



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: AYFC
OHR000156943
Complaint #2961
Lucas County
Hazardous Waste
Notice of Violation

April 8, 2010

Reverend Jamin Hurd
American Youth for Christ (AYFC)
32355 Newcastle Drive
Warren, Michigan 48093

Dear Reverend Hurd:

Thank you for accompanying me during Ohio EPA's March 11 and 12, 2010, complaint investigation **(CI)** and compliance evaluation inspection **(CEI)** of American Youth for Christ (AYFC) located at 205 W. Alexis Road in Toledo, Ohio. I inspected AYFC 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). My inspection included observations of facility operations and a review of written documentation. This letter will explain the violations I found, what you need to do to correct the violations, other general concerns I have and what you need to do to respond to my general concerns.

On March 10, 2010, Ohio EPA, Division of Hazardous Waste Management (DHWM) received a complaint/referral from Ohio EPA-Emergency Response, US EPA and US Coast Guard. The complaint indicated that there was oil spilled and flowing into a storm sewer catch basin at 205 West Alexis Road. The complaint further indicated that in the south side of the building, used oil was observed under and around equipment and buses owned by Reverend Jamin Hurd of AYFC, and that used oil was flowing into a storm sewer catch basin in the area. The complaint also alleged that you operated a used oil tote that was leaking used oil to the storm sewer catch basin in the area at the south end of the building and that AYFC had caused used oil to be released to the ground in various locations in the rear property. This letter will explain the validity of the complaint, the violations that I found and what you need to do to correct the violations.

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When I arrived at the site on March 11, 2010, I observed used oil on the ground in many areas of the rear property. I also observed that there was some used oil contamination on the ground in the area beside the south side of the building and that some of this used oil was draining into the storm sewer catch basin. I observed two totes and six pallets of 55-gallon drums in front of the last bay at the south side of the building. They appeared to contain used oil, spent gasoline and various antifreezes. Therefore, the complaint is valid.

According to you, AYFC buys buses from cities and school districts. Some of the buses in the lot that are bought are good and some are bad. You explained that you have bought buses from the city of Cincinnati lately, but they are bought from all over the country. You first tow them to 205 West Alexis Road in Toledo where mechanics try to start them and check them out. If they work they are sent to Michigan where they are fixed up and sold to churches and other ministries serving youth. Generally the repairs are minor. They are used in ministry and run for about a year before breaking down. Usually the repairs are too costly so they are scrapped and more buses are needed. So the buses that AYFC fixes up are constantly needed. They are far cheaper from auctions than they are new. Scrappers also try to buy the buses for the scrap value; but you explained that AYFC pays more for them since the ministry wants to run them. You are often able to bid higher. However, you stated that AYFC has been shut down since February 5, 2010, since AYFC has had no new buses and your house burned. You stated that the AYFC office is in your home.

According to you, AYFC filters the diesel fuel (and a very small amount of gasoline) left in the buses and uses it in the various AYFC trucks and sometimes the repaired buses. AYFC does not have to buy much fuel this way. AYFC has a lot of volunteer labor to make the operation work. You also said that antifreeze costs about 15\$ a gallon now, so it is more economical for AYFC to reuse the antifreeze taken from buses. AYFC removes the oils and antifreeze from the drive trains before sending the buses to Omni Source for shredding. DISC Environmental Services recycles the oil and antifreeze for them. You provided a copy of the latest shipping paper from DISC. AYFC has a 250 gallon used oil tote. You said that the smaller tote was from Crutchfield Trucking.

You acknowledged the used oil contamination around the used oil accumulation containers and explained that AYFC could use an air pump to get the fluids into drums and totes so the containers can be stored in a trailer and off the ground. They will stay secure inside the trailer. You explained that you had your employees move most of the equipment on the south side of the building and the trailers with engines in the rear property the night of March 10, 2010, so you could be able to see the ground and how bad it was contaminated and also to get to it to clean it up.

Most of the used oil contamination of the rear property was due to the handling of bus engines. You explained that a company wanted to buy some engines and that AYFC could earn more by removing and selling them than scrapping them. You left the fluids (engine and transmission oil) in the engines. According to you, AYFC does not usually remove engines. If the bus does not work it is scrapped with the engine in place. You stated that the buyer for the engines reneged on the deal when he found out that AYFC was buying buses that he also bid on. You said that no one wants the engines any more for the same reason. So AYFC will not go to the trouble to remove them anymore.

The engines were being stored on open flat bed trailers, about ten on each trailer. You said that when the ground thawed lately a trailer tipped and the oil inside the engines came out; but while they were sitting they did not leak at all. You later said that, in addition, an employee cut off copper parts and stole them. This left openings in the engines that contributed to the leak when the trailer tipped. You said that each engine may have had as much as 10 gallons of oil in it. I observed evidence of the spill. There were puddles of oil and oil tracked on the ground. However, it is significant to note that there was used oil contamination in areas in addition to that area under the tipped trailer. Water puddles may have helped to distribute the spilled oil. I did however observe that in an area where some of the engines were placed on the ground there was no sign of oil leaks, except under one engine where a significant spill resulted from a snow plow collision with it.

You said that you had called Mike Sheaves of Chemtron in Avon, Ohio, to help with the cleanup of the used oil contaminated ground. You explained that you wanted to start scraping the ground, on the day of my inspection, before the rain came.

At the time of my inspection, AYFC's generator status was unknown. Some waste was found that must be evaluated. AYFC generates the following other wastes on a regular basis:

1. Used Oil: Used oil (crankcase and transmission) which is removed from buses is accumulated in two totes (one inside and one outside) and several 55-gallon drums. DISC Environmental Service of Toledo is used to recycle the used oil.
2. Spent Antifreeze: Antifreeze that is removed from buses is re-used in AYFC trucks and buses that are repaired.
3. Used Batteries: You explained that the batteries are stacked on pallets three rows high with cardboard in between.

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You said that the whole pallet is shrink-wrapped and shipped to H&H metals, Michigan Avenue in either Ecorse or Taylor, Michigan. **Please confirm the address of H&H Metals and submit a copy of the most recent shipping paper for the spent batteries.**

As a result of my inspection, 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. I have also enclosed a copy of the Notice of Violation letter (NOV) sent to Mr. John Myers of AYFC on September 28, 2009. AYFC did not respond in writing to this Notice of Violation letter. When you abate violation number 2 of the new NOV, you will also abate the violation cited in the September 28, 2009, NOV.

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

A generator must determine whether its waste is hazardous by first determining if the waste is listed as a hazardous waste in rules 3745-51-30 to 3745-51-35; by testing the waste according to the methods set forth in rules 3745-51-20 to 3745-51-24; or by applying knowledge of the hazardous characteristic of the waste in light of the materials or the processes used. AYFC has failed to adequately evaluate all of its waste properly. Specifically, I observed several drums of waste in a white tractor trailer in the back of the rear property that had not been identified or properly evaluated. Most of the containers were open.

In order to abate this violation, you must immediately evaluate the wastes in the white tractor trailer, and any other waste discovered at the facility by Ohio EPA or AYFC, in accordance with the requirements of Ohio Administrative Code Rule 3745-52-11 and this letter. You must obtain a representative sample of the waste in each container in the white tractor trailer, according to OAC 3745-51-20. You must evaluate all samples, through laboratory analysis, for at least the Toxicity Characteristic Leaching Procedure (TCLP) metals, TCLP Volatile Organic Compounds (VOCs), TCLP Semi-Volatile Organic Compounds (SVOCs), flash point and pH, and submit the results of the laboratory analyses to Ohio EPA as soon as they are available.

AYFC will need to give Ohio EPA a five day advance notice of sampling activities, in order for an inspector to make arrangements to view the sampling.

Your results must document if the waste is hazardous or not and whether it is restricted from land disposal.

If it is hazardous, you must explain what treatment, storage or disposal facility you will send it to. AYFC must submit to me a legible copy of the manifest(s), signed by a representative of the permitted treatment, storage or disposal facility that documents the proper off-site shipment of all its hazardous waste. If non-hazardous waste is identified, AYFC must submit a copy(s) of the shipping papers used to transport the waste off-site to a permitted solid waste facility. **If the waste is hazardous, I will determine the status of your facility's compliance with other hazardous waste laws and notify you of my findings in a separate letter.**

**2. Used Oil Container Labeling
OAC Rule 3745-279-22(C)(1)**

Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil." On March 12, 2010, I observed unlabeled containers of used oil in the shop.

In order to correct this violation, AYFC must immediately mark or label all containers used for accumulating used oil with the words "Used Oil" and provide me with photographic documentation that this has been done.

**3. Used Oil Container Condition
OAC Rule 3745-279-22(B)**

Containers and aboveground tanks used to store used oil at generator facilities must be in good condition (no severe rusting, apparent structural defects or deterioration). On March 12, 2010, I observed two containers of used oil in the shop that were not closed (a structural defect), with visible leaks surrounding them.

In order to correct this violation, AYFC must immediately close all used oil containers and provide me with photographic documentation that this has been done.

**4. Response to Releases of Used Oil
OAC Rule 3745-279-22(D)**

Upon detection of a release of used oil to the environment a generator shall perform the following cleanup steps: stop the release, contain the released used oil, clean up and manage properly the released used oil and other materials, and if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service.

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Used oil mismanagement at AYFC has contaminated large areas of soil in the rear of the facility and at the south side of the building where equipment was stored. In order to correct this violation, AYFC must immediately clean up the contaminated soil, analyze the soil for hazardous characteristics, and manage the waste properly according to the analytical information. You will need to provide photographic documentation that the areas have been cleaned. You will need to submit copies of the waste analyses and any shipping papers or manifests, demonstrating that you have sent the waste off-site for proper disposal. **Please explain how you will correct this violation and maintain compliance with this rule.**

In order for AYFC to determine the characteristics of the used oil contaminated soil, it must obtain a chemical analysis of a representative sample of the contaminated soil. AYFC must determine, at least, the concentration of TCLP (Toxicity Characteristic Leaching Procedure) metals and TCLP VOCs.

Please explain, in writing, how you will obtain a representative sample, who will collect it, who will analyze it and how it will be analyzed. The complete analytical results must be submitted to me as soon as they are available. Your results must document if the waste is hazardous or not and whether it is restricted from land disposal. If it is hazardous, you must explain what treatment, storage or disposal facility you will send it to. If the waste is hazardous, I will determine the status of your company's compliance with other hazardous waste laws and notify you of my findings in a separate letter.

You must coordinate the soil cleanup and sampling at all locations with the Ohio EPA. Please contact me no later than five business days before you plan to have the cleanup and sampling performed.

As a used oil generator you are required to store used oil in containers or aboveground tanks that are in good condition (no severe rusting, apparent structural defects or deterioration) and not leaking. Containers, aboveground tanks and fill pipes for underground tanks must be labeled with the words "Used Oil." If leaks are detected, the generator must stop the release; contain the release; clean up and manage properly the released used oil and other materials related to the release; and, if necessary, repair or replace any leaking containers or tanks prior to returning them to service. I have enclosed copies of the following used oil fact sheets: The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil, and Used Oil Recyclers. Please review these carefully and contact me immediately if you have any questions.

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Please be aware that incandescent, fluorescent, metal halide, neon, high-intensity discharge, high-pressure sodium and mercury-vapor lamps could be hazardous waste when discarded. Fluorescent lamps may contain up to 40 milligrams (mg) of mercury, depending on the brand and manufacturer. Lamps may also contain lead and cadmium. Many lamps exhibit a characteristic of toxicity for heavy metals when disposed. I have enclosed copies of the following documents, to assist you in properly managing your spent lamps: Fluorescent Lamps: What You Should Know and Computer, Fluorescent Lamp and Ballast Recyclers. I recommend that you review these documents carefully and contact me if you have any questions. The first document describes the rules you must follow in order to manage lamps as a universal waste.

Instead of obtaining a sample of the spent lamps that you generate and having the sample analyzed in a laboratory, AYFC may elect to manage its spent lamps (all types) as Universal Waste. The requirements for Universal Waste lamps include:

- Avoid placing spent lamps into the trash;
- Place spent lamps into containers that are structurally sound and close them;
- Label the containers with the words Used Lamps;
- Document the length of time that the spent lamps are stored;
- Store spent lamps for no longer than one year;
- Inform all employees with the responsibility to collect spent lamps of these requirements; and
- Ship the spent lamps to a lamp recycler (please refer to the list of recyclers that I have enclosed with this letter).

General Concern:

AYFC must ensure that all containers of spent gasoline are closed and must submit copies of shipping papers that document that it has been sent off-site and burned for energy recovery.

You may be able to further 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 your treatment and disposal costs and you may possibly reduce your regulatory requirements. I have enclosed a copy of Pollution Prevention Opportunities, a worksheet that can help you recognize opportunities for reducing waste and conserving energy at your business. I have also enclosed a copy of the fact sheet Management of Electronic Waste from Businesses. Please review this information and contact me if you have any questions.

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I encourage you to schedule a pollution prevention assessment for your business because there are often many opportunities for businesses like yours to reduce waste and save money. If you wish to talk about an assessment or if you have other questions about pollution prevention, please feel free to contact the Office of Compliance Assistance and Pollution Prevention (OCAPP) at (614) 644-3469. There is no charge for an assessment.

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

If you have any questions, please feel free to contact me at (419) 373-3074. You can find copies of the rules and other information on the division's web page at <http://www.epa.ohio.gov/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.ohio.gov/ocapp>.

Sincerely,



Don North
District Representative
Division of Hazardous Waste Management

//lr

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
Ms. Randi McClintock, American Sign
(DHWM, NWDO, Lucas County, AYFC File ...)

ec: Don North, 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.

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

Site EPA ID No.	EPA ID Number: OHR000156943							
Site Name	Name: AYFC				Website: (Optional)			
Site Location Information	Street Address: 205 W. Alexis Rd.							
	City, Town, or Village: Toledo				State: OH			
Site Land Type (check only one)	County Name: Lucas				Zip Code: 43612			
NAICS code(s) www.census.gov/epcd/www/naics.html	Private <input checked="" 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"/>

Facility Representative	First Name: Jamin		MI:	Last Name: Hurd		
Additional names can be recorded in number 12	Phone Number: 810-523-5000			Phone Number Extension:		
	E-Mail Address:					
	Fax Number:			Fax Number Extension:		
Only provide address information if it is different than the site address	Street or P.O. Box: 32355 Newcastle Drive					
	City, Town or Village: Warren				Zip Code: 48093	
	State: Michigan					

Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner:				Date Became Owner (mm/dd/yyyy):				
	Owner Type:	Private <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:		

VIOLATIONS CITED?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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TYPE OF HANDLER - MARK "X" AS APPROPRIATE		
<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

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)

- Small Quantity Handler of Universal Waste
- Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)

Destination Facility for Universal Waste

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

- 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
- Tanks Yes No
- Containers Yes No

Additional Facility Representatives:

Name of Inspector(s)
Don North

Name of Inspector(s)

Date of Inspection/Time
(mm/dd/yyyy) (hh:mm)
03/12/2010

Comments:

This inspection was associated with Complaint #2961. AYFC is one of several tenants at 205 W. Alexis Road. They occupy Bays 7 and 14 and half of the rear property.

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: AYFC Facility Type: LQG SQG CESQG TSD Date of Inspection: 3-12-10 EPA ID#: OHR000156943

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, 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	Bus maintenance and repair	Used Oil At least 55 gallons	None	DISC Environmental Service Toledo, Ohio Recycling	Recycled	
2	Bus maintenance and repair	Spent Antifreeze Less than 25 gallons	Recycle in trucks and buses	None	Recycled	
3	Bus maintenance and repair	Used batteries Less than 12	None	H & H Metals Michigan Recycling	Recycled	
4						
5						
6						
7						

8							
9							

REMARKS **GENERAL INFORMATION**

General Process Information:

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.
 Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other:

**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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: For example, used oil contaminated scrap metal stored in a pile.

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input type="checkbox"/> No <input 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"/>

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 <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"/>

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

GENERATOR TRANSPORTATION

11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

COLLECTION CENTERS AND AGGREGATION POINTS

13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input 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"/>

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.