



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

February 5, 2008

**LAWRENCE COUNTY  
SUPERIOR MARINE  
DHWM/SEDO  
OH0000361840**

Mr. Bill Hunt  
Director E H & S  
Superior Marine Inc.  
P.O. Box 519  
South Point, OH 45680

Dear Mr. Hunt:

On January 23, 2008, Ohio EPA inspected Superior Marine's Proctorville facility to determine 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). During the inspection, we also helped you identify ways to prevent pollution by reducing waste. This letter will explain the violations we found, what you need to do to correct the violations, other general concerns we have, and what you need to do to respond to our general concerns.

We 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) **ORC Section 3734.02(E) and (F), Prohibitions:** (E) No person shall establish or operate a hazardous waste facility for the storage, treatment, or disposal of any hazardous waste, without a hazardous waste facility installation and operation permit issued in accordance with Section 3734.05 of the Ohio Revised Code.

(F) No person shall treat, store, or dispose of hazardous waste identified or listed under this chapter and the rules adopted under it, regardless of whether generated on or off premises where the waste is treated, stored, or disposed of.

During the inspection, Ohio EPA observed a 55-gallon drum in the storage shed that had been used as a burn barrel, with paint waste in the bottom of the drum. Based on this information, Superior Marine treated a D001/F003/F005 hazardous waste, in violation of this law. Superior Marine does not have a permit to treat hazardous waste on-site; therefore, Superior Marine has established an unpermitted hazardous waste facility.

Ohio EPA considers this violation to be very serious in nature. Abatement of this violation will require your facility to take measures to demonstrate a return to compliance. Superior Marine must immediately arrange to have the burn drum (and all hazardous waste drums) manifested off-site, and submit copies to this office of all manifests and land disposal restriction forms associated with the off-site shipment of these wastes. In addition, Superior Marine must submit written documentation (e.g., waste management plan) to this office describing how the facility will manage hazardous wastes in the future.

**As we discussed during the inspection, in a 4/18/90 letter Ohio EPA cited Superior Marine for this same violation for the disposal of creosote on-site. A copy of this letter was provided to you during the inspection. Our records indicate that this violation remains outstanding. The 1990 letter indicates that Superior Marine was responsible for the cleanup of the creosote and for determining if any more creosote had been buried. Since this occurred many years in the past, Ohio EPA would like to know what actions Superior Marine has taken to address the creosote disposal area. If Superior Marine performed investigations or cleaned up this area, please provide documentation to Ohio EPA. As you requested, attached is a map of the area that was produced during the 1990 investigation. After you receive this letter, and Ohio EPA receives your response, we would like to have a meeting with you at the Proctorville facility to discuss the creosote disposal area.**

- (2) **OAC Rule 3745-52-11, Hazardous Waste Determination:** Any person who generates a waste must evaluate the waste to determine if the waste is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51.

Superior Marine failed to evaluate the following wastes to determine if they are hazardous wastes, in violation of this rule:

- Burn pile ash located along the road to the river barge. TCLP metals analysis is necessary since fluorescent and incandescent bulbs were observed burned in the pile.
- Barge hold disposal area where paint wastes and other solid wastes were observed. The waste should be analyzed for TCLP volatiles since paint wastes were disposed of.
- Contaminated soil underneath leaking paint waste/solvent drum. Superior Marine may forego analytical testing and use process knowledge to manage the soil as a hazardous waste since the paint waste/solvent is known to be hazardous.
- Two 55-gallon drums labeled "slop" in the storage shed. It appeared that used oil and paint wastes may have been mixed together in these drums. If this is the case, Superior Marine may forego analytical testing and use process knowledge to manage the drums as hazardous waste since the paint waste/solvent is known to be hazardous.

After all wastes have been evaluated, Superior Marine shall forward the results to Ohio EPA. Based on the results of the waste evaluations, additional corrective measures may be necessary (i.e., closure/cleanup of the burn pile and soil cleanup and confirmation sampling in storage shed area).

- (3) **OAC Rule 3745-279-22(C)(1), Used Oil Storage Requirements for Generators:** Containers, aboveground tanks, and fill pipes used for underground tanks must be labeled or marked "Used Oil."

Several 55-gallon drums in the storage shed were not labeled "used oil", in violation of this rule. To abate this violation, Superior Marine must label the drums and send me documentation in the form of photographs, documenting your compliance with this rule.

### GENERAL COMMENTS

- (a) You indicated that the Superior Marine Proctorville facility is a Conditionally Exempt Small Quantity Generator (CESQG). As we explained during the inspection, CESQG's are allowed to accumulate up to five 55-gallon drums at any time. However, during the inspection, Ohio EPA observed at least twelve (12) 55 gallon drums of hazardous waste stored on-site. Please provide information concerning monthly paint waste generation amounts, and receipts and manifests from the off-site shipment of paint wastes and used oil since the last inspection (6/17/03).
- (b) Housekeeping is a problem at the Proctorville facility. During the inspection Ohio EPA observed numerous 55-gallon drums, 5-gallon containers, smaller containers, and solid waste placed on the property at several locations. If Superior Marine improves its housekeeping, this will likely lead to improved compliance at the facility.
- (c) As we discussed during the inspection, spent sandblast waste cannot be disposed of on-site. You indicated that Superior Marine does not sandblast paints that contain lead or other heavy metals. If it has been demonstrated that the spent sandblast is not a hazardous waste, the material would be considered a solid waste and should be disposed of in your solid waste dumpster. Please provide documentation to this office how Superior Marine will manage spent sandblast in the future.
- (d) The pile of pallets observed on the west side of the property should be recycled or disposed of. Attached is a list of pallet recyclers for your information.
- (e) Many drums were observed with no bungs and with the lids removed. This allows rainwater to enter the drums which increases waste volumes and disposal costs. Drums should be kept closed at all times, unless waste is being added to the drum.
- (f) No records were available at the Proctorville facility during the inspection. Records such as manifests and receipts should be maintained at the facility.
- (g) During our visit, we discussed the issue of mercury-containing spent fluorescent bulbs, which your company generates. All fluorescent bulbs contain mercury and can potentially exhibit the characteristic of toxicity for mercury or other metals when

Mr. Bill Hunt  
Superior Marine Inc.  
February 5, 2008  
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disposed, rendering them a hazardous waste. Ohio EPA recommends that the bulbs be recycled instead of disposing of them as a hazardous waste. The bulbs should never be burned in a waste pile, as observed at the site. The bulbs should not be crushed; rather, spent bulbs should be placed in a box or other suitable container prior to recycling. Enclosed is a fact sheet concerning fluorescent bulbs, along with a listing of fluorescent bulb recyclers for your information.

As discussed during the inspection, 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 your 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/ocapp\\_recycle.html](http://www.epa.state.oh.us/ocapp_recycle.html). 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.

Enclosed, you will find a copy of the checklists that were completed during the inspection. Should you have any questions, please feel free to contact me at (740) 380-5288. 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,



Scott N. Bergreen  
Environmental Specialist  
Division of Hazardous Waste Management

SNB/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.

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](mailto:tammy.mcconnell@epa.state.oh.us) or mail it to Tammy  
McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OH0000361840								
3. Site Name	Name: Superior Marine Ways					Website: (Optional)			
4. Site Location Information	Street Address: 95 Private Drive					State: OH			
	City, Town, or Village: Proctorville					Zip Code: 45669			
	County Name: Lawrence								
5. Site Land Type (check only one)	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"/>	
6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>									
7. Facility Representative  Additional names can be recorded in number 12.  Only provide address information if it is different than the site address	First Name: Bill			MI:	Last Name: Hunt				
	Phone Number: (740) 894-6224				Phone Number Extension:				
	E-Mail Address: bhunt@netacs.net								
	Fax Number: (740) 894-3923				Fax Number Extension:				
	Street or P.O. Box: 95 Private Drive								
	City, Town or Village: Proctorville					State: OH		Country: USA	Zip Code: 45669
8. 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: Mr. Dale Manns				Date Became Owner (mm/dd/yyyy):				
	Owner Type:	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"/>
	Street or P.O. Box: P.O. Box 519								
	City, Town or Village: South Point				Owner Phone #: (740) 894-6224				
	State: OH				Country: USA		Zip Code: 45669		
	Name of Site's Operator: Superior Marine Ways				Date Became Operator (mm/dd/yyyy):				
	Owner Type:	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"/>
	Street or P.O. Box: 95 Private Drive								
	City, Town or Village: Proctorville				Operator Phone #: (740) 894-6224				
	State: OH				Country: USA		Zip Code: 45669		
9. Violations Cited?:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste					
<input type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)									
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input checked="" type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Underground Injection Control Facility									

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))			
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste		<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	
<input type="checkbox"/> Destination Facility for Universal Waste			
Check all boxes below that apply for each of the three types of facilities above		10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
<b>Managed</b>		<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
11. 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.			
D001	F003	F005	
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.			
<b>Announced</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Additional Facility Representatives:</b>
<b>Tanks</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Other Comments:</b>
<b>Containers</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Scott Bergreen		Rich Stewart	1/23/2008 10:30 am-12:30 pm
14. 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, WASTE, P2 SUMMARY SHEET**

<b>Facility Name:</b> Superior Marine Ways	<b>Facility Type:</b> Generator/Illegal TSD	<b>Date of Inspection:</b> 1/23/08	<b>EPA ID #:</b> OH0000361840
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<b>Waste Generated</b>			<b>On- or Off-Site Management</b>		<b>P2 Activities</b>	
<b>Process/Activity Generating Waste</b> (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	<b>Waste Description</b> (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	<b>QTY Generated per Month, Type of Accumulation</b> (container, tank, etc) and location of waste accumulation area	<b>Type of On-Site Treatment</b> (recycle, wwt, etc)	<b>Name, state, and type of activity occurring at the off-site facility.</b>	<b>Current P2 Activities</b>	<b>P2 Opportunities</b>
1 Barge Repair	Spent Paint/Solvent  D001/F003/ F005	Quantity generated unknown.  55 g. drums stored in shed on west side of property.	N/A	?		
2 Equipment Maintenance	Used Oil	Quantity generated unknown.  55 g. drums stored in shed on west side of property.	N/A	?		
3 Lighting	Spent fluorescent bulbs  D009	Generate small quantity of bulbs.  Store bulbs in office area.	N/A	?		
4 Barge Repair	Scrap Steel	Scrap is stored in roll-off box.	N/A	Taylor's Iron & Metal Huntington, WV		

5	Barge Repair	Spent Sandblast Non-haz.	Quantity generated unknown	N/A	Disposed of on-site.		
6	General Facility Activities	Solid Waste	? Waste managed in a roll-off box.	N/A	Green Valley Landfill Greenup Co., KY		

### REMARKS-GENERAL INFORMATION

#### General Process Information:

Superior Marine Ways is located at 95 Private Drive in Proctorville, Lawrence County, right on the bank of the Ohio River. The Proctorville facility provides maintenance services for barges used for hauling products on the Ohio River. The barges are drydocked and new metal plating is welded to the barge hulls to replace metal that has become too thin over time. After the metal has been replaced, the barges are sandblasted and then painted. Red and black marine epoxy based paints are used at the facility. Barges are also repaired on the river (hatch lids replaced, painting, etc.). When painting is conducted on the river, a paint roller is used; when in drydock, a spray gun is used. Paint wastes and used oil are managed in 55-gallon drums and stored in a metal shed on the west side of the property. The facility consists of a dock area on the river and an area where barges are winched onto shore for repair in drydock. Several support buildings are located on the property.

#### Regulatory/Enforcement History:

The last compliance evaluation inspection was conducted at the Superior Marine Proctorville facility on June 17, 2003. No violations were found during that inspection.

#### Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes\* \_\_\_\_\_ No X

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

CESQG:  $\leq 100$  Kg. (Approximately 25-30 gallons) of waste in a calendar month or  $< 1$  Kg. of acutely hazardous waste.  
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.  
LQG:  $\geq 1,000$  Kg. (~300 gallons) of waste in a calendar month or  $\geq 1$  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

**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: Complete appropriate checklist for each unit.*  
*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
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 than 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-transportes 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.*

Keyword: UsedOilChecklistforGenerators.Oct.2007.doc