

**Environmental
Protection Agency**

Tim Walcott, Governor
Mike DeWine, Lt. Governor
John R. Kiser, Director

August 5, 2010

Mr. Brian Higgins, Service Director
Parma City Hall
6611 Ridge Road
Parma, OH 44129

**RE: PARMA CITY SERVICE CENTER, OHR000040675, CUYAHOGA COUNTY,
COMPLIANCE EVALUATION INSPECTION, CESQG, NOTICE OF
VIOLATION/RETURN TO COMPLIANCE**

Dear Mr. Higgins:

On May 25, 2010, Ohio Environmental Protection Agency (EPA), represented by Ms. Karen Nesbit and me, conducted an inspection at Parma City Service Center (Parma CSC), located at 5680 Chevrolet Boulevard in Parma, Ohio. Parma CSC was represented by Mr. Michael Shymske, Mechanic Supervisor and Mr. Richard Cline. The purpose of the inspection was to determine Parma CSC's compliance with Ohio hazardous waste laws and regulations found in Chapters 3734. of the Ohio Revised Code (ORC) and 3745. of the Ohio Administrative Code (OAC). Although we walked through your facility, we were unable to complete a review of your records because they were filed at the Parma City Hall.

On June 11, 2010, Ohio EPA received a letter from you dated June 9, 2010, which included answers to questions asked during the May 25th inspection as well as documents such as hazardous waste manifests, service invoices for the two parts washers at the Parma CSC facility, and one waste profile for waste generated at the facility. On July 23, 2010, I returned to the Parma CSC to complete the record review and conduct a follow up walk through inspection of your facility.

Based on the information gathered, it appears the service center generates less than 220 pounds of non-acute hazardous waste in any calendar month. Consequently, we evaluated Parma City Service Center's compliance with the conditionally exempt small quantity generator (CESQG) requirements. Enclosed are copies of our completed checklists. The Site Identification/Verification form was submitted to Ohio EPA's Central Office to update your generator status as the Parma City Service Center was on our small quantity generator list.

The following violation and concerns were noted during the inspection.

VIOLATION

1. **OAC rule 3745-279-22 (C)(1). Used oil container labeling**, this rule states, "Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words, "Used Oil".

On May 25, 2010, we observed a crusher collection can for used oil that was not labeled. When I returned on July 23, 2010, the collection can was labeled with the words, "Used Oil"; thereby **abating the violation**. The container was not closed (did not have a lid). Although this is not required by the regulations, it is best management practices to keep all containers of liquids closed. **No further action is required at this time.**

CONCERNS

- **Batteries** - We observed lead-acid batteries on the ground outside the maintenance building. The concern is leakage from the batteries to the ground. If you continue to store batteries outside on the ground, periodic inspection for leakage could prevent contamination of the ground and the subsequent clean up should leakage occur. Best management practice is to store batteries inside or, if outside, on a concrete base or in a containment vessel such as a plastic tub. I e-mailed you during the week of July 26, explaining two ways in which lead-acid batteries may be managed by a generator. One is as universal waste, and one, as hazardous waste. If you should choose to manage the batteries as universal waste, note from the article provided, Parma CSC will be required to label the batteries as "Universal Waste – Batteries", track their accumulation time on site, and ensure they are sent off site for recycling or reclamation within one year of being spent. If Parma CSC decides to manage the batteries as hazardous waste, you must adhere to the requirements as found in OAC rule 3745-266-80 Spent Lead Acid Batteries Being Reclaimed as well as any and all hazardous waste rules that would apply. **Please provide a description of how Parma CSC will manage their batteries from this point forward.**
- **Fluorescent bulbs** - Parma CSC had no used fluorescent bulbs on-site at the time of the inspection. I sent Mr. Shymske, via e-mail, a guidance document with respect to Universal Waste – Used Bulb management. He sent an e-mail dated 7/26/10 stating Parma CSC has contracted with Safety Kleen to manage used bulbs generated at the facility. **No further action is required at this time.**
- **Manifests** – Review of manifests of hazardous waste shipped off-site, revealed one manifest (000668473SKS) missing the signed designated facility to generator copy of the manifest. On August 4, 2010, Mr. Shymske forwarded a scanned copy of the missing manifest form to me. **No further action is required at this time.**
- **Container management** –
 - During the inspection, we observed five gallon pails with diesel fuel used to clean gook dispensers. The pails were not labeled and were open. As we explained to Mr. Shymske, placing a label on the container ensures easy recognition of the contents and increases the likelihood the diesel fuel will be properly managed. Covering the container reduces the likelihood of spillage. During my inspection on July 23, 2010, I observed that the containers were labeled.

- We observed over fifteen metal drums and other containers outside on the south side of the building; most were empty and unlabeled. Several of the containers were not closed (missing bungs) and contained liquid of unknown composition; it was suspected the contents were mostly rainwater. On my visit July 23, I observed the containers had been moved. Mr. Shymske reported that Parma CSC had identified the contents of the containers and Safety Kleen confirmed the composition in the containers to be an asphalt emulsion mixed with diesel fuel and water. On August 4, 2010, Mr. Shymske forwarded a scanned copy of the waste profile which demonstrated the waste was not a hazardous waste. Safety Kleen had arranged to transport the asphalt emulsion mixture for fuels blending. The empty containers observed outside the building were also being managed by Safety Kleen. **Please provide documentation of the removal of these drums and other containers by Safety Kleen at your earliest convenience.**

- We observed several small (gallon or less) containers of unknown contents at various locations within the facility. Mr. Shymske explained that prior to a household hazardous waste collection event held at the Parma CSC, the public sometimes “drops off” containers of unknown composition at the gates to the facility. The employees bring them into the facility and hold them until they can be sent off-site for disposal; in some cases sending them off-site with waste generated by Parma CSC. Mr. Shymske also stated that on occasion, an empty container will be used to collect liquid materials from operations at the service center. These containers may or may not be labeled. A note of caution, the hazardous waste regulations required of a facility are dependent upon the amount of hazardous waste generated. Including household hazardous waste with waste generated by Parma CSC may result in changing your generator status from conditionally exempt to small quantity or perhaps to a large quantity generator of hazardous waste.

Ohio EPA realizes the difficulty associated with preventing the public from dropping unlabeled and therefore unknown materials off at the service center when household hazardous waste collection events are not in operation; however anything that can be done to discourage this practice would be beneficial to Parma CSC (perhaps surveillance cameras). Two items to consider if and when this does occur; (1) how the facility will ensure the proper management of abandoned, unknown wastes on the property (i.e., don't mix with your generated waste, be mindful of issues with compatibility); and, (2) how your waste of unknown composition will be distinguished from household generated hazardous waste of unknown composition.

Waste generated by Parma CSC of unknown composition, will need to be characterized in accordance with OAC rule 3745-52-11, Hazardous Waste Determination. OAC rule 3745-52-11 states, “Any person who generates a waste in the state of Ohio...shall determine if the waste is a....hazardous waste.” Once the determination has been made, and if the waste is hazardous, Parma CSC will be required to manage the waste in accordance with all hazardous waste rules and regulations.

- **Scrap Tires** – Parma CSC had stored numerous scrap tires outside along the south side of the building. The tires were uncovered and potential sites for insect (e.g., mosquito) infestation. During my visit on July 23, 2010, Mr. Shymske reported the tires had been transported to a mobile roll-off box where they will be stored until being sent off site for recycling/reuse. **No further action is required at this time.**

During our inspection, we inquired about the two parts washers on-site at the facility. In your letter dated June 9, 2010 responding to my e-mail dated June 7, 2010, you stated the parts washers are managed by Safety-Kleen. According to documents provided, the solvents used in the parts washers are hazardous when discarded. Mr. Shymske informed me on July 23, 2010 that Parma CSC is currently investigating the use of a non-hazardous solvent for the parts washers. If you need any assistance in this endeavor, do not hesitate to contact me.

In your June 9, 2010 letter, you explained that the City of Parma entertains bids from vendors for the management of used oil and antifreeze. I sent you a list of vendors that provide these services via e-mail during the week of July 26, 2010.

Information Presented During the Inspection on May 25:

- Used Oil Guidance;
- Effective management of solvents – recycling and distillation.

Information Presented via e-mail:

- US EPA Small Business Handbook;
- Information regarding conditionally exempt small quantity generators;
- Universal Waste Guidance;
- Northeast Ohio Recyclers list, July 2010;
- Used Oil Generators Guidance;
- Used Oil recyclers;
- Used Oil Requirements Table;
- Used Oil Transporters;
- Aerosol can flowchart;
- Scrap Tires information

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. They can be contacted at 800-329-7518 or <http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/ocapp>
- Entrepreneurs for Sustainability is a group that seeks to "build a sustainable regional economy in Northeast Ohio that will create prosperity and total community health." They offer workshops, conferences, a business to business directory and more. Their website is at <http://www.e4s.org/content/index.asp>

- ENERGY STAR is a government-backed program helping businesses and individuals protect the environment through superior energy efficiency. Their website is at: <http://www.energystar.gov/>
- 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/>
- 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 at: http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage.
- Ohio Bureau of Workers' Compensation has an OSHA On-Site Consultation service which includes free on-site safety inspections and consultation, safety program assistance, and safety and hygiene training or seminars. More information can be found at: <http://www.ohiobwc.com/employer/programs/safety/SandHOSHAOnSite.asp>
- 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 your cooperation with our inspection of Parma CSC. I would also like to thank Mr. Shymske for his assistance, quick response, and attention to details during this time. Do not hesitate to contact me at (330) 963-1279 if you have any questions with regard to the violation and/or concerns listed in this letter.

Sincerely,



Patricia M. Natali
Environmental Specialist
Division of Hazardous Waste Management

PMN:ddw
Enclosure

cc: Marlene Kinney, DHWM, NEDO
Michael Shymske, Parma City Service Center
ec: Natalie Oryshkewych, DHWM, NEDO
Frank Popotnik, DHWM, NEDO
Paula Canter, DHWM, CO
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 applicable regulations.

Send to Central Office <input checked="" type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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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: OHR000040675	
Site Name	Name: Parma City Service Center	Website: (Optional)
Site Location Information	Street Address: 5680 Chevrolet Blvd	
	City, Town, or Village: Parma	State: OH
	County Name: Cuyahoga	Zip Code: 44130
Site Land Type (check only one)	Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input checked="" type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	
NAICS code(s) www.census.gov/epcd/www/naics.html		

Facility Representative	First Name: Michael MI: Last Name: Shymske
Additional names can be recorded in number 12	Title: Mechanic Supervisor
Only provide address information if it is different than the site address	Phone Number: 440.885.8984 Phone Number Extension:
	E-Mail Address: mshymske@cityofparma-oh.gov
	Fax Number: 440.885.8070 Fax Number Extension:
	Street or P.O. Box: 5680 Chevrolet Blvd
	City, Town or Village: Parma
	State: OH Zip Code: 44130

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: City of Parma		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 checked="" type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	Street or P.O. Box: 6611 Ridge Road, City Hall		
	City, Town or Village: Parma	Owner Phone #: 440.885.8191		
	State: OH	Country: USA	Zip Code: 44130	
	Name of Site's Operator: Brian Higgins	Date Became Operator (mm/dd/yyyy):		
	Operator Type: Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input checked="" type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	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

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input type="checkbox"/> Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). <i>Check the box for the applicable generator status and provide a comment.</i>	<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
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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"/> Receives Hazardous Waste from Off-site

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

Small Quantity Handler of Universal Waste Destination Facility for Universal Waste

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

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, F037, 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.

D001	D005	D006	D007	D008	D018	D035
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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: **Richard Clein**

Tanks: Yes No

Containers: Yes No

Name of Inspector(s): **Patricia Natali** Name of Inspector(s): **Karen Nesbit** Date of Inspection/Time (mm/dd/yyyy) (hh:mm): **05/25/10 10:30**

Comments:
Used oil is stored in tanks. additional codes: D039, and D040

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Parma City Service Center Facility Type: CESQG Date of Inspection: 5/25/10 EPA ID#: OHR000040675

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1 Vehicle maintenance	Used oil, used antifreeze, Freon, oil filters, scrap tires (weights are salvaged) used diesel, batteries For used gasoline and diesel, D001, D008, D018, D039, D040	Varies, generated <55 gallons of used gasoline and used diesel over the course of a year, from May 2009 through August 2010.	Used oil is recycled; batteries are sent off-site for reclamation; used antifreeze is sent off-site for recycling; Freon is captured and sent off-site for recycling; used gasoline and used diesel are sent off-site for fuels blending	Safety Kleen for used oil, used gasoline and diesel; NAPA Auto Parts and D&W Diesel for batteries; Freon recycled by Mobile Air Society Worldwide; used oil, hydraulic fluids, transmission fluid and grease may also be handled by Universal Oil, Peerless Oil, Northeast Lubricants, or Varouh Oil	Used oil is recycled; batteries are sent off-site for reclamation; used antifreeze is sent off-site for recycling; Freon is captured and sent off-site for recycling; used gasoline and used diesel are sent off-site for fuels blending	None
2 Parts washers	Solvents – D001	Two thirty gallon containers ancillary to the parts washers Removal of solvent varies, 3 times in 2010 through May; 4 times in 2009, in each case, recorded < 20 gal. total removed	Reuse the solvent until it needs to be replaced.	Safety Kleen	Used solvent is reused by Safety Kleen	The service center is looking into switching to a non-hazardous solvent for the parts washers
3 Painting operations at the service center	Used paint - D001	Generated < 55 gallons over the course of a year from May 2009 through August 2010	None	Safety Kleen	None	None

4	Patch pot holes in city streets	Asphalt mixed with diesel and water – non-hazardous	Varies	None	Safety Kleen	Is sent off site for reuse	
5	Oil/Water Separator for collecting wastewater draining through garage	Oily wastewater	varies	None	Safety Kleen	None	None

REMARKS-GENERAL INFORMATION

General Process Information: The facility maintains all types of city vehicles, including Zambonies, mowers, chain saws, brush hogs, cars and trucks; they serve as a storage site for city owned vehicles taken out of service. They do not paint streets, but may touch up vehicles, no body work on the vehicles. They patch pot holes in the city roads. There are household hazardous waste, e-waste, and scrap tire roundups for the municipality; the waste is then transferred to the county's designated site for further processing. Scrap metal is collected and recycled; street sweepings are collected and catch basins are cleaned out and the debris is dewatered on site (liquid to POTW) prior to off-site for disposal (non-hazardous). The facility collects animal carcasses which are managed by Republic Services out of Elyria. The facility was recently "re-lamped" (2005) with the waste lamps and ballasts being managed by Johnson Control Company out of Garfield Heights. The arrow boards they occasionally use are solar powered. Aerosol cans (penetrating oils, gasket stripper, paint, etc.), if damaged, are returned to the vender, otherwise, the cans are used until empty and then put in with scrap metal. The facility has a sand blasting unit which has not been changed out; we told them the used sanding material would require characterization when removed for disposal.

Regulatory/Enforcement History (if applicable): **None**

Additional P2 remarks and information: They have a grant for their diesel trucks. We suggested they maintain an inventory control for their aerosol cans. They use a biodegradable brake cleaner, suggested that when brake cleaner unit filter is removed, it be characterized for heavy metals.

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/ocapp.html

Other: none

**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: $\text{Amount in gallons} \times \text{Specific Gravity} \times 8.345 = \text{Amounts in pounds}$.

Safety Equipment Used:

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

3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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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 <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 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 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.

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

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"/>

Parma City Service Center / 5/25/10

[Facility Name/Inspection Date]

[ID number]

OHR000040675

CESQG/February 2009

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

Parma City Service Center / 5/25/10
 OHR 0000 40675 [Facility Name/Inspection Date]
 Used Oil Checklist for Generators/August 2009 [ID Number]
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ON-SITE BURNING IN SPACE HEATER		
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	<i>No</i>
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 checked="" 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 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 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#? [3745-279-24]	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 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 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 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.

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[Facility Name/Inspection Date]

[ID Number]

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 checked="" type="checkbox"/> N/A <input 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 checked="" type="checkbox"/> N/A <input 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 - Batteries" 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 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; 3745-66-100 and 3745-66-101 of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input 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 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 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 type="checkbox"/>
UNIVERSAL WASTE THERMOSTATS		

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14.	Have thermostats that show evidence of leakage, spillage or damage that could cause leaks been contained in a container that is closed, structurally sound, compatible with contents of the thermostats and lacks evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
15.	If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]				
a.	Remove 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)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <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 3745-52-14 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)&(d)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <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)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <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)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <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)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <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)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
16.	When removing mercury containing ampules from thermostats if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining thermostat units), 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)(3)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <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)(3)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
17.	Are thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)"? [3745-273-14(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
UNIVERSAL WASTE LAMPS					
18.	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 type="checkbox"/>	<input checked="" type="checkbox"/>
		<i>AT Time of Inspection there were no lamps on-site</i>			
19.	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 type="checkbox"/>	<input checked="" type="checkbox"/>
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.					
20.	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 type="checkbox"/>	<input checked="" type="checkbox"/>

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ACCUMULATION TIME		
21.	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"/>
NOTE: Accumulation is defined as date generated or date received from another handler.		
22.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	If yes, describe below: <i>Pick up dates by battery collector</i>	
EMPLOYEE TRAINING		
23.	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		
24.	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"/>
	<i>No releases to date</i>	
25.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
26.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-89? (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		
NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.		
27.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
28.	Is the handler aware of DOT requirements for packaging and shipping?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	If no, make aware of 49 CFR 171-180.	
29.	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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
30.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <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)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
31.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do one of the following:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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)(2)] (this change makes it like the LQUWH checklist)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
32.	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 checked="" type="checkbox"/>
EXPORTS		

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33.	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 checked="" 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 checked="" 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 checked="" type="checkbox"/>

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