



State of Ohio Environmental Protection Agency

Southwest District Office

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

June 22, 2007

Mr. Wade Pettengill  
790 Perching Road  
Raleigh, North Carolina 27608

**Re: Complaint Investigation-Jiffy Lube Store # 2400 and #1306**

Dear Mr. Pettengill:

On May 23, 2007, Steve Roth and I representing Ohio EPA visited your Jiffy Lube Stores in regard to a complaint received in our office alleging a release of used motor oil through a sump and through spills during transfer to the storage tanks. Based upon the inspection of the Jiffy Lube Stores, the complaint was deemed to have some validity. The following violations of Ohio's hazardous waste rules were noted:

**Used Oil Storage Requirements for Generators., OAC 3745-279-22(c)(1):**

This rule states that containers and aboveground tanks used to store used oil shall be labeled or marked clearly with the words "Used Oil". During the inspection, it was noted that the containers used to collect and transfer used oil located at your stores were not labeled as required by this rule. Please label the drip pans and buckets used to temporarily store used oil until it can be transferred to the storage tank(s) at both store locations with the words "used oil".

**Used Oil Storage Requirements for Generators., OAC 3745-279-22(c)(2):**

This rule states that piping used to transfer used oil to underground storage tanks shall be labeled or marked clearly with the words "Used Oil". During the inspection, it was noted that the piping used to transfer used oil to the underground storage tank was not labeled as required by this rule. Please label the piping at Jiffy Lube Store # 1306 with the words "used oil".

Additionally, I asked to see shipping receipts for the disposal of your used oil. Thank you for submitting copies of the shipment/disposal records via electronic mail on May 24, 2007.

As a result of our inspection of the used oil storage tank and the disposal records we identified a storage tank large enough to require a Spill Prevention, Control, and Countermeasures Plan (SPCC Plan). A copy of the SPCC Plan for Jiffy

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#

*NO USED OIL BURNED*

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 or tolling agreements)? [3745-279-24]

Yes  No  N/A  RMK#

*GENEROIL  
: NOBLE OIL (800) 662-5364  
CITIZEN WORKER*

**USED OIL COLLECTION CENTERS AND AGGREGATION POINTS**

*None required*

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#

**WASTE EVALUATION**

15. Have all wastes generated at the facility been evaluated? [3745-52-11]

Yes  No  N/A  RMK#

C:\bkm\Bmarlatt\Temporary Internet Files\Content.IE5\E7ORW3Y1\USED OIL.SHORT.11.2004.fin.megaset[1].wpd

**REMARKS**

*PAM HOUSE  
6395 BEECHMONT TRL  
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