



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

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

June 22, 2009

RE: MODERALLI EXCAVATING, INC.  
MAHONING COUNTY  
NON-NOTIFER  
NOTICE OF VIOLATION (NOV)  
COMPLAINT NUMBER 7186

Mr. Gary Moderalli  
Moderalli Excavating, Inc.  
9784 Springfield Road  
Poland, OH 44514

Dear Mr. Moderalli:

On June 16, 2009, I and Kris Coder, as representatives of the Ohio EPA's (OEPA) Division of Hazardous Waste Management (DHWM), conducted an inspection of Moderalli Excavating, Inc., located on Woodworth Rd., New Springfield, for compliance with Ohio's hazardous waste and used oil regulations. You represented Moderalli Excavating during the inspection. Ohio EPA had received a complaint alleging that the facility was mismanaging used oil and burning copper wire at the facility.

The facility's major activities are excavating and building demolition operations. In support of these operations the facility stores heavy equipment, stores scrap metal for eventual recycle, stores demolition debris and conducts equipment maintenance. Used oil is generated from equipment maintenance and is stored on-site for burning in a space heater.

Although several small areas of oil-stained soils were observed, no indications of major discharges of oil onto soil were observed. No evidence of burning of copper wire was observed.

The inspection included a review of the facility's operations, as well as waste management practices and documentation. Moderalli Excavating was inspected for the requirements of a conditional exempt small quantity generator (CESQG) of hazardous waste. A CESQG is a facility that generates less than the 220 pounds of hazardous waste per calendar month.

Based on observations made during the facility walk-through, Ohio EPA has determined that Moderalli Excavating 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..."

The facility generates used fluorescent lamps. We observed about 6 used fluorescent lamps in a trash container, several of which were broken. The facility did not provide evidence during the inspection that it had evaluated its used lamps to determine if they are hazardous wastes.

To return to compliance the facility must:

- Either manage discarded fluorescent lamps as universal waste, or evaluate all discarded lamps not managed as universal wastes, to determine if they exhibit any characteristic of hazardous waste.

You may use either generator knowledge based on documentation provided by the lamp manufacturer for that model number lamp or take a representative sample of the lamps for an analysis using the TCLP test.

- Only lamps that are determined to NOT exhibit any characteristic of hazardous waste may be disposed of as trash. (Ohio EPA encourages recycling of these lamps.) All other discarded lamps must be managed in compliance with either the hazardous waste or universal waste rules. (Most generators of discarded lamps that cannot be disposed as trash elect to manage them as universal waste since this entails a lower regulatory burden.)
- Develop a plan that describes how Moderalli Excavating plans to evaluate and manage discarded lamps.
- Submit a copy of the plan to this office within 30 days of receipt of this letter.

Attached is a guidance document on management of used lamps that you might wish to review when responding to this violation. This document is also on the internet at:

[http://www.epa.state.oh.us/dhwm/pdf/Universal\\_Waste\\_Rules\\_for\\_Handlers\\_of\\_Lamps.pdf](http://www.epa.state.oh.us/dhwm/pdf/Universal_Waste_Rules_for_Handlers_of_Lamps.pdf)

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

Several 55 gallon drums and the tank holding used oil for the maintenance building space heater were not labeled or marked with the words "Used Oil". This violation was abated during the inspection by placing labels with the words "Used Oil" on the drums and tank. No further action is required on this violation at this time.

**All above requested documentation is to be submitted to this office within 30 days of the date of this letter.**

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

**CONCERNS**

**C&D Waste**

I have notified the Division of Solid and Infectious Waste Management (DSIWM) about the usage of brick/block/concrete demolition debris as fill material and about the smaller pile of material acknowledged as being C&D waste (e.g., old plastic gas lines) located near the pile of brick/block/concrete demolition debris. Someone from DSIWM may contact you on these issues.

**Management of Spent Solvents**

I would like to clarify the rules that regulate mixing of any spent solvents that your facility might generate with used oil. So long as Moderalli Excavating retains its CESQG status, that is so long as does not generate in excess of 220 pounds of hazardous waste per calendar month or accumulate in excess of 2,200 pounds of hazardous waste on-site at any one time, it may mix any spent solvents it generates with used oil and manage the mixture as used oil, including burning the mixture for space heating. If Moderalli Excavating were to exceed these quantities, it would be subject to more stringent requirements and if spent solvents were mixed with used oil, the mixture could only be managed as used oil if additional evaluation and documentation indicated this complied with applicable rules.

Obtaining Material Data Safety Sheets for all solvents used is an important part of the process of determining if the solvents you use would be hazardous wastes when spent. Some common solvents that would be hazardous waste when spent include: any spent solvent with a flash point less than 140°F, any chlorinated hydrocarbon solvent, xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, methanol, toluene, methyl ethyl ketone, isobutanol and benzene.

Attached is a guidance document on Hazardous Waste Generator Categories. This document is also on the internet at:

[http://www.epa.state.oh.us/dhwm/pdf/Episodic\\_Generation.pdf](http://www.epa.state.oh.us/dhwm/pdf/Episodic_Generation.pdf)

### **Lead Acid Batteries**

Several used lead acid batteries were observed, including one lying on the ground behind the maintenance building the casing of which had been punctured and from which acid had leaked.

Lead acid batteries may be recycled, in which case they are not considered to be hazardous waste. If lead acid batteries are not intended to be recycled, they are hazardous waste due to leachable lead content, and must be managed as hazardous waste. In Ohio lead acid batteries can never be disposed of as trash. Spillage of the acid in a lead acid battery to soil is release of hazardous waste, which must be cleaned up and the spill residue and debris managed as hazardous waste.

Please advise on the facility plans for managing these batteries within 30 days of the date of this letter.

### **Off-Site Used Oil**

When additional used oil is needed for the maintenance building space heater, apparently it is sometimes obtained from a friend's business. This activity is subject to the used oil marketer and possibly transportation rules. If any more oil is to be obtained from this party, either Moderalli Excavating or the friend must obtain and retain documentation that it has performed analyses or possesses generator knowledge that the used oil met the standards for on-spec used oil, or comply with all applicable rules on marketing and transportation of used oil.

Some guidance documents on used oil management are attached. They are 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)

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

**All above requested responses to concerns are to be submitted to this office within 30 days of the date of this letter.**

### **Other Information**

A list of Ohio EPA's 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&Reqs.html>.

MODERALLI EXCAVATING  
JUNE 22, 2009  
PAGE - 4 -

The Division of Hazardous Waste Management has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link: [http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc\\_serve.php?2=subscriptionpage](http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage).

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

ec: Nyall McKenna, Ohio EPA, DHWM, NEDO

**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

<b>Site EPA ID No.</b> <b>Site Name</b>  <b>Site Location Information</b>  <b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	EPA ID Number: NON-NOTIFER Name: <b>Moderalli Excavating, Inc.</b> Website: (Optional) Street Address: <b>Woodworth Rd</b> City, Town, or Village: <b>New Springfield</b> State: <b>OH</b> County Name: <b>MAHONING</b> Zip Code: <b>44443</b> 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> Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	First Name: <b>Gary</b> MI: Last Name: <b>Moderalli</b> Phone Number: <b>(330) 549-5206</b> Phone Number Extension: E-Mail Address: Fax Number: Fax Number Extension: Street or P.O. Box: <b>9784 Springfield Road</b> City, Town or Village: <b>Poland</b> State: <b>OH</b> Zip Code: <b>44514</b>
<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	Name of Site's Legal Owner: <b>Gary Moderalli</b> Date Became Owner (mm/dd/yyyy): 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: <b>X</b> Street or P.O. Box: <b>9784 Springfield Road</b> City, Town or Village: <b>Poland</b> State: <b>OH</b> Name of Site's Operator: Owner 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: City, Town or Village: State: Owner Phone #: Country: <b>USA</b> Zip Code: <b>44443</b> Date Became Operator (mm/dd/yyyy): Operator Phone #: United States Zip Code:

**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 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)

- Recycler or Hazardous Waste
- Underground Injection Control Facility
- Hazardous Waste Transporter
- Treater, Storer or Disposer of Hazardous Waste
- Exempt Boiler and/or Industrial Furnace
- Small Quantity On-Site Burner Exemption
- Smelting, Melting, Refining Furnace Exemption

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY)

- Small Quantity Handler of Universal Waste
- Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)
- Destination Facility for Universal Waste

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.

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:
- Tanks  Yes  No Other Comments: An unannounced inspection visit was made on 6-4-09. However no one was present that day and inspection was eventually scheduled for 6-16-09.
- Containers  Yes  No

Name of Inspector(s) N. Wasilk Name of Inspector(s) K. Coder Date of Inspection/Time (mm/dd/yyyy) (hh:mm) 6-16-09 12:45 p.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 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)

*MODERATE EXCAVATING*  
**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** *USED LAMPS NOT EVALUATED*

2. Does the generator produce <100 kg. of hazardous waste per month? Yes  No  N/A   
[conditionally exempt small quantity generator ("CESQG")]

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   
*NO OFF SITE OBSERVED*

**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.

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

**REMARKS**

MODEX LMI EXCAVATING

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 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"/>
----	--	--

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 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:	Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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? MAY RECEIVE USED OIL FROM	Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

APPARENTLY ANOTHER GENERATOR

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"/>
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"/>

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#? <i>NOT TRANSPORTING OFF-SITE</i>	Yes <input 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]	
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 type="checkbox"/> N/A <input checked="" 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.