



State of Ohio Environmental Protection Agency

Northeast District Office

2110 E. Aurora Road  
Twinsburg, Ohio 44087-1969

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

Bob Taft, Governor  
Jennette Bradley, Lieutenant Governor  
Christopher Jones, Director

LAKE

JUNK YARD DOG DBA AFFORDABLE AUTO

RTC

Hazardous Waste

OHR000151050





**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



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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  
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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.

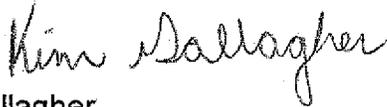
Ohio EPA has attached a guidance document regarding Universal wastes management. Universal wastes includes batteries and florescent lamps. Universal wastes (UW) are specific hazardous waste streams that a generator can choose to manage in an alternative manner in place of the more complex hazardous waste 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  
Kraiss  
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 AFFORDABLE AUTO		Website: WWW.Affordableauto parts (Optional)	
4. Site Location Information	Street Address: 1500 ROUTE 20		State: OH Zip Code: 44077	
	City, Town, or Village: PAINESVILLE			
	County Name: Lake			
5. Site Land Type (check only one)	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	
6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	
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@affordableautopartsinc.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"/>	
	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: <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	
	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <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				

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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

Managed	10C. Used Oil Activities (Indicate Type(s) of Activity(ies))
<input checked="" type="checkbox"/> Batteries <i>not at this time per given</i>	<input checked="" type="checkbox"/> Used Oil Generator <span style="float: right;">NOV item</span> <input type="checkbox"/> Used Oil Transporter
<input type="checkbox"/> Pesticides	<input type="checkbox"/> Used Oil Transfer Facility <input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
<input type="checkbox"/> Mercury containing equipment	<input type="checkbox"/> Used Oil Processor
<input checked="" type="checkbox"/> Lamps <i>not at this time per given</i>	<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 RCRA Info 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)
<i>Kim Baillacher</i>	<i>Robert Almqvist</i>	<i>2/29/08</i>

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)