



Environmental  
Protection Agency

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

58  
**FILE COPY**

June 30, 2011

Mr. Charles Crites  
Crites Restoration  
13155 US RT 23 SB  
Ashville, OH 43113

**Re: Crites Restoration  
Pickaway County  
Non-notifier**

Dear Mr. Crites:

On June 22, 2011, I conducted a complaint investigation of your 13155 US Rt. 23 facility in Ashville, Ohio to determine its compliance with Ohio's hazardous waste laws and Used Oil Rules as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). The complainant stated that the facility was chronically dumping waste chemicals. Upon investigation there was no evidence of dumping, however, issues were found in the oil storage area next to the metal shop.

Crites Restoration is in violation of the following Ohio used oil rules. In order to correct these violations you must do the following and send me the required information ***within 30 days of your receipt of this letter.***

**1. 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 the containers being used to collect oil from the metal shop were not labeled with the words "Used Oil."

Crites Restoration needs to label the used oil containers and submit a photo to me.

**2. Used Oil Generator Standards [OAC 3745-279-22(D)]**

The generator upon detection of a release of used oil must clean up and properly manage the used oil and other materials. The ground around the used oil drums was heavily stained with oil.

Photos submitted on 6-22-11 show that this area has been addressed. No further action is necessary.

Mr. Charles Crites  
Crites Restoration  
Page -2-

Enclosed you will find a copy of the checklists that we completed as a result of the inspection. Should you have any questions, please feel free to call me at (614-728-3884). You can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dmwm/>.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Maneff". The signature is written in a cursive style with a large initial "P" and "M".

Peter Maneff  
District Representative  
Division of Materials and Waste Management  
Central District Office

Enclosure

c: CDO File

PM/nsm Crites RestorationComplaint

Send to Central Office <input type="checkbox"/>	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE</b> <b>IDENTIFICATION/VERIFICATION FORM</b>	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to [paula.canter@epa.state.oh.us](mailto:paula.canter@epa.state.oh.us).

<b>Site EPA ID No.</b> <b>Site Name</b>	EPA ID Number: <b>Non-Notifier</b>		Website: (Optional)								
<b>Site Location Information</b>	Name: <b>Crites Restoration</b>		Street Address: <b>13155 US Rt 23</b>								
<b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	City, Town, or Village: <b>Ashville</b>	State: <b>OH</b>									
	County Name: <b>Franklin</b>	Zip Code: <b>43113</b>									
	<table style="width:100%; border-collapse: collapse;"> <tr> <td style="text-align: center; border: 1px solid black;">Private <input checked="" type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">County <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">District <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Federal <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Indian <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Municipal <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">State <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Other <input type="checkbox"/></td> </tr> </table>	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"/>		
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<b>Facility Representative</b>  Additional names can be recorded in number 12.  Only provide address information if it is different than the site address	First Name: <b>Charles</b>		MI:	Last Name: <b>Crites</b>	
	Title: <b>Owner</b>		Phone Number Extension:		
	Phone Number:		E-Mail Address:		
	Fax Number:		Fax Number Extension:		
	Street or P.O. Box:		City, Town or Village:		
	State:		Zip Code:		

<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: <b>Charles Crites</b>		Date Became Owner (mm/dd/yyyy):																
	Owner Type:	<table style="width:100%; border-collapse: collapse;"> <tr> <td style="text-align: center; border: 1px solid black;">Private <input checked="" type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">County <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">District <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Federal <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Indian <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Municipal <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">State <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Other <input type="checkbox"/></td> </tr> </table>	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"/>	<table style="width:100%; border-collapse: collapse;"> <tr> <td style="text-align: center; border: 1px solid black;">Federal <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Indian <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Municipal <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">State <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Other <input type="checkbox"/></td> </tr> </table>				Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
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	Street or P.O. Box:		Owner Phone #:																
	City, Town or Village:		State:		Country: <b>USA</b>	Zip Code:													
	Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):																
	Operator Type:	<table style="width:100%; border-collapse: collapse;"> <tr> <td style="text-align: center; border: 1px solid black;">Private <input checked="" type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">County <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">District <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Federal <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Indian <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Municipal <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">State <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Other <input type="checkbox"/></td> </tr> </table>	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"/>	<table style="width:100%; border-collapse: collapse;"> <tr> <td style="text-align: center; border: 1px solid black;">Federal <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Indian <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Municipal <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">State <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Other <input type="checkbox"/></td> </tr> </table>				Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
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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:		Operator Phone #:																
	City, Town or Village:		State: <b>OH</b>		Country: <b>USA</b>	Zip Code:													

<b>VIOLATIONS CITED?</b>	<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

**TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)**

<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Hazardous Waste Transfer Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility
<input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Receives Hazardous Waste from Off-site

**UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY))**

<input type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	

**CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES**

Batteries  
 Pesticides  
 Mercury containing equipment  
 Lamps

**USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))**

Used Oil Generator  
 Used Oil Transporter  
 Used Oil Transfer Facility  
 Used Oil Processor  
 Used Oil Re-refiner  
 Off-Specification Used Oil Burner  
 Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil  
 Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

**Eligible Academic Entities with Laboratories:** Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

College or University  
 Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university  
 Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

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

**COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.**

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Containers	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Peter Maneff		06/22/2011

**Comments:**

**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](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](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  No  N/A

a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] Yes  No  N/A

*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  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

*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  No  N/A

a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] Yes  No  N/A

*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  No  N/A

*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  No  N/A

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)] Yes  No  N/A

9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] Yes  No  N/A

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

<b>ON-SITE BURNING IN SPACE HEATER</b>		
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).</i>		
<b>GENERATOR TRANSPORTATION</b>		
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).</i>		
<b>COLLECTION CENTERS AND AGGREGATION POINTS</b>		
13.	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.</i>		

\*\*\*\*\*

**PROCESS DESCRIPTION SECTION**

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

Crites Restoration is a small job shop making fiberglass body panels for cars and trucks. The production shops are located in out buildings and pole barns throughout the property. Each one of these locations is run on a contract basis with Crites Restoration providing the parts orders. Parts are formed in molds with a resin and hardening agent. Any waste generated from this process is fully catalyzed before disposed of with Local Waste. Crites also has a small metal fabrication shop onsite that periodically generates used oil, which is disposed of on an as needed basis.

\*\*\*\*\*

**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 facility.

Used oil is generated by the metals shop and is stored in 55 gallon drums on the north side of the building. It is disposed of on and as needed basis, currently they had accumulated four 55 gallon drums.

# Emergency Response Section - Initial Pollution Incident Report (IPIR)

6/21/2011

Spill Id Number: 1106-65-2134//0

District: CD

<b>Reported By:</b> OSCAR ALLEN	<b>Reported:</b> 06/21/2011 09:52
<b>Title:</b> CIT	<b>Discovered:</b> 06/20/2011 12:00
<b>Telephone:</b> (740) 497-5092 <b>ext:</b>	<b>Occurred:</b> 00/00/0000
<b>Affiliation:</b> CITIZEN	<b>Chronic:</b> Y

**County:** PICKAWAY **City/Township:** ASHVILLE  
**Did Spiller Report ?** N **Complaint ?** Y  
**Received By:** HOLMES, CHRIS **Priority:** 4  
**Local EPC ?** N **Did you tell the Spiller to Call the N.R.C ?** N  
**Business:** N **SARA Report:** N

<b>Suspected Spiller:</b> CRITES RESTORATION
<b>Mailing Address:</b> 13155 US RT 23 SB ASHVILLE, OH 43113
<b>Telephone:</b> (000) 000-0000 <b>ext:</b>

**Location:** 13155 US RT 23 SB

**Source:** FIXED FACILITY - INDUSTRY - FIELD

**Cause:** DUMPING / DISPOSAL

**Reason:** SLOPPY OPERATION

**Waterways Affected:** N/A

**Media Affected 1:** LAND OR LAND SURFACE

**Media Affected 2:**

**Media Affected 3:**

## Product(s) Spilled

Product	Amount	UOM	RQ	Size	Type	EHS
CHEMICAL WASTE	.0	UNK	.0	U	WC	N

## Other Agencies Notified

Agency	Person	Date	Time
DHWM	CDO	06/21/2011	09:56

## Remark

CHRONIC DUMPING OF WASTE CHEMICALS AT ABOVE LOCATION. EMPLOYEES DUMP WASTE AROUND THE BUILDING. ISSUE IS CHRONIC.



Crites Restoration, Unlabeled Used oil drums .

Crites Restoration, Used oil Spilled on the ground.

