



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

September 18, 2007

**MUSKINGUM COUNTY
ZEMBA BROTHERS, INC
DHWM/SEDO
NON-NOTIFIER**

Mr. Chris Zemba
Zemba Brothers, Inc.
3401 East Pike
Zanesville, Ohio 43701

Dear Mr. Zemba:

On Monday, August 20, 2007, Ohio EPA was notified at 7:19 pm by Mr. Gene Hanning (from the local fire department) through Ohio EPA's spill hotline that a tanker truck located at Zemba Brothers, Inc.'s facility (Zemba) in Zanesville, Muskingum County, had ruptured and released onto the ground approximately 4,000 gallons of waste sodium hydroxide liquid. Zemba had been hired by the Colgate-Palmolive Company (Colgate) facility in Cambridge, Guernsey County to transport this waste material. Ohio EPA was informed during subsequent discussions that this material was to be solidified and disposed at the Suburban landfill located in Perry County. Ohio EPA's On-Scene Coordinator (Dennis Deavers), while at the site, was informed by Colgate representatives that the load contained sodium hydroxide that originated from a spill that occurred during a transfer operation at Colgate earlier that day. Colgate had mischaracterized the waste sodium hydroxide as rainwater and had pumped it to the Murphy's sump. Mr. Delbert Grubb, a truck driver for Zemba, arrived at the Colgate site on the morning of August 20th and began pumping the contents of the Murphy's sump into a Zemba tanker truck with the intent of transporting it to Suburban Landfill. Due to time constraints, Mr. Grubb returned the tanker to the Zemba property for delivery to Suburban Landfill the following day.

Mr. Grubb stated that he had pumped 5,700 gallons into the Zemba tanker truck. To characterize the waste, Mr. Grubb stated that he took a pH sample of this waste from the surface of the Murphy's sump. This sample was analyzed in the lab at the Colgate facility and indicated a pH of 8.5.

Mr. Grubb stated that he departed the Colgate facility at approximately 3:00 pm and arrived at Zemba's facility before 4:30 pm. Shortly thereafter, Zemba noticed that the tanker sidewall was very hot to the touch, that the sidewalls of the tanker were deteriorating, and that the truck was "rolling back and forth" due to the reaction of the aluminum with waste sodium hydroxide (waste code D002). The tanker began leaking waste and then ruptured releasing the contents onto the soil at the Zemba facility. While some of the sodium

hydroxide was captured by a pit constructed by Zemba, a sufficient quantity flowed overland and into a pond on an adjacent property causing a fish kill several days later. A measured pH of 11 was reported from a reading at 10' below the pond surface. Zemba contacted 911 just after 6:00 pm on Monday, August 20, 2007 and as previously stated Mr. Gene Hanning then notified Ohio EPA's spill response hotline.

On August 23, 2007, Melody Stewart and I performed a compliance inspection at your facility, located at 3401 East Pike in Zanesville, to determine its compliance with Ohio's hazardous waste and solid waste laws and regulations as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). During this inspection, it was determined that the waste sodium hydroxide had not been properly characterized.

This letter will explain the hazardous waste violations we found and what you need to do to correct the violations. Based on this inspection, your facility is in violation of the following hazardous waste regulations:

- (1) **OAC Rule 3734.02(E) & (F), Prohibitions:** This law states, in part, that no person shall store, treat or dispose of hazardous waste without a hazardous waste facility installation and operation permit. ORC 3734.02(F) states that no person shall treat, store or dispose of hazardous waste except at the types of facilities specified below, or transport or cause to be transported any hazardous waste identified or listed under this chapter and rules adopted under it to any other premises, except at or to any of the following:
 - (1) A hazardous waste facility operating under a permit issued in accordance with this chapter;
 - (2) A facility in another state operating under a license or permit issued in accordance with the "Resource Conservation and Recovery Act of 1976," 90 Stat. 2806, 42 U.S.C.A. 6921, as amended;
 - (3) A facility in another nation operating in accordance with the laws of that nation;
 - (4) A facility holding a permit issued pursuant to Title I of the "Marine Protection, Research, and Sanctuaries Act of 1972," 86 Stat. 1052, 33 U.S.C.A. 1401, as amended;
 - (5) A hazardous waste facility as described in division (E)(3)(a) or (b) of this section.

As a result of the above described incident that occurred on Monday, August 20, 2007 and because Colgate failed to properly characterize the waste, Zemba transported D002 caustic hazardous waste liquid from Colgate, to a facility other than the above listed locations in violation of this law; and, due to the release of this caustic hazardous liquid waste (D002) to the ground at your facility constitutes unpermitted disposal of hazardous waste in violation of this law.

In addition to the above violations, Zemba also violated the following additional hazardous waste requirements as a result of the incident which occurred on August 20, 2007. Specific action to abate these violations listed below is not necessary at this time. Abating the above violations will be sufficient, in part, to demonstrate abatement of these additional violations:

- (2) **OAC Rule 3745-53-11(A), Registration of hazardous waste transporters; and, OAC Rule 3745-53-11 (B).** Must not transport hazardous waste without having a hazardous waste identification number:

Zemba did not register as a hazardous waste transport (OAC 3745-53-11) and transported hazardous waste with an identification number (OAC 3745-53-11(B)).

- (3) **OAC Rule 3745-53-20, Acceptance and handling of hazardous waste and the manifest system (A)(B)(C).** Transporter must ensure manifest accompanies the hazardous waste.

Zemba did not manifest the D002 caustic hazardous waste liquid.

- (4) **OAC Rule 3745-53-22 (A) Transporter shall keep manifest copies for 3 years from the date of acceptance.**

Zemba did not manifest the D002 caustic hazardous waste liquid.

- (5) **OAC 3745-53-31 (C) Immediate action. A transporter must notify the Ohio EPA in writing.** ³⁰

Zemba did not notify Ohio EPA in accordance with the hazardous waste transporter rules.

- (6) **OAC 3745-53-31 Discharge clean-up.** A transporter shall clean up any hazardous waste discharge that occurs during transportation or take such action as may be required or approved by Ohio EPA or federal agency personnel so that the hazardous waste discharge no longer presents a hazard to human health or the environment.

Clean up is ongoing, this violation will be abated pending Ohio EPA approval of the clean-up activities.

Other violations

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

The used oil tank at the ZBI facility was not labeled with the words "used oil" in violation of this rule. This violation was corrected during the inspection, therefore, Zemba has adequately demonstrated compliance with this rule.

Since Zemba violated ORC §3734.02(E) and (F), Zemba is subject to all applicable general facility standards found in OAC chapters 3745-54 and 55. Additionally, at any time Ohio EPA may assert its right to have Zemba begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law. Although no further action is being required by Ohio EPA at this time, be advised that due to the nature of the violation Ohio EPA may require closure pursuant to OAC rules 3745-55-11 through 3745-55-20 and OAC rules 3745-55-42 through 3745-55-47 at this site.

GENERAL COMMENT

During the inspection, we discussed the management of spent fluorescent lamps. Please find enclosed a fact sheet regarding the proper management of spent lamps. Universal waste rules for spent fluorescent lamps can be found on Ohio EPA's web page at: <http://www.epa.state.oh.us/dhwm/guidancedocs.html#UW>.

Enclosed you will find a copy of the checklists that were completed as a result of the August 23, 2007 inspection.

Sincerely,



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: Non-Notifier		
Site Name	Name: Zemba Brothers, Inc.	Website: www.zembabrosinc.com (Optional)	
Site Location Information	Street Address: 3401 East Pike		
	City, Town, or Village: Zanesville	State: OH	
	County Name: Muskingum	Zip Code: 43701	
Site Land Type (check only one)	<input checked="" type="checkbox"/> Private <input 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		
NAICS code(s) www.census.gov/epcd/www/naics.html			
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address.	First Name: Chris	MI: Last Name: Zemba	
	Phone Number: 740-452-1880	Phone Number Extension:	
	E-Mail Address:		
	Fax Number: 740-450-4209	Fax Number Extension:	
	Street or P.O. Box: 3401 East Pike		
	City, Town or Village: Zanesville		
	State: OH	Country: USA Zip Code: 43701	
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: Zemba Brothers, Inc.		Date Became Owner (mm/dd/yyyy): ?
	Owner Type:	<input checked="" type="checkbox"/> Private <input 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	
	Street or P.O. Box: 3401 East Pike		
	City, Town or Village: Zanesville	Owner Phone #: 740-452-1880	
	State: OH	Country: USA	Zip Code: 43701
	Name of Site's Operator: Zemba Brothers, Inc.		Date Became Operator (mm/dd/yyyy): ?
	Owner Type:	<input checked="" type="checkbox"/> Private <input 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	
	Street or P.O. Box: same as above		
	City, Town or Village:	Operator Phone #:	
	State:	Country:	Zip Code:
Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Type of Generator			
<input checked="" type="checkbox"/> Non-Generator of hazardous waste	<input 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)			
Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)			
<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 checked="" type="checkbox"/> 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	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input checked="" 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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> 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 RCRA Info source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

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: _____
 Containers Yes No

Name of Inspector(s): _____ Name of Inspector(s): _____ Date of Inspection/Time (mm/dd/yyyy) (hh:mm) _____
 John Rochotte Melody Stewart 8/23/2007 1:00 - 2:30 PM

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: Zemba Brothers, Inc.

Facility Type: Non-generator

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 Engine/Equipment Maintenance	Used oil	NA	< 100 gallons	tank	NA	above ground tank behind facility	Burned for energy recovery in site space heaters
2 Equipment maintenance	Spent antifreeze	NA	< 10 gallons	container	NA	In shop	Re-used in trucks, equipment
3 Lighting	Spent fluorescent lamps	D009	Unknown – facility is less than 1 year old	Universal waste program to be started	NA	Accumulation area to be established	Management company to be selected.
4 Routine Business Operations	solid waste	NA	?	dumpster	NA	dumpster located outside	Local waste hauler

REMARKS - GENERAL INFORMATION

General Process Information:

Zemba Bros., Inc. (ZBI), is a full service excavating contractor with hydro-excavating and vacuor equipment available for vacuum liquid removal. The facility is located just east of Zanesville on east Pike, just south of I-70. ZBI serves Muskingum, Guernsey, Perry, Morgan & Licking Counties. Services include excavation (commercial & residential), trucking, water hauling, and septic services (cleaning, installation & repair) including portable restroom rental. The facility consists of a large building with offices and a work repair area. An additional area of the building is used for equipment storage. Large equipment is stored outside of the facility.

Regulatory/Enforcement History (if applicable): NA

HAZARDOUS WASTE TRANSPORTER REQUIREMENTS

1. Has the transporter registered with the Public Utilities Commission of Ohio? [3745-53-11] Yes No NA

2. Has the transporter received a U.S. EPA ID number? [3745-53-11(B)] Yes No NA

3. All hazardous wastes accepted have been accompanied by a manifest? Yes No NA
 - a. If not, was the waste generated by a CESQG or by a SQG shipped under a reclamation agreement? [3745-53-20(H)(1)] Yes No NA

4. The transporter has signed the manifest as required by 3745-53-20 and carried the manifest with the waste shipment? [3745-53-20(C)] Yes No NA

5. Manifests are retained for at least three years? [3745-53-22(A)] Yes No NA

6. The transporter has delivered the entire quantity of waste accepted from the generator in accordance with manifest instructions? Yes No NA
 - a. If not, did the transporter contact the generator for further instructions and revise the manifest accordingly? [3745-53-21(A)(B)] Yes No NA

7. **For hazardous waste delivered by the original transporter to a rail or water transporter:** Did the original transporter comply with the manifest handling requirements of 3745-53-20(E)(F)? Yes No NA

8. **For hazardous waste shipped out of the country:** Has the transporter retained signed copies of the manifest for at least three years indicating that the waste left the U.S.A.? [3745-53-22(D)] Yes No NA

9. Has the transporter ever had a discharge of hazardous waste during the time that the waste was under the transporter's control? Yes No NA
 If so:
 - a. Was immediate action taken? [3745-53-30(A)] Yes No NA
 - b. Was Ohio EPA's Office of Emergency Response immediately notified as required by 3745-53-30(C)(1)? Yes No NA
 - c. Did the transporter report in writing to Ohio EPA's Office of Emergency Response? [3745-53-30(C)(2)] Yes No NA
 - d. Was the discharge cleaned up as required by Ohio EPA or a federal agency to remove hazard to human health or the environment? [3745-53-31] Yes No NA

The clean up of the August 20, 2007 spill is still on-going.

10. Does the transporter store manifested hazardous wastes in containers temporarily while wastes are in transit? Yes No NA
 If so:
 - a. Are wastes stored for only ten days or less? Yes No NA
 - b. Do wastes remain properly DOT packaged during storage? [3745-53-12] Yes No NA

NOTE: Temporary storage in stationary tanks is not permitted under transfer facility requirements and such storage requires a RCRA permit and is subject to interim status requirements for storage facilities. Any type of storage by the transporter which is not specifically authorized under OAC 3745-53-12 transfer facility requirements is subject to full RCRA regulations.

A "transfer facility" means any transportation-related facility, including loading docks, parking areas, storage areas and other similar areas where hazardous waste is held during the normal course of transportation. (This does not include the designated facility.)

11. Does the transporter import hazardous waste into the United States? Yes No NA
If so:
- a. Did the transporter comply with OAC Chapter 3745-52? Yes No NA
[3745-53-10(C)(1)]
12. Does the transporter mix hazardous wastes of different U.S. DOT descriptions by placing them into a single container? Yes No NA
If so:
- a. Did the transporter comply with OAC Chapter 3745-52? Yes No NA
[3745-53-10(C)(2)]
13. Does the transporter receive SQG wastes for transport pursuant to a reclamation agreement? Yes No NA
- If so, was the following information recorded in a log or shipping paper carried with the shipment as required by 3745-53-20(H): Yes No NA
- a. Name, address and U.S. EPA ID # of SQG? Yes No NA
- b. Quantity of waste? Yes No NA
- c. DOT required shipping information? Yes No NA
- d. Date waste was accepted? Yes No NA
14. If the transporter receives SQG wastes for transport as described in Question No. 13, are records related to the shipments maintained for at least three years following expiration of the reclamation agreement? [3745-53-20(H)(4)] Yes No NA

REMARKS

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? [conditionally exempt small quantity generator ("CESQG")] Yes No NA

Zemba was operating as a non-generator of hazardous waste at the time of the August 23, 2007 inspection.

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? [3734.02(F)] Yes No NA

Caustic liquid waste was in the process of being transported to a solid waste facility when the tanker ruptured and spilled this waste liquid at the Zemba facility on August 20, 2007

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

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)? [3745-279-21(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
- The used oil tank was not labeled with the words "used oil". The tank was 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 NA
- b. Contained the release? Yes No NA
- c. Cleaned up and properly managed the used oil and other materials? Yes No NA
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No NA

10. Does the generator burn use _____ in used oil fired space heaters? [3745-23] If so: Yes No NA
- 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