

FILE COPY

August 20, 2013

Mr. Amir Taghavi
Parsons Auto Parts
2250 Parsons Rd.
Columbus OH, 43207

Re: Parsons Auto Parts
OHR000118794
Franklin County
NOV

Dear Mr. Taghavi:

Thank you for accompanying me during Ohio EPA's July 17, 2013, complaint investigation of Parsons Auto Parts' facility in Columbus, Ohio. We inspected Parsons Auto Parts 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). The complaint noted mismanagement of auto fluids, in particular, used oil and antifreeze. This letter will explain the violations we found and what you need to do to correct the violations.

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 14 days of your receipt of this letter.**

Used Oil Generator Standards (OAC 3745-279-22 (D))

Upon detection of a release of used oil to the environment a generator shall clean up and manage properly the released used oil and other materials. At the time of the inspection Used Oil was puddling throughout the dismantling area.

As denoted by the accompanying pictures, the ground around the dismantling area and oil storage area appear freshly stained. As we discussed, Parsons Auto Parts needs to clean up this area by removing and properly disposing of any visibly contaminated soils. Ohio EPA will be back two weeks from the date of this letter to conduct a follow up inspection and assess the facility's progress.

Mr. Amir Taghavi
Parsons Auto Parts
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Used Oil generator Standards [OAC 3745-279-22 (C)]

Containers and aboveground tanks used to store used oil at generator facilities shall be labeled or marked clearly with the words "Used Oil." At the time of the inspection five 55 gallon drums and two totes were not labeled with the words "Used Oil."

Parsons Auto Parts needs to appropriately label all containers "Used Oil" and submit a photo to Ohio EPA.

You can find Ohio's hazardous waste rules and other information on the division's web page at: <http://www.epa.ohio.gov/dmwm/>

Enclosed please find copies of the checklist completed. Should you have any further questions, please feel free to contact me at (614) 728-3884.

Sincerely,



Peter Maneff
Division of Materials and Waste Management
Central District Office

PM/nsm ParsonsAutoNOV2013

Send to Central Office <input checked="" type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to RCRAInfo.Data@epa.state.oh.us.

Site EPA ID No.	EPA ID Number: OHR000118794							
Site Name	Name: Parsons Auto Parts L.L.C.				Website: (Optional)			
Site Location Information	Street Address: 2250 Parsons Avenue							
	City, Town, or Village: Columbus				State: OH			
	County Name: Franklin							
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"/>
NAICS code(s) www.census.gov/epcd/www/naics.html								

Facility Representative	First Name: Amir		MI:	Last Name: Taghavi			
Additional names can be recorded in number 12 Only provide address information if it is different than the site address	Title: Manager						
	Phone Number: 614-443-7451				Phone Number Extension:		
	E-Mail Address: www.parsonautoparts.com						
	Fax Number: 614-443-7452				Fax Number Extension:		
	Street or P.O. Box: 2250 Parsons Ave.						
	City, Town or Village: Columbus				State: OH		

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: Amir Taghavi				Date Became Owner (mm/dd/yyyy): 06/23/2009								
	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 #:		Country:		Zip Code:				
	State:				Date Became Operator (mm/dd/yyyy):								
	Name of Site's Operator:				Operator 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:						

VIOLATIONS CITED?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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TYPE OF HANDLER - MARK "X" AS APPROPRIATE		
<input checked="" type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). <i>Check the box for the applicable generator status and provide a comment.</i>	<input type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input 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

PROCESS DESCRIPTION SECTION

Give a general process description (include all processes done at the facility)

Parsons Auto Parts, 2250 Parson Avenue, is a salvage yard for all types of cars and small trucks. The company buys cars at auction and then breaks them down for parts. The company is currently not generating any hazardous waste as they have switched over to a nonhazardous parts washer. The facility does however generate used oil which is stored both outside in the dismantling area and inside the maintenance shop in 55 gallon drums and 250 gallon totes. The used oil is stored all summer and then burned in an on-site furnace during the winter. Batteries are recycled through Interstate. All diesel and gas is collected and used onsite in the company's own vehicles.

WASTE ACTIVITIES SUMMARY SECTION

For each of the processes listed above that generate a waste, give the following information: (1) name of process generating waste, (2) name or description of waste generated, (3) EPA waste codes, (4) quantity generated per month, (5) type of accumulation container used, (6) waste accumulation location in facility, (7) type of on-site treatment (if used), (8) name of off-site management facility (9) type of activity occurring at off-site management facility and (10) P2 activities

No hazardous waste is generated at this site at this time.

Batteries are sent to Interstate as needed.

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

NOTE: 1. 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.

2. Inspectors can check BUSTR's web-site at https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at: https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp.

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 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 checked="" type="checkbox"/> No <input 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 checked="" type="checkbox"/> No <input 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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input 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 type="checkbox"/> No <input checked="" 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 type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input checked="" 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 type="checkbox"/>

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS		
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more		
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less		
PROHIBITIONS		
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
WASTE MANAGEMENT & LABELING/MARKING		
UNIVERSAL WASTE BATTERIES		
3.	Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Does the SQUWH conduct any of the following activities:	
a.	Sort batteries by type?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Mix battery types in one container?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
c.	Discharge batteries to remove the electric charge?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
d.	Regenerated used batteries?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
e.	Disassemble them into individual batteries or cells?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
f.	Remove batteries from consumer products?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
g.	Remove the electrolyte from the battery?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
6.	If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
7.	Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
UNIVERSAL WASTE LAMPS		
8.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] At the time of the inspection no lamps were being accumulated on-site.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
9.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	foreign destination? [3745-273-18(A)]	
NOTE: SQUWHs are prohibited to send waste to any other facility.		
18.	If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:	
	a. Receive the waste back? [3745-273-18(E)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. Agree to where the shipment will be sent? [3745-273-18(E)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
21.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss <u>one of the following</u> :	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Sending the waste back to the originating handler? [3745-273-18(F)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
23.	If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
EXPORTS		
24.	Is waste being sent to a foreign destination? If so:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>



Parsons Auto Parts, 7-17-13, Used Oil being stored for burning in a unlabeled drum.



Parsons Auto Parts, 7-17-13, Used Oil being stored for burning in unlabeled drums.

Parsons Auto Parts, 7-17-13, Used Oil spilled on ground and stored in an unlabeled drum.



Parsons Auto Parts, 7-17-13, Used Oil spilled on ground and stored in an unlabeled drum.



Parsons Auto Parts, 7-17-13, Oil
contaminated soil dumped in
adjacent parking lot.

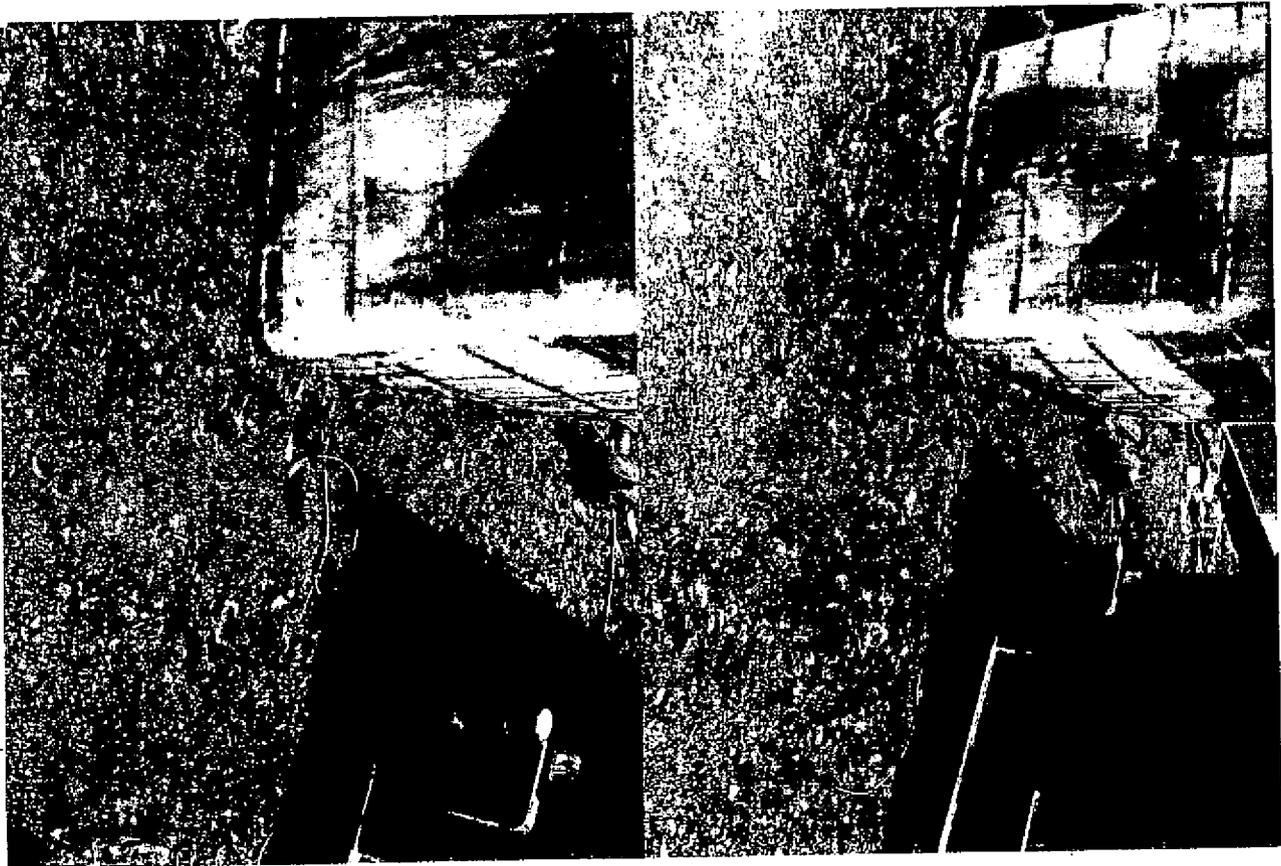


Parsons Auto Parts, 7-17-13, Oil
contaminated soil.



Parsons Auto Parts, 7-17-13, Used Oil spilled on ground.

Parsons Auto Parts, 7-17-13, Used Oil spilled on ground.



Parsons Auto Parts, 7-17-13, Used Oil spilled on ground and stored in an unlabeled tote. Roll off box also leaking oil onto ground.

Parsons Auto Parts, 7-17-13, Used Oil spilled on ground and stored in an unlabeled tote. Roll off box also leaking oil onto ground.



Parsons Auto Parts, 7-17-13, Used Oil spilled on ground.



Parsons Auto Parts, 7-17-13, Used Oil spilled on ground



Complaint No. 4598
 Sequence No. 0
 DERR Spill No.

Complaint Investigation Summary

Received By: PETER MANEFF, DMWM

Date Received: 07/15/2013 Time Received:

<p>Complainant:</p> <p>Name: HARRY KALLIPOLITIS</p> <p>Address:</p> <p>City/State: ,</p> <p>Zip:</p> <p>Phone #'s: Home Work</p> <p>Confidential: N</p>	<p>Suspected Source:</p> <p>Name: PARSONS AUTO PARTS</p> <p>Address: 2250 PARSONS AVE</p> <p>City/State: COLUMBUS, OH</p> <p>Zip: 43207</p> <p>Phone:</p> <p>Contact:</p> <p>Township:</p> <p>County: FRANKLIN</p>
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Statement of Complaint: (Describe location, type of material, quantity, areas affected etc.)

Mismanagement of auto fluids, gas, oil, transmission oil.

Investigated By: DAPC: DERR: DHWM: DSIWM: DSW: DDAGW:

Date Investigated: 07/17/2013

Investigated By: PETER MANEFF, DMWM

Watershed:

Investigation Summary:

Found numerous used oil violations.

Action:

Facility is required to clean up all spills and releases of used oil.

Date Action Taken: / /

Date Referred: / /

Final Action Date: / /

Referred To: