



State of Ohio Environmental Protection Agency

**Northeast District Office**

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Twinsburg, Ohio 44087

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

July 31, 2008

RE: MARK'S EQUIPMENT  
WAYNE COUNTY  
NON-NOTIFER  
NOTICE OF VIOLATION (NOV)  
COMPLAINT NUMBER 7050

Mr. Mark Mahnen  
Mark's Equipment  
100 Industrial Street  
Rittman, OH 44270

Dear Mr. Mahnen:

On July 14, 2008, I, as a representative of the Ohio EPA Division of Hazardous Waste Management, conducted an inspection of Mark's Equipment, located at 100 Industrial Street, Rittman, Ohio, for compliance with Ohio's hazardous waste and used oil regulations. You represented Mark's Equipment during the inspection. Ohio EPA had received a complaint alleging that the facility was mismanaging sandblasting paint waste at the facility.

The facility's primary business is purchasing and selling used construction equipment. As part of this business some equipment is cleaned, sandblasted and repainted.

Materials observed to be present included: used sand blast media, containers of old paint and unknown materials reportedly left by previous owner, solvent-based parts washer and used oil tanks and containers.

The inspection included a review of the facility's operations, as well as the waste management practices and documentation. Mark's Equipment was inspected to determine compliance with the requirements for a conditionally exempt small quantity generator (CESQG) of hazardous waste. If as Mark's Equipment evaluates containers of waste currently onsite it is determined that the quantity of hazardous waste on-site exceeds 2,200 pounds, additional violations may be cited.

Based on observations made during the facility walk-through, Ohio EPA has determined that Mark's Equipment has violated the following state hazardous waste and used oil regulations:

**1. OAC Rule 3745-52-11 Waste Evaluation**

OAC Rule 3745-52-11 requires "Any person who generates a waste...[to] determine if that waste is a hazardous waste..."

Mark's Equipment has not evaluated the following wastes as required by OAC Rule 3745-52-11:

- Media from blasting paint from used equipment and/or parts that is located in a pile outdoors on the ground. Media apparently consists of Black Beauty, which is used as the blasting agent, and removed paint covering an area roughly 20 feet in diameter and about 5 inches in depth near the center. A representative sample must be taken and analyzed using the TCLP test.

- Approximately thirteen 5-gallon pails without labels reportedly left by previous owner and believed to contain old paint. A representative sample must be taken and analyzed using the TCLP test.
- A 55-gallon drum reportedly left by previous owner containing what appeared to be oil and an organic liquid. A representative sample must be taken and analyzed using the TCLP test.
- A 55-gallon drum located on an old truck bed. Appeared to be about half full; contents not known. A representative sample must be taken and analyzed using the TCLP test.

If the approximately 10 aerosol cans (1 lb. 2 oz size) of Big Sky "Wet Stripper" which contains methylene chloride that were located in a semi-trailer are no longer usable, they should also be evaluated for disposal.

To return to compliance the facility must:

- Evaluate all wastes identified above to determine if they are hazardous wastes;
- Determine if there are any other wastes currently at the facility that are not named above, and if so, evaluate all such wastes to determine if they are hazardous wastes;
- Dispose of all hazardous wastes in accordance with the hazardous waste rules; and,
- Provide documentation of results of the waste evaluation and waste disposal to this office within 45 days of receipt of this letter.

To assist you in evaluating your wastes, I have attached a copy of an Ohio Environmental Protection Agency list of hazardous waste facilities in Ohio. This list is only a partial list of potential consultants that could assist you. Also enclosed are Ohio EPA guidance documents on waste generator categories and identifying hazardous waste.

If the pile of media from blasting paint from used equipment and/or parts located in a pile outdoors on the ground is determined to be hazardous waste, additional violations may be issued.

**2. OAC 3745-279-22(C)(1) Used oil containers and tanks must be labeled with the words Used Oil**

Mark's Equipment collects used oil from the equipment that it buys and sells. I observed two 55-gallon drums and two 500 gallon tanks holding used oil at the facility.

Neither the drums nor the tanks were marked with the words "Used Oil". The two 55-gallon drums were marked while I was on-site; the tanks were not marked during the inspection.

To return to compliance, Mark's Equipment must:

- Determine if any other containers or tanks of used oil are on-site in addition to those observed by me;

- Label all containers and tanks holding used oil with the words "Used Oil"; and,
- Provide photos of all used oil containers (except the two 55-gallon drums marked during the inspection) and tanks labeled with the words "Used Oil" to this office within 45 days of the date of this letter.

**3. OAC Rule 3745--279-22(D) Generator must respond to used oil releases and perform cleanup steps**

I observed several patches of gravel and/or soil near the front of the maintenance shop that were saturated and/or heavily stained with what appeared to be recent releases of used oil.

OAC rule 3745-279-22(D) requires Mark's Equipment, as a generator of used oil, to respond to releases of used oil by cleaning up and managing properly the released used oil and other materials.

Contaminated soils and debris from the clean up may be managed as solid waste in trash dumpster, provided that this is acceptable to your trash hauler.

Ohio EPA uses a visual standard when determining whether a clean up of released used oil and any media absorbing that used oil is adequate. Ohio EPA does not require confirmatory soil sampling and analysis to demonstrate that the release has been cleaned up.

To return to compliance, Mark's Equipment must:

- Clean up and remove the recently released used oil and contaminated soils and debris from the area near the front of the maintenance shop; and,
- Provide a photo of the area after clean up to this office within 45 days of the date of this letter.

To assist you in management of used oil, I have attached a copy of an Ohio Environmental Protection Agency guidance document on used oil. The document is also available on the Internet at:

[http://www.epa.state.oh.us/dhwm/pdf/Used\\_Oil\\_Generators\\_Guidance.pdf](http://www.epa.state.oh.us/dhwm/pdf/Used_Oil_Generators_Guidance.pdf)

All above requested documentation is to be submitted to this office within 45 days of the date of this letter.

Enclosed you will find a copy of the checklists completed during the inspection.

**Concerns:**

Reportedly a 55-gallon drum of used oil had been left at your facility by another business, apparently KDI. You agreed to contact the owner of this business and have him take it back. Unless you or the original generator comply with used oil rules, including those regarding evaluation and recordkeeping, you cannot accept used oil from another business. Allowing others to leave used oil or wastes on your property may create significant liabilities for you.

You use a portable power washer to remove dirt and grease from used equipment and water and removed materials drain to the ground. You cannot discharge industrial wastewater into "waters of the state" without obtaining a permit from the Ohio EPA. Wastewater generated by power washing is considered industrial wastewater. For your assistance, following is an Internet link to a Fact Sheet on Mobile Power Washing and Environmental Regulations:

<http://www.epa.state.oh.us/ocapp/sb/publications/powerwash.pdf>

### Other Information

A list of Ohio EPA DHWM guidance documents can be found at the following Internet site: <http://www.epa.state.oh.us/dhwm/guidancedocuments.html>. You can find copies of Ohio's hazardous waste laws and regulations at our web page at: <http://www.epa.state.oh.us/dhwm/Law&Regs.html>.

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign up for this free service. You can find more information at the following Web link: <http://www.epa.state.oh.us/dhwm/listserv.html>.

The OEPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes and pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image through pollution prevention. More information about pollution prevention can be found on our website at <http://www.epa.state.oh.us/ocapp/ocapp.html>.

Should you have any questions regarding this letter, please contact me at (330) 963-1165.

Sincerely,



Neil J. Wasilk  
Environmental Specialist  
Division of Hazardous Waste Management

NJW:ddw

Enclosure

cc: Natalie Oryshkewych, Ohio EPA, DHWM, NEDO  
ec: Harry Sarvis, Ohio EPA, DHWM, CO

**NOTICE:**

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your facility from its obligation 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

Site EPA ID No.	EPA ID Number: NON-NOTIFER								
Site Name	Name: <b>Mark's Equipment</b>					Website: (Optional)			
Site Location Information	Street Address: <b>100 Industrial Street</b>								
	City, Town, or Village: <b>Rittman</b>					State: <b>OH</b>			
	County Name: <b>WAYNE</b>					Zip Code: <b>44270</b>			
Site Land Type (check only one)	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"/>	
NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>									
Facility Representative  Additional names can be recorded in number 12.  Only provide address information if it is different than the site address.  Legal Owner and Operator of the Site List Additional Owners and Operators in the Comment Section or on another copy of this form page.	First Name: <b>Mark</b>			MI:	Last Name: <b>Mahnen</b>				
	Phone Number: <b>330-315-5841</b>					Phone Number Extension:			
	E-Mail Address:								
	Fax Number:					Fax Number Extension:			
	Street or P.O. Box:								
	City, Town or Village:								
	State:				Country:		Zip Code:		
	Name of Site's Legal Owner:					Date Became Owner (mm/dd/yyyy):			
	Owner Type:	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"/>
	Street or P.O. Box:								
	City, Town or Village:					Owner Phone #:			
	State:				Country:		Zip Code:		
Name of Site's Operator:					Date Became Operator (mm/dd/yyyy):				
Owner Type:	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"/>	
Street or P.O. Box:									
City, Town or Village:					Operator Phone #:				
State:				Country:		Zip Code:			
Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
Type of Generator	<input type="checkbox"/> Not Regulated <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"/> United States 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"/> Underground Injection Control Facility <input type="checkbox"/> Hazardous Waste Transporter <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste								
	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace <input type="checkbox"/> Small Quantity On-Site Burner Exemption <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption								

Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply))

<input type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)
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Destination Facility for Universal Waste  
(Check all boxes below that apply for each of the three types of facilities above)

	Managed	Used Oil Activities (Indicate Type(s) of Activity(ies):	
Batteries	<input type="checkbox"/>	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Lamps	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
		<input type="checkbox"/> Used Oil Re-refiner	

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, D002, F007, U112) on 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.

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:	Mark Mahnen
Tanks	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Other Comments:	
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection	Time
Neil Wasilk		7/14/2008	10:00 a.m.

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 gathered 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)

**PROCESS DESCRIPTION  
and  
Hazardous Waste Compliance Inspection Notes**

Facility:

Mark's Equipment  
100 Industrial Street  
Rittman, OH 44270

Inspector: N. Wasilk

Arrived at 10:00 a.m. on 7-14-08.

Facility contact was Mark Mahnen (Proprietor).

**Opening Meeting**

Informed facility that OEPA had received a complaint and I was conducting a follow-up inspection.

Facility's major activity is purchasing and selling used construction equipment, mostly heavy construction equipment such as bulldozers, graders, earth movers, etc. The process of getting the equipment ready for sale may include:

- Paint removal with blasting equipment;
- Repainting;
- Cleaning with high-pressure water;
- Changing oil.

Has been at this facility since about 2005.

Facility believes that most of the equipment it refurbishes does not have lead-based primer. Facility reports that the paint it uses is oil-based and is direct-to-metal and is applied without a primer.

**Plant Walk Through**

*Maintenance Garage*

Used oil space heater Clean burn Model 1750, rated for about 175,000 BTU/Hr. Used oil from changes of crankcase and hydraulic oil is collected in 55 gallon drums and then transferred to a tank in the 500-1,000 gallon capacity range. Tank labeled "Waste Oil". Two 55-gallon drums holding used oil not labeled as "Used Oil". (The drums were marked during the inspection.)

Small areas of oil saturated ground and soil at from of used oil tank and in front of main door to garage.

Parts washer present. Reportedly have not yet replaced solvent, but it is nearly spent. Apparently mineral spirits solvent purchased from Tractor Supply. Does not have an MSDS. One 55-gallon drum of reportedly clean solvent purchased at an auction; composition not known.

Several Lead acid batteries present. Old batteries purchased by Taylor and Summerville Battery Co. of Dayton.

#### Rented Room

One room in building is rented. Tenant blasts and repaints auto parts. Tenant is Second Chance Equipment Refinishing. Contact is Leeann Larson.

#### *Outdoors*

Sandblasting of paint from used equipment and/or parts is conducted outdoors using Black Beauty as the blasting media. Tenant that rents room in the building also reportedly conducts blasting for paint removal. Used blast media present on the ground; covered an area roughly 20 feet in diameter and about 5 inches in depth near the center.

A drum about half full with unknown contents was located on an old truck bed.

Tank approximately 250 gallons capacity partially full in boneyard. Contents not known.

Approximately 10 aerosol cans (1 lb. 2 oz size) of Big Sky "Wet Stripper" which contains methylene chloride were located in a trailer.

Power washer was being used to remove oil & grease & dirt from an earthmover part. Used oil and removed material drained to ground.

A 55-gallon drum with markings "KDI", that appeared to be used oil was not marked as "used oil". Reportedly left on property by a local business within past week.

Thirteen 5-gallon pails were on a pallet. No labels. Believed to be old paints left by previous owner.

One 55-gallon drum containing what appeared to be used oil and an organic solvent. Believed to have been left by previous owner.

One semi trailer full of used tires. Reportedly some are still useable.

Several patches of black stained soil located through out the facility.

*Paint Room*

Use Sherwin Williams SURE KEM Paint. Per MSDS flash point is 80 F. Paint gun left soaking in xylene between uses; paint not flushed between uses because nearly all paint is CAT yellow or John Deere yellow, both of which are very close in color. Facility reports that xylene solvent used to soak is used on rags to wash excess paint from equipment or tires, which uses all this solvent.

Departed facility at about 1:20 p.m. on 7/14/2008.

*MARK'S EQUIPMENT*  
**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.

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   
*NOT YET SHIPPED HAZ. WASTE*

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

NOTE: If waste is treated to meet LDRs, use LDR checklist.

**REMARKS**

*QUANTITY HAZ WASTE ON-SITE TO BE  
DETERMINED BY RESPONSE TO 52-11  
VIOLATION.*

*MARK'S EQUIPMENT*  
**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  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
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)]
- 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

**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  No  N/A
  - b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes  No  N/A
  - c. Are the combustion gases from heater vented to the ambient air? Yes  No  N/A

**GENERATOR TRANSPORTATION**

11. If the generator self-transported 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  No  N/A
  - b. Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24] Yes  No  N/A

*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**

- 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
- 13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes  No  N/A
- 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

*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.*

Keyword: UsedOilChecklistforGenerators.Oct.2007.doc