OhioEPA
State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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

January 11, 2008

BELMONT COUNTY
GENERAL FILE
(HILL IDEALEASE, LLC)
DHWM/SEDO
NON-NOTIFIER

Mr. Nick Maltese
Hill Idealease, LLC
311 Center Street
Martins Ferry, Ohio 43935

Dear Mr. Maltese:

On January 9, 2008, I performed a compliance inspection at your facility, located at 311 Center Street in Martins Ferry, to determine its compliance with Ohio's hazardous waste laws and regulations as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). This letter will explain the hazardous waste violations I found and what you need to do to correct the violations.

Based on this inspection, you are in violation of the following hazardous waste regulations:

(1) **OAC Rule 3745-279-22(C), Used oil storage requirements for generators:** Containers and aboveground tanks used to store used oil at generator facilities shall be labeled or marked clearly with the words, "**Used Oil**."

Tanks were not labeled with the words "Used Oil", in violation of this rule. This violation was corrected during the inspection. Therefore, Hill Idealease, LLC has adequately demonstrated compliance with this rule.

As we discussed during the inspection, spent fluorescent lamps can be managed as a universal waste. Universal waste rules can be found on Ohio EPA's web page at http://www.epa.state.oh.us/dhwm/guidancedocs.html#UW.

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 and, you may possibly reduce your regulatory requirements. The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You may benefit economically, help preserve the environment, and improve you public image by implementing pollution prevention programs.

You can find more information about pollution prevention, including fact sheets, at the following web address: http://www.epa.state.oh.us/opp. If you would like to be considered for an in-depth on-site pollution prevention assessment, or if you would like more information about pollution prevention assessments, please contact me at (740) 380-5262.

Enclosed, you will find a copy of the checklists that were completed as a result of the January 9, 2008 inspection. If you have any questions regarding waste management or pollution prevention activities, please call me at the above number.

Sincerely,

John Rochotte

John Rochotte
District Representative
Division of Hazardous Waste Management

JR/mlm

Attachments

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 tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office

Site EPA ID No.	**EPA ID Number:**							
Site Name	**Name: Hill Idealease, LLC**				**Website: www.oshill.com www.hillinternationaltruck.com (Optional)**			
Site Location Information	**Street Address: P. O. Box 218, 311 Center Street**							
	City, Town, or Village: Martins Ferry				**State: OH**			
	County Name: BELMONT				**Zip Code: 43935**			
Site Land Type (check only one)	**Private** ☒	**County** ☐	**District** ☐	**Federal** ☐	**Indian** ☐	**Municipal** ☐	**State** ☐	**Other** ☐
NAICS code(s) www.census.gov/epcd/www/naics.html	**532120**		**811111**					
Facility Representative	**First Name: Nick**			**MI:**	**Last Name: Maltese**			
	Phone Number: 740-633-3011				**Phone Number Extension:**			
Additional names can be recorded in number 12	**E-Mail Address:**							
	Fax Number: 740-633-2140				**Fax Number Extension:**			
Only provide address information if it is different than the site address	**Street or P.O. Box: 311 Center Street**							
	City, Town or Village: Martins Ferry							
	State: OH			**Country: USA**		**Zip Code: 43935**		
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: Hill Idealease, LLC**			**Date Became Owner (mm/dd/yyyy): ?**				
	Owner Type:	**Private** ☒	**County** ☐	**District** ☐	**Federal** ☐	**Indian** ☐	**Municipal** ☐	**State** ☐	**Other** ☐
	Street or P.O. Box: same as above							
	City, Town or Village:			**Owner Phone #:**				
	State:			**Country:**		**Zip Code:**		
	Name of Site's Operator: Hill Idealease, LLC			**Date Became Operator (mm/dd/yyyy): ?**				
	Owner Type:	**Private** ☒	**County** ☐	**District** ☐	**Federal** ☐	**Indian** ☐	**Municipal** ☐	**State** ☐	**Other** ☐
	Street or P.O. Box: Same as above							
	City, Town or Village:			**Operator Phone #:**				
	State:			**Country:**		**Zip Code:**		
Violations Cited?	☒ **Yes** ☐ **No**							

Type of Generator

☐ **Not Regulated**	☒ **Conditionally Exempt Small Quantity Generator**
☐ **UNKNOWN**: Cited for violation of 3745-52-11	☐ **United States Importer of Hazardous Waste**
☐ **Large Quantity Generator (LQG)**	☐ **Mixed Waste (Hazardous and Radioactive) Generator**
☐ **Small Quantity Generator (SQG)**	

Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)

☐ **Recycler of Hazardous Waste**	☐ **Exempt Boiler and/or Industrial Furnace**
☐ **Underground Injection Control Facility**	☐ **Small Quantity On-Site Burner Exemption**
☐ **Hazardous Waste Transporter**	☐ **Smelting, Melting, Refining Furnace Exemption**
☐ **Treater, Storer or Disposer of Hazardous Waste**	

Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (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 each of the three types of facilities above)			Used Oil Activities (Indicate Type(s) of Activity(ies)	
	Generated	**Accumulated**	☒ **Used Oil Generator**	☐ **Off-Specification Used Oil Burner**
Batteries	☒	☐	☐ **Used Oil Transporter**	☐ **Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil**
Pesticides	☐	☐	☐ **Used Oil Transfer Facility**	☐ **Used Oil Fuel Marketer to Off-Specification Used Oil Burner**
Thermostats	☐	☐	☐ **Used Oil Processor**	
Lamps	☒	☒	☐ **Used Oil Re-refiner**	

Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your 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.

D001						

Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

Announced	☐ **Yes**	☒ **No**	**Additional Facility Representatives:**
Tanks	☒ **Yes**	☐ **No**	**Other Comments: tanks and containers for used oil**
Containers	☒ **Yes**	☐ **No**	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
John Rochotte		**1/9/2008 10:30-11:30**

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)

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Hill Idealease, LLC **Facility Type:** CESQG **EPA ID#:** Non-Notifier

	Description of Waste				On-Site Management			Off-Site Management
	Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	**Waste Generated** (e.g. sludge, spent solvent, ash, etc)	**EPA Waste Code**	**QTY Generated per Month**	**Type of Accumulation/ Storage** (e.g. container, tank, etc)	**Type of On-Site Treatment** (recycle, wwt, etc)	**Waste Location** (Include map if possible)	**Name, state, and type of activity occurring at the facility.**
1	routine operations	paper/trash	NA	? (emptied weekly)	container	NA	trash container located outside	Local Waste Hauler (Martins Ferry)
2	Vehicle Maintenance	Used Oil	NA	4-500 gallons	2 steel tanks	NA	Tanks in the service area.	NA. Used oil is burned on-site in a used oil space heater
3	Vehicle Maintenance	Spent antifreeze	NA	< 5 gal	tank	NA	Container inside facility	antifreeze is re-used.
4	Engine & Equipment Maintenance	scrap metal	NA	< 50 lbs.	container	NA	outside of facility	recycled
5	Lighting	Spent fluorescent lamps	D009	< 1	Container to be designated	NA	Container to be designated	Waste Management company to be determined.

REMARKS – GENERAL INFORMATION

General Process Information:

Hill Idealease, LLC is a full service truck repair center and truck leasing center. The facility consists of service bays, an office area and a parts storage loft.

Regulatory/Enforcement History (if applicable): NA

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

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

WASTE EVALUATION

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes ☒ **No** ☐ N/A ☐

GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes ☒ **No** ☐ N/A ☐

*NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. – or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). **If so**, complete the Small Quantity Generator Requirements checklist.*

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes ☐ **No** ☐ N/A ☒

D001 spent mineral spirits solvent is added to used oil and burned in an on-site space heater.

TREATMENT OF HAZARDOUS WASTE

4. Does the generator treat hazardous waste in a :

a.	Container that meets 3745-66-70 to 3745-66-77	Yes ☐	**No** ☐	N/A ☒
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes ☐	**No** ☐	N/A ☒
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes ☐	**No** ☐	N/A ☒
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes ☐	**No** ☐	N/A ☒

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

REMARKS

USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS

1. Does the generator manage used oil in a surface impoundment or waste pile? If yes: — Yes ☐ No ☒ N/A ☐

   a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] — Yes ☐ No ☒ N/A ☒

2. Is used oil used as a dust suppressant? [3745-279-12(B)] — Yes ☐ No ☒ N/A ☐

3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? — Yes ☐ No ☒ N/A ☐

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

GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil? If so, — Yes ☒ No ☐ N/A ☐

   a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] — Yes ☒ No ☒ N/A ☐

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

5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] — Yes ☐ No ☒ N/A ☒

NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6. Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] — Yes ☒ No ☒ N/A ☐

7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] — Yes ☒ No ☒ N/A ☐

8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] — Yes ☐ No ☒ N/A ☐
   Containers were labeled during the inspection.

9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]

a. Stopped the release? Yes ☐ No ☒ N/A ☒

b. Contained the release? Yes ☐ No ☒ N/A ☒

c. Cleaned up and properly managed the used oil and other materials? Yes ☐ No ☒ N/A ☒

d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ☐ No ☒ N/A ☒

ON-SITE BURNING IN SPACE HEATER

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: Yes ☒ No ☐ N/A ☐

a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes ☒ No ☒ N/A ☐

b. Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour? Yes ☒ No ☒ N/A ☐

c. Are the combustion gases from heater vented to the ambient air? Yes ☒ No ☒ N/A ☐

GENERATOR TRANSPORTATION

11. If the generator self-transports used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] Yes ☐ No ☒ N/A ☒

a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24] Yes ☐ No ☒ N/A ☒

b. Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24] Yes ☒ No ☐ N/A ☒

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

COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes ☐ No ☒ N/A ☒

13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes ☐ No ☒ N/A ☒

14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes ☐ No ☒ N/A ☒

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.