



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

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www.epa.state.oh.us

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

**Re: Grogan's Towne Chrysler Dodge
OHR000024307
Conditionally Exempt Small
Quantity Generator
Lucas County, NWDO
NOV**

March 12, 2009

Mr. Mark Nowacki, Fixed Operations Manager
Grogan's Towne Chrysler Dodge
6100 North Telegraph Road
Toledo, Ohio 43612

Dear Mr. Nowacki:

On February 26, 2009, Wendy Miller and I inspected Grogan's Towne Chrysler Dodge's facility located at 6100 North Telegraph Road in Toledo, Ohio. Grogan's Towne Chrysler Dodge was represented by Mr. Greg Snyir, Service Manager, Mr. Bill Bartja, Body Shop Manager and you. We inspected Grogan's Towne Chrysler Dodge to determine the facility's 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). Our inspection included a tour of the facility as well as a review of facility records. We also helped Grogan's Towne Chrysler Dodge identify ways to prevent pollution by reducing waste the facility generates.

Grogan's Towne Chrysler Dodge is a full service automotive dealership which operates a service shop and auto body repair facility at the 6100 North Telegraph Road location. Company records reviewed during this inspection indicate that Grogan's Towne Chrysler Dodge generates nearly 100 kg of hazardous waste each month making the facility a conditionally exempt small quantity generator of hazardous waste.

Grogan's Towne Chrysler Dodge utilizes several parts washers in the service shop which generate D001 hazardous waste spent parts washer solvent. The service shop also generates spent lead acid automotive batteries that are exchanged with new batteries by a battery wholesaler, used oil which is shipped off-site for recycling, used anti-freeze/coolant which is sent off-site for recycling, Freon which is recycled on-site, scrap metal which is recycled off-site, cardboard which is recycled off-site, shop rags that are laundered off-site and spent fluorescent light bulbs which are currently disposed as solid waste.

Grogan's Towne Chrysler Dodge generates D001/D035/F003/F005 hazardous waste spent solvent/paint sludge and non-hazardous paint filters in the auto body repair facility. The spent solvent is shipped off-site for fuels blending.

We found the following violations of Ohio's hazardous waste laws. In order to correct these violations you must do the following and send me the required information ***within 30 days*** of your receipt of this letter:

1. **OAC Rule 3745-52-11, Hazardous Waste Determination:** "Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste..."

Grogan's Towne Chrysler Dodge has failed to evaluate the spent fluorescent lamps used throughout the facility to determine if they are hazardous waste. Grogan's Towne Chrysler Dodge is currently disposing of these fluorescent lamps as solid waste.

Grogan's Towne Chrysler Dodge must immediately cease disposing of the spent fluorescent lamps as non-hazardous waste until a proper waste evaluation has been completed. The spent fluorescent lamps typically contain mercury and other heavy metals which could make them a hazardous waste.

Grogan's Towne Chrysler Dodge has the option of handling spent fluorescent lamps as hazardous waste or as universal waste. Managing hazardous waste lamps under the universal waste rules eases certain regulations imposed on generators of spent fluorescent lamps.

To abate this violation, Grogan's Towne Chrysler Dodge must choose one of the following options for the spent fluorescent lamps:

A. Disposal Option:

Grogan's Towne Chrysler Dodge may manage the lamps as a hazardous waste. Grogan's Towne Chrysler Dodge must sample each type and brand of lamp used at the facility for Resource Conservation and Recovery Act (RCRA) metals using a Toxicity Characteristic Leaching Procedure (TCLP) test. Grogan's Towne Chrysler Dodge must ensure that all spent fluorescent lamps that are determined to be hazardous waste are disposed of at a permitted hazardous waste disposal facility. Grogan's Towne Chrysler Dodge must submit all analytical results to Ohio EPA along with a description of how the spent lamps will be managed or,

B. Recycling Option:

In lieu of evaluating and disposing of the spent fluorescent lamps, Grogan's Towne Chrysler Dodge may manage spent fluorescent lamps as universal waste. Universal waste spent fluorescent lamps must be stored in a closed and labeled container. This container must be properly labeled with the wording "Universal Waste Lamp(s)", "Waste Lamp(s)", or "Used Lamp(s)". Grogan's Towne Chrysler Dodge must also track the accumulation of the spent lamps to ensure spent lamps are not stored for greater than 365 days. This can be accomplished with recycling receipts or by marking the container with the accumulation start date (the day the first lamp is placed in the container).

Spent lamps observed during the inspection were stored in unlabeled cardboard containers. On February 19, 2009, Grogan's Towne Chrysler Dodge submitted photographs of the cardboard containers which were labeled "Spent Lamps".

Please be advised that the containers must be closed and labeled with the wording "Universal Waste Lamp(s)", "Waste Lamp(s)", or Used Lamp(s)" as specified in the previous paragraph. Also, the containers must be closed.

Ohio EPA recommends that spent lamps be managed as a universal waste and recycled. If Grogan's Towne Chrysler Dodge should choose the recycling option, you should submit to me updated photos of the properly labeled and closed containers as well as the name of the recycling facility Grogan's Towne Chrysler Dodge intends to use.

I have enclosed the following fact sheets on spent lamps: Universal Waste Rules for Handlers of Lamps, dated June 2005; Fluorescent Lamps: What You Should Know, dated January 2007; and Computer, Fluorescent Lamp and Ballast Recyclers, dated April 2008 for your use.

Grogan's Towne Chrysler Dodge must identify how the facility intends to properly manage the facility's spent fluorescent lamps. This information should be submitted to my attention at the Ohio EPA within 30 days of receipt of this letter.

2. **OAC Rule 3745-279-22(C)(1) – Marking of Used Oil Containers:** "Containers and above ground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil"."

Grogan's Towne Chrysler Dodge failed to mark used oil containers with the words, "Used Oil".

Each of the used oil containers were properly marked during the inspection. Therefore, this violation has been abated.

In addition to the above violations, Ohio EPA has the following suggestion:

1. During the review of facility records, we observed that the facility maintains only the generator copy of manifests used for off-site shipments of hazardous waste solvent from your paint shop. The manifest system is designed to ensure that waste that you generate is properly delivered to the designated permitted hazardous waste disposal facility by the transporter. You should be receiving a copy of each manifest you signed which is in turn signed by the disposal facility. This is your proof that the waste that you generated has reached the disposal facility. Without a copy of the manifest signed by the disposal facility, you have no way of ensuring that your waste was received by the disposal facility which may lead to future liability for your facility. The signed and returned copy of the manifest should be stapled and/or filed with the original generator copy of the manifest. You should maintain these records for at least three years.

As we discussed during the inspection, 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.

During the inspection, we observed potential pollution prevention (P2) opportunities associated with your operations. In addition to recycling the fluorescent lamps, P2 options that you may want to evaluate for this these operations include the reduction in the number of parts washers used in the service area and/or the substitution of a water based solvent for the solvent based parts washer solvent currently used.

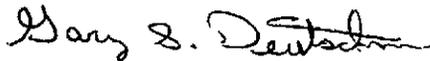
Mr. Mark Nowacki, Fixed Operations Manager
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The Ohio Department of Development's Office of Energy Efficiency may be able to help with energy efficiency issues. Their website is at: <http://www.odod.state.oh.us/cdd/oeef/>

If you would like a free, non-regulatory on-site pollution prevention assessment or if you would like more information about pollution prevention, please contact me at the number listed below. Ohio EPA has helpful information about this at the following web address:
<http://www.epa.state.oh.us/ocapp/ocapp/>

Enclosed you will find a copy of the checklists that we completed as a result of the inspection. Should you have any questions, please feel free to call me at (419-373-3056). You can find copies of the rules and other information on the division's web page at:
<http://www.epa.state.oh.us/dhwm/>.

Sincerely,



Gary S. Deutschman
Environmental Specialist III
Division of Hazardous Waste Management

/llr

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, Supervisor, DHWM, NWDO
DHWM, NWDO File – Grogan's Towne Chrysler Dodge file, Lucas County }
ec: Gary Deutschman, DHWM, NWDO

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

For Ohio EPA use only

E-mail this completed form to kristina.durnell@epa.state.oh.us
 or mail it to Kristina Durnell, Central Office

Site EPA ID No. Site Name Site Location Information Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html	EPA ID Number: OHR000024307 Name: Grogan's Towne Chrysler Dodge Website: groganstowne.com (Optional)																								
	Street Address: 6100 N. Telegraph Road City, Town, or Village: Toledo County Name: Lucas State: OH Zip Code: 43612																								
	<table border="0"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>44110</td> <td>441310</td> <td></td> <td></td> <td></td> <td></td> <td>441310</td> <td></td> </tr> </table>	Private	County	District	Federal	Indian	Municipal	State	Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>	44110	441310					441310							
Private	County	District	Federal	Indian	Municipal	State	Other																		
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44110	441310					441310																			

Facility Representative Additional names can be recorded in number 12. Only provide address information if it is different than the site address	First Name: Mark Phone Number: 419-476-0761 E-Mail Address: markn54@hotmail.com Fax Number: 419-269-2907 Street or P.O. Box: 6100 N. Telegraph Road City, Town or Village: Toledo State: OH	MI: Last Name: Nowacki Phone Number Extension: Fax Number Extension: Zip Code: 43612
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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: Floyd Investments LTD 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 Street or P.O. Box: 6100 N. Telegraph Road City, Town or Village: Toledo State: Ohio Name of Site's Operator: Grogan's Towne Chrysler Dodge 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 Street or P.O. Box: 6100 N. Telegraph Road City, Town or Village: Toledo State: Oh	Date Became Owner (mm/dd/yyyy): 07/02/1996 Owner Phone #: 419-476-0761 Country: USA Zip Code: 43612 Date Became Operator (mm/dd/yyyy): 1996 Operator Phone #: 888-gro-gans United States Zip Code: 43612
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VIOLATIONS CITED? Yes No

TYPE OF HANDLER- A MINIMUM OF ONE BOX MUST BE CHECKED

<input type="checkbox"/> Not a HW Generator <input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
	<input type="checkbox"/> Small Quantity Generator (SQG)
	<input checked="" 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"/> Recycler of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Underground Injection Control Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	

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"/> 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 checked="" 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. Oil	
<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner	

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.

	D001	D035	F003	F005
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 checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Other Comments: Used Oil stored in containers and a UST. HW stored in containers.	
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)
Gary Deutschman	Wendy Miller	02/26/2009

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)

**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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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GENERATOR CLASSIFICATION

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c. Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	d. Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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.

#1 – Grogan's Towne Chrysler Dodge must evaluate spent fluorescent bulbs or recycle bulbs.

**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 checked="" type="checkbox"/>	N/A <input 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 type="checkbox"/>	No <input checked="" 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 checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Stopped the release?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Contained the release?	Yes <input checked="" 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 checked="" type="checkbox"/>	No <input 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 checked="" 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]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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.

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Grogan's Town Chrysler Dodge	Facility Type: CESQG/SQG	Date of Inspection: 2/26/09	EPA ID #: OHD000024307
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Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation <small>(container, tank, etc) and location of waste accumulation area</small>	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	Parts Cleaning D001 Spent Solvent	20 gallons		Vesco Oil Corporation, 1900 E. Warren, Detroit Mi 48207 - Recycled		Solvent Substitution/Parts Washer Reduction
2	Battery Replacement Spent Lead Acid Batteries	5-10		Interstate Battery, 1632 Unit A, Holloway Road, Holland, Ohio 43528 - Sent off-site for smelting.		
3	Oil Change Used Oil	200-300 gallons		DISC Environmental Services, 151 East Andrus Road, Northwood, Ohio 43619 - sold as on-spec used oil fuel.		Used Oil Burner for Heat
4	Coolant Replacement Used Anti-freeze	10 gallons		DISC Environmental Services, 151 East Andrus Road, Northwood, Ohio 43619 - sold to recycling facility for		

					re-use.		
5	Lighting	Spent Fluorescent Light Bulbs	Not tracked at this time		Managed as solid waste		Recycling
6	Air Conditioning Re-charge	Spent Freon	Varies	Captured and Re-generated on-site		Re-Use	
	Paint Booth	Non-Hazardous Paint Filters	Changed Monthly and Yearly		SBS Systems, 17275 Ida Center Road, Petersburg, MI 49270 - Sent off-site for disposal		
8	Paint Shop	D001/D035/F003/F005 Spent Solvent /Paint Sludge	5-15 gallons		Petro Chem Processing, 421 Lycoste, Detroit, MI 48214 - blended for alternative fuels.		Solvent Distillation
9	Scrap Metal	Parts replacement	Not tracked at this time		Omni-Source - recycled	Recycled as scrap or returned as Cores	
	Cardboard	New Parts	Not tracked at this time		Waste Management - recycled	Recycled	
11	Shop Rags	Cleaning of parts, hands	Not tracked at this time		Cintas - Laundered	Laundered	

REMARKS-GENERAL INFORMATION

General Process Information: Automotive Service and Auto Body Shop. Retailer of Chrysler and Dodge automobiles and trucks.

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information: Grogan's Towne Chrysler Dodge should look at reducing the number of parts washer

units in the service area as well as solvent substitution with non-hazardous solvent. This facility could also benefit from investigating solvent use in paint shop to determine if distillation and re-use is cost effective. Fluorescent and HID should be recycled.

Would this facility be interested in a P2 assessment? Yes* No

*If yes, refer promptly to your district P2 coordinator. Office of Compliance Assistance and Pollution Prevention – 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other: