

February 7, 2008

GUERNSEY COUNTY
GENERAL FILE
(LOCAL TRUCKING)
DHWM/SEDO
NON NOTIFIER

Denise Larson
4362 Glen Highway
Cambridge, Ohio 43725

Dear Ms. Larson:

On February 4, 2008, Ohio EPA conducted a complaint investigation of Local Trucking in response to a complaint received by this office. The complainant alleged that your company was disposing of used oil on the ground, both inside and outside the building. During the investigation, Dusty and Dan Larson accompanied me.

Based on my investigation, 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 the date of this letter:

- (1) **OAC Rule 3745-52-34, Waste Evaluation:** Any person who generates a waste must evaluate it to determine if it is a hazardous waste.

Two drums located outside the building, labeled "junk gas", were observed during the investigation. No one was able to identify how or when this waste was generated or what it was. As owner of the property, you are responsible for determining if the contents of each drum are a hazardous waste. In order to abate this violation, please immediately evaluate the contents of each drum to determine if the waste is characteristic or listed in accordance with the above regulation, and submit the results of the evaluation to me. Should the contents of any of the drums be a hazardous waste, they must be managed in accordance with Ohio Hazardous waste laws. If this is the case, I will provide further instructions once you provide your waste evaluation to me at the Ohio EPA. The following fact sheet provides instructions on how to identify your waste in accordance with the above-cited rule:

<http://www.epa.state.oh.us/ocapp/sb/publications/identifyingwaste.pdf>

- (2) **OAC Rule 3745-279-22,(C)&(D), Used Oil Storage Requirements for Generators:** (C)Containers and tanks of used oil must be labeled with the words "Used Oil"; (D) Upon detection of a release of used oil to the environment, a used oil generator must stop the release, contain the released used oil, clean up and properly manage the

released used oil and materials used to clean up the used oil, and if necessary, repair or replace any leaking used oil storage containers prior to returning them to service for used oil storage.

(C) Three tanks and several drums of used oil inside your shop were not properly labeled. These were labeled during the inspection. However, ten drums of used oil stored outside the building were not labeled. In order to abate this section of the violation, you must label the drums with the words "used oil" and submit photographs to me at this office.

(D) Used oil which had spilled onto the floor of the truck repair building was entering a trench which drains into your septic system. It did not appear as though an oil water separator exists. Used oil can not only damage your septic system and make it inoperable, but it can also cause used oil to be released into the environment. To correct this, you must immediately stop all used oil from entering the trench and take steps to prevent future releases of used oil onto the floor. For example, we recommend that you centralize your used oil accumulation area and installing a dike around it so that spills are contained. In addition, you should train your employees in proper housekeeping so that used oil spills are prevented and immediately cleaned up, should they occur. To demonstrate a return to compliance with this rule, please submit a description the steps you will take to prevent and contain all future used oil spills that could enter the trench.

GENERAL COMMENTS

- (a) Used oil filters generated in large quantities by your company are currently managed as a solid waste, once drained. We recommend that you find a local recycling company that can accept drained filters for recycling. The following contains information on used oil filter recycling and includes a list of used oil filter recyclers in Ohio and other states:

<http://www.epa.state.oh.us/opp/recyc/oiltrans.html>

- (b) Your company generates spent fluorescent lamps, which are a universal waste in Ohio. Information on proper management of universal waste lamps, as well as a list of recyclers of spent fluorescent lamps, can be found at the following links:

<http://www.epa.state.oh.us/opp/recyc/oiltrans.html>

[http://www.epa.state.oh.us/dhwm/pdf/Universal Waste Rules for Handlers of Lamps.pdf](http://www.epa.state.oh.us/dhwm/pdf/Universal%20Waste%20Rules%20for%20Handlers%20of%20Lamps.pdf)

<http://www.epa.state.oh.us/dhwm/pdf/LampGuidance.pdf>

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Should you have any questions, please feel free to call me at (740) 380-5293. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,

Donna Goodman
District Representative
Division of Hazardous Waste Management

DG/mlm

Enclosure

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.