



State of Ohio Environmental Protection Agency

Southeast District Office

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

October 12, 2007

**BELMONT COUNTY
GENERAL FILE
(ORRISON MAINTENANCE SERVICE)
DHWM/SEDO
NON-NOTIFIER**

Mr. John Orrison
Orrison Maintenance Service
103 Ruggles Avenue
St. Clairsville, Ohio 43950

Dear Mr. Orrison:

Thank you for your October 4, 2007 response to my May 17, 2007 Notice of Violation letter. The documentation you submitted included pictures of used oil containers at your facility that have been labeled with the words "used oil". You have previously faxed analytical information to this office demonstrating that used oil at your facility is considered to be on-specification used oil.

My review of this documentation, and past documentation submitted to this office reveals that Orrison Maintenance Service has adequately demonstrated abatement of all violations discovered during the May 3, 2007 inspection.

GENERAL COMMENTS:

- (a) On-going compliance with used oil rules requiring documentation, cited in my May 17, 2007 letter (e.g., OAC Rule 3745-279-46A(1-5), Tracking of used oil by Transporters; OAC Rule 3745-279-46B(1-5(a)), Deliveries; OAC Rule 3745-279-73, Notification by a used oil fuel marketer; and OAC Rule 3745-279-74B(1-4), On-specification used oil delivery) will be assessed in future compliance evaluation inspections.
- (b) Your facility has an above-ground used oil storage tank exceeding the capacity of at least 1,320 gallons. Therefore, the federal Spill Prevention, Control and Countermeasure (SPCC) requirements (40 CFR 112) apply to your facility. Please see the USEPA SPCC web page at <http://www.epa.gov/oilspill/spcc.htm> for more information regarding the SPCC requirements. For additional SPCC compliance assistance, please contact Dennis Deavers in the Southeast District Office Emergency Response Section.

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If you have any questions, please feel free to contact me at 740-380-5262.

Sincerely,



John Rochotte
District Representative
Division of Hazardous Waste Management

JR/mlm

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.