



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.state.oh.us

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

Re: University of Findlay, South Campus  
Center for Equine and Pre-Veterinary Studies  
OHR000116038  
Hazardous Waste  
Hancock County  
Notice of Violation

March 31, 2009

Mr. Dan Webb  
University of Findlay – Center for Equine and Pre-Veterinary Studies  
11613 County Road 40  
Findlay, Ohio 45840

Dear Mr. Webb:

Thank you for accompanying Ed Pulido and me during Ohio EPA's March 10, 2009, hazardous waste compliance evaluation inspection (CEI) of University of Findlay – Center for Equine and Pre-Veterinary Studies (UF) located at 11613 County Road 40, Findlay, Ohio. This inspection was conducted to determine UF's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC), and Ohio's hazardous waste regulations as adopted under Chapter 3745. of the Ohio Administrative Code (OAC). The inspection included a tour of your facility and a review of your facility paperwork. This letter will explain the violations I discovered; what you need to do to correct these violations; two general areas of concern; what you need to do to satisfy these areas of concern and two general comments.

UF is where the Center for Equine and Pre-Veterinary Studies is located as part of the University of Findlay. UF is a transporter of used oil. UF picks up used oil generated by Findlay City Schools, Cory-Rawson Schools, Blanchard Valley Center, and Maralube. UF transports the oil generated at these facilities to their facility where they heat their main building/horse riding rink. Wastes generated at your facility include lamps.

During the inspection, I gave you the following information: the fact sheets Used Oil Burners – New Guidance for Rebuttable Presumption; The Regulation of Used Oil: Transporters and Transfer Facilities; The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil; a list of commercial environmental laboratories and an outline of common used oil management standards.

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I 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 your receipt of this letter:

**1. Waste Evaluation.  
OAC Rule 3745-52-11**

Any person who generates a waste must determine if that waste is a hazardous waste in accordance with the criteria for hazardous waste as set forth in Chapter 3745-51 of the Administrative Code.

UF failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility. UF has taken approximately 80 bulbs per year to the University of Findlay – Main Campus.

On March 26, 2009, Myreon Cobb, Physical Plant Director for the University of Findlay main campus faxed me hazardous waste manifests and information pertaining to the management of fluorescent bulbs.

UF cannot take the spent fluorescent bulbs to the main campus for disposal since main campus is managing the spent bulbs as a hazardous waste.

The waste evaluation can be conducted by taking a representative sample of this waste to properly evaluate this waste stream through a laboratory analysis which lists constituents present and at what concentration or through appropriate generator knowledge. UF must ensure that the laboratory chosen to perform sampling utilizes the proper method(s) to evaluate these bulbs. UF must sample the fluorescent bulbs to determine the Toxicity Characteristic Leaching Procedure (TCLP) concentrations of barium (D005), cadmium (D006), lead (D008), and mercury (D009) as listed in OAC Rule 3745-51-24 following the methods as outlined in U.S. EPA's SW-846. UF's may run total concentrations for these constituents as a screening tool. If the concentration(s) are detected for any of these constituents at or above the regulatory limit, a TCLP may be required to ensure these constituent(s) are not present above the Ohio EPA regulatory level.

If the bulbs are determined to be hazardous through a proper waste evaluation, UF will have to manage their bulbs either as 1) a universal waste (OAC Chapter 3745-273), or 2) as a hazardous waste under Ohio's generator standards (OAC Chapter 3745-52). UF may recycle their bulbs if they are hazardous or non-hazardous. Ohio EPA would encourage this option as a pollution prevention alternative.

I have enclosed the fact sheets: Universal Waste Rules for Handlers of Lamps & Fluorescent Lamps: What you Should Know and a list of computer, fluorescent lamp and ballast recyclers.

- In lieu of conducting a waste evaluation, UF may choose to manage their bulbs as a universal waste as outlined in OAC Chapter 3745-273. Please consult the fact sheet Universal Waste Rules for Handlers of Lamps enclosed for more information. If you choose this option, please provide me an outline of your universal waste management plan.
- ***To abate this violation, please submit to me your waste evaluation of your lamps or an outline of your universal waste management plan (indicating how you will manage, label, send off-site within one year, where lamps will be recycled, etc.)***
- *Please note that I will be discussing this issue with Mr. Cobb and conducting a CEI at University of Findlay – Main Campus to ensure that likewise they are managing their bulbs correctly.*

If you perform sampling, Ohio EPA will use the data you provide, in addition to other documentation, to make regulatory decisions concerning the wastes tested. The data you submit should be reviewed using a data review process, referred to as data validation, to confirm the validity of your data prior to submission. Data validation includes a review of the following components: laboratory test methods, laboratory data completeness, documentation of holding time(s), chain(s) of custody, and quality assurance/quality control (QA/QC) data.

To confirm the validity of your data, you may use Ohio EPA's tier 1 data validation plan review form which can be obtained from Ohio EPA's web page:  
[http://www.epa.state.oh.us/dhwm/tier\\_1\\_data\\_validation\\_manual.html](http://www.epa.state.oh.us/dhwm/tier_1_data_validation_manual.html). Ohio EPA may request the documentation needed to confirm the validity of the data submitted.

Please submit a brief narrative of each sampling event which includes: process generating the waste, point in the process the sample was obtained, sampling techniques used to obtain the sample and a description of how this sample was determined to be a representative sample of the waste tested.

*In addition, if sampling is performed, please notify me at least seven days prior to taking the samples so that I or an Ohio EPA representative may be present.*

**2. Rebuttable Presumption for used oil transporters.  
OAC Rule 3745-279-44 (A)**

To ensure that used oil is not a hazardous waste under the rebuttable presumption of OAC Rule 3745-279-10, a used oil transporter shall determine whether the total halogen content of used oil being transported is above or below 1000 ppm.

UF failed to determine whether the total halogen content of used oil being transported is above or below 1000 ppm.

This may be conducted through testing of the used oil through an acceptable analytical test including either SW-846 test methods 9075, 9076 and 9077 or applying appropriate generator knowledge of the halogen content of the used oil in light of materials or processes used to generate the used oil. (9077 is a field test such as Chlor-D-Tect 1000® and Chlor-D-Tect 4000®). Please consult the fact sheet The Regulation of Used Oil: Transporters and Transfer Facilities given to you during the CEI for more information.

- ***To abate this violation, UF must determine the total halogen content of the used oil that they transport by each generator to determine whether it is above or below 1000 ppm. An explanation outlining how you will determine the total halogen content [which method(s), etc.] must be submitted to me for review. This outline must indicate UF's course of action if total halogen level is greater than 1000 ppm. In addition, this plan must outline that you will generate and retain the appropriate records for three years as outlined in OAC Rule 3745-279-44 (D), Record Retention for used oil transporters – rebuttable presumption.***

**Areas of Concern:**

- A. UF picks up used oil generated from Maralube Express (Maralube) located at 2410 N. Main Street, Findlay and transports it to Northside Marathon Auto Shop (Northside) located at 310 Bigelow Avenue, Findlay. Northside then burns this used oil in their on-site used oil furnace. If there is any extra used oil that Northside does not use then, UF takes the oil generated from Maralube back to their facility and burns on-site in their two used oil furnaces to heat their main building/horse riding rink.

As a used oil transporter, UF is only allowed to transport used oil they pick up to one of four different options: to another used oil transporter, used oil processor/re-refiner, off-specification used oil burner or an on-specification used oil burner. Since UF is transporting used oil from Maralube to Northside, UF must know if Northside is one of these four options. (Please consult the fact sheet The Regulation of Used Oil: Transporters and Transfer Facilities given to you during the CEI).

*To satisfy this area of concern, please indicate to me if Northside is in fact one of these four options and if so which one and how you determined this. Please note that to determine if a facility is an on or off-specification used oil burner requires analytical of the used oil as outlined in the fact sheet Used Oil Burners – New Guidance for Rebuttable Presumption given to you during the CEI.*

UF may not transport used oil from Maralube to Northside until you have demonstrated that as a used oil transporter you are delivering the used oil to one of the four options above (as outlined in OAC Rule 3745-279-43).

- B. UF must stop burning used oil generated from other businesses until you have provided the additional information from these generators as outlined below:

- a) UF must provide information on whether the used oil is on or off-specification and you must retain this analysis on-site.
- b) If any (or all) of the used oil generated from the other businesses in which you pick up is off-specification, then your burners may not be appropriate
- c) UF needs to determine how you plan to keep your burner status. Will UF be making the determination if the oil is on or off-specification (be the marketer) or are you going to require this of the generators you pick up from? Please outline how you plan to do this to be in compliance now (for your current generators) and in the future (if you decide to pick up from other generators as well).

*To satisfy this area of concern, UF must provide information (the determination/analysis) of whether the used oil they burn is on or off-specification. In addition, please submit a plan to me outlining all of the information above if you wish to continue to burn used oil generated from other businesses. Please consult the fact sheet Used Oil Burners – New Guidance for Rebuttable Presumption and the common used oil management standards given to you during the CEI for additional information.*

**General Comments:**

- ❖ Please note that Ohio EPA has not fully determined the complete compliance requirements for the UF since the used oil being transported by UF is generated from other businesses and brought to your own facility to be burned on-site in two used oil furnaces. I am still gathering compliance information pertaining to these issues from the generators that you pick used oil up from and also seeking guidance from Ohio EPA's Central Office. Once this is complete, additional violations or areas of concern may be cited or additional information may be required from UF to determine your compliance.
- ❖ In addition based on information provided for abatement of the above violations and to satisfy the areas of concern additional violations or areas of concern may be cited. Based on this additional information, I will determine the status of your compliance with other hazardous waste laws and notify you of my findings in a separate letter.

If you find additional 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. Furthermore, you may possibly reduce your regulatory requirements. You can find helpful information about pollution prevention at the following web address:  
<http://www.epa.state.oh.us/ocapp/ocapp.html>

The Division of Hazardous Waste Management (DHWM) 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.

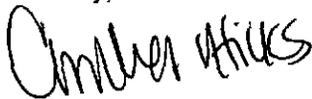
If you haven't already, we encourage you to sign-up for this free service. You can find more information at the following Web link <http://www.epa.state.oh.us/dhwm/listserv.html>. Please feel free to share this information with your colleagues.

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Please address all correspondence to Amber Hicks, Ohio EPA, 347 N. Dunbridge Road, Bowling Green, Ohio 43402. Should you have any questions, please feel free to call me at (419) 373-3082.

You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp.html>.

Sincerely,



Amber M. Hicks  
Division of Hazardous Waste Management

/llr

Enclosures

pc: Colleen Weaver, DHWM, NWDO  
Cindy Lohrbach, DHWM, NWDO  
(DHWM, NWDO) File: University of Findlay, South Campus, 11613 County Road 40

ec: Amber Hicks, DHWM, 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.

Ohio Environmental Protection Agency  
**RCRA SUBTITLE C SITE  
 IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to [kristina.durnell@epa.state.oh.us](mailto:kristina.durnell@epa.state.oh.us)  
 or mail it to Kristina Durnell, Central Office

<b>Site EPA ID No.</b> <b>Site Name</b>  <b>Site Location Information</b>  <b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	EPA ID Number: <b>OHR000116038</b> Name: <b>University of Findlay - South Campus, Center for Equine and Pre-Veterinary Studies</b> Website: <b>www.findlay.edu</b> (Optional) Street Address: <b>11613 County Road 40</b> City, Town, or Village: <b>Findlay</b> State: <b>OH</b> County Name: <b>Hancock</b> Zip Code: <b>45840</b> Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input checked="" type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> <b>61131</b>
<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>Dan</b> MI: Last Name: <b>Webb</b> Phone Number: <b>419-434-4525</b> Phone Number Extension: E-Mail Address: <b>webb@findlay.edu; SPIDER727@JUNO.COM</b> Fax Number: <b>419-434-4887</b> 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>University of Findlay</b> Owner Private County District Federal Indian Municipal State Other Type: <input checked="" type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: <b>1100 N MAIN</b> City, Town or Village: <b>Findlay</b> State: <b>Ohio</b> Name of Site's Operator: Owner Private County District Federal Indian Municipal State Other Type: <input type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: City, Town or Village: State: Operator Phone #: United States Zip Code:

**VIOLATIONS CITED?**  Yes  No

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

<input type="checkbox"/> Not a 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
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TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)	
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Underground Injection Control Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY))	
<input type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input type="checkbox"/> 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	
<input type="checkbox"/> Batteries	
<input type="checkbox"/> Pesticides	
<input type="checkbox"/> Mercury containing equipment	
<input type="checkbox"/> Lamps	

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))	
<input type="checkbox"/> Used Oil Generator	
<input checked="" type="checkbox"/> Used Oil Transporter	
<input type="checkbox"/> Used Oil Transfer Facility	
<input type="checkbox"/> Used Oil Processor	
<input type="checkbox"/> Used Oil Re-refiner	
<input type="checkbox"/> Off-Specification Used Oil Burner	
<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil	
<input type="checkbox"/> 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.

**NA**  
**COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.**

Announced	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Other Comments: <b>Facility is used oil transporter. Facility also burns used oil generated from other businesses. Compliance status still being determined.</b>
Containers	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
<b>Amber Hicks</b>	<b>Ed Pulido</b>	<b>3/10/2009 9:41-10:37</b>

**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)

**USED OIL INSPECTION CHECKLIST  
TRANSPORTER AND TRANSFER FACILITIES**

*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 transporter or transfer facility 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, scrap metal contaminated with used oil or used oil managed in a surface impoundment (i.e., pond).*

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 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).*

**TRANSPORTER AND TRANSFER FACILITIES**

4.	Does the used oil transporter process used oil or store used oil for greater than 35 days? [3745-279-41(A)] If so: **	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> **
	Is the used oil transporter in compliance with the requirements for processors/re-refiners in 3745-279-50 to 3745-279-59 (except as provided in 3745-279-41(B) and (C))? [3745-279-41(A)] (Complete Used Oil Processor/Re-refiner checklist.) **	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Has the used oil transporter notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-42(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	Has the used oil transporter delivered all used oil to: **	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> **
a.	Another used oil transporter that has a U.S. EPA ID#? [3745-279-43(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	A used oil processing/re-refining facility that has a U.S. EPA ID#? [3745-279-43(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	An off-spec used oil burning facility that has a U.S. EPA ID#? [3745-279-43(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	An on-spec used oil burning facility? [3745-279-43(A)(4)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Has the used oil transporter complied with all applicable USDOT regulations (49 CFR 171 to 180)? [3745-279-43(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Has the used oil transporter had a discharge of used oil? If yes: [OAC rule 3745-279-43(C)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Did they take immediate action to protect human health and the environment? [3745-279-43(C)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did they give notice (phone call), if required, to the national response center? [3745-279-43(C)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Did they report in writing to DOT per 49 CFR 171.16? [3745-279-43(C)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Did they give notice (phone call) to Ohio EPA - DERR? [3745-279-43(C)(3)(c)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
e.	If a water transporter, did they give notice per 33 CFR 153.203?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

		[3745-279-43(C)(4)]	
	f.	Did they clean up any used oil discharged during transportation or take any necessary action so the discharge no longer presents a hazard to human health or the environment? [3745-279-43(C)(5)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
9.		Has the used oil transporter determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? [3745-279-44(A)] If yes, then;	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a.	How did transporter determine halogen level content:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
		i. Testing (approved SW-846 method)? or	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
		ii. Applying knowledge of the halogen content of the used oil in light of the materials or processes used?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>NOTE: If determination was not made by one of the two methods, then determination is not valid.</b>			
	b.	If halogens are equal to/above 1000 ppm, did the transporter successfully rebut the presumption the used oil was mixed with a listed hazardous waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
		If yes, what method did transporter use to rebut the presumption (e.g., testing, exclusion, generator process information, etc.) (describe below)	
		If no, did the transporter manage the material as a hazardous waste? [ORC 3734.02(E) and/or (F)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>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.</b>			
10.		Does the transporter retain all records of analyses and information used to comply with 3745-279-44 for at least three years? [3745-279-44(D)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
11.		Does the owner/operator of a used oil transfer facility:	
	a.	Store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-45(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Store used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-45(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Provide secondary containment for containers used to store used oil as required by 3745-279-45(D)? [3745-279-45(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Provide secondary containment for existing aboveground tanks required by 3745-279-45(E)? [3745-279-45(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e.	Provide secondary containment for new aboveground tanks as required by 3745-279-45(F)? [3745-279-45(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	f.	Label all containers, aboveground tanks, and fill pipes used for underground tanks with the words "Used Oil"? [3745-279-45(G)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	g.	Upon detection of a release of used oil: [3745-279-45(H)]	
		i. Stopped the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		ii. Contained the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		iii. Cleaned up and managed the used oil and other materials?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.		Does the used oil transporter keep a record of each shipment of used oil? [3745-279-46(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a.	Does each record include the name and address of the generator, transporter or processor/re-refiner who provides the used oil for transport? [3745-279-46(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	b.	Does each record include the U.S. EPA ID# of the generator, transporter or processor/re-refiner (if applicable) that provides the used oil for transport? [3745-279-46(A)(2)]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	c.	Does each record include the quantity of used oil accepted? [3745-279-46(A)(3)]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	d.	Does each record include the date of acceptance? [3745-279-46(A)(4)]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	e.	Does each record include the signature of a representative of the generator, transporter, processor/re-refiner that provided the used oil for transport? [3745-279-46(A)(5)]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
13.		Does the used oil transporter keep a record of each shipment of used oil that is delivered to another used oil transporter, burner, processor/re-refiner, or disposal facility? [3745-279-46(B)] **	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	a.	Does each record include the name and address of the receiving facility or transporter? [3745-279-46(B)(1)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	b.	Does each record include the U.S. EPA ID# of the receiving facility or transporter? [3745-279-46(B)(2)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	c.	Does each record include the quantity of used oil delivered? [3745-279-46(B)(3)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	d.	Does each record include the date delivered? [3745-279-46(B)(4)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	e.	Does each record include the signature of a representative of the receiving facility or transporter (intermediate rail transporters are not required to sign a record of delivery)? [3745-279-46(B)(5)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
14.		Does the used oil transporter who exports used oil to a foreign country comply with 3745-279-46(B)(1) to (B)(4)? [3745-279-46(C)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
15.		Does the used oil transporter retain all records required under 3745-279-46 for at least three years? [3745-279-46(D)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
16.		Does the used oil transporter generate residues from the storage or transportation of used oil?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N/A	<input type="checkbox"/>
		If so, are they managed as specified in 3745-279-10(E)? [3745-279-47]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>

\*\*Compliance with these issues has not yet been determined.

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**REMARKS GENERAL INFORMATION**

**General Process Information:**

\*\* Facility cited for 52-11.

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

**Additional P2 remarks and information:**

Not sure if facility would be interested or not.

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:**

## PROCESS, WASTE, P2 SUMMARY SHEET

**Facility Name:** University of Findlay - Center for Equine and Pre-Veterinary Studies  
 **Facility Type:**  LQG  SQG  CESQG  TSD  
**Date of Inspection:** 3-10-09  
 **EPA ID#:** OHR000116038

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, house, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	Lightning	Fluorescent bulbs ~ 80 bulbs per year	NA	Taking to Univ. of Findlay main campus where facility is crushing in bulb crusher.**	After crushing, bulbs are ultimately being recycled.	Manage as UW and recycled.
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