



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Rd.  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468  
www.epa.ohio.gov

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

Re: Moyer's Auto Wrecking  
Crawford County  
DHWM, NWDO  
Complaint 2946  
Notice of Violation

February 25, 2010

Mr. Terry Moyer  
Moyer's Auto Wrecking  
735 Bauer Avenue  
Crestline, Ohio 44827

Dear Mr. Moyer:

Please thank Trevor Moyer, John Moyer and Tammy Moyer of your staff for accompanying Amy Heller, Tyler Madeker, Ed Pulido and me during the Ohio Environmental Protection Agency's (Ohio EPA's) January 13, 2010; January 22, 2010; January 28, 2010; and February 4, 2010, site visits. Ohio EPA conducted a compliance evaluation inspection and complaint investigation of the Moyer's Auto Wrecking (MAW) facility located at 735 Bauer Avenue, Crestline, Ohio, during these site visits. We inspected MAW to determine its 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) and we also investigated a complaint alleging mismanagement of auto fluids at the facility.

This letter will explain the violations we found, what you need to do to correct the violations, other general concerns we have, what you need to do to respond to the general concerns and the pollution prevention opportunities we identified.

MAW is a licensed motor vehicle salvage facility. MAW purchases vehicles from automobile auctions and receives automobiles that have been involved in accidents. MAW leaves all fluids in the vehicles that it receives until the engine or part of the car containing the fluid has been sold, at which time the fluids from the vehicles are drained. Once the majority of parts from a vehicle has been sold and removed, the remaining vehicle shell and other parts are crushed on site and taken to an off-site shredder.

MAW has a paint booth located on the north side of Bauer Avenue where auto body work is conducted. It is unclear if hazardous waste is currently generated at MAW as little information pertaining to the paint booth was obtained during the inspection. More information has been requested below in regard to this issue. Additionally, not all wastes have been properly evaluated at MAW. MAW does generate universal waste lamps, used oil and spent lead-acid batteries. Antifreeze and gasoline from salvage vehicles is drained and immediately used in MAW's on site trucks; no storage of these materials takes place.

We found the following violations of Ohio's hazardous waste laws. In order to correct these violations, you must do the following and send me the required information **within 30 days of receipt of this letter**, unless otherwise specified.

**Violations:**

- 1 **OAC Rule 3745-52-11, Hazardous Waste Determination:** "Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste ..."

MAW failed to evaluate the following waste streams to determine if they were a hazardous waste in accordance with OAC Rule 3745-52-11, prior to sending them off site: a) spent lamps, b) used oil-contaminated soil from the cleanup of used oil spills in the yard, and c) used oil-contaminated material from the cleanup of used oil spills in the buildings.

In order to abate this violation, MAW must do the following and submit the requested information to Ohio EPA **within 30 days of receipt of this letter**.

- a. **Spent Lamps** – On January 13, 2010, MAW told Ohio EPA that they throw their spent lamps into the trash. MAW failed to evaluate the spent lamps prior to disposing of them in the trash.

On January 22, 2010, MAW showed Ohio EPA the container they would be using to store their universal waste lamps. The container was closed and properly labeled with an accumulation start date of January 15, 2010. However, it was unclear where MAW would be recycling the universal waste lamps.

In order to abate this violation, MAW must submit the name, address and phone number of the facility that MAW will be shipping the universal waste lamps to be recycled. This information should be submitted **within 30 days of receipt of this letter**.

For more information the following fact sheets have been enclosed: Universal Waste Rules for Handlers of Lamps, dated June 2005; Fluorescent Lamps: What You Should Know, dated January 2007; Computer, Fluorescent Lamp and Ballast Recyclers, dated July 2009; and Universal Waste, dated December 2004.

- b. **Used oil-contaminated soil from the cleanup of used oil spills in the yard** – MAW failed to evaluate the used oil-contaminated soil generated from spills in the yard prior to shipping it off site.

MAW explained to Ohio EPA on January 22, 2010, that MAW shovels used oil-contaminated soil into the trunks and bodies of cars prior to the cars being crushed and sent off site to the shredders. However, MAW has not evaluated the used oil-contaminated soil prior to sending it off site.

In order for MAW to determine whether the used oil-contaminated soil exhibits any hazardous waste characteristics, MAW must obtain a chemical analysis of a representative sample of the contaminated soil. MAW will need to contract the services of an environmental laboratory to analyze this material. MAW must at least determine the concentrations of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and Resource Conservation and Recovery Act (RCRA) metals of the waste. MAW has the option of analyzing the soil for total VOCs, total SVOCs and total RCRA metals. However, based upon the results of these analyses MAW may be required to analyze the soils for toxicity characteristic leaching procedure (TCLP) VOCs, TCLP SVOCs and TCLP RCRA metals.

**Within 30 days of receipt of this letter**, MAW shall submit the analytical results indicating the proper evaluation of the contaminated soil for Ohio EPA's review. The results must document if the waste is hazardous or not and, if hazardous, whether it is restricted from land disposal. If the waste is hazardous, MAW must also submit information as to what treatment, storage or disposal facility the waste will be sent to.

Once Ohio EPA acknowledges MAW's proper characterization of the waste, MAW must dispose of the waste at a proper disposal facility. MAW must then submit the appropriate manifest documents or shipping papers indicating proper disposal of the waste to Ohio EPA. MAW must cease disposing of this soil in scrap automobiles whether it is hazardous or not.

For more information, the following fact sheets have been enclosed: Identifying Your Hazardous Waste, dated November 2006; Use of Generator Knowledge In Complying with OAC Rule 3745-52-11 Hazardous Waste Evaluation, dated July 18, 2005; Commercial Environmental Laboratories, printed November 19, 2009; and Violations Most Frequently Cited by Division of Hazardous Waste Management Inspectors, printed November 19, 2009.

Please notify me at least five days prior to taking the sample(s) so that I may be present.

If the waste is hazardous, I will determine the status of your compliance with other hazardous waste laws and notify you of my findings in a separate letter.

- c. Used oil-contaminated material from the cleanup of used oil spills in the buildings – MAW failed to evaluate the used oil-contaminated material generated from spills in the buildings prior to shipping it off site.

MAW explained to Ohio EPA on February 4, 2010, that the used oil dry from the cleanup of used oil spills inside the buildings is either thrown into the trash or is shipped off site in the trunks of cars being sent off site to the shredders. However, MAW has not evaluated the used oil-contaminated material prior to sending it off site.

OAC Rule 3745-279-10(C)(2) states, "Materials containing or otherwise contaminated with used oil that are burned for energy recovery are subject to regulation as used oil ..." MAW has the option of managing the used oil-contaminated material as used oil if it can be burned for energy recovery. Ohio EPA recommends that MAW contact used oil recyclers to set up an agreement/contract for this material to be recycled. However, the final determination that this material can be burned for energy recovery must be made by the used oil recycling facilities, not Ohio EPA or MAW.

If the used oil recycling facilities determine that this material cannot be burned for energy recovery, then MAW must dispose of this material as a waste. Prior to disposing of the waste, MAW must make a proper waste evaluation on the used oil-contaminated material. In order for MAW to determine whether the used oil-contaminated material exhibits any hazardous waste characteristics, MAW must obtain a chemical analysis of a representative sample of the contaminated material. MAW will need to contract the services of an environmental laboratory to analyze this material. MAW must at least determine the concentrations of the VOCs, SVOCs, and RCRA metals of the waste. MAW has the option of analyzing the material for total VOCs, total SVOCs and total RCRA metals. However, based upon the results of these analyses MAW may be required to analyze the material for TCLP VOCs, TCLP SVOCs and TCLP RCRA metals.

**Within 30 days of receipt of this letter**, MAW shall submit the analytical results indicating the proper evaluation of the contaminated material for Ohio EPA's review. The results must document if the waste is hazardous or not and, if hazardous, whether it is restricted from land disposal. If the waste is hazardous, MAW must also submit information as to what treatment, storage or disposal facility the waste will be sent to.

Once Ohio EPA acknowledges MAW's proper characterization of the waste, MAW must dispose of the waste at a proper disposal facility. MAW must then submit the appropriate manifest documents or shipping papers indicating proper disposal of the waste to Ohio EPA. MAW must cease disposing of this material in scrap automobiles whether it is hazardous or not.

Please notify me at least five days prior to taking the sample(s) so that I may be present.

If the waste is hazardous, I will determine the status of your compliance with other hazardous waste laws and notify you of my findings in a separate letter.

2. **OAC Rule 3745-279-11(C)(1), Used Oil Storage Requirements for Generators:**

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

MAW failed to mark one used oil tote located outside the main office building and four used oil totes located south of the loader storage building with the words "Used Oil."

In order to abate this violation, MAW must properly label all used oil containers with the words "Used Oil." **Within 30 days of receipt of this letter**, MAW must submit to Ohio EPA photographs of the used oil totes located south of the loader storage building and next to the main office building showing the proper labels. For more information Ohio EPA has enclosed the fact sheet titled The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil, dated April 2006.

3. **OAC Rule 3745-279-22(D), Used Oil Requirements for Generators:** "Response to releases. Upon detection of a release of used oil to the environment ... a generator must perform the following cleanup steps: (1) Stop the release; (2) Contain the released used oil; (3) Clean up and manage properly the released used oil and other materials; and (4) If necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service."

MAW failed to clean up and properly manage the used oil in the following areas: back storage room of main office building; used oil tote area in front of main office; loader storage building; all other areas outside where leaking engines are in contact with the ground.

MAW must immediately begin properly cleaning up used oil releases in a timely manner.

MAW must clean up all visible contamination located in the buildings and in the yard. The contaminated material shall be evaluated and placed in containers in good condition prior to disposal. **Ohio EPA must be present to verify that all visible used oil contamination has been removed from an area prior to this area being backfilled or a secondary containment system being put into place. Due to the size of the property and amount of contamination present, a description of how this rule will be met prior to excavation should be submitted to Ohio EPA for review within 14 days of receipt of this letter.**

The description of MAW's clean-up plans should include the following information:

- A map showing all areas of the property where oil contamination will be cleaned up. (This map must include all areas mentioned above.)
- A description of how soils will be excavated and staged.
- A description of how samples will be collected.
- An explanation of how MAW will determine how many samples are necessary to properly characterize the soil. (MAW should propose a certain number of samples per the volume of soil that they expect to generate.)
- A description of what the samples will be analyzed for and the methods utilized. (To meet the requirements of OAC Rule 3745-52-11 for waste evaluation, MAW must analyze a representative sample of the soil for VOCs, SVOCs, RCRA metals, and polychlorinated biphenyls (PCBs). MAW has the option of analyzing

the soil for total VOCs, total SVOCs, total RCRA metals and total PCBs. However, based upon the results of these analyses MAW may be required to analyze the soils for TCLP VOCs, TCLP SVOCs and TCLP RCRA metals.)

- The name of the environmental laboratory that MAW will use to analyze the samples.
- The names of the disposal facilities that MAW plans to use whether the soil is hazardous or non-hazardous.

**Once Ohio EPA has reviewed and accepted MAW's plan for abating this violation, MAW will have 30 days to implement the plan and submit all requested information and documentation to Ohio EPA.** Based on the results of the analytical test(s), MAW shall label the container(s) appropriately and dispose of the wastes at a proper disposal facility.

MAW shall submit the analytical results indicating the proper evaluation of the contaminated soil and appropriate manifest documents or shipping papers indicating proper disposal of the contaminated soil to Ohio EPA **within 30 days of implementation of the plan.** The results must document if the waste is hazardous or not and, if hazardous, whether it is restricted from land disposal. If the waste is hazardous, MAW must explain what treatment, storage or disposal facility the waste will be sent to.

MAW must also submit information describing how the used oil will be collected and managed in the future to prevent future releases to the environment. This information should include how MAW will be collecting used oil draining from the engines, how it will be stored on site, and where it will be recycled.

If the waste is hazardous, I will determine the status of your compliance with other hazardous waste laws and notify you of my findings in a separate letter.

Please notify me at least five days prior to removal of the used oil-contaminated soils and contaminated soil sampling so that I may be present.

#### **Additional Information Requested**

- A. **Loader Storage Building** – This building contains engines on metal racks, three shelves high. Engines are also placed directly on the floor without secondary containment for used oil. This building is equipped with a concrete floor and a drain in the middle of the building. During the site visits, Ohio EPA observed used oil draining from the engines directly into the drain. MAW explained that the drain flows into a concrete holding pit. However, MAW did not know the size of the holding pit or if the holding pit had ever been pumped out. MAW must submit information to answer the following questions **within 30 days of receipt of this letter**: What are the dimensions of the holding pit? What is the volume held by the pit? Where is the pit located? When was the pit installed? Where does the holding pit flow to? Has the pit ever been

pumped out? What was done with the contents of the holding pit once it was pumped out? If the pit has been pumped out, please submit a copy of all documentation from this activity including any analytical results from the waste, invoices, and shipping papers/manifests.

- B. Paint Booth** – During Ohio EPA's February 4, 2010, site visit, MAW showed Ohio EPA the body shop located on the north side of the property. MAW told Ohio EPA that the paint booth was used by Jim (last name unknown) who was not an employee of MAW. MAW did not know how the waste generated from this paint booth was disposed except that the paint filters were thrown into the trash. MAW must submit information to answer the following questions **within 30 days of receipt of this letter**: What wastes are generated from this paint booth? How much of these wastes is generated in a month? Where are these wastes disposed of? Please submit any documentation associated with the disposal of these wastes. Please submit Material Safety Data Sheets (MSDSs) for the three paints utilized most frequently and any paint thinner or solvent utilized in the painting process or cleaning process.
- C. Lead-Acid Batteries** – MAW generates lead-acid batteries from salvaged cars. These batteries are picked up by companies that regenerate the batteries through electrolyte replacement or send them on to smelters located in Indiana. These batteries are not stored in a central location while at MAW. They are scattered throughout the site on the ground, in the back of open truck beds, or on pallets. It appears that MAW is managing the batteries as reclaimed spent lead-acid batteries instead of universal waste batteries. In which case, MAW is subject to complying with the applicable provisions in Chapter 3745-270 of the OAC.

In order to determine MAW's compliance with the applicable rules, more information is needed. **Within 30 days of receipt of this letter**, MAW must submit to Ohio EPA the dates, number of batteries picked up each day, and name of the battery company accepting the batteries for the last three months. MAW should also submit any documentation showing compliance with OAC Chapter 3745-270 to Ohio EPA for this time period along with the requested information.

MAW may also be subject to the Spill Prevention Control and Countermeasure (SPCC) regulations. For more information the fact sheet titled, Understanding the Spill Prevention Control and Countermeasure (SPCC) Requirements, dated March 2007, has been enclosed.

As we discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce or altogether eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs as well as regulatory requirements. Ohio EPA has helpful information about pollution prevention at <http://www.epa.ohio.gov/ocapp>. If you would like to be considered for a free, non-regulatory on-site pollution prevention assessment, or if you would like more information about pollution prevention assessments, please contact me at the number listed below. The Ohio Department of Development's Office of Energy Efficiency may also be able to help with energy efficiency issues. Their website is <http://www.development.ohio.gov/cdd/oeef/>.

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

Enclosed you will find a copy of the checklists that were completed during the inspection. Should you have any questions, please feel free to call me at 419-373-3065. You can find copies of the rules and other information at <http://www.epa.ohio.gov/dhwm/>.

Please send all correspondence **within 30 days or receipt of this** letter, unless otherwise specified to Kara Reynolds, Ohio EPA Northwest District Office, Division of Hazardous Waste Management, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,

*Kara Reynolds*

Kara Reynolds  
Environmental Specialist  
Division of Hazardous Waste Management

/cs

Enclosures

pc: Colleen Weaver, DHWM, NWDO  
Kara Reynolds, DHWM, NWDO  
Cindy Lohrbach, DHWM, NWDO  
~~DHWM, NWDO File: Crawford County, Moyer's Auto Wrecking~~

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.

Send to Central Office <input checked="" type="checkbox"/>	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE</b> <b>IDENTIFICATION/VERIFICATION FORM</b>	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to [kristina.durnell@epa.state.oh.us](mailto:kristina.durnell@epa.state.oh.us).

<b>Site EPA ID No.</b> <b>Site Name</b>	EPA ID Number:		Website: (Optional)	
<b>Site Location Information</b>	Name: <b>Moyer's Auto Wrecking</b>			
	Street Address: <b>735 Bauer Avenue</b>			
	City, Town, or Village: <b>Crestline</b>		State: <b>OH</b>	
<b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	County Name: <b>Crawford</b>		Zip Code: <b>44827</b>	
	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>
Municipal <input type="checkbox"/>		State <input type="checkbox"/>	Other <input type="checkbox"/>	

<b>Facility Representative</b>  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: <b>Terry</b>		MI:	Last Name: <b>Moyer</b>		
	Phone Number: <b>419-683-2255</b>			Phone Number Extension:		
	E-Mail Address:					
	Fax Number:			Fax Number Extension:		
	Street or P.O. Box:					
	City, Town or Village:					
	State:			Zip Code:		

<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: <b>Terry Moyer</b>				Date Became Owner (mm/dd/yyyy): <b>1986</b>				
	Owner Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box:								
	City, Town or Village:				Owner Phone #:				
	State:				Country:		Zip Code:		
	Name of Site's Operator:				Date Became Operator (mm/dd/yyyy):				
	Operator Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box:								
	City, Town or Village:				Operator Phone #:				
	State:				Country:		Zip Code:		

<b>VIOLATIONS CITED?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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<b>TYPE OF HANDLER - MARK "X" AS APPROPRIATE</b>		
<input type="checkbox"/> Not a HW Generator	<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
<input type="checkbox"/> Small Quantity Generator (SQG)		
<input type="checkbox"/> Conditionally Exempt Small Quantity Generator		
<input type="checkbox"/> U.S. Importer of Hazardous Waste		
<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator		

<b>TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)</b>	
<input type="checkbox"/> Recycler of Hazardous Waste <input type="checkbox"/> Underground Injection Control Facility <input type="checkbox"/> Hazardous Waste Transporter <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace <input type="checkbox"/> Small Quantity On-Site Burner Exemption <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption

**UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE 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.

**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:      **John Moyer**  
Tanks             Yes       No  
Containers       Yes       No

Name of Inspector(s)      Name of Inspector(s)      Date of Inspection/Time  
**Kara Reynolds**            **Amy Heller**            **01-13-2010 11:00 AM**  
(mm/dd/yyyy) (hh:mm)

**Comments:**

Complaint investigated/CEI began on 01-13-2010, however, paperwork was not reviewed at this time. Paperwork reviewed on 01-22-2010. ER was called to investigate material flowing off property on 01-22-2010, violation was cited by ER. Waste from ER spill clean-up was sampled by Ohio EPA and facility on 01-28-2010. Additional site visit conducted on 02-04-2010; paint booth discovered on this date. However, more information needed to determine site generator status.

## PROCESS, WASTE, P2 SUMMARY SHEET

**Facility Name:** Moyer's Auto Wrecking **Facility Type:** Unknown **Date of Inspection:** 01-13-2010

**EPA ID#:**

<b>Waste Generated</b>			<b>On- or Off-Site Management</b>		<b>P2 Activities</b>	
<b>Process/Activity Generating Waste</b> <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	<b>Waste Description</b> <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	<b>QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area</b>	<b>Type of On-Site Treatment</b> <small>(recycle, wwt, etc)</small>	<b>Name, state, and type of activity occurring at the off-site facility.</b>	<b>Current P2 Activities</b>	<b>P2 Opportunities</b>
1	Maintenance	Spent Lamps  Minimal Box Main Office Back Room	Storage			Recycle
2	Selling Cars for Parts/Scrap	Used Oil  Unknown Blue Metal Totes 1 by Main Office on South side of Bauer Avenue, 4 South of Loader Storage Building on North Side of Bauer Avenue		Nothing Recent but in 2008 Volunteer Oil Service, Tennessee		
3	Selling Cars for Parts/Scrap	Gasoline  Not accumulated or stored on site. Immediately used on site in facility vehicles.			Used in Site Vehicles	

4	Used Oil Clean-up	Used Oil contaminated soil	N/A N/A N/A		Sent off site in trunks of vehicles to the shredder		
5	Used Oil Clean-up	Used Oil contaminated material	N/A N/A N/A		Sent off site in trunks of vehicles to the shredder or sent to the landfill.		
6	Selling Cars for Parts/Scrap	Antifreeze	Not accumulated or stored on site. Immediately used on site in facility vehicles.				
7	Auto Body Shop	Paint Filters	Unknown Unknown Unknown		Local Landfill.		
8	Selling Cars for Parts/Scrap	Lead-Acid Batteries	More information requested		The Battery Shop of Columbus, Ohio  Ohio Battery and Supply of Ashland, Ohio		
9							

## REMARKS/GENERAL INFORMATION

**General Process Information:** See Attached Letter.

**Regulatory/Enforcement History** (if applicable): N/A

**Additional P2 remarks and information:** See Attached Letter.

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](mailto:p2mail@epa.state.oh.us) or [www.epa.state.oh.us/ocapp/ocapp.html](http://www.epa.state.oh.us/ocapp/ocapp.html)

**Other:** N/A

**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/bustr/bustr/PublicInquiry.asp](https://www.comapps.ohio.gov/sfm/fire_apps/bustr/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/bustr/bustr/SearchByCounty.asp](https://www.comapps.ohio.gov/sfm/fire_apps/bustr/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 type="checkbox"/> N/A <input checked="" 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)] <b>Visible soil contamination around totes; cannot determine if totes are leaking or if bad housekeeping practices are cause of soil contamination.</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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 checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Stopped the release?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	b. Contained the release?	Yes <input type="checkbox"/> No <input checked="" 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 checked="" 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 checked="" type="checkbox"/> N/A <input type="checkbox"/>

<b>ON-SITE BURNING IN SPACE HEATER</b>		
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 <input type="checkbox"/> No <input 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 checked="" 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 checked="" type="checkbox"/>
<i>NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).</i>		
<b>GENERATOR TRANSPORTATION</b>		
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"/>
<i>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).</i>		
<b>COLLECTION CENTERS AND AGGREGATION POINTS</b>		
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>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.</i>		