Environmental
Protection Agency

, Governor
, Lt. Governor
, Director

November 12, 2010

Thomas S. Mirante III
Superintendent
City of Youngstown, Ohio
Waste Water Division
725 Poland Avenue
Youngstown, Ohio 44502

RE: YOUNGSTOWN WASTE WATER TREATMENT PLANT, EPA ID NO. OHD 987 043 601, MAHONING COUNTY, NOTICE OF VIOLATION (NOV), CESQG

Dear Mr. Mirante:

On November 3, 2010, I as a representative of the Ohio EPA Division of Hazardous Waste Management, conducted an inspection of the City of Youngstown Waste Water Treatment Plant, (Waste Water Treatment Plant), located at 725 Poland Avenue, Youngstown, Ohio, for compliance with Ohio's hazardous waste and used oil laws and regulations. You represented the Waste Water Treatment Plant during the inspection.

The facility is a waste water treatment plant for the City of Youngstown and some of the Youngstown suburban areas. Water treatment processes include: primary screening, primary treatment settling, secondary treatment (trickling filters and aeration), microscreening, chlorination and de-chlorination.

Wastes produced include:
-Head works screening solids
-Primary treatment grit
-Primary treatment sludge
-Secondary treatment sludge
-Oil and grease (concentrated from grease and scum from primary and secondary clarifiers).

All the above are non-hazardous wastes.

Head works screening solids and primary treatment grit are transported to a solid waste landfill. Primary treatment sludge and secondary treatment sludge are dewatered and then incinerated in an on-site solid waste incinerator. Oil and grease is also incinerated on-site.

Incinerator ash is a non-hazardous waste that is transported to a solid waste landfill.

Hazardous wastes generated included:
-Spent hexane solvent in the lab;
-Mercury standard solutions in the lab; and
-Spent parts washer solvent.

The facility also generates used fluorescent lamps and used batteries.

The inspection included a review of the facility's operations, as well as waste management practices and documentation. The Waste Water Treatment Plant was inspected for the requirements of a conditionally exempt small quantity generator (CESQG) of hazardous waste because it appears to have generated less 220 pounds of hazardous waste per calendar month in 2010.

Should the Waste Water Treatment Plant generate more than 220 pounds of hazardous waste in a calendar month or accumulate more than 2,200 pounds of hazardous waste on-site at any one time, it must comply with the requirements of a Small Quantity Generator (SQG) or a Large Quantity Generator (LQG), whichever is applicable. Guidance on this topic is attached.

This letter will explain the violations I found and steps you need to take to correct them. I found the following violations of Ohio's hazardous waste, used oil and universal waste laws and 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 and High Intensity discharge (HID) lamps. Based on information provided by the facility during the inspection, used lamps are disposed in the facility trash. 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 lamps as universal waste, or evaluate all discarded lamps not managed as universal wastes, to determine if they exhibit any characteristic of hazardous waste.

The facility may use either generator knowledge based on documentation provided by the lamp manufacturer for model number lamp of each lamp used 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 the Waste Water Treatment Plant plans to evaluate and manage discarded lamps.

Guidance is attached to assist in responding to this violation.

Submit a copy of the plan to this office within 30 days of receipt of this letter.

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

Vehicle oil changes are done in the Sewer Maintenance Building. Used oil had been collected in three-55 gallon drums and one 30 gallon drum in this building. When initially observed none were labeled with the words "Used Oil" as required by OAC 3745-279-22(C)(1).

All were labeled with words "Used Oil" during the inspection. This action abated this violation. No further action on this violation is required at this time.

3. OAC Rule 3745-273-16 Employee training for small quantity handlers of universal waste

The facility generates used lamps and used batteries that could be managed as universal waste. In addition to the used lamps discussed in Violation No. 1, the facility generates several types of used batteries reportedly including batteries from portable power tools and from emergency lighting systems. Batteries used in these services are commonly nickel-cadmium and sealed lead-acid batteries, respectively; both of which would be expected to exhibit a characteristic of hazardous waste for cadmium and lead, respectively. No documentation on shipments of waste batteries was provided.

Based on the management practices for these wastes, facility employees with universal waste duties were not appropriately trained on universal waste requirements.

To return to compliance the facility must:

- Train appropriate personnel with universal waste management duties on applicable universal waste requirements. Training should address handling of both universal waste lamps and universal waste batteries.

- Submit copies of training documentation to this office within 30 days of the date of receipt of this letter.

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

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

Other Information

The division 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.

You can find copies of the rules and other information on the division's web page at: http://www.epa.ohio.gov/dhwm/laws_regs.aspx.

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: Natalie Oryshkewych, Ohio EPA, DHWM, NEDO
Nyall McKenna, Ohio EPA, DHWM, NEDO
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
or mail it to Kristina Durnell, Central Office

Site EPA ID No.	EPA ID Number: OHD987043601
Site Name	Name: Youngstown City Of Waste Water — Website: (Optional)
Site Location Information	Street Address: 725 Poland Avenue City, Town, or Village: Youngstown — State: OH County Name: Mahoning — Zip Code: 44502
Site Land Type (check only one)	Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal X☐ State ☐ Other ☐
NAICS code(s) www.census.gov/epcd/www/naics.html	
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Thomas — MI: S. — Last Name: Mirante III Phone Number: (330) 742-8820 — Phone Number Extension: E-Mail Address: Fax Number: — Fax Number Extension: Street or P.O. Box: City, Town or Village: State: — Zip Code:
Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: — Date Became Owner (mm/dd/yyyy): Owner Type: Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal X☐ State ☐ Other ☐ Street or P.O. Box: Same as above address. City, Town or Village: — Owner Phone #: State: — Country: — Zip Code: Name of Site's Operator: Same as above — Date Became Operator (mm/dd/yyyy): Owner Type: Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other ☐ Street or P.O. Box: City, Town or Village: — Operator Phone #: State: — United States — Zip Code:

VIOLATIONS CITED? X☐ Yes ☐ No

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

☐ Not a HW Generator	☐UNKNOWN: Cited for violation of 3745-52-11	☐Large Quantity Generator (LQG)
		☐Small Quantity Generator (SQG)
		X ☐Conditionally Exempt Small Quantity Generator
		☐U.S. Importer of Hazardous Waste
		☐Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

- ☐ Recycler of 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)

- X☐ 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

- X☐ Batteries
- ☐ Pesticides
- ☐ Mercury containing equipment
- X☐ Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S)

- X☐ 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	X☐ No	Additional Facility Representatives:
Tanks	☐ Yes	X☐ No	Other Comments:
Containers	X☐ Yes	☐ No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh mm)
N. Wasilk		11-3-10 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 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)
SIGNATURE NOT REQUIRED		

PROCESS DESCRIPTION

Facility:
EPA ID NO. OHD 987 043 601

Youngstown Waste Water Treatment Plant
725 Poland Avenue
Youngstown, Ohio 44502

Inspector: N. Wasilk

The facility is a sewage treatment plant with the following processes:

-primary screening,
-primary treatment settling,
-secondary treatment (trickling filters and aeration),
-microscreening,
-chlorination and de-chlorination.

Treatment chemicals include:
-polymer for flocculation,
-gaseous chlorine for chlorination (received as a liquid and vaporized)
-sulfur dioxide, fed as a liquid for de-chlorination.

Wastes produced include:
-Head works screening solids
-Primary treatment grit
-Primary treatment sludge
-Secondary treatment sludge
-Oil and grease (concentrated from grease and scum from primary and secondary clarifiers).

All the above are non-hazardous wastes.

Facility operates its own incineration system which incinerates:
-oil and grease from the grease concentrator (i.e., materials that float on the primary and secondary separators);
- Primary treatment sludge and secondary treatment sludge after dewatering.

The treatment plant operates a quality control lab on-site. Hazardous wastes generated in the lab are:
-Spent hexane solvent in the lab;
-Mercury standard solutions in the lab;

An infrequent waste stream is spent refractory brick from the incinerator.

Used oil is generated from vehicle maintenance and from process equipment, for example, bearing oils.

Used lamps, mostly fluorescents and HIDs, are generated but reportedly not recycled but instead disposed in trash.

Parts washer is located in the warehouse; fresh solvent has a flash point of 106 °F pursuant to the MSDS. Spent solvent is presumed to be a hazardous waste and is reportedly managed by pouring into the used oil.

Facility believes that all the mercury containing devices have been removed.

Any sand blasting for major painting projects would be done by a contractor.

On-site lab generates spent hexane from the oil and grease test. The spent hexane managed as a hazardous waste. Acids used in the lab are neutralized in limestone pit prior to discharge to the sewers. Last lab waste shipment of hazardous waste was on 12-18-06.

Primary and secondary sludges and grease from the grease concentrator are incinerated in the on-site incinerator. Incineration ash is a non-hazardous waste and is hauled by the treatment plant to a solid waste landfill operated by Allied Waste. The treatment plant also hauls grit and catch basin solids to a solid waste landfill operated by Allied Waste. Allied Waste picks-up and hauls head works screen solids to a solid waste landfill.

Used oil is sent to Environmental Specialists.

Hazardous wastes generated are:
-Spent hexane solvent in the lab;
-Mercury standard solutions in the lab; and
-Spent parts washer solvent.

Hazardous waste is generated from the parts washer as the solvent has a flash point of 106 °F. Reportedly spent solvent is added to the used oil.

Facility is a CESQG.

YOUNGSTOWN WASTE WATTER TREATMENT PLANT

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] WASTE LAMPS NOT EVALUATED		Yes ☐ No ☑ N/A ☐
GENERATOR CLASSIFICATION			
2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]		Yes ☑ No ☐ N/A ☐
*NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). **If so**, complete the Small Quantity Generator Requirements checklist.*			
OFF-SITE SHIPMENT OF HAZARDOUS WASTE			
3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)]		Yes ☑ No ☐ N/A ☐
TREATMENT OF HAZARDOUS WASTE			
4.	Does the generator treat hazardous waste in a:		
	a.	Container that meets 3745-66-70 to 3745-66-77?	Yes ☐ No ☐ N/A ☑
	b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes ☐ No ☐ N/A ☑
	c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes ☐ No ☐ N/A ☑
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes ☐ No ☐ N/A ☑
NOTE: Complete appropriate checklist for each unit.			
NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.			
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 ☑ No ☐ N/A ☐
	a.	Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes ☑ No ☐ N/A ☐

YOUNGSTOWN WASTE WATER TREATMENT PLANT

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS – BATTERIES AND LAMPS			
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 ☐ No ☑ N/A ☐
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 ☐ No ☑ N/A ☐
WASTE MANAGEMENT AND LABELING/MARKING			
UNIVERSAL WASTE BATTERIES NO U.W. BATTERIES OBSERVED			
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]		Yes ☐ No ☐ N/A ☐
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 ☐ No ☐ N/A ☐
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]		Yes ☐ No ☐ N/A ☐
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 ☐ No ☐ N/A ☐
	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 ☐ No ☐ N/A ☐
	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 ☐ No ☐ N/A ☐
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 ☐ No ☐ N/A ☐
UNIVERSAL WASTE LAMPS NO U.W. LAMPS OBSERVED.			
8.	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 ☐ No ☐ N/A ☐
9.	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 ☐ No ☐ N/A ☐
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.*			
10.	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 ☐ No ☐ N/A ☐

ACCUMULATION TIME			
11.	Is the waste accumulated for less than one year? [3745-273-15(A)]		Yes ☐ No ☐ N/A ☐
	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 ☐ No ☐ N/A ☐
NOTE: Accumulation is defined as date generated or date received from another handler.			
12.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below:		Yes ☐ No ☐ N/A ☐
EMPLOYEE TRAINING			
13.	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] WASTE LAMPS APPARENTLY DISPOSED IN TRASH.		Yes ☐ No ☑ N/A ☐
RESPONSE TO RELEASES			
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] NO RELEASES OBSERVED.		Yes ☐ No ☐ N/A ☐
15.	Is the material released characterized? [3745-273-17(B)]		Yes ☐ No ☐ N/A ☐
16.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]		Yes ☐ No ☐ N/A ☐
OFF-SITE SHIPMENTS NO DOCUMENTATION OF U.W. SHIPMENTS PROVIDED BY THE FACILITY			
NOTE: If a SQUWH self-transports waste, then the handler must comply with the Universal Waste transporter requirements.			
17.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]		Yes ☐ No ☐ N/A ☐
18.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.		Yes ☐ No ☐ N/A ☐
19.	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 ☐ No ☐ N/A ☐
20.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?		Yes ☐ No ☐ N/A ☐
	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 ☐ No ☐ N/A ☐
21.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u>:		Yes ☐ No ☐ N/A ☐
	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)]	Yes ☐ No ☐ N/A ☐
22.	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 ☐ No ☐ N/A ☐
EXPORTS			
23.	Is waste being sent to a foreign destination? If so:		Yes ☐ No ☐ N/A ☐

	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 ☐ No ☐ N/A ☐
	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 ☐ No ☐ N/A ☐
	c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes ☐ No ☐ N/A ☐

YOUNGSTOWN WASTE WATER TREATMENT PLANT

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 ☑
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 ☐ 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)] 3745-279-10(B)(3); CESQG	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)] DRUMS NOT MARKED		Yes ☐ No ☑ N/A ☐
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] NO RELEASES OBSERVED		Yes ☐ No ☐ N/A ☑
	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:		NO
	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 that 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 ☑
NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).			
GENERATOR TRANSPORTATION			
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#?		Yes ☑ No ☐ N/A ☐
12.	If the generator self-transports 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			
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 ☐ No ☐ N/A ☑
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]		Yes ☐ No ☐ N/A ☑
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 ☐ 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.			