

February 6, 2019

James Lansing
New York State Department of Environmental Conservation
Bureau of Solid Waste Management - Region 3
21 South Putt Corners Road
New Paltz, NY 12561

**Re: John Hughes Used Auto Parts
6257 Route 82
Stanfordville, NY 12581
Permit No. NYR00E049**

On behalf of John Hughes Used Auto Parts, James Environmental Management, Inc. (JEM), would like to submit the enclosed 2018 Vehicle Dismantling, Motor Vehicle Repair Shop and Mobile Vehicle Crusher Annual Report.

Should you have any questions or require additional information, please feel free to contact the JEM office.

Sincerely,

Kristyn Jacher
Environmental Specialist
Kjacher@jamesenvironmental.com

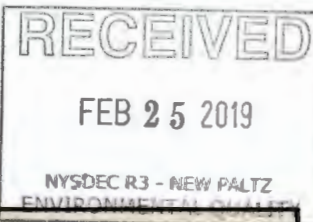
Enc: 2018 Annual Report - Solid Waste

cc: John Hughes, Owner, John Hughes Used Auto

VEHICLE DISMANTLING FACILITY, MOTOR VEHICLE REPAIR SHOP AND MOBILE VEHICLE CRUSHER ANNUAL REPORT

Submit the Annual Report no later than March 1, 2019.

This annual report is for the year of operation from January 01, 2018 to December 31, 2018



SECTION 1 – FACILITY INFORMATION

FACILITY INFORMATION			
FACILITY NAME: John Hughes Used Auto Parts, Inc.			
FACILITY LOCATION ADDRESS: 6257 Route 82	FACILITY CITY: Stanfordville	STATE: NY	ZIP CODE: 12581
FACILITY TOWN: Stanfordville	FACILITY COUNTY: Dutchess	FACILITY PHONE NUMBER: 845-868-7870	
FACILITY NYS PLANNING UNIT: (A list of NYS Planning Units can be found at the end of this report). Dutchess County			NYSDEC REGION #: 3
FACILITY TYPE: <input checked="" type="checkbox"/> Vehicle Dismantler <input type="checkbox"/> Motor Vehicle Repair Shop <input type="checkbox"/> Mobile Vehicle Crusher			
DMV I.D. # <u>7042977</u>			
FACILITY CONTACT: John Hughes	<input type="checkbox"/> public <input checked="" type="checkbox"/> private	CONTACT PHONE NUMBER: 845-868-7870	CONTACT FAX NUMBER:
CONTACT EMAIL ADDRESS: cop3pp@gmail.com			
OWNER INFORMATION			
OWNER NAME: John Hughes Used Auto Parts, Inc.	OWNER PHONE NUMBER: 845-868-7870	OWNER FAX NUMBER:	
OWNER ADDRESS: 6257 Route 82	OWNER CITY: Stanfordville	STATE: NY	ZIP CODE: 12581
OWNER CONTACT: Phone/Email	OWNER CONTACT EMAIL ADDRESS: cop3pp@gmail.com		
OPERATOR INFORMATION			
OPERATOR NAME: <input checked="" type="checkbox"/> same as owner		<input type="checkbox"/> public <input checked="" type="checkbox"/> private	
PREFERENCES			
Preferred address to receive correspondence: <input checked="" type="checkbox"/> Facility location address <input type="checkbox"/> Owner address <input type="checkbox"/> Other (provide):			
Preferred email address: <input checked="" type="checkbox"/> Facility Contact <input type="checkbox"/> Owner Contact <input type="checkbox"/> Other (provide):			
Preferred individual to receive correspondence: <input checked="" type="checkbox"/> Facility Contact <input type="checkbox"/> Owner Contact <input type="checkbox"/> Other (provide):			

Did you operate in 2018?
☒ Yes; Complete this form.

 ☐ No; Complete and submit Sections 1 and 12.

SECTION 2A VDF/REPAIR SHOPS- END-OF-LIFE VEHICLES (ELVs) PROCESSED

• Provide the number of ELVs received from January 1 to December 31:

54

• Provide the number of ELVs crushed and/or removed from the facility from January 1 to December 31:

65

• Provide the number of ELVs stored at the facility as of December 31:

37

• Provide the highest number of ELVs stored at the facility at any one time from January 1 to December 31:

88

• Provide the approximate area used for the storage of vehicles (acres):

5 acres

• Provide the names of scrap metal processors to which you sold or sent decommissioned ELVs:

1) BARONI SCRAP METAL PAUGHKEEPSIC NY

2) _____

3) _____

SECTION 2B MOBILE CRUSHERS - END-OF-LIFE VEHICLES (ELVs) PROCESSED

• Provide the number of ELVs crushed from January 1 to December 31:

• Provide the names of each facility where you crushed decommissioned ELVs:

1) _____

2) _____

3) _____

4) _____

5) _____

6) _____

SECTION 3 - WASTE FLUIDS RECOVERED

Complete this table by reporting volumes of End-of-Life Vehicle (ELV) waste fluids managed at the facility during the reporting period. Qualitative responses (i.e. √'s or X's) are not acceptable. Report only fluids generated from dismantling operations (not general car repair, etc.).

Waste Fluid Recovered	Fluid Volume				Destination Name & Address (Indicate permitted facility or permitted Part 364 transporter accepting waste fluids.)
	Used on-site (oil heater, etc.)	Stored on-site at year-end	Sold/ Recycled off-site	Disposed off-site*	
Refrigerant (pounds)	3/4 LB	1/2 LB			
Used Oil** (gallons)		25 gal		42 gal	VAZCO Highland NY 12528
Diesel Fuel (gallons)					
Gasoline (gallons)	150 gal used on site				
Engine Coolant/ Antifreeze (gallons)				35 gal	VAZCO
Window Washing Fluid (gallons)	2 gal used on site	1 gal	3 gal		
Other (specify)					

* Any fluids disposed must undergo a hazardous waste determination and proper handling, storage, and disposal, if hazardous.

** Includes Engine Oil, Transmission Fluid, Axle Fluids, Hydraulic Fluid, Power Steering Fluid, Brake Fluid, etc.

SECTION 4 – SCRAP METAL

Complete this table by reporting the amount of metal received, stored and sent off site, by the facility, during the reporting period.

Material Types	Received (tons)	Stored On Site (tons)	Sent Off Site (tons)	Destination	
				NYS <u>Planning Unit</u> (or state if other than New York)	To Scrap Metal Processor
Ferrous Scrap Metal	3/4		3/4	BARONI SCRAP METAL	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Aluminum Scrap Metal	9		9	BARONI SCRAP METAL	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Lead Weights					<input type="checkbox"/> Yes <input type="checkbox"/> No
Non – Ferrous Scrap Metal					<input type="checkbox"/> Yes <input type="checkbox"/> No
Other (specify):					<input type="checkbox"/> Yes <input type="checkbox"/> No
					<input type="checkbox"/> Yes <input type="checkbox"/> No

SECTION 5 – MERCURY SWITCHES COLLECTED

Provide the number of mercury-containing devices recovered. Including but not limited to hood & trunk lighting switches (H&TS) and antilock brake assemblies (ABS).

H&TS 5
(Number)

ABS _____
(Number)

Indicate permitted facility or permitted transporter accepting mercury containing devices:

STORED ON SITE

SECTION 6 – AIR BAGS COLLECTED

Provide the number of air bags recovered.

Number of Air Bags Removed: 0

Number of Air Bags Deployed: 0

Indicate permitted facility or permitted transporter accepting air bags:

ALL ELV'S DELIVERED TO SCRAP PROCESSOR WERE DELIVERED AS COMPLETE. 90% OF ELV'S BOUGHT FROM INSURANCE CO. AIR BAGS WERE DEPLOYED FROM ACCIDENT.

SECTION 7 – LEAD-ACID BATTERIES COLLECTED

Provide the number of lead-acid batteries recovered and their disposition.

Number of Lead-Acid Batteries collected from ELVs:

38

Indicate permitted facility or permitted transporter accepting lead-acid batteries:

Baroni Scrap metal

20 US/Kleck Dr

Poughkeepsie NY

Any materials disposed must undergo a hazardous waste determination and proper handling, storage and disposal, if hazardous.

SECTION 8 – WASTE TIRES COLLECTED

Number of waste tires stored on-site:

100

as of December 31

Number of used tires available for sale on-site:

20

as of December 31

Number of used tires sold:

25

during operating year

Number of waste tires shipped off-site for recycling, disposal, other:

0

during operating year

Indicate name of facility(ies) accepting waste tires:

SECTION 9 – SELF INSPECTIONS

Number of self-inspections conducted for the year:

2

Are self-inspection records up-to-date with inspector name, what was inspected, time and date of inspection?

☒ Yes ☐ No

At a minimum, are fluid storage areas, vehicles, vehicle storage areas inspected for leaks/spills?

☒ Yes ☐ No

SECTION 10 – PROBLEMS

Were any problems encountered during the reporting period (e.g., specific occurrences which have led to changes in facility procedures)?

☒ Yes ☐ No If yes, attach additional sheets identifying each problem and the methods for resolution of the problem

SECTION 11 – CHANGES

Were there any changes from approved reports, plans, specifications, and permit conditions?

☐ Yes ☒ No If yes, attach additional sheets identifying changes with a justification for each change.

SECTION 12 – COMPLIANCE CERTIFICATION

As of December 31, 2018:

Waste Management Compliance Checklist	NA	Yes	No	Date of Return to Compliance
1. If your facility stores LESS THAN 1,000 tires, check NA. If your facility stores MORE THAN 1,000 tires, do you have a PART 360 permit for tire storage?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Is a system in place to control vegetation and prevent it from encroaching onto fire access lanes or driveways?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Have you recorded the date of receipt for all end-of-life vehicles received?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Are the end-of-life vehicle records available on-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5. Have all end-of-life vehicles been inspected, upon arrival, for leaking fluids and unauthorized wastes?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6. Have all observed leaks been remedied or contained?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7. Does your facility have a written Contingency Plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8. Are facility personnel trained to implement the Contingency Plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9. Does your Contingency Plan include actions to be taken in the event of the following?				
9a. Fire.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9b. Spill or release of vehicle waste fluids.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9c. Unauthorized material received at facility.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10. Are spills of waste fluids, if any occur, reported to the NYSDEC Spills Hotline within two hours of detection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11. Are all vehicle residues prevented from migrating from or running off your property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12. Is dust controlled to prevent interference with facility operations or from leaving facility site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
13. Are vectors (mosquitoes, rats, mice, etc.) controlled to prevent interference with facility operations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
14. Are waste fluids kept from being discharged onto the ground or into surface waters?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
15. Is access to your facility controlled by: fences, gates, sign and/or natural barriers (not vehicles)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
15a. Are the access controls working (i.e. controlling access)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
16. Are fluids drained from end-of-life vehicles on a pad constructed of concrete or equivalent material?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
17. Are you doing the following with your concrete (or equivalent surface) pad that is used for vehicle dismantling, fluid draining, crushing, etc.?				
17a. Cleaning daily.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
17b. Cleaning spills as they occur.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
17c. Collecting and properly disposing of absorbent materials.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Reprinted (12/18)

Waste Management Compliance Checklist				Date of Return to
	NA	Yes	No	Compliance
18. Have the following wastes been drained, removed, deployed, collected and/or stored following best management practices, prior to vehicle crushing or shredding?				
18a. Fluids (including engine oil, transmission fluid, transaxle fluid, front and rear axle fluid, brake fluid, power steering fluid, coolant, and fuel).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
18b. Lead acid batteries.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
18c. Mercury switches or other mercury containing devices, if any.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
18d. Refrigerants, if any.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
18e. Air bags.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
18f. PCB capacitors, if any.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
19. Are fluids stored separately & in containers that are compatible with their contents?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
20. Are fluids stored in closed containers?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
21. Are containers which contain waste fluids in good condition and not visibly leaking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
22. Are containers clearly and legibly labeled to describe their contents?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
23. Are containers stored on a bermed pad constructed of concrete or equivalent material?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
24. Are lead-acid batteries stored upright and off the ground?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
25. Are lead-acid batteries covered to protect them from precipitation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
26. Are all lead-acid batteries sent for recycling within one-year of receipt?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
27. Are <u>leaking</u> lead-acid batteries, if any are encountered, stored in leak-proof containers separated from intact batteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
27a. Are provisions in place to absorb any acid leakage?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
28. Are mercury switches and other mercury containing devices stored in appropriate, labeled containers and then sent for recycling?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
29. Are PCB capacitors, if any are encountered, removed and stored in appropriate, labeled containers for recycling or disposal?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
30. Is used oil stored in accordance with local building codes, local fire codes, and the NYS Uniform Fire Prevention & Building Code?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
31. If sent off-site, is used oil transported via a permitted hauler?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
32. If you do not burn used oil onsite check NA for 32a., 32b., 32c. If you do, then answer 32a., 32b., 32c:				
32a. Is used oil burned in a used oil space heating unit, with a maximum capacity of 0.5 million BTU's per hour or less?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
32b. Do on-site space heaters burn only used oil that is generated on-site or received from household do-it-yourself generators?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
32c. Are combustion gases from used oil space heaters vented to the outside ambient air?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Waste Management Compliance Checklist				Date of Return to
	NA	Yes	No	Compliance
33. Is waste oil kept from being mixed with brake cleaner, carb cleaner, antifreeze, solvents, gasoline, or degreasers?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
34. Are sludges from sumps and oil/water separators stored in covered, closed and labeled containers?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
35. Are sludges properly recycled or disposed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
36. Are used oil filters properly drained, crushed or dismantled?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
37. Are drained oil filters properly recycled or disposed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
38. If your facility does not require an SPDES Multi-Sector General Permit (MSGP) for Stormwater Discharge, check NA for 38a, 38b, 38c. If your facility requires an SPDES MSGP answer 38a, 38b, 38c:				
38a. If required by the SPDES MSGP, has a Stormwater Pollution Prevention Plan been prepared for this facility?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
38b. Is the information provided in the facility's original Notice of Intent or Termination submission for the SPDES MSGP still accurate and up to date?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
38c. Has the facility's Annual Certification Report for the SPDES MSGP been submitted within the previous year?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
39. If your facility does not handle cleaning solvents, degreasers, battery acids or non-vehicle wastes write NA. If these materials are handled at your facility, what is the maximum amount of this material that your facility generates in any calendar month?	<p>_____ pounds</p> <p><u>N/A</u> gallons</p>			

Do you have any other Environmental Conservation Law or regulatory violations?
(Attach additional sheets as necessary.)

EPA Violation of Clean Water Act

COMMENTS? (Attach additional sheets if necessary)

I have ATTACHED the violations and a Timeline of Compliance.

SECTION 12 - SIGNATURE AND DATE BY OWNER OR OPERATOR

Owner or Operator must sign, date and submit one completed form to the appropriate Regional Office (See attachment for Regional Office addresses, email addresses and Materials Management Contacts).

The Owner or Operator must also submit one copy by email, fax or mail to:

**New York State Department of Environmental Conservation
Division of Materials Management
Bureau of Solid Waste Management
625 Broadway
Albany, New York 12233-7260
Fax 518-402-9041
Email address: SWMFannualreport@dec.ny.gov**

I certify, under penalty of law, that the data and other information identified in this report have been prepared under my direction and supervision in compliance with a system designed to ensure that qualified personnel properly and accurately gather and evaluate this information. I am aware that any false statement I make in such report is punishable pursuant to section 71-2703(2) of the Environmental Conservation Law and section 210.45 of the Penal Law.

John Hughes
Signature

2-19-19
Date

John Hughes
Name (Print or Type)

President
Title (Print or Type)

COP3PP@gmail.com
Email (Print or Type)

6257 Ptd 2
Address

Stanfordville
City

NY 12581
State and Zip

(914) 451-7601
Phone Number

ATTACHMENTS: ☒ YES ☐ NO

facility did not have any exceedances. The NOI for GP-0-17-004 was submitted on March 9, 2018, and the facility is covered under MSGP Sector M for Auto Salvage Yards.

During the Inspection EPA was able to perform a facility walkthrough of the entire site. The facility consists of an auto salvage and dismantling which has been in operation for approximately 30 years under the name John Hughes Used Auto. Approximately two months prior to the EPA inspection, the owner got a license to become an auto dealer, towing and repair shop under the name L & S Auto Repair Foreign and Domestic with the NY State registered motor vehicle and repair shop number No 7056165. The facility has a two-bay maintenance garage. Inside the garage there is a floor drain that representatives were unaware of the destination. The owner said the garage was built in 1948 and the floor drain was installed originally with the building. All automotive and dismantling takes place inside the garage or in the driveway. Petroleum tanks were noted in the garage without secondary containment. The facility did not have a parts washer or any bulk petroleum stored on site. The facility has two large storage lots where the vehicles are kept until scrap. The vehicles are drained of all fluids before going into storage and are either towed or pushed into the storage areas. During the walk through of the yards, EPA noted various locations where batteries, petroleum tanks, engines and transmissions were left outside uncovered on top of native soil.

The following areas were identified as potential noncompliance items and areas of concern at the time of the CEI:

Potential Noncompliance Items

1. In accordance with Part III of the Permit, a SWPPP shall be developed and implemented by the owner or operator for each facility covered by this permit. At the time of the inspection, EPA noted multiple locations where batteries or cores were being stored outside and not in the designated location in accordance with the approved SWPPP. (WIN_20180912_11_46_23_Pro, WIN_20180912_11_46_57_Pro).
2. In accordance with Part III of the Permit, a SWPPP shall be developed and implemented by the owner or operator for each facility covered by this permit. At the time of the inspection, EPA noted multiple locations where engines, transmissions or petroleum tanks were being stored outside and not in the designated location in accordance with the approved SWPPP. (WIN_20180912_11_22_13_Pro, WIN_20180912_11_24_36_Pro, WIN_20180912_11_30_54_Pro, WIN_20180912_11_38_15_Pro, WIN_20180912_11_45_00_Pro, WIN_20180912_11_47_14_Pro, WIN_20180912_11_49_30_Pro).
3. In accordance with Part III of the Permit, a SWPPP shall be developed and implemented by the owner or operator for each facility covered by this permit. At the time of the inspection, EPA noted multiple locations where various parts were stored in home heating oil tanks that had been cut in half and not in the designated location in accordance with the approved SWPPP. (WIN_20180912_11_23_35Pro, WIN_20180912_11_30_13_Pro, and WIN_20180912_11_31_13_Pro).
4. In accordance with the permit GP-0-12-001 Part IV.A.2, Part IV.B.3, Part IV.C.2. and Part IV.E.3 the facility is required to perform monitoring and analysis. During the inspection, EPA noted that the facility has not performed the required inspections, including, but not limited to: quarterly visual inspections, annual dry weather, and visual wet weather for a period of at least 3 years.

Areas of Concern

1. During the inspection EPA noted a floor drain in the maintenance garage. Onsite representatives indicated that they did not know the destination of the floor drain but noted that it had been in the garage since 1948 when the garage was built. If the floor drain leads outside the building and not into a containment tank, the floor drain would be considered a process waste water discharge point and would require an individual SPDES permit. (WIN_20180912_11_21_20_Pro, WIN_20180912_11_51_47_Pro).

C. CLOSING CONFERENCE

A closing conference was held with the facility representative where the requirements of the Stormwater permit were fully explained. During the closing conference EPA allowed for any additional questions to be asked and compliance assistance was provided at that time.

D. ATTACHMENTS

Photographs

Photo Log

On 09-12-18 epa conducted an inspection of my facility, and stated that there were violations concerning core storage and abandoned drain in the dismantling area of the garage. On 11-12-18 I received the official charges from the epa. Here is the timeline of compliance.

09-17-18 iron rotors and aluminum cores stored in 250 gal. perfectly clean oil tanks removed and disposed of at baroni scrap. 09-15-18 cemented drain in dismantling garage. On 09-20-18 installed secondary confinement under 55 gal. drums containing waste oil and antifreeze. 11-26-18 removed more aluminum cores to baroni scrap. on 11-26-18 shipped 38 batteries to baroni scrap. On 12-04-18 had vaz-co remove waste oil and antifreeze. On 12-11-18 james environmental conducted a comprehensive site compliance review and all violations had been brought into compliance.