

**Environmental  
Protection Agency**

John E. Kasich, Governor  
Mark Taylor, Lt. Governor  
Scott W. Nally, Director



September 14, 2011

RE: JD SERVICES  
CUYAHOGA COUNTY  
THIRD NOTICE OF VIOLATION (NOV)  
OHD 007 832 827  
COMPLAINT NUMBERS 7301, 7449

James Dupre  
JD Services  
P.O. Box 93823  
Cleveland, OH 44101

**CERTIFIED MAIL**

Dear Mr. Dupre:

On August 10, 2011 I, as a representative of the Ohio EPA's Division of Materials and Waste Management, conducted an inspection of JD Services, located at 16100 S. Waterloo Road, Cleveland, Ohio 44110, for compliance with Ohio's hazardous waste and used oil regulations. You represented JD Services during that inspection. Ohio EPA had received a complaint in June 2011 alleging that this facility had waste oil on the ground. (The complaint also made the same allegation for JR's Trucks and Parts located at 16606 S. Waterloo. My inspection of 16606 S. Waterloo will be the subject of a separate letter.) Valerie Shaffer of the Cleveland Division of Air Quality was also present during this inspection.

I have conducted previous inspections of this site. On April 20, 2010 Robert Almquist and I conducted an inspection which resulted in a Notice of Violation (NOV) letter dated May 6, 2010. On March 23, 2011, Nyall McKenna and I conducted a follow-up inspection which resulted in a Notice of Violation (NOV) letter dated April 4, 2011.

Observations made by me during the August 10, 2011 inspection of the 16100 S. Waterloo Road facility include:

- Car and truck dismantling was being conducted in the maintenance garage. The floors in the maintenance garage were oily with fresh oil sorbent material on the floor.
- A tote and several drums in the maintenance garage were being used to collect used oil. All were labeled with words "used oil".
- The space heater previously used for burning used oil along with wood contained plastic bags which presumably contained trash. A verbal warning was given by Valerie Shaffer. You stated that used oil is no longer burned in this heater; apparently all used oil is now being shipped to Peerless Oil Service.
- There were fewer truck and vehicle parts outdoors than during previous visits; my understanding is this is the result of work to comply with zoning restrictions that do not allow salvage operations outdoors or storage of salvaged parts outdoors. You stated that all outdoor truck and vehicle parts would be removed in another month. Reportedly after truck and vehicle parts are removed, removal of soil to meet visually clean standards required by previous NOV letters will be conducted.
- Oil sheens were present on some of the accumulated stormwater. (Several brief rain showers occurred shortly before the inspection, so accumulated stormwater was present.)
- Three used oil filters, judging from the sizes, probably from truck or bus engines, initially were on the floor near the used oil tote and then were placed into a drum of metal parts that reportedly were to go to vehicle recyclers.
- Much of the soil pile scraped up in 2010 and still in place in March 2011 had been spread out near the maintenance building, reportedly to control water flow around and into the building. None had been shipped off-site.

We also briefly discussed that no response had been submitted as required by the April 4, 2011 NOV letter.

Ohio EPA expects you on behalf of JD Services to promptly address the used oil contaminated soils/surface materials and additional delays are not acceptable.

Based on the observations made during the facility visit/inspection of August 10, 2011, Ohio EPA has determined that JD Services is in continuing violation of the following state used oil regulation:

1. **OAC 3745-279 22(D) Generator must respond to used oil releases and perform cleanup steps**

Part of the pile of surface soil and materials that had been scraped from the property formerly stored south of the maintenance garage building had been spread out near the maintenance building, reportedly to control water flow around and into the building. Reportedly none had been shipped off-site. This pile is part of the used oil contaminated soils and materials that were to be removed from the site in response to the May 6, 2010 NOV letter.

Numerous depressions in the south yard contained puddles of water from recent precipitation. Some had oil sheens from the recent precipitation.

As stated in the May 6, 2010 letter, OAC rule 3745 279 22(D) requires JD Services, as a generator of used oil, to respond to releases of used oil. JD Services must take the following steps to respond to this violation:

- A. Don't perform work that results in the release of used oil to the ground.
- B. Promptly ship the soils/materials pile now on-site behind (to the south of) the maintenance garage to a solid waste landfill; Ohio EPA believes that these shipments should be completed within 60 days of the date of receipt of this letter.
- C. Develop a schedule for expeditiously completing the scraping of soils/materials contaminated with used oil from the parts of the property where this has not been done. Equipment lying on the ground will have to be removed and/or relocated as necessary to complete this work.
- D. Place newly scraped soils/materials into a dumpster as it is scraped and ship promptly when the dumpster is full. Newly scraped soils/materials are not to be stored in piles on the ground.
- E. Submit documentation in the form of a landfill manifest for all shipments from the soils/materials pile and future soils and materials contaminated with used oil that are removed from the site.
- F. Submit documentation (for example, a landfill manifest or billing statement) for the load of used oil contaminated soil that was reportedly removed last winter, but then reportedly required thawing to remove from the container.

Ohio EPA uses a visual standard when determining whether a clean-up of released used oil and any media (for example, soil) containing used oil is adequate. Ohio EPA does not require confirmatory soil sampling and lab analysis to demonstrate that the release has been cleaned up.

Enclosed you will find a copy of the checklist completed during the August 10, 2001 inspection.

**Required Written Response and Documentation**

The following response items must be submitted to this office within 30 days of the date of receipt of this letter:

- A. A written procedure stating that no disassembly of oil-containing equipment is to be conducted outdoors unless work is done over a containment box. (Note: my understanding is that no outdoor disassembly work is allowed by the zoning laws applicable to this facility.)
- B. A written procedure on using and removing oil sorbent in the maintenance garage. For example, place oil sorbent on the floor whenever any oil gets on the floor and at a minimum sweep up at the end of the work day. (Note: used oil sorbent should be placed in your trash dumpster.)
- C. Landfill manifests for the shipments from the soils/materials from the pile currently on-site to a solid waste landfill. (Note: clearly these shipments are expected to be completed sooner than 60 days after the date of receipt of this letter.)
- D. A schedule for expeditiously completing the scraping of soils/materials contaminated with used oil from the parts of the property where this has not been done and shipping these to a solid waste landfill. The submitted schedule should be one that JD Services intends to follow as additional extensions to that schedule are not likely.
- E. Documentation (for example, a landfill manifest or a billing statement) for the load of used oil contaminated soil that was reportedly removed last winter for disposal.

Response correspondence should be sent to: Neil Wasilk, Northeast District Office, Ohio Environmental Protection Agency, 2110 East Aurora Road, Twinsburg, OH 44087

Please call me within 15 days of the date of receipt of this letter to discuss required actions.

Present or past instances of non-compliance may be subjects of pending or future enforcement actions.

Should you have any questions regarding this letter, please contact me at (330) 963-1165.

Sincerely,



Neil J. Wasilk  
Environmental Specialist  
Division of Materials and Waste Management

NJW:ddw  
Enclosure

cc: Jeff Clark, City of Cleveland, Building Department  
Valerie Shaffer, Cleveland Division of Air Quality  
Scott Broski, NEORS  
Rachid Zoghaib, City of Cleveland Department of Water Pollution Control

ec: Natalie Oryshkewych, Ohio EPA, DMWM, NEDO  
Nyall McKenna, Ohio EPA, DMWM, NEDO  
Jeff Mayhugh, Ohio EPA, DMWM, CO

**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.



Send to Central Office <input checked="" type="checkbox"/>	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE</b> <b>IDENTIFICATION/VERIFICATION FORM</b>	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to [brad.hauser@epa.state.oh.us](mailto:brad.hauser@epa.state.oh.us).

<b>Site EPA ID No.</b> <b>Site Name</b>  <b>Site Location Information</b>  <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>	EPA ID Number: <b>OHD 007 832 827</b> Name: <b>JD Services</b> Website: (Optional) Street Address: <b>16100 S. Waterloo Road</b> City, Town, or Village: <b>Cleveland</b> State: <b>OH</b> County Name: <b>CUYAHOGA</b> Zip Code: <b>44110</b> <table style="width:100%; border: none;"> <tr> <td style="border: none;">Private <input checked="" type="checkbox"/></td> <td style="border: none;">County <input type="checkbox"/></td> <td style="border: none;">District <input type="checkbox"/></td> <td style="border: none;">Federal <input type="checkbox"/></td> <td style="border: none;">Indian <input type="checkbox"/></td> <td style="border: none;">Municipal <input type="checkbox"/></td> <td style="border: none;">State <input type="checkbox"/></td> <td style="border: none;">Other <input type="checkbox"/></td> </tr> </table>	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"/>
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<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>James</b> MI: Last Name: <b>Dupre</b> Title: Phone Number: <b>216-481-2293</b> Phone Number Extension: E-Mail Address: Fax Number: Fax Number Extension: Street or P.O. Box: <b>P.O. Box 93823</b> City, Town or Village: <b>Cleveland</b> State: <b>OH</b> Zip Code: <b>44101</b>
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<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: Date Became Owner (mm/dd/yyyy): <table style="width:100%; border: none;"> <tr> <td style="border: none;">Owner Type: <input checked="" type="checkbox"/></td> <td style="border: none;">Private <input type="checkbox"/></td> <td style="border: none;">County <input type="checkbox"/></td> <td style="border: none;">District <input type="checkbox"/></td> <td style="border: none;">Federal <input type="checkbox"/></td> <td style="border: none;">Indian <input type="checkbox"/></td> <td style="border: none;">Municipal <input type="checkbox"/></td> <td style="border: none;">State <input type="checkbox"/></td> <td style="border: none;">Other <input type="checkbox"/></td> </tr> </table> Street or P.O. Box: Owner Phone #: City, Town or Village: Country: Zip Code: State: Name of Site's Operator: Date Became Operator (mm/dd/yyyy): <table style="width:100%; border: none;"> <tr> <td style="border: none;">Operator Type: <input type="checkbox"/></td> <td style="border: none;">Private <input type="checkbox"/></td> <td style="border: none;">County <input type="checkbox"/></td> <td style="border: none;">District <input type="checkbox"/></td> <td style="border: none;">Federal <input type="checkbox"/></td> <td style="border: none;">Indian <input type="checkbox"/></td> <td style="border: none;">Municipal <input type="checkbox"/></td> <td style="border: none;">State <input type="checkbox"/></td> <td style="border: none;">Other <input type="checkbox"/></td> </tr> </table> Street or P.O. Box: Operator Phone #: City, Town or Village: Country Zip Code: State:	Owner Type: <input checked="" type="checkbox"/>	Private <input 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"/>	Operator Type: <input type="checkbox"/>	Private <input 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"/>
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<b>VIOLATIONS CITED?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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<b>TYPE OF HANDLER - MARK "X" AS APPROPRIATE</b>											
<input checked="" type="checkbox"/> Not a HW Generator	<table style="width:100%; border: none;"> <tr> <td style="border: none;"> <input type="checkbox"/> UNKNOWN:            Cited for violation of 3745-52-11         </td> <td style="border: none;"> <input type="checkbox"/> Large Quantity Generator (LQG)         </td> </tr> <tr> <td style="border: none;"> <input type="checkbox"/> 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.         </td> <td style="border: none;"> <input type="checkbox"/> Small Quantity Generator (SQG)         </td> </tr> <tr> <td style="border: none;"></td> <td style="border: none;"> <input type="checkbox"/> Conditionally Exempt Small Quantity Generator         </td> </tr> <tr> <td style="border: none;"></td> <td style="border: none;"> <input type="checkbox"/> U.S. Importer of Hazardous Waste         </td> </tr> <tr> <td style="border: none;"></td> <td style="border: none;"> <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator         </td> </tr> </table>	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)	<input type="checkbox"/> 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.	<input type="checkbox"/> Small Quantity Generator (SQG)		<input 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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	<input 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										

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)	
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Hazardous Waste Transfer Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility
<input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Receives Hazardous Waste from Off-site

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 Used Oil	
<input type="checkbox"/> 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.

<input type="checkbox"/> College or University	
<input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university	
<input type="checkbox"/> 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.

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.			
Announced	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
N. Wasilk		08/10/2011 10:00 a.m.

**Comments:**

**USED OIL INSPECTION CHECKLIST**

**GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

*NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.*

**PROHIBITIONS**

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*NOTE: For example, used oil contaminated scrap metal stored in a pile.*

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).*

**GENERATOR STANDARDS**

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.*

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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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*NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.*

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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil"? [3745-279-22(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**ON-SITE BURNING IN SPACE HEATER**

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

**GENERATOR TRANSPORTATION**

11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

**COLLECTION CENTERS AND AGGREGATION POINTS**

13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.