



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 Korleski, Director

May 20, 2008

**PIKE COUNTY  
GENERAL FILE  
(WAVERLY QUICK LUBE)  
DHWM/SEDO  
NON-NOTIFIER**

Mr. Matt Reed  
Waverly Quick Lube Car Care & Custom Exhaust  
100 Caudill Road  
Waverly, Ohio 45690

Dear Mr. Reed:

On May 5, 2008, Melody Stewart and I inspected Waverly Quick Lube Car Care & Custom Exhaust 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). This letter will explain the violations discovered during the inspection and what you need to do to correct them, the general concerns we have and what you can do to respond to those concerns, and any pollution prevention opportunities we identified.

We found the following violation of Ohio's hazardous waste laws:

- (1) ***OAC Rule 3745-279-22(C)(1), Used Oil Storage Requirements for Generators.*** Containers and above ground tanks used to store used oil at generator facilities must be labeled or clearly marked with the words "Used Oil."

Two 250-gallon tanks that held used oil were not labeled "Used Oil." During the inspection, Waverly Quick Lube labeled the tanks with the words "Used Oil", in accordance with this rule.

***Waverly Quick Lube has demonstrated a return to compliance with this rule.***  
No further action is necessary on your part to address this matter.

**GENERAL COMMENTS:**

- (a) I have enclosed information regarding management of spent fluorescent lamps under Ohio's Universal Waste Rule (UWR). Because all fluorescent lamps contain mercury, Ohio EPA recommends that you manage your spent lamps under the

UWR, if you are not already doing so. The UWR eliminates many regulatory requirements such as waste evaluation, manifesting and record keeping. If you manage your spent lamps as universal waste and they will be recycled, you do not have to determine if they are hazardous waste. If you do not have your spent fluorescent lamps recycled, it is your responsibility to evaluate the lamps to determine if they are hazardous prior to their disposal.

Enclosed you will find a copy of the checklist that was completed as a result of the inspection. 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 information and pollution prevention information can be found at <http://www.epa.state.oh.us/ocapp/ocapp.html>.

If you should 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

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.***

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: Waverly Quick Lube Car Care & Custom Exhaust					Website: (Optional)			
Site Location Information	Street Address: 100 Caudill Road								
	City, Town, or Village: Waverly				State: OH				
	County Name: Pike				Zip Code: 45690				
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  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	First Name: Matt		MI:		Last Name: Reed				
	Phone Number: 740-941-0005				Phone Number Extension:				
	E-Mail Address:								
	Fax Number:				Fax Number Extension:				
	Street or P.O. Box: same as above								
	City, Town or Village:				State: OH		Country: USA		Zip Code:
	Name of Site's Legal Owner: same as above				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:									
City, Town or Village:				Owner Phone #:					
State:				Country: USA		Zip Code:			
Name of Site's Operator: same as above				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:									
City, Town or Village:				Operator Phone #:					
State:				Country: USA		Zip Code:			
Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
Type of Generator:									
<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)									
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 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)

<input type="checkbox"/> <b>Small Quantity Handler of Universal Waste</b>	<input type="checkbox"/> <b>Large Quantity Handler of Universal Waste</b> (accumulates 5,000 kg. or more)
<input type="checkbox"/> <b>Destination Facility for Universal Waste</b>	

(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"/> <b>Used Oil Generator</b>
<b>Batteries</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Transporter</b>
<b>Pesticides</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil</b>
<b>Thermostats</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Transfer Facility</b>
<b>Lamps</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Processor</b>
			<input type="checkbox"/> <b>Used Oil Re-refiner</b>

**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 RCRAInfo 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.

<b>Announced</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Additional Facility Representatives:</b>
<b>Tanks</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<b>Other Comments:</b> Facility generates used oil (two 250-G used oil tanks) and spent antifreeze (two 55-G containers). Facility rtc'd during inspection.
<b>Containers</b>	<input checked="" 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	5/5/2008

**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.

<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")  
Waverly Quick Lube generates used oil and spent antifreeze (recycled), scrap metal from muffler changes, and used oil filters (drained and managed as scrap metal or solid waste).

**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

## 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.**



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## USED OIL GENERATOR REQUIREMENTS

**NOTE:** 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
- a. 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  
*The two 250-gallon tanks used for collecting and storing used oil were not labeled as "used oil. Waverly Quick Lube labeled the tanks during the inspection, demonstrating a return to compliance with this rule.*
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 used oil or used fired space heaters? [3745-279-23] 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

**GENERAL FACILITY INFORMATION**

Waverly Quick Lube Car Care & Custom Exhaust  
100 Caudill Road  
Waverly, Ohio 45690

**PROCESS INFORMATION**

The facility does automobile oil changes, radiator flushes, transmission flushes, tune-ups, and also installs brake pads. A coin car wash is attached to the oil change business.

**WASTES GENERATED**

Used oil generated from automobile oil changes is collected in two 250-gallon tanks and taken off-site by Glockner Oil Company in Piketon, Ohio for recycling/reuse. Spent antifreeze generated from radiator flushes is collected in two 55-gallon drums and is also recycled. Scrap metal from muffler replacement/repairs is sold to a scrap metal dealer. Spent oil filters are drained and managed as solid waste.

**REGULATORY HISTORY**

File information indicates that the facility has not previously been inspected for compliance with Ohio's hazardous waste regulations.