</b> Name of Site's Operator: <b>Ashot Samuelyan</b> Operator Private County District Federal Indian Municipal State Other Type: <input checked="" type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: _____ City, Town or Village: _____ Operator Phone #: _____ State: _____ United States Zip Code: _____		Date Became Owner (mm/dd/yyyy): _____ Owner Phone #: _____ Country: <b>USA</b> Zip Code: <b>43068</b> Date Became Operator (mm/dd/yyyy): <b>02/01/2009</b>

**VIOLATIONS CITED?**     Yes     No

**TYPE OF HANDLER- A MINIMUM OF ONE BOX MUST BE CHECKED:**

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator <input type="checkbox"/> U.S. Importer of Hazardous Waste <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator
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**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 MANAGED (CHECK ALL BOXES THAT APPLY))**

<input type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	

**CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES**

<input type="checkbox"/> Batteries
<input type="checkbox"/> Pesticides
<input type="checkbox"/> Mercury containing equipment
<input type="checkbox"/> Lamps

**USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))**

<input checked="" type="checkbox"/> Used Oil Generator
<input type="checkbox"/> Used Oil Transporter
<input type="checkbox"/> Used Oil Transfer Facility
<input type="checkbox"/> Used Oil Processor
<input type="checkbox"/> Used Oil Re-refiner
<input type="checkbox"/> Off-Specification Used Oil Burner
<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner

**Waste Codes for Federally Regulated Hazardous Wastes.** Please list the codes for the federally regulated hazardous waste handled at the 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      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:	<b>Rob Gyndall</b>
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments:	<b>used oil tote container, and two mobile oil caddy containers.</b>
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		<b>four 5-gallon cans and a 55-gallon drum of waste paint + thinner.</b>

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
<b>David Hohmann</b>		<b>7/7/2009 10:25</b>

**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)