Ohio | Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Altec Industries, Inc.
Ashland County
NOV/RTC
OHR000117937
CESQG

August 3, 2011

Mr. Bruce Stainbrook, EH&S
GESI
810 Franklin Court, Suite A
Marietta, Georgia 30067

Dear Mr. Stainbrook:

Thank Ron Betit for accompanying me during the Ohio Environmental Protection Agency's (Ohio EPA) July 14, 2011, compliance evaluation inspection of your business located at 1236 Township Road 1175, Ashland, Ohio. I inspected your facility to determine the facility's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). This inspection consisted of a walkthrough of the facility and paperwork review. Pollution prevention options were also discussed during this inspection. This letter will explain the violations I found.

Altec Industries, INC (AI) is a service center specializing in in repairing electric company service trucks. AI generates approximately 10 gallons/month of spent solvent/paint (D001, F003, and F005) generates during limited paint activities which is disposed off-site. Also, AI generates used oil which is currently being burned in a used oil furnace. Three (3) used oil storage containers were noted unlabeled. The used oil containers were properly labeled during this inspection. AI also manages spent fluorescent light bulbs as universal waste and are currently recycled off-site. At the time of this inspection, AI was a conditionally exempt small quantity generator of hazardous waste.

I found the following violation of Ohio's hazardous waste laws. No further action is required at this time.

1. **OAC 3745-279-22 (C)(1) Used oil storage container labeling.**

   Containers and above ground tanks used to store used oil at generator facilities shall be labeled or marked clearly with the words "Used Oil."

   AI did not label several containers of used and a used oil tanks located outdoors. This violation was **abated** during the inspection. No further action is required at this time.

The Division of Materials and Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign up for this free service.

You can find more information at http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage. Please feel free to share this information with your colleagues.

As we discussed during the inspection, if you find ways to recycle reduce or altogether eliminate the amount of waste that your company generates you may be able to reduce your treatment and disposal costs. Thus, you may possibly reduce your regulatory requirements. Ohio EPA has helpful information about pollution prevention at the following web address: http://www.epa.ohio.gov/ocapp.

Enclosed you will find a copy of the checklists that were completed as a result of this inspection. You can find copies of the rules and other information on the division's web page at http://www.epa.ohio.gov/dhwm/.

For your information, I am providing you with the following documents: Universal Waste Guidance, December, 2004; Universal Waste Rules for Handlers of Lamps, June, 2005; Computer, Fluorescent Lamps, and Ballasts Recyclers List, November, 2008; Used Oil Burners – New Guidance for Rebuttable Presumption, April 2008; and The Regulation of Used Oil: An Overview for Ohio Business Who Generate Used Oil, April, 2006.

Should you have any questions or if I can be of assistance, please contact me at (419) 373-3015.

Sincerely,

Edgar V. Pulido
Division of Materials and Waste Management

/llr
Enclosures

pc: Cindy Lohrbach, DMWM, NWDO
Colleen Weaver, Supervisor, DMWM, NWDO
DHMM-HW, NWDO File: Altec Industries, Inc., Ashland County (new)
Ron Betit, Service Manager, Altec Industries

ec: Ed Pulido, DMWM, NWDO

NOTICE: Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

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 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)]		Yes ☐ No ☒ N/A ☐
WASTE MANAGEMENT & LABELING/MARKING			
UNIVERSAL WASTE BATTERIES			
3.	Are battery(ies) 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.	Does the SQUWH conduct any of the following activities:		
	a.	Sort batteries by type?	Yes ☐ No ☒ N/A ☐
	b.	Mix battery types in one container?	Yes ☐ No ☒ N/A ☐
	c.	Discharge batteries to remove the electric charge?	Yes ☐ No ☒ N/A ☐
	d.	Regenerated used batteries?	Yes ☐ No ☒ N/A ☐
	e.	Disassemble them into individual batteries or cells?	Yes ☐ No ☒ N/A ☐
	f.	Remove batteries from consumer products?	Yes ☐ No ☒ N/A ☐
	g.	Remove the electrolyte from the battery?	Yes ☐ No ☒ N/A ☐
	If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)]		Yes ☐ No ☐ N/A ☒
6.	If the electrolyte is removed or other waste generated, has it been determined whether it is a 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 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 battery(ies) of container(s) 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			
8.	Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are 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?		Yes ☒ No ☐ N/A ☐

	[3745-273-13(D)(2)]		
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 ☒

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 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.*

ACCUMULATION TIME			
11.	Is the waste accumulated for less than one year? [3745-273-15(A)] If not:		Yes ☐ No ☐ N/A ☒
	a.	Was 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 length of time the universal waste is stored documented by **one** of the following: [3745-273-15(C)]		Yes ☐ No ☐ N/A ☒
	a.	Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)]	Yes ☐ No ☐ N/A ☒
	b.	Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)]	Yes ☐ No ☐ N/A ☒
	c.	Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)]	Yes ☐ No ☐ N/A ☒
	d.	Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)]	Yes ☐ No ☐ N/A ☒
	e.	Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)]	Yes ☐ No ☐ N/A ☒
	f.	Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)]	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]		Yes ☒ No ☐ N/A ☐
RESPONSE TO RELEASES			
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]		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, is 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 Chapter 3745-52) [3745-273-17 (B)]		Yes ☐ No ☐ N/A ☒
OFF-SITE SHIPMENTS			
NOTE: If a SQUWH self-transports waste, then they 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 ☐

NOTE: SQUWHs are prohibited to send waste to any other facility.

18.	If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)]		Yes ☐ No ☐ N/A ☒
19.	Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)]		Yes ☐ No ☐ N/A ☒
20.	If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:		
	a.	Receive the waste back? [3745-273-18(E)(1)]	Yes ☐ No ☐ N/A ☒
	b.	Agree to where the shipment will be 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 one of the following:		Yes ☐ No ☐ N/A ☒
	a.	Sending the waste back to the originating handler? [3745-273-18(F)(1)]	Yes ☐ No ☐ N/A ☒
	b.	Sending 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 universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]		Yes ☐ No ☐ N/A ☒
23.	If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)]		Yes ☐ No ☐ N/A ☒
EXPORTS			
24.	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 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 U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)]	Yes ☐ No ☐ N/A ☒
	c.	Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes ☐ No ☐ N/A ☒

Send to Central Office ☒	Ohio Environmental Protection Agency **RCRA SUBTITLE C SITE** **IDENTIFICATION/VERIFICATION FORM**	For Ohio EPA use only

Completed verification forms required to be submitted to CO should be e-mailed to brad.hauser@epa.state.oh.us

Site EPA ID No.	EPA ID Number: OHR000117937							
Site Name	Name: **Altec Industries, Inc.**				Website: (Optional) http://www.altec.com/			
Site Location Information	Street Address: 1236 Township Road 1175							
	City, Town, or Village: Ashland				State: OH			
	County Name: Ashland				Zip Code: 44805			
Site Land Type (check only one)	Private ☒	County ☐	District ☐	Federal ☐	Indian ☐	Municipal ☐	State ☐	Other ☐
NAICS code(s) www.census.gov/epcd/www/naics.html	**336211**							
Facility Representative	First Name: Mike		MI:		Kedanis			
Additional names can be recorded in number 12	Phone Number: (419)289-6066				Phone Number Extension:			
	E-Mail Address: mike.kedanis@altec.com							
	Fax Number: (419)				Fax Number Extension:			
Only provide address information if it is different than the site address	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: Altec Industries, Inc.				Date Became Owner (mm/dd/yyyy): 10/24/2003			
	Owner Type:	Private ☒	County ☐	District ☐	Federal ☐	Indian ☐	Municipal ☐	State ☐	Other ☐
	Street or P.O. Box: **210 Inverness Center Drive**							
	City, Town or Village: Birmingham				Owner Phone #: (877)462-5832			
	State: AL				Country: USA		Zip Code: 35242	
	Name of Site's Operator:				Date Became Operator (mm/dd/yyyy):			
	Operator Type:	Private ☐	County ☐	District ☐	Federal ☐	Indian ☐	Municipal ☐	State ☐	Other ☐
	Street or P.O. Box:							
	City, Town or Village:				Operator Phone #:			
	State:				Country		Zip Code:	

VIOLATIONS CITED?	☒ Yes ☐ No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

☐ Not a HW Generator	☐ UNKNOWN: Cited for violation of 3745-52-11	☐ Large Quantity Generator (LQG)
		☐ Small Quantity Generator (SQG)
		☒ 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)

☐ 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. 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 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 D035 F003 F005

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	
Containers	☒ Yes	☐ No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Ed Pulido		**07/14/2010 2:30**

Comments:

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

WASTE EVALUATION			
1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]		Yes ☒ No ☐ N/A ☐
GENERATOR CLASSIFICATION			
2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]		Yes ☒ No ☐ N/A ☐
*NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). **If so,** complete the Small Quantity Generator Requirements checklist.*			
OFF-SITE SHIPMENT OF HAZARDOUS WASTE			
3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)]		Yes ☒ No ☐ N/A ☐
TREATMENT OF HAZARDOUS WASTE			
4.	Does the generator treat hazardous waste in a:		
	a.	Container that meets 3745-66-70 to 3745-66-77?	Yes ☐ No ☐ N/A ☒
	b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes ☐ No ☐ N/A ☒
	c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes ☐ No ☐ N/A ☒
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes ☐ No ☐ N/A ☒
NOTE: Complete appropriate checklist for each unit.			
NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.			
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 ☐

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Altec Industries, Inc. LQG/SQG/CESQG/TSD **EPA ID#:** OHR 000 117 937

	Description of Waste				***On-Site Management***			***Off-Site Management***	
	Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	**Waste Generated** (e.g. sludge, spent solvent, ash, etc)	**EPA Waste Code**	**QTY Generated per Month**	**Type of Accumulation/ Storage** (e.g. container, tank, etc)	**Type of On-Site Treatment** (recycle, wwt, etc)	**Waste Location** (Include map if possible)	**Name, state, and type of activity occurring at the facility.**	**P2 Activities**
1	Maintenance	Used oil	N/A	20 gallons	Container	N/A	Indoors	N/A	Used oil furnace indoors
2	Maintenance	Spent lamps	N/A	<1 unit	N/A	N/A	N/A	Giant Resource Recovery Sumter, Inc. 755 Industrial Road Sumter, SC 29151 SCD036275626	Recycling
3	Painting	Spent Solvent/Paint	D001 F003 F005	<10 gal.	Container	N/A	Indoors	Giant Resource Recovery Sumter, Inc. 755 Industrial Road Sumter, SC 29151 SCD036275626	Burn for energy recovery
4									
5									

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)]	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 used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes ☐ No ☐ N/A ☒
NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.			
6.		Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes ☐ No ☐ N/A ☒
7.		Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes ☒ No ☐ N/A ☐
8.		Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked Used Oil? [3745-279-22(C)]	Yes ☐ No ☒ N/A ☐
9.		Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	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:	
	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.			