



State of Ohio Environmental Protection Agency

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Southwest District

401 East Fifth Street  
Dayton, Ohio 45402-2911

TELE: (937)285-6357 FAX: (937)285-6249  
www.epa.state.oh.us

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

February 1, 2007

Mr. Robert Beedle  
2783 West Hwy 22 & 3  
Wilmington, OH 45177

**Re: Complaint Investigation, Robert Beedle Trucking, Clinton County**

Dear Mr. Beedle:

On January 23, 2007, Ohio EPA visited your shop in response to a complaint received by our office alleging the mismanagement of used motor oil at your address. Based upon the inspection of your shop the complaint was deemed to be unfounded. However, the following violation of Ohio's hazardous waste rules was 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 two tanks of used oil located inside your shop were not labeled as required by this rule. One tank was used to settle solids out of the oil and the other tank was used to store oil for a used oil burning furnace. The words "used oil" were written on the frame holding the two tanks. **The violation was corrected at the time of the inspection.**

Scrap tire storage issues discussed during the inspection will be described in a letter from Ohio EPA's Division of Solid and Infectious Waste Management. Enclosed you will find a copy of the checklist that was completed during the inspection. You can find copies of the rules and other information on the division's web page at [www.epa.state.oh.us/dhwm](http://www.epa.state.oh.us/dhwm). Ohio EPA also has helpful information about pollution prevention at the following web address: [www.epa.state.oh.us/opp](http://www.epa.state.oh.us/opp). Should you have any questions, please feel free to contact me at (937) 285-6083.

Sincerely,

  
Brian Marlatt

Division of Hazardous Waste Management

cc: Dinah Crawford, SWDO-DHWM/SWDO File  
Maria Lammers, Ohio EPA/SWDO/DSIWM

BM/plh

**NOTICE:**

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



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## USED OIL INSPECTION CHECKLIST (Short Version)

**NOTE:** This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.

### PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_  
Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes \_\_\_ No  N/A  RMK# \_\_\_
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# \_\_\_

### 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# 1
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. 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# \_\_\_  
*USED OIL BURNED IN FURNACE*

**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# \_\_\_

**WASTE EVALUATION**

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

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**REMARKS**  
 1) USED OIL TANK LABELED AT THE TIME OF THE INSPECTION *ben*



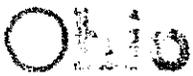
**2427**

**Cessation of Regulated Operations**

**NOV**

**CLINTON**

**SABINA FARMERS EXCHANGE**



**Environmental  
Protection Agency**

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

January 27, 2011

**RE: Sabina Farmers Exchange (SFE)**  
OHD076795939  
Clinton County  
CRO NOV

Mr. Chris Van Meter  
Sabina Farmers Exchange  
292 North Howard  
Sabina, OH 45169

Dear Mr. Van Meter:

Thank you for meeting with Jeff Smith and me during Ohio EPA's January 10, 2011 inspection of SFE's facility located at 197 N. Jefferson St. in Sabina, Ohio. We inspected SFE with Casey Basford's assistance to determine its compliance with Ohio's Cessation of Regulated Operations (CRO) laws as found in Chapter 3752. of the Ohio Revised Code (ORC) and Chapter 3745-352 of the Ohio Administrative Code (OAC). This letter will explain the violations we found, what you need to do to correct the violations, other action items we identified and what you need to do to address these action items.

SFE bought this property from Stanley Works (SW). It is our understanding from a complaint received on November 24, 2010 that SW ceased regulated operations at the end of 2009. Since SFE is the owner of this property, you are subject to the CRO laws (which includes filling out the enclosed forms). I mistakenly identified SW as the company that would have to fill out this forms in a December 23, 2010 e-mail to you, but they are not the current owner. Given SFE may not be familiar with these forms, I can assist you in filling them out.

We found the following violations of Ohio's CRO laws. 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. Duties of Owner/Operator within 30 Days of Cessation  
(ORC §3752.06 and OAC rule 3745-352-20)**

Within 30 days of ceasing regulated operations, you must submit a notice of CRO operations to the director, the local emergency planning committee, and the fire department using form EPA 0327.

SFE has failed to submit form EPA 0327 (copy enclosed).

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Mr. Chris Van Meter  
Sabina Farmers Exchange  
January 27, 2011  
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- SFE must immediately fill out EPA 0327 and submit it to the required entities.

**2. Duties of Owner/Operator within 90 Days of Cessation  
(ORC §3752.06 and OAC rule 3745-352-20)**

Within 90 days of ceasing regulated operations, you must submit a copy of the most recent chemical inventory form submitted to the State Emergency Response Commission (SERC) in accordance with ORC §3750.08 (copy already on file with Ohio EPA, enclosed for your review), including a statement indicating whether any asbestos-containing materials are present at the facility. You must also submit a list and location of every stationary item associated with SW on site that contains or is contaminated with a regulated substance, including an identification of the regulated substance in each at the time of cessation. All stationary and non-stationary containers or vessels or transformers, vats, or tanks and their contents and debris, non-stationary equipment and furnishings, motor vehicles and rolling stock that are contaminated with a regulated substance associated with SW must be legally removed or drained from the facility.

SFE has failed to submit a copy of the most recent emergency and hazardous chemical inventory form submitted to the SERC and the most current hazardous chemical list with your written certification provided on the form prescribed by the Director (Regulated Substance & Equipment Removal 90-Day Form, EPA 0329). SFE has also failed to remove all regulated substances associated with SW at the facility. Ohio EPA discovered various maintenance and industrial chemicals, oils (some evidence of sloppy handling), computer monitors and bulbs (some broken) during our January 10, 2011 inspection. We are enclosing pictures to document what we discovered. Please note that the above ground tank that is labeled "filtered water" and "nonhazardous waste" had an oily appearance. I am enclosing guidance documents regarding universal waste bulbs, computer monitors, used oil and waste characterization.

- SFE must immediately do the following: 1) Fill out Regulated Substance & Equipment Removal 90-Day Form, EPA 0329. 2) A list of regulated substances associated with SW and a designation for each (disposal, awaiting characterization, and reuse for example). As Ohio EPA suggested to Casey Basford on January 10, 2011, we recommend that



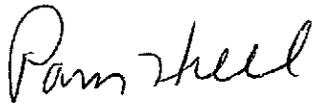
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Sabina Farmers Exchange  
January 27, 2011  
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SFE combine SW's previous inventory in one place in their various designations for organization purposes.

Should you have any questions, please feel free to call me at (937) 285-6091.

Sincerely,



Pam Hull  
District Representative  
Division of Hazardous Waste Management

Enclosure

cc: George Strobel, Ohio EPA, SWDO  
Ralph McGinnis, CAS, DHWM  
Robyn Fox, SWDO-DHWM/SWDO CRO File  
CRO File: Sabina Farmers Exchange, OHD076795939, Clinton County

PH/rb

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