



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

April 21, 2011

**RE: JUNKYARD DOG, INC.
DBA AFFORDABLE AUTO PARTS AND
SALVAGE
COMPLAINT #7048
LAKE COUNTY
NON-NOTIFIER
RETURN TO COMPLIANCE**

Mr. Geoffrey C. Hanahan
Zanderland Properties LLC
8383 Mentor Ave.
Suite 101
Mentor, Ohio 44060

Dear Mr. Hanahan:

On December 10, 2008, you submitted a response on behalf of Junkyard Dog, Inc. Dba Affordable Auto Parts and Salvage to the Ohio EPA Notice of Violation dated October 7, 2008. Your submittal contained a service document and photograph of labeled used oil containers. Ohio EPA failed to send a Return to Compliance letter as discovered during a recent file review.

The following violations have been abated:

1. Containers labeled or marked "Used Oil"
(OAC 3745-279-22(C))
2. On-Spec Used Oil Marketer Ensure Used Oil Meets Specifications by Proper Documents
(OAC rule 3745-279-72(A))

If you should have any questions, please do not hesitate to contact me at (330) 963-1214.

Sincerely,

Kim Gallagher
Environmental Specialist
Division of Materials and Waste Management

KG/cl

ec: Frank Popotnik, DMWM, NEDO
Robert Almquist, DMWM, NEDO
Jeff Mayhugh, DMWM, NEDO
Natalie Oryshkewych, DMWM, NEDO

cc: Chris Loxterman, Lake County General Health District
Marlene Kinney, DMWM, NEDO



PHASE 0 AD-HOC BARCODE SHEET

11/1/2011 10:08 AM

Department:



DMWM

Locked to DMWM

Subdepartment:



DMWM-Hazardous Waste

Office Location:



NEDO

Locked to NEDO

Media:



LAND

Locked to LAND

Doc Type:



NOV

Doc Subtype:



<NONE>

Program:



<NONE>

County:



43 - LAKE

(Auto Load)

<NONE>

(Override)

Facility ID:



OHR000151050

Facility Name:



JUNK YARD DOG DBA AFFORDABLE AUTO

(Auto Load) input is 35 characters long.

(Override) input is 0 characters long.



9/23/2008

Record ID:





State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

September 23, 2008

**RE: AFFORDABLE AUTO PARTS AND
SALVAGE/JUNKYARD DOG
COMPLAINT # 7048
LAKE COUNTY
NON-NOTIFIER
NOTICE OF VIOLATION**

Mr. Bradley Alexander
Junkyard Dog, Inc.
Affordable Auto Parts and Service
1500 route 20
Painesville, Ohio 44077

Dear Mr. Alexander:

On February 29, 2008, Robert Almquist and I investigated a complaint at Junkyard Dog, Inc./Affordable Auto Parts in Painesville Twp., Ohio. The temperature was at or below freezing and the ground was snow covered. The complainant alleged that gasoline, coolant, and used oil is drained onto the ground. This letter will explain the validity of the complaint.

You stated that the gasoline is drained out of the cars and the employees take it home. We observed a red metal can that was labeled, "gasoline". You also stated that the oil is only removed from the car if the engine is being removed. The oil is collected in a pan and then transferred to a used oil drum inside.

We found the following violations of Ohio's used oil regulations. In order to correct these violations you must do the following and send me the required information within 30 days of the date of this letter:

Violations

1. Containers labeled or marked "Used Oil"
OAC 3745-279-22(C)

We observed a drum of used oil inside the shop that was not labeled.

To abate this violation please document that an appropriate label has been added to the container of used oil by submitting a photo or a written confirmation that all used oil containers have been appropriately labeled with the words, "used oil". Please describe in writing what procedures have been instituted to ensure continued compliance with this rule.

Mr. Bradley Alexander
Junkyard Dog, Inc.
September 23, 2008
Page 2

2. On-Spec Used Oil Marketer Ensure Used Oil Meets Specifications by Proper Documents
(OAC rule 3745-279-72(A))

The used oil manifests were not available during the inspection. On March 26, 2008, Ohio EPA sent an email requesting the used oil manifests. The manifests were received on April 11, 2008. The packet contained manifests dated February, September, and October 2007 indicating that used oil was picked up by Lake Towing in Painesville to be burned in their used oil burner. A note dated December 2007 indicated that the used oil was taken by Eastlake Body and Frame.

Junk Yard Dog cannot send the used oil that they generate to another facility unless the used oil is tested and shown to be on-specification per OAC rule 3845-279-11.

For used oil to be considered "on-specification," its constituent levels must be at or below (except for flash point) the following levels:

- 5 ppm or less of arsenic
- 2 ppm or less of cadmium
- 10 ppm or less of chromium
- 100 ppm or less of lead
- 100< F minimum flash point
- 4,000 ppm or less of total halogens*
- less than 2 ppm PCBs

The person who makes the claim that the used oil meets these specifications must keep all records of the analysis and a record of all shipments of the used oil.

Comments

We observed 4 drums outside to the right of the back bay door. The drums were slightly snow and ice covered. The contents/conditions of the drums could not be determined. We asked that the material in the drums be sampled and disposed of properly.

The April 11, 2008 submittal also contained antifreeze manifests for February, April, September, and October 2007. The manifests indicated that the antifreeze was taken by Lake Towing and recycled.

Mr. Bradley Alexander
Junkyard Dog, Inc.
September 23, 2008
Page 3

During the inspection, Ohio EPA did not find evidence to support the complaint that gasoline, coolant, and used oil is drained onto the ground.

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

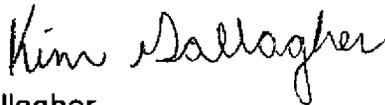
Ohio EPA has attached a guidance document regarding Universal wastes management. Universal wastes includes batteries and florescent lamps. Universal wastes (UW) are specific hazardous waste streams that a generator can choose to manage in an alternative manner in place of the more complex hazardous waste requirements. These wastes are encouraged to be recycled rather than disposed of as hazardous waste.

You may be able to reduce the waste your company generates. If you find ways to recycle, reduce or eliminate the amount of waste that your company generates, you may be able to reduce treatment and disposal costs as well as regulatory requirements. If you would like a free, non-regulatory on-site compliance assistance or pollution prevention assessment, or if you would like more information about pollution prevention, please contact Adrienne LaFavre at (330) 963-1250. Ohio EPA has helpful information about this at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp.html>.

The Division of Hazardous Waste Management has created an electronic news service to provide you with updates on events and news related to hazardous waste activities in Ohio. You can find more information at: <http://www.epa.state.oh.us/dhwm/listserv.html>.

If you should have any questions, please do not hesitate to contact me at (330) 963-1214.

Sincerely,



Kim Gallagher
Environmental Specialist
Division of Hazardous Waste Management

KG:cl
Attachment

ec: Frank Popotnik, DHWM, NEDO
Robert Almquist, DHWM, NEDO

cc: Natalie Oryshkewych, DHWM, NEDO
Chris Loxterman, Lake County General Health District



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

Scan sent 9/26/08
Kaitiana
Dunnell

For Ohio EPA use only

E-mail this completed form to
tammy.mcconnell@epa.state.oh.us or mail it to Tammy
McConnell, Central Office

2. Site EPA ID No.	EPA ID Number:								
3. Site Name	Name: JUNK Yard Dog DBA AFFORDABLEAUTO				Website: WWW.Affordableauto parts inc.com (Optional)				
4. Site Location Information	Street Address: 1500 ROUTE 20								
	City, Town, or Village: PAINESVILLE				State: OH				
	County Name: Lake				Zip Code: 44077				
5. Site Land Type (check only one)	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"/>	
6. NAICS code(s) www.census.gov/epcd/www/naics.html									
7. Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Bradley Alexander MI:				Last Name:				
	Phone Number: (440) 1354-9904				Phone Number Extension:				
	E-Mail Address: Sales@affordableauto parts inc.com								
	Fax Number: (440) 357-7752				Fax Number Extension:				
	Street or P.O. Box:								
	City, Town or Village:		State:		Country:		Zip Code:		
8. 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: ZANDERLAND PROPERTIES LLC				Date Became Owner (mm/dd/yyyy):				
	Owner Type:	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"/>
	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):				
	Owner Type:	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"/>
	Street or P.O. Box:								
	City, Town or Village:				Operator Phone #:				
	State:				Country:		Zip Code:		
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input checked="" type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste					
<input type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)									
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Underground Injection Control Facility									

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))			
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste		<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	
<input type="checkbox"/> Destination Facility for Universal Waste			
Check all boxes below that apply for each of the three types of facilities above		10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
	Managed	<input checked="" type="checkbox"/> Used Oil Generator	<input checked="" type="checkbox"/> Off-Specification Used Oil Burner <i>NOV item</i>
Batteries <i>not at time, info given</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Ship Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps <i>not at time, info given</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
11. 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.			
12. 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:
Tanks	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Other Comments:
Containers	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Kim Gallagher		Robert Almqvist	2/29/08
14. 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)