



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

September 11, 2013

RE: JD SERVICES
CUYAHOGA COUNTY
RETURN TO COMPLIANCE (RTC)
OHD 007 832 827
COMPLAINT NUMBERS 7301, 7449

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

Dear Mr. Hill:

On July 25, 2013, Nyall McKenna and I, as representatives of the Ohio EPA's Division of Materials and Waste Management, visited JD Services, located at 16100 S. Waterloo Road, Cleveland, Ohio 44110, to evaluate progress in responding to the violations of Ohio's used oil regulations as cited in my NOV letters dated May 31, 2012, September 14, 2011, April 4, 2011 and May 6, 2010. You and Ed Haddad, your environmental consultant, represented JD Services during the July 25, 2013 visit.

During the July 25, 2013 visit to 16100 S. Waterloo Road we observed that the trucks, truck parts and other equipment previously present in the salvage yard area to the south of the maintenance garage had been removed. It appeared that soil and debris contaminated with used oil had been removed from the salvage yard. We also learned that JD Services no longer conducts business at this location.

My review of the 16100 S. Waterloo Road site and of conversations with you and Mr. Haddad indicate that JD Services has adequately demonstrated abatement of the violations for the 16100 S. Waterloo Road site identified during the previous inspections conducted on April 20, 2010, March 23, 2011, August 10, 2011, and May 17, 2012 and cited in my letters dated May 6, 2010, April 4, 2011, September 14, 2011, and May 31, 2012, specifically:

1. **OAC 3745-279 22(D) Generator must respond to used oil releases and perform cleanup steps**
2. **OAC 3745-279 22(C)(1) Used oil containers and tanks must be labeled with the words "Used Oil"**
3. **OAC Rule 3745 279-72(A) Used oil marketer must ensure used oil meets specs by proper documents**

Some of the soil and debris contaminated with used oil previously present 16100 S. Waterloo Road was transferred from 16100 S. Waterloo Road to the JR's Trucks & Parts facility located at 16606 S. Waterloo Road. You as owner and operator of JR's Trucks & Parts, remain responsible to properly evaluate that soil and debris and to dispose in accordance with the hazardous waste rules for any portions determined to be hazardous waste or in accordance with the used oil rules for those portions that are not hazardous waste. You as owner and operator of JR's Trucks & Parts also remain responsible for the actions requested in the NOV letters issued by me as a result of previous inspections of JR's Trucks & Parts.

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

cc: Marlene Kinney, Ohio EPA, DMWM, NEDO
Jeff Clark, City of Cleveland, Building Department
ec: Natalie Oryshkewych, Ohio EPA, DMWM, NEDO
Nyall McKenna, Ohio EPA, DMWM, NEDO
Jeff Mayhugh, Ohio EPA, DMWM, CO
Tammy Heffelfinger, Ohio EPA, DMWM, CO