



State of Ohio Environmental Protection Agency

Northeast District Office

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

September 17, 2009

Mr. Patrick A. Jordan  
Director of Fixed Operations  
John Lance Ford  
8000 Leavitt Rd.  
Amherst, OH 44001

**RE: JOHN LANCE FORD, OHD017786294, CUYAHOGA COUNTY  
COMPLAINT #7229, NOTICE OF VIOLATION/RETURN TO COMPLIANCE**

Dear Mr. Jordan:

On September 8 and 10, 2009, the Ohio Environmental Protection Agency (Ohio EPA), Division of Hazardous Waste Management, conducted a complaint investigation and compliance evaluation inspection at John Lance Ford, located at 23775 Center Ridge Rd, Westlake, Ohio.

John Lance Ford was inspected to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and the rules promulgated under Chapter 3745 of the Ohio Administrative Code (OAC). You, Kim Yungvirt, Paul Timura and Chris Youseff represented John Lance Ford and I represented the Ohio EPA.

John Lance Ford is an automobile dealership with a service center and a collision center at this location. Those areas generate hazardous waste, used oil and universal waste streams.

The complaint alleged that water from the oil water separator water been placed in a wheel barrel and dumped to the right of the brown shed located behind the facility. I observed no evidence that oil/water had been spilled on the ground. Based on my observations, the complaint appears to be unfounded.

Although the complaint is unfounded, the area where the alleged dumping occurred should be cleaned up. The three tires lying on the ground should be taken to a scrap tire recycler, the pile of asphalt should be removed, and I recommend the 3 empty 55-gallon drums be stored somewhere else. One 55-gallon drum, with the label "Safety Kleen Premium Gold Solvent" was located in such a position that I could not determine if it had anything in it. John Lance Ford must determine if anything is in the drum, and if there is material in the drum, you must determine if it is a usable product or waste. If the material is no longer usable it must be evaluated for disposal. Please send me the results of the determination.

During the facility walk through I noted the following violation of the universal waste requirements:

1. OAC rule 3745-273-14(A): Batteries or containers of batteries must be labeled with the words "Universal Waste-Batteries" or "Waste Battery(ies)" or "Used Battery/(ies).

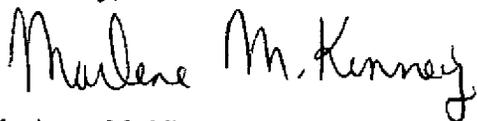
The box holding the batteries was not labeled as required by this rule. The violation was abated at the time of the inspection when the box was properly labeled. No further action is required.

Failure to list specific deficiencies and or violations in this communication does not relieve John Lance Ford from the responsibility of complying with all applicable laws, rules and regulations.

You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

Should you have any questions, please feel free to call me at (330) 963-1162.

Sincerely,



Marlene M. Kinney  
Environmental Specialist  
Division of Hazardous Waste Management

MMK:ddw

cc: Natalie Oryshkewych, DHWM, NEDO  
Kim Yungvirt, Controller  
ec: Nyal McKenna, DHWM, NEDO  
Harry Sarvis, DHWM, CO