



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, Ohio 43138

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

March 14, 2007

**MUSKINGUM COUNTY  
GENERAL FILE  
(ACE TRUCK EQUIPMENT CO.)  
DHWM/SEDO  
OHD018483040**

Mr. David Beitzel  
Ace Truck Equipment Co.  
P.O. Box 2605  
Zanesville, Ohio 43702

Dear Mr. Beitzel:

On February 27, 2007, Melody Stewart and I inspected Ace Truck Equipment Co., located at 1130 Newark Road, Zanesville, Ohio, 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). You were not at the facility at the time, and Mr. Steve Hampp accompanied us during our inspection. This letter will explain the violations we found and what you need to do to correct the violations, as well as other general concerns we have and what you need to do to respond to those 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) **OAC Rule 3745-279-22(C), Used Oil Storage Requirements for Generators (Labels)**  
Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil".

One approximately 1000-gallon above-ground used oil tank, located behind the service area/body shop, was not labeled with the words "Used Oil".

To demonstrate compliance with this rule, Ace Truck Equipment Co. must label the used oil tank with the words "Used Oil" and send a photograph of the properly labeled tank to this office.

- (2) **OAC Rule 3745-279-22(D)(1), (2), and (3), Used Oil Storage Requirements for Generators (Response to Releases)**

Upon detection of a release or spill of used oil to the environment, a generator must perform the following clean-up steps:

- (1) Stop the release;
- (2) Contain the released used oil; and
- (3) Clean up and properly manage the released used oil and other materials used in the clean up.

Mr. David Beitzel  
Ace Truck Equipment Co.  
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During the inspection, we observed an area of oil-stained soil surrounding the used oil tank, located behind the service area/shop.

To demonstrate compliance with this rule, Ace Truck Equipment Co. must dig up all visible oil-contaminated soil surrounding the used oil tank, and submit a photograph to this office showing that this area has been cleaned up. The oil-contaminated soil and materials generated from the clean up can be containerized and managed along with your regular trash.

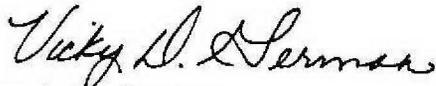
#### GENERAL COMMENTS

- a) During the inspection, records for the off-site shipment of used oil could not be located. Please send to me a copy of the record (e.g., manifest, bill of lading, etc.) for your most recent off-site shipment of used oil.
- b) It is my understanding that Ace Truck Equipment Co. occasionally does sandblasting or hires a company to do sandblasting work on-site. No sandblast material was observed on-site at the time of our inspection. Please be advised that any sandblast waste generated on-site by your company must be evaluated to determine if it is a hazardous waste prior to its disposal.

Enclosed, you will find a copy of the checklists that were completed during the inspection, as well as several fact sheets that you may find useful. You can find copies of the hazardous waste rules and other information on our division's web page at <http://www.epa.state.oh.us/dhwm>. Compliance assistance and pollution prevention information is available at <http://www.epa.state.oh.us/ocapp/ocapp.html>.

Should you have any questions, please feel free to call me at 740-380-5237.

Sincerely,



Vicky D. German  
Environmental Specialist  
Division of Hazardous Waste Management  
Ohio EPA, Southeast District Office

VDG/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

Site EPA ID No.	EPA ID Number: OHD018483040								
Site Name	Name: Ace Truck Equipment Co.					Website: (Optional) <a href="http://www.acetruck.net/">http://www.acetruck.net/</a>			
Site Location Information	Street Address: 1130 Newark Road								
	City, Town, or Village: Zanesville					State: OH			
	County Name: Muskingum					Zip Code: 43701			
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"/>	
NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>									
Facility Representative  Additional names can be recorded in "Comments" below  Only provide address information if it is different than the site address	First Name: David			MI:	Last Name: Beitzel				
	Phone Number: 740-453-0551				Phone Number Extension:				
	E-Mail Address: david@acetruck.net								
	Fax Number: 740-453-7023				Fax Number Extension:				
	Street or P.O. Box: P.O. Box 2605								
	City, Town or Village: Zanesville					State: OH		Country: USA	Zip Code: 43702
	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: David Beitzel, President				Date Became Owner (mm/dd/yyyy):			
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 2605									
City, Town or Village: Zanesville					Owner Phone #: 740-453-0551				
State: OH					Country: USA		Zip Code: 43702		
Name of Site's Operator: Ace Truck Equipment Co.				Date Became Operator (mm/dd/yyyy):					
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 2605									
City, Town or Village: Zanesville					Operator Phone #: 740-453-0551				
State: OH					Country: USA		Zip Code: 43702		
Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
<b>Type of Generator:</b>									
<input type="checkbox"/> Not Regulated				<input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input 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)									
<b>Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)</b>									
<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									

<b>Universal Waste Activities</b> (Indicate types of universal waste generated and/or accumulated (check all boxes that apply))					
<input 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)			<b>Used Oil Activities</b> (Indicate Type(s) of Activity(ies))		
	<b>Generated</b>	<b>Accumulated</b>	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner	
Batteries	<input type="checkbox"/>	<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"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner	
Thermostats	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor		
Lamps	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner		
<b>Waste Codes for Federally Regulated Hazardous Wastes</b> 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 RCRA info source record, you do not need to list them all. Instead just indicate the date of the most recent source record.					
D001					
<b>Comments:</b> 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>	Steve Hampp, Parts Manager	
<b>Tanks</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Other Comments:</b> Above ground used oil storage tank		
<b>Containers</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No			
<b>Name of Inspector(s)</b>		<b>Name of Inspector(s)</b>		<b>Date of Inspection/Time (mm/dd/yyyy) (hh:mm)</b>	
Vicky German, DHWM-SEDO		Melody Stewart, DHWM-SEDO		02-27-2007	
<b>OPTIONAL CERTIFICATION.</b> 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.					
<b>Signature of Owner, Operator, or an Authorized Representative</b>		<b>Name and Title (Print)</b>		<b>Date (mm/dd/yyyy)</b>	

# CONDITIONALLY EXEMPT SMALL QUANTITY (CESQG) GENERATOR REQUIREMENTS

CESQG: <100Kg. (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.

## WASTE EVALUATION

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11]  Yes  No  NA

## GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg. of hazardous waste per month?  Yes  No  NA  
[conditionally exempt small quantity generator ("CESQG")] **See Remarks Section**

*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").*

## OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD?  Yes  No  NA  
[3734.02(F)]

## 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  NA
  - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)  Yes  No  NA
  - c. Drip pad that meets 3745-69-40 to 3745-69-45?  Yes  No  NA
  - d. Containment building that meets 3745-256-100 to 3745-256-102?  Yes  No  NA

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

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

## REMARKS

Ace Truck Equipment Co. notified Ohio EPA of their waste generation activities on 7/05/1988 as a Small Quantity Generator (SQG) of hazardous waste. During the 2/27/2007 inspection, it was determined that the company is currently operating as a Conditionally Exempt Small Quantity Generator (CESQG).

# USED OIL GENERATOR REQUIREMENTS

**NOTE: (Short Version) - This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.**

## PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so:  Yes  No  NA
- Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)]  Yes  No  NA
2. Is used oil being used as a dust suppressant? [3745-279-12(B)]  Yes  No  NA
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)?  Yes  No  NA

## USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)]  Yes  No  NA
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  NA
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)]  Yes  No  NA
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]  Yes  No  NA
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  NA  
**See Remarks Section**
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  NA
- b. Contained the release?  Yes  No  NA
- c. Cleaned up and properly managed the used oil and other materials?  Yes  No  NA  
**See Remarks Section**
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary?  Yes  No  NA

10. Does the generator burn used oil in used fired space heaters? [3745-279-20]  
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  No  NA
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?  Yes  No  NA
- c. Are the combustion gases from heater vented to the ambient air?  Yes  No  NA
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24]  Yes  No  NA

### USED OIL 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  NA
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]  Yes  No  NA
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  NA

### WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11]  Yes  No  NA

### REMARKS

One approximately 1000-gallon above ground used oil tank, located behind the service area/shop, was not labeled with the words "Used Oil".

During the inspection, we observed an area of oil-stained soil surrounding the used oil tank, located behind the service area/shop.

### WASTE ACTIVITIES SUMMARY

**Facility Name:** Ace Truck Equipment Co.     
 **Facility Type:** CESQG     
 **EPA ID#:** OHD018483040

**Waste Generated**

**On-Site and Off-Site Management**

**Pollution Prevention Activities**

Process Generating Waste	Waste Generated	EPA Waste Code	Amount Generated per Month	Type and Location of Accumulation, Storage	Type of On-Site Treatment	Off-Site - Name, State, and Type of Activity Occurring at the Facility	Current Pollution Prevention Activities	Pollution Prevention Opportunities
1	Truck maintenance	Spent parts cleaner from 1 ZEP parts washer	D001	NA	Added to used oil in used oil tank	NA	NA – Managed with used oil per CESQG requirements	NA
2	Truck maintenance	Used oil	NA	NA	1000-G above ground used oil tank	NA	Unknown – requesting information from facility	NA
3	Truck maintenance	Used oil filters	NA	Varies	NA	Drained, then disposed as solid waste	NA – Solid waste	NA
4	Painting truck bodies, beds, equipment	Paint-related wastes (paint, solvent, gun cleaner)	D001 D035 F003 F005	~ 14 G	55-G drum	NA	Veolia Environmental Services, Chicago IL Fuel blending	NA
5	Painting truck bodies, beds, equipment	Paint booth filters from 2 spray booths	Non-hazardous (1998 analysis)	Varies	NA	NA	NA – Solid waste	NA

## WASTE ACTIVITIES SUMMARY

Facility Name: Ace Truck Equipment Co.

Facility Type: CESQG

EPA ID#: OHD018483040

Waste Generated				On-Site and Off-Site Management			Pollution Prevention Activities		
Process Generating Waste	Waste Generated	EPA Waste Code	Amount Generated per Month	Type and Location of Accumulation, Storage	Type of On-Site Treatment	Off-Site - Name, State, and Type of Activity Occurring at the Facility	Current Pollution Prevention Activities	Pollution Prevention Opportunities	
6	Truck maintenance, repair	Spent antifreeze	NA if recycled	Varies	55-G drum	NA	S.E. Tire  Recycled -reused	Recycled	NA
7	Metal fabrication	Scrap metal	NA	Varies	NA	NA	Scrap metal recycler (Polk, Muskingum Iron & Metal)	Recycled	NA
8									
9									
10									

## GENERAL FACILITY INFORMATION

### **Process Information:**

Ace Truck Equipment Co. is a wholesaler/distributor of truck bodies, equipment, and supplies; including dump, platform, utility, van bodies, cranes, and snow removal equipment. The company outfits trucks for snow and ice control, installs custom truck equipment, and does general repair work. Some fabrication and welding is done on-site. Wastes generated include paint-related wastes from painting installed truck bodies/beds and equipment, used oil/oil filters, spent parts cleaner solvent, and scrap metal.

### **Regulatory/Enforcement History:**

Ace Truck Equipment Co. notified Ohio EPA of their waste generation activities on 7/05/1988 as a Small Quantity Generator (SQG) of hazardous waste. During the 2/27/2007 inspection, it was determined that the company is currently operating as a Conditionally Exempt Small Quantity Generator (CESQG). The company was previously inspected for compliance with Ohio's hazardous waste regulations on 2/4/1998.

### **Pollution Prevention Remarks and/or Other Information:**

Would this facility be interested in a P2 assessment?

Yes  No  NA

### **REMARKS**

*If yes, refer to Ohio EPA Southeast District Office Pollution Prevention Coordinator or to Ohio EPA's Office of Compliance Assistance and Pollution Prevention, at 1-800-329-7518, [p2mail@epa.state.oh.us](mailto:p2mail@epa.state.oh.us) or [www.epa.state.oh.us/ocapp/ocapp.html](http://www.epa.state.oh.us/ocapp/ocapp.html).*