



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Central District Office

MAILING ADDRESS:

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Columbus, Ohio 43215

TELE: (614) 728-3778 FAX: (614) 728-3898
www.epa.state.oh.us

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

April 13, 2007

Re: Fleet Mobile Service
Non-notifier
Licking County

Mr. Don Phillips
Fleet Mobile Service, Inc.
24 Cedar Park Boulevard
Pataskala, OH 43062

Dear Mr. Phillips:

Thank you for your assistance during my inspection at your facility at 24 Cedar Park Boulevard in Pataskala on April 3, 2007. Ohio EPA had received a complaint (#3101) regarding management of used oil and other fluids at your facility. 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. This letter summarizes my findings.

The following violations were noted:

1. **Used Oil Container and Tank Marking, OAC rule 3745-279-22(C):** Containers and tanks of used oil must be clearly labeled or marked, "Used Oil".

A 250-gallon storage tank and eight 55-gallon drums of used oil inside the building, plus three drums outside the building believed to contain used oil and water mixtures each lacked marking as "used oil".

Please provide proper labeling/markings of these items and send photos showing that you have corrected this problem.

2. **Waste Evaluation, OAC rule 3745-52-11:** Wastes generated at the facility must be adequately evaluated to determine if they are regulated under these rules.

Two drums in the storage yard and one drum near the front of the building were believed to contain oil/water mixtures. Two partial 55-gallon drums and two full drums were believed to contain off-spec fuel mixtures of diesel and gasoline.

Please confirm the contents of these drums and mark them appropriately. Off-spec fuel may be able to be given to a used oil recycler for fuels blending. Please send a description of steps taken to correct this problem.

Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Mr. Don Phillips
Fleet Mobile Service, Inc.
Page - 2 -

In addition to the above-noted violations, the following comments are also offered:

- ▶ A storage rack for lead acid batteries is located inside the building. Batteries were also stacked on a pallet outside the building, exposed to the elements. Storage of these items indoors is recommended to protect against possible leaks, spills or deterioration. You indicated that the batteries are periodically sent to a recycler.
- ▶ Although the used oil recycler companies may be able to take other items such as off-spec fuel mixtures, it is usually advisable to keep such.
- ▶ Used oils that are generated by your staff servicing customer-owned trucks at other locations are brought to your shop and used as fuel in the space heater in your building. This is fine, but used oils should not be accepted for this purpose if generated from other businesses.
- ▶ For our own internal tracking purposes only at this time, Ohio EPA is assigning a Hazardous Waste I.D. number to this facility location.

Thank you for your efforts to address these matters. If you have any questions now or in the future about such matters, do not hesitate to call me at (614) 728-3885.

Sincerely,



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

c: Tammy McConnell, DHWM/CO
Stan Robinson, City of Pataskala
CDO File

DH/c Fleet Mobile NOV

Notice:

Ohio EPA's failure to list specific deficiencies/violations in this letter does not relieve your company from general obligations to comply with all applicable regulations.

E-mail this completed form to tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office	Environmental Protection Agency RCRA SUB: LE C SITE IDENTIFICATION/VERIFICAT. FORM		For Ohio EPA use only																		
2. Site EPA ID No.	EPA ID Number: (unassigned)																				
3. Site Name	Name: Fleet Mobile Service		Website (optional:)																		
4. Site Location Information	Street Address: 24 Cedar Park Blvd.																				
	City, Town, or Village: Pataskala	State: OH																			
	County Name: Licking	Zip Code: 43062																			
5. Site Land Type (check only one)	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	X									
Private	County	District	Federal	Indian	Municipal	State	Other														
X																					
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A.		B.																		
7. Facility Representative: Additional names can be recorded in number 12. Only provide address information if it is different than the site address.		First Name: Don MI: Last Name: Phillips																			
		Phone Number: 740-964-7900		Phone Number Extension:																	
		E-Mail Address:																			
		Fax Number:		Fax Number Extension:																	
		Street or P.O. Box:																			
		City, Town or Village:		State:	Country: Zip Code:																
8. 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.	A. Name of Site's Legal Owner: Thaimany Sonmuck		Date Became Owner (mm/dd/yyyy):																		
	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Owner Type: Mark with an X</td> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td></td> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other		X							
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		X																			
	Street or P.O. Box:																				
	City, Town, or Village:		Owner Phone #:																		
	State:		Country:	Zip Code:																	
	B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):																		
	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Operator Type: Mark with an X</td> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other									
	Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other												
Street or P.O. Box:																					
City, Town, or Village:		Operator Phone #:																			
State:		Country:	Zip Code:																		
9. Violations Cited?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No																			

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

Not Regulated

A. Hazardous Waste Activities

(choose only one of the following categories)

- UNKNOWN: Cited for violation of 3745-52-11
- a. Large Quantity Generator (LQG):
- b. Small Quantity Generator (SQG)
- c. Conditionally Exempt Small Quantity Generator
- d. United States Importer of Hazardous Waste
- e. Mixed Waste (hazardous and radioactive) Generator

- 3. Treater, Storer or Disposer of Hazardous Waste
- 4. Recycler of Hazardous Waste
- 5. Exempt Boiler and/or Industrial Furnace
 - a. Small Quantity On-site Burner Exemption
 - b. Smelting, Melting, Refining Furnace Exemption
- 6. Underground Injection Control Facility

B. Universal Waste Activities

- 1. Small Quantity Handler of Universal Waste
(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):
 - 2. Large Quantity Handler of Universal Waste
(accumulates 5,000 kg or more).
 - 3. Destination Facility for Universal Waste
(Check all boxes below that apply for each of the three types of facilities above.)
- | | Generated | Accumulated |
|----------------|--------------------------|--------------------------|
| A. Batteries | <input type="checkbox"/> | <input type="checkbox"/> |
| B. Pesticides | <input type="checkbox"/> | <input type="checkbox"/> |
| C. Thermostats | <input type="checkbox"/> | <input type="checkbox"/> |
| D. Lamps | <input type="checkbox"/> | <input type="checkbox"/> |

C. Used Oil Activities

- 1. Used Oil Generator
- 2. Used Oil Transporter Indicate Type(s) of Activity(ies)
 - Transporter
 - Transfer Facility
- 3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)
 - Processor
 - Re-refiner
- 4. Off-Specification Used Oil Burner
- 5. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)
 - a. Marketer Who Directs Shipment of Off-Specification Oil
 - b. Used Oil to Off-Specification Used Oil Burner

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

N/A

12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

Y / N	Announced ?	Additional Facility Representatives:
Y / N	Tanks?	Other comments: Complaint regarding management of off-spec fuel and used oil. Narrative inspection report in DHWM-CDO files. Facility burns their own used oil in a space heater. Lead acid batteries are also generated and accumulated.
Y / N	Containers?	

13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
David Hohmann		4-3-2007 13:10

~~14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.~~

Signature of owner, operator, or an authorized representative	Name and Title (Print)	Date (mm-dd-yyyy)
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PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Fleet Mobile Services Type: CESQG, Used oil generator Inspection Date: 4/3/2007 EPA ID#: unassigned

Waste Generated			On- or Off-Site Management		P2 Activities	
Process / Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>+ EPA Waste Code, if applicable</small>	QTY Generated per Month; Type of Accumulation & location of waste accumulation	Type of On-Site Treatment, if any	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1 parts cleaning	spent solvent (D001)	<1 gallon per month	N/A	unknown. mixed with used oil to be recycled or burned in space heater.	change out only as needed, very infrequently	
2 vehicle maintenance activities on and off site by company personnel	used oil	20 gal/month est. held in drums and tank indoors, and some 55-gallon drums outdoors	burned in space heater on site	N/A. Oil/water mixtures are accumulated on site and sent for management by a recycler (fuels blending) such as Central Ohio Oil.	Oils without water are burned in space heater for energy recovery	labeling of containers and tank is needed. Storage indoors would be more protective.
	used oil filters	5-10 per month est. draining over drum in the building	draining for far more than 24 hours	after draining, these are combined with scrap metals and recycled to Columbus Auto Shredding	recycling as scrap metal	puncturing before hot draining will be more effective to remove the oil contents.
	Used lead acid batteries	5 per month est.	n/a	local battery vendors take these for recycling	recycled as lead acid batteries	storing indoors or under cover would be more protective
3 Vehicle repair and emptying of gas tanks	off-spec fuels (diesel, gasoline +/- water)	four 55-gallon drums	N/A	send to used oil recycler	not really able to burn in most equipment they own.	storing indoors or under cover would be more protective. labeling of containers is advised.

REMARKS-GENERAL INFORMATION

See Inspection narrative report.



CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET

CESQG: $\leq 100\text{Kg}$. (Approximately 25-30 gallons) of waste in a calendar month or $< 1\text{ Kg}$. of acutely hazardous waste.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used: Steel-toed boots.

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 $< 100\text{ kg}$. of hazardous waste per month? Yes No N/A
[conditionally exempt small quantity generator ("CESQG")]

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

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]

REMARKS

- a. There was no record of any past off-site shipment of any hazardous wastes. Two partial 55-gallon drums and two full drums believed to contain off-spec fuel mixtures of diesel and gasoline. Two other drums in the storage yard and one drum near the front of the building were believed to contain oil or oil/water mixtures. The contents needed to be confirmed, and properly managed by shipping to a recycler or disposal facility permitted to accept such materials.
- b. Spent solvent may occasionally be generated from a parts-washing unit. Because the business is a CESQG, it may be possible to manage this along with used oil and shipped to a recycler, if that recycler is willing to accept such materials.



USED OIL INSPECTION CHECKLIST (Short Version)

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? Yes ___ No N/A ___ RMK# ___
If so: [N/A]
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No N/A ___ RMK# ___
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes No N/A ___ RMK# a

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes No N/A ___ RMK# ___
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 RMK# ___
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes No
N/A ___ RMK# ___
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 ___ RMK# ___
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes ___ No
N/A ___ RMK# b
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 ___ RMK# ___
- b. Contained the release? Yes No N/A ___ RMK# ___
- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A ___ RMK# ___
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A ___ RMK# ___
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes No ___ N/A ___
RMK# a
- 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 ___ RMK# ___
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A ___
RMK# ___
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A ___
RMK# ___
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation / tolling agreements)? [3745-279-24] Yes No
N/A ___ RMK# ___

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes No
N/A RMK#
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes No
N/A RMK#
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes No
N/A RMK# c

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes No N/A RMK# d

C:\Documents and Settings\dhohmann\My Documents\JDH\OEPA Compliance\Complaints\Fleet Mobile Services\Fleet Mobile used oil cklst.wpd

REMARKS

- a. Used oil is burned on site in a space heater that meets the requirements of OAC rule 3745-279-12(C)(2)(c) and, by reference, OAC rule 3745-279-23. The unit is a "clean burn 2500" furnace.
- b. A 250-gallon storage tank and about 8 55-gallon drums of used oil inside the building, plus three drums outside the building that were believed to contain used oil and water mixtures each lacked the proper marking as "used oil".
- c. See above. Tanks and containers lacked the proper markings.
- d. Answer to this question (redundant) is covered in the CESQG checklist, also completed.