



State of Ohio Environmental Protection Agency

**Northeast District Office**

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

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

September 3, 2009

RE: EVERBRITE, INC. CESQG  
PORTAGE COUNTY  
COMPLAINT No. 7189  
NOTICE OF VIOLATION

Mr. Brian Slider  
Everbrite Power Sweeping & Paving, Inc.  
12546 Mahoning Avenue  
North Jackson, OH 44451-9617

Dear Mr. Slider:

On August 11, 2009, representing the Ohio EPA's Division of Hazardous Waste Management, I conducted a complaint investigation of your Everbrite Power Sweeping & Paving, Inc. facility at 12546 Mahoning Avenue in North Jackson. You represented the facility during the inspection.

The complaint alleged that motor oil and diesel fuel were dumped down drains that go to the ground and the city sanitary. The drain gets plugged with tars and asphalts and the drain clean out is dumped in the back in the weeds. Diesel oil also gets on the ground from oiling up the dump truck beds and Bobcat bucket.

From my site visit it is understood that your business operations involve parking lot maintenance which includes sweeping, cleaning, repaving, paint striping, plowing and salting. The facility is used for storage and equipment maintenance in support of your business operations. Equipment maintenance involves the use of a parts washer using diesel fuel or kerosene as a solvent. This spent solvent goes into used oil containers. Painting of equipment is also done using largely oil based paint and D001 thinners. Hazardous waste solvent generation from painting is estimated to average about two gallons per month. This spent solvent is also disposed into the "used oil" container. Used oil is taken by EverClear.

Paint striping of parking lots is performed using primarily "waterborne" paints. It is understood that cleanout of painting equipment is done in the shop. This wastewater is disposed to the Mahoning county sanitary connection through a 1,000 gallon holding tank to separate solids. You reported that the county is aware of the nature of your wastewater discharges and required the installation of a holding tank to accommodate your operations. You were not aware of whether the county has sampled or monitored your discharges. No dumping was observed to occur to storm drains or outside areas.

### **NOTICE OF VIOLATIONS**

The following violations of Ohio's hazardous waste rules and regulations were identified during the inspection:

1. **Waste Evaluation, OAC 3745-52-11:** Any person who generates a waste must evaluate the waste to determine if the waste is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51. Lamps were reported disposed to the trash. You failed to evaluate spent lamps.

Spent fluorescent and high intensity discharge lamps may be considered hazardous waste due to their mercury, lead and other metal content and must be disposed or recycled properly.

Spent lamps that are recycled are not subject to the hazardous waste rules. For additional information refer to the Ohio EPA Fact Sheet "The Management of Fluorescent Lamps and PCB Ballasts in Ohio":

(<http://www.epa.state.oh.us/dhwm/pdf/FluorescentFacts.pdf>); a list of lamp recyclers [http://www.cuyahogaswd.org/business/guide\\_lamps.shtml](http://www.cuyahogaswd.org/business/guide_lamps.shtml); and also:

<http://www.epa.state.oh.us/dhwm/pdf/fluorescent.bulb.list.pdf>. This guidance information is also enclosed. Per the enclosed guidance universal waste lamps are required to be labeled, dated, and kept in closed containers prior to recycling.

**To abate this violation**, you indicated that you would manage all lamps as a universal waste. Enclosed is a list of facilities that accept lamps for recycling. Please confirm in writing how you intend to manage your lamps and where you intend to send this waste stream.

2. **OAC 3745-279-22(C): Used Oil Storage Requirements for Generators (Labels) -** "Containers and above ground tanks used to store used oil at generator facilities shall be labeled or marked clearly with the words "Used Oil". A 250 gallon tank and a 30 gallon drum for containing used oil were not labeled "Used Oil".

This violation was abated when the drum and tank were labeled as "used oil".

## CONCERNS AND RECOMMENDATIONS

1. **Oily ground areas.** There was observed an oily area around an indoor 250 gallon used oil tank located on the ground. According to **OAC 3745-279-22(D): Response to Releases of Used Oil -** "Upon the detection of a release of used oil to the environment, a generator shall...clean up and manage properly the released used oil..." This matter could become a threat to the environment without clean up and implementation of best management practices to reduce or eliminate incidental releases. This area should be cleaned up and the waste properly disposed.

Regulations for understanding the management of used oil are presented in the enclosed *Fact Sheet* on "The Regulation of Used Oil:" and may be also found at: <http://www.epa.state.oh.us/dhwm/pdf/UsedOilGen.pdf>.

2. The complaint alleged that equipment is oiled in outside areas. You should take steps to minimize overspray and dripping of oil from equipment. You may consider alternate spray methods, additives or spraying indoors. Everbrite must operate in manner that prevents oil or oily contamination discharge to the ground, storm water or other surface waters of the state. All oil stained areas must be removed and properly disposed. Such material containing only "Used Oil" may be disposed as a solid waste. The following fact sheet "Managing Used Oil: Advice for Small Business" is enclosed and may be found at: <http://www.epa.gov/epaoswer/hazwaste/usedoil/usedoil.htm>.
3. **Aerosol cans and small containers.** These are reported used up and disposed with solid wastes. It is recommended that a management plan or training be implemented to ensure all containers are properly emptied or contents properly disposed. Some of your residual container contents could contain materials that are a *characteristic or listed hazardous waste* and therefore must be properly disposed. The following links can assist you in making a proper waste evaluation:  
<http://www.epa.state.oh.us/dhwm/pdf/GeneratorKnowledge6.pdf> and  
<http://www.epa.state.oh.us/ocapp/sb/publications/identifyingwaste.pdf>.

If containers are empty per OAC 3745-51-07(B)(2) the container may be disposed as a solid waste. Guidance regarding what is considered empty is attached: (Winter 2006 Notifier) – "*Aerosol Can Questions*" and at:

<http://www.epa.state.oh.us/dhwm/pdf/NotifierWinter05.pdf>. You might obtain a can crushing system that attaches to and captures residuals in a drum for later disposal. Otherwise, refer to manufacturer's information or MSDS data to determine whether residual contents could be a hazardous waste and dispose accordingly.

4. **Lead-acid batteries from vehicles.** Please keep in mind that Ohio Administrative Code (OAC) 3745-273-13(A) - Waste management-standards, requires that batteries (and other components of universal waste) must be stored in a manner to prevent damage and releases to the environment. Should you accumulate batteries onsite, the batteries container must be labeled according to OAC 3745-273-14(A) as: 'Universal Waste-Batteries or Waste Batteries, or Used Batteries'.
5. **Spill Prevention Control and Countermeasure (SPCC) plan.** Based on the total gallons of petroleum product (fuel and oils) stored on site, you may be required to develop a Spill Prevention Control and Countermeasure (SPCC) plan. Attached is a Fact Sheet regarding the Understanding of SPCC Requirements which may also be found at: <http://www.epa.gov/region5/oil/plan/spcc.html>. For assistance please contact Bruce Miller of this office at (330) 963-1211 or at: [bruce.miller@epa.state.oh.us](mailto:bruce.miller@epa.state.oh.us).

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides compliance and pollution prevention assistance on environmental issues related to air, land, and water. If desired, this can include an onsite assessment of your operations with a resulting report containing waste minimization and energy conservation suggestions. OCAPP can be contacted at 800-329-7518 or <http://www.epa.state.oh.us/ocapp/ocapp.html>

EVERBRITE, INC  
SEPTEMBER 3, 2009  
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You may also contact Adrienne Lafavre of this office at (330) 963-1250 for compliance assistance.

The Division of Hazardous Waste Management (DHWM) has copies of the rules and other information on the DHWM's web page at: <http://www.epa.state.oh.us/dhwm/>.

Enclosed you will find a copy of an identification form and the checklists completed for the inspection. Please submit the requested documentation to my attention **within 30 days** of receipt of this letter. Should you have any questions, please feel free to contact me at (330) 963-1146 or at: [ron.shadrach@epa.state.oh.us](mailto:ron.shadrach@epa.state.oh.us).

Sincerely,



Ronald J. Shadrach  
District Representative  
Division of Hazardous Waste Management

Enclosures

RJS:ddw

ec: Frank Popotnik, DHWM, NEDO  
Natalie Oryshkewych, DHWM, NEDO  
Bruce Miller, DERR, NEDO  
Rich Blasick, DSW, NEDO  
Harry Sarvis, DHWM, CO

**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.

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

For Ohio EPA use only

E-mail this completed form to [kristina.durnell@epa.state.oh.us](mailto:kristina.durnell@epa.state.oh.us)  
 or mail it to Kristina Durnell, Central Office

<b>Site EPA ID No.</b>	EPA ID Number: <b>CESQG</b>	
<b>Site Name</b>	Name: <b>Everbrite, Inc.</b>	Website: (Optional)
<b>Site Location Information</b>	Street Address: <b>12546 Mahoning Ave.</b>	State: <b>OH</b>
	City, Town, or Village: <b>North Jackson</b>	Zip Code: <b>44451-9617</b>
	County Name: <b>Mahoning</b>	
<b>Site Land Type</b> (check only one) NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	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"/>
<b>Facility Representative</b>	First Name: <b>Brian and Gary</b>	MI: Last Name: <b>Slider</b>
Additional names can be recorded in number 12	Phone Number: <b>330-538-3333</b>	Phone Number Extension:
Only provide address information if it is different than the site address	E-Mail Address:	Fax Number Extension:
	Fax Number:	
	Street or P.O. Box:	
	City, Town or Village:	Zip Code:
	State:	
<b>Legal Owner And Operator of the Site.</b>	Name of Site's Legal Owner:	Date Became Owner (mm/dd/yyyy): <b>1995</b>
List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	<b>Brian Slider</b>	
	Owner 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"/>	
	Type: <input checked="" type="checkbox"/>	
	Street or P.O. Box:	Owner Phone #: <b>330-233-1014</b>
	City, Town or Village:	Country: Zip Code:
	State:	Date Became Operator (mm/dd/yyyy):
	Name of Site's Operator:	
	Operator Private <input 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"/>	
	Type: <input type="checkbox"/>	
	Street or P.O. Box:	Operator Phone #:
	City, Town or Village:	United States Zip Code:
	State:	

**VIOLATIONS CITED?**  Yes  No

**TYPE OF HANDLER- A MINIMUM OF ONE BOX MUST BE CHECKED**

<input type="checkbox"/> Not a HW Generator	<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
		<input type="checkbox"/> Small Quantity Generator (SQG)
		<input checked="" 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"/> Recycler of Hazardous Waste                    | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace       |
| <input type="checkbox"/> Underground Injection Control Facility         | <input type="checkbox"/> Small Quantity On-Site Burner Exemption       |
| <input type="checkbox"/> Hazardous Waste Transporter                    | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste |  |

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<br>(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. Oil
- Used Oil Fuel Marketer to Off-Specification Used Oil Burner

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 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.

D001

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 | Other Comments: <b>Uses tanks and drums for used oil.</b> |
| Containers | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |   |

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection, Time
Ron Shadrach, DHWM.NEDO		(mm/dd/yyyy) (h.h.mm) 8/11/2009 (10:25)

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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**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:

**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 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes  No  N/A

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**

4. Does the generator treat hazardous waste in a:

a. Container that meets 3745-66-70 to 3745-66-77? Yes  No  N/A

b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes  No  N/A

c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes  No  N/A

d. Containment building that meets 3745-256-100 to 3745-256-102? Yes  No  N/A

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

**REMARKS**

There are fluorescent and HID lamps that could contain mercury and other metals requiring proper disposal and recycling. These were reported disposed to solid waste and not characterized. Information regarding management and recycling for universal waste lamps was provided. Facility intends to recycle lamps.

CESQG facility mixes spent part cleaning solvent and spent paint solvent (minimally D001) to "used oil".

Unspent aerosol can waste could be a D001 (ignitable) hazardous waste. Aerosol can waste may be minimized by using refillable pump/spray bottles from bulk supply for some fluids. You must ensure cans are properly emptied prior to disposal.

The facility generates batteries that are typically exchanged when generated. Guidance on universal waste labeling and management of batteries was provided.

**USED OIL INSPECTION CHECKLIST  
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

*NOTE: 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.*

**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 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 checked="" type="checkbox"/> No <input 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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input 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 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 type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/> No <input 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 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**

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"/>

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

**GENERATOR TRANSPORTATION**

11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#?	Yes <input checked="" 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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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"/>

*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.*

Used oil fluids were being accumulated in a 30 gallon container in the shop. These contents were transferred into a 250 gallon tank located in a rear storage building. Neither container was labeled as "used oil" per the rule. Oil stained the ground at the tank located inside. This would be cleaned up and new practices implemented to minimize spilling. Release reported to be from operations not leak. Suggested routine inspections to ensure containers are labeled, in good condition and properly managed. Also suggested implementing practices in yard/storage area to minimize oily water runoff releases from containers and surfaces.