

**Environmental
Protection Agency**

Gov. John Kasich, Governor
Lieke Martel, Lt. Governor
Cynthia Burse, Director

December 13, 2010

Mr. Richard Horton
Advantage Towing and Salvage
409 Bliss Avenue
Conneaut, OH 44030

RE: ADVANTAGE TOWING AND SALVAGE, NON-NOTIFIER, ASHTABULA COUNTY, COMPLAINT #7389, COMPLIANCE EVALUATION INSPECTION, NOTICE OF VIOLATION

Dear Mr. Horton:

On November 1, 2010, Ohio Environmental Protection Agency (EPA), represented by Ed Damato and me, investigated a complaint regarding Advantage Towing and Salvage (Advantage) located in Conneaut, Ohio. The complaint received by the Ohio EPA on October 27, 2010 alleged oils and other fluids were being mismanaged and that oil, gas, and antifreeze were being released onto the ground. The complainant also alleged that Freon was being vented to the atmosphere. This letter will explain:

- our findings with respect to the complaint;
- violations found during the compliance evaluation inspection (CEI) conducted;
- what you need to do to correct the violations;
- other general concerns; and
- what you need to do to respond to those concerns.

Ms. Danielle Horton accompanied us during the inspection and Mr. Michael Horton was available to answer questions with regard to the removal of coolant from vehicles when necessary.

Advantage collects used oil and transmission fluid removed from vehicles, stores the fluids (photo #1) in 55 gallon metal drums (DM), and burns the fluids for energy recovery in a furnace in the main building at the Bliss Ave. location. Used oil filters are hot drained, collected as scrap metal, and sent to Liberty Iron and Metal in Liberty, OH. Used oil that has been contaminated with water is transported by Advantage, in your vehicle, to your Kingsville location where it is separated and burned in an oil burning furnace there. Ms. Horton informed us that Advantage serves as a used oil collection site for an external used oil generator and that this used oil is also burned in your furnace at the Conneaut location.

Antifreeze collected is filtered and transported by you to your Kingsville location where it is sold. Radiator fluid is also filtered and reused or sold. Any gas collected from vehicles is used in company vehicles. When necessary, Freon is removed by Mr. Michael Horton who was certified by VGi Training as a Technician Type I, II, as required by 40 CFR 82, Subpart F. Mr. Horton brings equipment from the Kingsville location to Bliss Ave., when necessary, to remove the Freon which is reused at the Kingsville location.

Mercury switches collected from vehicles are mailed to ELVS (End of Life Vehicle Solutions) in Farmington Hills, Michigan. We observed the switches being collected on-site in a closed five gallon pail. Batteries are recycled at Direct Recycling in Geneva, OH.

During the inspection, we observed violations of Ohio's used oil and universal waste regulations found in Chapter 3745. of the Ohio Administrative Code (OAC). It appears that **the complaint was partially valid**; i.e., we did observe releases of used oil and vehicle fluids on the ground. The locations (near the vehicle lift, in the used oil drum storage area, and in the Unloading Building) and the surface area of soil and gravel observed with contamination indicate the releases to be housekeeping issues. As no Freon was being removed from any of the vehicles during the time of our inspection, this part of the complaint could not be evaluated. However, Advantage does have a technician available with a certificate of completion for training as required by 40 CFR 82, subpart F. This technician would be qualified to remove Freon using approved recovery equipment.

I have included a copy of the checklists used during the inspection. The following violations and concerns were noted. Please address each of them immediately and submit the requested information within 30 days of the date of this letter.

VIOLATIONS

1. Used Oil – OAC rule 3745-279-31 Used oil collection centers.

This rule requires that owners or operators (o/o) of all used oil collection centers...

- (1) comply with the generator standards in rules 3745-279-20 to 3745-279-24 of the Administrative Code; and
- (2) be registered with Ohio EPA, on a form prescribed by the director, to manage used oil.

Advantage has not registered as a used oil collection center. **You must cease accepting used oil from facilities not owned by Advantage.** To document compliance, indicate in your response that you have ceased accepting used oil from other generators or that you have registered with the Ohio EPA as a used oil collection center and are complying with the required OAC rules.

2. Used Oil - OAC rule 3745-279-22 (C) Container Labeling

In accordance with this rule, all containers of used oil must be labeled or clearly marked with the words, "Used Oil".

Numerous containers of used oil (photo #1, #2, and #3) did not have the words 'Used Oil' marked on the container.

In order **to abate this violation**, conduct a thorough inspection of your property and locate all containers (all types and sizes) of used oil and label or clearly mark them with the words, "Used Oil". We suggest you gather all the used oil containers, inspect them to ensure the containers are in good condition, i.e., none with severe rusting, no deterioration and no leaking, and stage them within one specific area, in containment if possible.

Please **submit photograph(s)** of used oil containers (all types and sizes) showing that each is labeled or clearly marked with the words, "Used Oil". Also explain in your response who will be responsible for insuring proper labeling in the future.

3. Used Oil - OAC3745-279-22(D) Releases

In accordance with **OAC rule 3745-279-22(D)**, upon detection of a release of used oil to the environment....a generator must perform the following.....

- (1) Stop the release;
- (2) Contain the released used oil;
- (3) Clean up and manage properly the released used oil and other materials (e.g., soil and gravel);
- (4) If necessary, repair or replace any leaking containers prior to...using them for used oil storage.

We observed used oil releases just outside the door on the southeast side of the main building (photo #2), in the loading building (photo #3), and under the lift, behind the main building, used to discharge fluids from vehicles. Advantage uses containment vessels in the lift area while discharging fluids from vehicles; however there was evidence of release(s) to the ground.

In order **to abate this violation**, Advantage must clean up these areas to visual cleanup standards. This is achieved by excavating the contaminated materials until there is no visible evidence of the release(s). Advantage will need to determine if the excavated material is a hazardous waste (i.e., were there chemicals in addition to the oil contaminating the ground such as flammable liquids or electrolyte from vehicle batteries) and manage it appropriately. If Advantage can determine the contamination is solely oil, the excavated materials would not be a hazardous waste.

Submit to me your written waste determination as well as a description of how/where the soil was disposed. Also submit photographs documenting the cleanup of the areas.

4. Universal Waste Batteries – OAC rule 3745-273-14(A) Labels

In accordance with **OAC rule 3745-273-14(A)**, all batteries or containers of batteries must be labeled with the words “Universal Waste – Batteries” or “Used Batteries” or “waste batteries”..

Advantage collects batteries from vehicles they receive for salvage (including lawn mowers). The batteries are stored in racks or on the ground (photo #2) of the main building. Advantage checks the batteries and those that are still useful, are sent to the Kingsville location to sell. Batteries that cannot be sold are recycled through Direct Recycling in Geneva, OH. None of the batteries observed were labeled.

To document compliance with this rule please submit a photograph showing that all of the batteries to be recycled are properly labeled during storage and prior to shipment off-site. This can include labeling each battery, or labeling the container the batteries are store in.

During the inspection, we discussed universal waste requirements for spent or waste lamps, batteries, pesticides, and mercury bearing equipment such as thermostats and switches. In addition to the requirements with respect to labeling, accumulation time on site of less than one year, and response to releases; training must be provided for all employees that handle of universal waste. Guidance on these requirements was forwarded to you shortly after the inspection. Please ensure compliance with the rules and if you have any questions, do not hesitate to contact me.

CONCERNS

Scrap Tires. We observed hundreds of scrap tires scattered throughout the property (photo #2 shows one area). Advantage informed Ohio EPA that scrap tires are cut up and taken away by Liberty Tire. However, during the inspection of the salvage yard, we observed hundreds of tires, some in the yard, some stacked along the main building, some holding down tarps, some in semi-truck trailers. Ohio EPA's Division of Solid and Infectious Waste Management (DSIWM) enforces rules pertaining to the management of scrap tires. I have copied DSIWM on this letter for their appropriate follow-up. For advice and information with regard to the proper management of scrap tires you may contact Mr. Colum McKenna at 330-963-1268.

Universal waste – lamps. You stated the lamps at Advantage had been changed out recently and, at the time of our inspection, there were no spent/waste lamps on the property. In accordance with **OAC 3745-52-11, Hazardous waste determination**, all waste, including spent bulbs/lamps, must be evaluated prior to disposal to determine if they are hazardous or non-hazardous waste.

You are required to manage your spent lamps/bulbs as either universal waste or as a hazardous waste unless you have characterized them and determined they are non-hazardous waste. The determination should be documented and all records maintained as to how the lamps/bulbs are being managed and disposed.

Websites of Interest:

- Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides compliance and pollution prevention assistance on environmental issues (including sources of funding) related to air, land, and water. <http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/ocapp>
- The Clean Air Resource Center offers help in understanding EPA air quality requirements. In addition, if your business is required to purchase new equipment, they can offer better-cost financing with special tax incentives. Their phone number is 800-225-5051 and website is <http://www.ohioairquality.org/>
- You can find copies of the regulations and other information on the Division of Hazardous Waste Management web page at <http://epa.ohio.gov/dhwm>.

Thank you for allowing Mr. Damato and me to inspect your property.

Do not hesitate to contact me, (330) 963-1279, if you have any questions with regard to the violations and/or concerns listed in this letter. **Please address each of the above violations immediately and submit the requested documentation of compliance within thirty days of the date of this letter.**

Sincerely,



Patricia Natali, Environmental Specialist
Division of Hazardous Waste Management

PN:ddw
Enclosure

cc: Colum McKenna, DSIWM, NEDO
ec: Frank Popotnik, DHWM, NEDO
Harry Sarvis, DHWM, CO

NOTICE: Failure to list specific deficiencies in this communication does not relieve Advantage Towing and Salvage from the responsibility of complying with all applicable Ohio EPA laws and regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Send to Central Office



Ohio Environmental Protection Agency
RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM

For Ohio EPA use only

Completed verification forms required to be submitted to CO should be e-mailed to paula.canter@epa.state.oh.us.

Site EPA ID No.

EPA ID Number: **Non-notifier**

Site Name

Name: **Advantage Towing and Salvage**

Website:
(Optional)

Site Location Information

Street Address: **409 Bliss Avenue**

City, Town, or Village: **Conneaut**

State: **OH**

County Name: **Ashtabula**

Zip Code:

Site Land Type

(check only one)

NAICS code(s)

www.census.gov/epcd/www/naics.html

Private

County

District

Federal

Indian

Municipal

State

Other



Facility Representative

First Name: **Danielle**

MI:

Last Name: **Horton**

Title: **Office Manager**

Additional names can be recorded in number 12

Phone Number: **440-599-7278**

Phone Number Extension:

Only provide address information if it is different than the site address

E-Mail Address: **usedparts@suite224.net or KingsvilleTowing@live.com**

Fax Number: **440-224-1213**

Fax Number Extension:

Street or P.O. Box: **409 Bliss Ave.**

City, Town or Village: **Conneaut**

State: **OH**

Zip Code:

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

Name of Site's Legal Owner: **David**

~~Richard Horton~~

Date Became Owner (mm/dd/yyyy): **05/06/03**

Owner Type:

Private

County

District

Federal

Indian

Municipal

State

Other



Street or P.O. Box: **same as above**

City, Town or Village:

Owner Phone #:

State:

Country:

Zip Code:

Name of Site's Operator:

Richard Horton

Date Became Operator (mm/dd/yyyy):

Operator Type:

Private

County

District

Federal

Indian

Municipal

State

Other



Street or P.O. Box: **same as above**

City, Town or Village:

Operator Phone #:

State:

Country

Zip Code:

VIOLATIONS CITED?

Yes No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

Not a HW Generator

UNKNOWN:

Cited for violation of 3745-52-11

Short-Term/Temporary Generator

(generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.

Large Quantity Generator (LQG)

Small Quantity Generator (SQG)

Conditionally Exempt Small Quantity Generator

U.S. Importer of Hazardous Waste

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 checked="" 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 applying into managing laboratory hazardous waste pursuant to OAC rules 3745-50-000 through 3745-50-218. Check the boxes 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 Yes No Additional Facility Representatives: **Michael Horton**
Tanks Yes No
Containers Yes No

Name of Inspector(s) Name of Inspector(s) Date of Inspection/Time
Patricia Natali **Ed Damato** (mm/dd/yyyy) (hh:mm)
11/01/2010

Comments:
Complaint investigation, complaint# 7389. Facility accepts used oil from a used oil generator. They were told to cease the practice until and unless they register with OHio EPA and then they are required to comply with rules 3745-279-20 to 279-24.

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Advantage Towing and Salvage **Facility Type:** Non-Notifier **Date of Inspection:** 11/01/10 **EPA ED#** None

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>(e.g. sludge, solvent, ash, used oil, spent wraps, etc.) and EPA Waste Code, if applicable</small>	QTY Generated per Month, Type of Accumulation (container, tank, etc.) and location of waste accumulation area	On or Off-Site Management		P2 Activities	
				Type of On-Site Treatment <small>(recycle, wwt, etc.)</small>	Name, state, and type of activity occurring at the off-site facility	Current P2 Activities	P2 Opportunities
1	Towing and storage of vehicles	Automobile fluids	Variable	Recycle	None	Recycle	none
2	Draining automobile fluids from vehicles prior to crushing of vehicles	Used oil, automobile fluids,	Variable. Stored in metal drums in main building	Energy recovery	None	Reused	none
3	Salvage vehicles	Used oil filters	Variable. Drained and included in scrap metal	Recycle	Liberty Iron and Metal	Recycle	none
4	Salvage vehicles	Scrap tires	Variable. Stored outside main building, stored in piles around the property	Recycle	Liberty Tire	Recycle	none
5	Salvage vehicles	Spent antifreeze	Variable. Stored in metal drums in main building	Filtered and reused	None	Reuse	none

6	Salvage vehicles	Batteries	Variable	Recycle	Direct Recycling	Recycling	none
7	Salvage vehicles	Mercury switches	Variable. Stored in a pail in main building	Recycle	ELVS in Farmington, MI	Recycling	none
8	Salvage vehicles	Freon	Variable. Removed from vehicle using CPS	Reused	None	Reuse	none
9	Crush vehicles	Scrap metal	Variable. Crushed cars are stacked on property	Recycle	Liberty Iron and Metal	Recycle	none
10	Building maintenance	Fluorescent bulbs	Variable. None on site at the time of the inspection				

REMARKS – GENERAL INFORMATION

General Process Information: Advantage Towing and Salvage has two locations, one in Conneaut and one in Kingsville. A complaint was lodged regarding the Conneaut property. The company provides towing services and also serves as a salvage yard for a variety of vehicles. Vehicles to be salvaged have their batteries removed, fluids drained, Freon captured, mercury switches removed and in many cases, the engine, transmission and all viable parts are removed prior to crushing. Some vehicles are crushed; others are parked on the property and salvaged for parts for sale. The company has an on-line service listing their inventory of vehicles and parts available for sale.

Regulatory/Enforcement History (if applicable): None known

Additional P2 remarks and information: Advantage needs to find a recycler for spent/waste fluorescent bulbs. List of vendors included in NOV

Would this facility be interested in a P2 assessment? Yes* No

*If yes, refer promptly to your district P2 coordinator.

Office of Compliance Assistance and Pollution Prevention – 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp

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

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used: **Steel Toe Shoes**

WASTE EVALUATION

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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GENERATOR CLASSIFICATION

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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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 - Do not generate hazardous waste, only universal waste

3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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TREATMENT OF HAZARDOUS WASTE – Do no generate Hazardous Waste

4.	Does the generator treat hazardous waste in a:	
	a. Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c. Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	d. Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements. **N/A**

NOTE: If waste is treated to meet LDRs, use LDR checklist. **N/A**

MIX HAZARDOUS WASTE WITH USED OIL

5.	Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more

Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS

1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

UNIVERSAL WASTE PESTICIDES

8.	Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
9.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
10.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97, of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
11.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(B)(4)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
12.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides"? [3745-273-14(B)(1)&(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
13.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste-Pesticides" or "Waste Pesticides"? [3745-273-14(C)(1)&(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

UNIVERSAL WASTE MERCURY-CONTAINING EQUIPMENT		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	X <input type="checkbox"/>
14.	Has mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage or damage that could cause leaks been placed in a container that is closed, structurally sound, compatible with contents of the device and lacks evidence of leakage, spillage or damage that could cause leakage and is designed to prevent escape of mercury into the environment by volatilization or any other means? [3745-273-13(C)(1)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15.	If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]				
a.	Remove and manage the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-13(C)(2)(a)&(b)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)&(d)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e.	Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-13(C)(2)(h)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16.	If the open original housing holding mercury is removed from a mercury-containing equipment that does not contain an ampule, does the SQUWH: [3745-273-13(C)(3)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a.	Immediately seal the original housing holding the mercury with an air-tight seal to prevent the release of any mercury to the environment? [3745-273-13(C)(3)(a)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	Follow all requirements for removing ampules and managing removed ampules in accordance with 3745-273-13(C)(2)? [3745-273-13(C)(3)(b)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17.	When removing mercury containing ampules from mercury-containing equipment or sealing mercury from its original housing if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining mercury-containing device), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-13(C)(4)(a)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a.	If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-13(C)(4)(b)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18.	Is mercury-containing equipment or containers of mercury-containing equipment labelled either "Universal Waste-Mercury-Containing Equipment" or "Waste Mercury-Containing Equipment" or "Used Mercury-Containing Equipment"? [3745-237-14(D)(1)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
19.	Are mercury-containing thermostats or containers containing ONLY thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)"? [3745-273-14(D)(2)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

UNIVERSAL WASTE LAMPS – Are lamps at the time of the inspection, Advantage has spent bulbs on-site.		
20.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
21.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<p>NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.</p>		
22.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
ACCUMULATION TIME		
23.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<p>NOTE: Accumulation is defined as date generated or date received from another handler.</p>		
24.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below: Had invoices and receipts for the mercury switches and batteries.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
EMPLOYEE TRAINING		
25.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RESPONSE TO RELEASES – Reported no releases		
26.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
27.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
28.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
OFF-SITE SHIPMENTS		
<p>NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements. Mercury switches are transported to ELVS by mail; batteries are exchanged for new batteries.</p>		
29.	Are universal wastes sent to another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
30.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

31.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> X <input type="checkbox"/>
32.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> X <input type="checkbox"/>
	a. If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> X <input type="checkbox"/>
33.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u> :	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> X <input type="checkbox"/>
	a. Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> X <input type="checkbox"/>
34.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> X <input type="checkbox"/>
EXPORTS		
35.	Is waste being sent to a foreign destination? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> X <input type="checkbox"/>
	b. Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> X <input type="checkbox"/>
	c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> X <input type="checkbox"/>

**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 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.

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil"? [3745-279-22(C)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Stopped the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

ON-SITE BURNING IN SPACE HEATER

Advantage Towing & Salvage
utilizing
used oil

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 checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> x
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> x
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> x

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

GENERATOR TRANSPORTATION - *Self transport when necessary*

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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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]	<i>May transport to their Kingsville location</i>
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"/> x
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"/> x

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).

COLLECTION CENTERS AND AGGREGATION POINTS

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"/>

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.