Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

April 4, 2012

**RE: SNIDER PRECISION AUTO-BODYWORKS
CONDITIONALLY EXEMPT SMALL
QUANTITY GENERATOR
OHD 010 854 537
LAKE COUNTY
NOV**

Mr. Stan Snider
Snider Precision Auto
7856 Chardon Road
Kirtland, Ohio 44094

Dear Mr. Snider:

Thank you for accompanying me during Ohio EPA's March 27, 2012 inspection of Snider Precision Auto-bodyworks (SPA) in Kirtland, Ohio. I inspected SPA to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). My inspection included a review of company operations and written documentation. In addition to the inspection for compliance with Ohio's hazardous waste rules, the facility was inspected for compliance with Ohio's universal hazardous waste rules.

SPA is primarily an auto-body repair shop. The facility generates paint and solvent hazardous waste (D001, F003) at a rate of ~55 gallons every three years. This rate of generation classifies SPA as a conditionally exempt small quantity generator of hazardous waste. SPA also generates universal waste lamps. At the time of my inspection, you indicated that these have been disposed of as solid waste. No used oil was currently being generated or accumulated at the facility.

The following violation of Ohio's hazardous waste rules was found during this inspection.

1. **Waste Evaluation, OAC 3745-52-11:**
   Any person who generates a waste must evaluate the waste to determine if it is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51. SPA violated this regulation by disposing of waste lamps (primarily fluorescent lamps) with the facility's solid waste without determining whether or not the waste lamps are a hazardous waste. The waste fluorescent lamps contain mercury and may contain other hazardous metals. These may therefore be a hazardous waste. To abate this violation, submit documentation of SPA's evaluation of the waste lamps in compliance with Ohio's hazardous waste regulations. **As an alternative to determining whether your particular waste lamps are hazardous waste, you may wish to manage them as Universal Waste.** In general, this would involve saving the waste lamps in a

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087-1924

330 | 963 1200
330 | 487 0769 (fax)
www.epa.ohio.gov

properly labeled and closed container and having them recycled by a lamp recycler. If SPA chooses to manage the waste lamps as Universal Waste and recycle the lamps through an approved lamp recycler, indicate this in your response letter.

SPA needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, SPA is requested to provide documentation to this office including the steps taken to abate the violation cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to tom.roth@epa.ohio.gov.

Please be advised that the violation cited above will continue until the violation has been properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to $10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of the violation, SPA is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

Enclosed you will find a copy of the checklists that I completed as a result of the inspection. Should you have any questions, please feel free to call me at (330) 963-1231. You can find copies of the rules and other information on the Division of Materials and Waste Management's web page at: http://www.epa.state.oh.us/dhwm/.

Sincerely,

Tom R. Roth

Tom Roth
District Representative
Division of Materials and Waste Management

TR/cl
Enclosure

ec: Jeff Mayhugh, DMWM, CO
Nyall McKenna, DMWM, NEDO
Natalie Oryshkewych, DMWM, NEDO
Marlene Kinney, DMWM, NEDO

Send to Central Office ☐	Ohio Environmental Protection Agency **RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM**	For Ohio EPA use only

Completed verification forms required to be submitted to CO should be e-mailed to brad.hauser@epa.state.oh.us.

Site EPA ID No.
Site Name

EPA ID Number: **OHD 010 854 537**

Name: **Snider Precision Auto-bodyworks** | Website: (Optional)

Site Location Information

Street Address: **7856 Chardon Road**

City, Town, or Village: **Kirtland** | State: OH

County Name: **Lake** | Zip Code: **44094**

Site Land Type (check only one)

Private	County	District	Federal	Indian	Municipal	State	Other
☒	☐	☐	☐	☐	☐	☐	☐

NAICS code(s) www.census.gov/epcd/www/naics.html

Facility Representative

Additional names can be recorded in number 12

Only provide address information if it is different than the site address

First Name: **Stan** | MI: | Last Name: **Snider**

Title: **Owner**

Phone Number: **440-256-8486** | Phone Number Extension:

E-Mail Address:

Fax Number: | Fax Number Extension:

Street or P.O. Box:

City, Town or Village:

State: | 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	County	District	Federal	Indian	Municipal	State	Other
	☐	☐	☐	☐	☐	☐	☐	☐

Street or P.O. Box:

City, Town or Village: | Owner Phone #:

State: | Country: | Zip Code:

Name of Site's Operator: | Date Became Operator (mm/dd/yyyy):

Operator Type:	Private	County	District	Federal	Indian	Municipal	State	Other
	☐	☐	☐	☐	☐	☐	☐	☐

Street or P.O. Box:

City, Town or Village: | Operator Phone #:

State: | Country | Zip Code:

VIOLATIONS CITED? ☒ Yes ☐ No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

☐ Not a HW Generator	☐ UNKNOWN: Cited for violation of 3745-52-11	☐ Large Quantity Generator (LQG)
	☐ Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). *Check the box for the applicable generator status and provide a comment.*	☐ Small Quantity Generator (SQG) ☒ Conditionally Exempt Small Quantity Generator ☐ U.S. Importer of Hazardous Waste ☐ Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

- ☐ Hazardous Waste Transporter
- ☐ Hazardous Waste Transfer Facility
- ☐ Treater, Storer or Disposer of Hazardous Waste
- ☐ Recycler of Hazardous Waste
- ☐ 72-Hour Recycler
- ☐ Exempt Boiler and/or Industrial Furnace
  - ☐ Small Quantity On-Site Burner Exemption
  - ☐ Smelting, Melting, Refining Furnace Exemption
- ☐ Underground Injection Control Facility
- ☐ Receives Hazardous Waste from Off-site

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY)

- ☒ Small Quantity Handler of Universal Waste
- ☐ Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)
- ☐ Destination Facility for Universal Waste

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

- ☐ Batteries
- ☐ Pesticides
- ☐ Mercury containing equipment
- ☒ Lamps

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

- ☐ Used Oil Generator
- ☐ Used Oil Transporter
- ☐ Used Oil Transfer Facility
- ☐ Used Oil Processor
- ☐ Used Oil Re-refiner
- ☐ Off-Specification Used Oil Burner
- ☐ Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil
- ☐ Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

- ☐ College or University
- ☐ Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
- ☐ Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

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 or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

D001 **F003**

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

Announced	☐ Yes	☒ No	Additional Facility Representatives:
Tanks	☐ Yes	☒ No	
Containers	☒ Yes	☐ No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Tom Roth		**03/27/2012**

Comments:

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET

CESQG: ≤100Kg. (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: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥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.

Safety Equipment Used:

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			
4.	Does the generator treat hazardous waste in a:		
	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.			
MIX HAZARDOUS WASTE WITH USED OIL			
5.	Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:		Yes ☐ No ☐ N/A ☒
	a.	Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes ☐ No ☐ N/A ☒