



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

Re: Snyder Chevrolet Co., Inc.
Service Shop & Body Shop
Henry County
OHD018210229
Hazardous Waste
Notice of Violation

August 30, 2013

Mr. William Snyder, Owner
Snyder Chevrolet Company, Inc.
524 North Perry Street
Napoleon, Ohio 43545

Dear Mr. Snyder:

On August 13, 2013, Kara Reynolds and I conducted a compliance evaluation inspection at Snyder Chevrolet Co., Inc., (SCC) located at 524 North Perry Street in Napoleon, Ohio. We inspected SCC to determine its 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). Pollution prevention options were also discussed during this inspection.

During our inspection, we spoke with Steven Dietrich, Service Manager; and Randy Schwab, Body Shop Manager, inspected your facility and reviewed applicable paperwork. SCC is a full-service automotive service shop and body shop (i.e. oil changes, service repairs, painting).

SCC generates used oil in the service shop which is stored in two 1,000-gallon above ground storage tanks and a tanker truck. SCC burns the used oil in an on-site burner to heat the building. Used oil filters are hot drained and managed as a solid waste. SCC may want to consider recycling the used oil filters once they have been properly drained. A list of used oil filter recyclers is enclosed. Please review this information and contact me if you have any questions.

SCC does painting on-site and generates approximately five gallons of waste paint solvent (D001, D007, D008, D035, F003, F005) from spray gun cleaning per month. SCC operates two paint booths and changes the floor filter in each booth approximately once every six months and the side filters in each booth once a year. All of the spent paint booth filters are managed as solid waste.

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SCC has one parts washer on-site and the spent solvent (D001) has been managed by Safety Kleen in the past but the facility recently started adding it to the used oil. SCC has not generated any spent fluorescent lamps since the facility switched all of their lighting fixtures over to T5 lamps. Once the fluorescent lamps are no longer under warranty, SCC plans to manage them as universal waste. A copy of Fluorescent Lamps: What You Should Know, is enclosed. I recommend that you review this document and contact me if you have any questions.

At the time of our inspection, SCC was operating as a conditionally exempt small quantity generator of hazardous waste.

We found the following violations of Ohio's hazardous waste laws:

1. Waste Evaluation: OAC Rule 3745-52-11:

Any person who generates a waste must determine if that waste is a hazardous waste by using generator knowledge or by testing the waste.

At the time of our inspection, SCC did not have waste evaluation documentation for the spent paint booth filters. SCC has historically disposed of this spent material as a non-hazardous/solid waste. SCC must immediately cease disposing of the waste paint booth filters as non-hazardous waste until a proper waste evaluation has been completed.

SCC must obtain a representative sample of the spent paint booth filter waste streams, floor filters from each booth and side filters from each booth, and have them analyzed for Toxic Characteristic Leaching Procedure (TCLP) Resource Conservation and Recovery Act (RCRA) metals (SW-846 Method 1311/6010) and volatile organics (SW-846 Method 1311/8260). To abate this violation, SCC must submit a copy of the analytical results for the spent floor filters and the spent side filters to Ohio EPA.

Ohio EPA may use the data you collect, in part, to make regulatory decisions concerning the waste(s) tested. A data review process, referred to as data validation, may be utilized to confirm the validity of the data. This data validation can include a review of the following components: sampling techniques, sample containers, representativeness of sample, laboratory test methods, laboratory data completeness, and documentation of holding time(s), chain(s) of custody and quality assurance/quality control (QA/QC) data. Please include data sufficient for Ohio EPA to perform the data validation review. Information on conducting a data validation can be obtained from Ohio EPA's web page:

http://www.epa.state.oh.us/dhwm/tier_i_data_validation_manual.html.

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Ohio EPA will review the submitted waste evaluation information and determine if there is a change in your generator status. Additional violations may be cited based upon your determined generator status. You will be notified of any additional violations in a separate letter.

2. Labeling: OAC Rule 3745-279-22(C)(1):

Containers, aboveground tanks, and fill pipes used for underground storage tanks shall be labeled or marked clearly with the words "used oil."

SCC had two 1,000-gallon storage tanks, a tanker truck, and multiple portable containers of used oil that were not properly labeled "Used Oil".

In order to correct this violation, SCC must properly label the two storage tanks, tanker truck, and portable containers with the words "Used Oil" and submit photographic documentation to demonstrate compliance.

A copy of the following fact sheets, The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil, and Burning Used Oil in a Space Heater – For Businesses, are enclosed.

In addition, I've included the Bulk Storage Container Inspection Fact Sheet and an Applicability Flow Chart for the Spill Prevention, Control and Countermeasure Plan (SPCC) Program. Your facility has an aboveground oil storage capacity greater than 1,320 gallons and may be subject to the SPCC rules. Please review this information and contact US EPA's Emergency Management Information Center at (800) 424-9346 if you have questions.

Ohio EPA has helpful information about compliance assistance and pollution prevention at the following web address: <http://www.epa.ohio.gov/ocapp>. In addition, you can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>.

Enclosed you will find a copy of the checklists that were completed during the inspection.

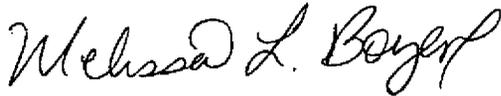
SCC needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within **14 days** of receipt of this letter, SCC is requested to provide documentation to this office including the steps taken to abate the violations cited above.

Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to melissa.boyers@epa.ohio.gov.

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Should you have any questions or if I can be of assistance, please contact me at (419) 373-3066.

Sincerely,



Melissa L. Boyers
Division of Materials and Waste Management

/llr

Enclosures

pc: Lisa Gifford, DMWM, NWDO
Colleen Weaver, DMWM, NWDO

ec: Colleen Weaver, DMWM, NWDO (w/attachments)
Melissa Boyers, DMWM, NWDO (w/attachments)
RCRAInfoData@epa.state.oh.us (w/attachments)
sara@snyderautogroup.com

Notice:

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, SCC is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.