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State of Ohio Environmental Protection Agency

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P.O. Box 1049  
Columbus, OH 43216-1049

January 2, 2008

Mr. Ron Gill  
AAMCO Transmissions  
6450 E. Main St.  
Reynoldsburg, OH 43068

Re: **AAMCO Transmissions  
OHD982613598 (CESQG)  
Franklin County**

Dear Mr. Gill:

Thank you for your time during my inspection visit on December 12, 2007 to review the status of hazardous waste generation activity at the AAMCO Transmissions facility at 6450 E. Main Street. in Reynoldsburg. Your business had notified Ohio EPA as a small quantity generator (SQG) but now appears to be a conditionally exempt small quantity generator (CESQG) of hazardous waste. Ohio's laws under Chapter 3745 of the Ohio Administrative Code and Chapter 3734 of the Ohio Revised Code establish a system for safe and responsible management of hazardous waste and used oil.

One violation was noted:

**Used Oil Tank Marking, OAC rule 3745-279-22(C):** Tanks accumulating used oil (and their filler pipes if in a different location) must be marked as "used oil".

Two used oil accumulation tanks and a draining rack piped to one of the tanks were unmarked and lacked the required marking as "Used Oil".

*Please make the required corrections and send photos showing the proper marking is provided.*

Enclosed is a copy of the checklist that was completed for this inspection Our website, [www.epa.state.oh.us/dhwm](http://www.epa.state.oh.us/dhwm), provides links to copies of Ohio hazardous waste rules.

It may be possible to extend the service life of your parts cleaning solvent and save money by installing a filter on the side of the unit or by using a two-stage cleaning approach. More information is enclosed.

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

Mr. Ron Gill  
AAMCO Transmissions  
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**I look forward to receiving the follow-up photos from you in about 30 days.** Should you have any questions, please feel free to call me at (614) 728-3885

Sincerely,

*copy*

J. David Hohmann  
Environmental Specialist  
Division of Hazardous Waste Management  
Central District Office

Enclosure

c: Tammy McConnell, DHWM/CO  
CDO File

JDH/nsm AAMCO NOV

**"Notice: Ohio EPA's failure to list specific deficiencies/violations in this letter does not relieve your company from having to comply with all applicable regulations."**

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

**PROHIBITIONS**

1. Does the generator manage used oil in a surface impoundment or waste pile? Yes  No  N/A   
 2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes  No  N/A   
 3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? Yes  No  N/A

*RMK: A 'Clean Burn' used-oil-fired space heater was installed about 4 years ago and is used for supplemental heat in winter months.*

**GENERATOR STANDARDS**

4. Does the generator mix hazardous waste with used oil? If so Yes  No  N/A   
 a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] Yes  No  N/A   
 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  No  N/A   
 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  No  N/A   
*RMK: Used oil drains from a bench area were piped to a subfloor 50-gallon tank, then pumped into a 250-gallon steel tank (all indoors) which fed the space heater.*  
 7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes  No  N/A   
 8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] *RMK: The tanks and bench area lacked this required marking.* Yes  No  N/A   
 9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]  
 a. Stopped the release? Yes  No  N/A   
 b. Contained the release? Yes  No  N/A   
 c. Cleaned up and properly managed the used oil and other materials? Yes  No  N/A   
 d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes  No  N/A

*RMK: Shop areas were free of oil spillage and there was no evidence of any oil releases.*

**ON-SITE BURNING IN A SPACE HEATER**

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] N/A  
 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  No  N/A   
 b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes  No  N/A

**COLLECTION CENTERS AND AGGREGATION POINTS**

N/A



*World's Largest Transmission Specialists*

*Ron Gill*

6450 E. MAIN ST.  
 REYNOLDSBURG, OHIO 43068

Tel: 614-866-4262  
 Fax: 614-866-3565

AAMCO Transmission, 12-12-2007  
 OHD982618598  
 CESQG, Used Oil Generator

# CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS

CESQG:  $\leq 100$  kg. or approximately 25-30 gallons of waste in a calendar month; or  $< 1$  Kg. of acutely hazardous waste.

## WASTE EVALUATION

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes  No  N/A

## GENERATOR CLASSIFICATION

2. Does the generator produce  $< 100$  kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes  No  N/A

## 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  No  N/A

## TREATMENT OF HAZARDOUS WASTE

*N/A, no HW treatment was being done on site*

## REMARKS

- Parts washing was done in an aqueous dishwasher-style unit, from which about half a gallon of used oil was skimmed about once per week.
- In addition, low-flash mineral spirits solvent was being used in an immersion-type parts washing tank (with estimated capacity of 60 gallons) from which about 25 gallons of ignitable spent solvent waste was generated every 3 months. The ignitable solvent waste was being mixed with used oil and burned for energy recovery in the on-site space heater.
- Used antifreeze was being collected for recycling by Central Ohio Waste Oil (about 55 gallons in 6 months).