



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-5490
www.epa.state.oh.us

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

October 29, 2007

**PIKE COUNTY
GENERAL FILE
(ODOT DIST. 9 - PIKE COUNTY GARAGE)
DHWM/SEDO
OHD982064636**

Mr. Steven Jenkins
ODOT District 9 – Pike County Garage
353 Grove Road
Piketon, Ohio 45661

Dear Mr. Jenkins:

On October 17, 2007, Melody Stewart and I inspected ODOT District 9's Pike County Garage, located at 353 Grove Road in Piketon, 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 any violations found as a result of the inspection and what you need to do to correct the violations, as well as any general concerns we have and how you can address those concerns.

We found the following violation 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 - Labeling:** Containers, above-ground tanks, and fill pipes used for underground tanks that store used oil must be labeled or marked clearly with the words "Used Oil".

During the inspection, we observed that the fill pipe leading to the underground used oil tank was labeled as "Waste Oil" instead of with the words "Used Oil" as required by this rule.

ODOT District 9 – Pike County Garage must label the fill pipe with the words "Used Oil", and send a photograph of the correctly labeled fill pipe fill pipe to this office to demonstrate a return to compliance with this rule.

GENERAL COMMENTS

- (a) As we mentioned during the inspection, it is recommended that the outside manhole/access cover to the underground used oil tank also be labeled "Used Oil", as a precautionary measure.
- (b) Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) is an independent, non-regulatory office within Ohio EPA that provides information and resources to help facilities identify and implement pollution prevention measures that can save money and benefit the environment. This office provides a free on-site assessment of a facility's operations to identify and evaluate opportunities to reduce wastes and pollution. If your facility would like to be considered for an on-site pollution prevention assessment, or if you would like more information about pollution prevention assessments, you can contact Ohio EPA's Office of Compliance Assistance and Pollution Prevention at their toll free phone number, (800) 329-7518, or by e-mail at p2mail@epa.state.oh.us. You can also find more information about on-site pollution prevention assessments at: <http://www.epa.state.oh.us/ocapp/p2/p2assmnt.html>.

Enclosed you will find a copy of the checklists that were completed during the inspection. You can find copies of the rules and other information on our division's web page at <http://www.epa.state.oh.us/dhwm>. Compliance assistance and pollution prevention information and fact sheets are 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

Enclosure

cc: Shaun Bennett, ODOT District 9

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: OHD982064636							
Site Name:	Name: ODOT District 9 - Pike County Garage				Website: (Optional)			
Site Location Information:	Street Address: 353 Grove Road							
	City, Town, or Village: Piketon				State: OH			
Site Land Type (check only one)	County Name: Pike		Zip Code: 45661					
	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 checked="" type="checkbox"/>	
NAICS code(s) www.census.gov/epcd/www/naics.html								
Facility Representative Additional names can be recorded in "Comments" below Only provide address information if it is different than the site address	First Name: Shaun		MI:	Last Name: Bennett				
	Phone Number: 740-774-8857			Phone Number Extension:				
	E-Mail Address: shaun.bennett@dot.state.oh.us							
	Fax Number: 740-774-8870			Fax Number Extension:				
	Street or P.O. Box: 650 Eastern Avenue							
	City, Town or Village: Chillicothe				State: OH		Country: USA	Zip Code: 45601
	Name of Site's Legal Owner: State of Ohio			Date Became Owner (mm/dd/yyyy):				
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	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 checked="" type="checkbox"/>	
	Street or P.O. Box: 650 Eastern Avenue							
	City, Town or Village: Chillicothe			Owner Phone #:				
	State: OH			Country: USA		Zip Code: 45601		
	Name of Site's Operator: ODOT District 9 - Pike County Garage			Date Became Operator (mm/dd/yyyy):				
	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 checked="" type="checkbox"/>	
	Street or P.O. Box: 353 Grove Road							
	City, Town or Village: Piketon			Operator Phone #: 740-289-2650				
State: OH			Country: USA		Zip Code: 45661			
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 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)			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 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 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 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.					
Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:	Steven Jenkins ODOT District 9 - Pike Co. Administrator 740-289-2650	
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments		
Containers	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No			
Name of Inspector(s)		Name of Inspector(s)		Date of Inspection/Time (mm/dd/yyyy) (hh:mm)	
Vicky German, DHWM-SEDO		Melody Stewart, DHWM-SEDO		10/17/2007	
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)	

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

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.

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? Yes No NA
 [3745-279-12(A)]
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 fill pipe leading to the underground used oil tank was labeled as "Waste Oil" instead of with the words "used Oil" as required by the rule. It is recommended that the manhole/access cover to the tank also be labeled "Used Oil" as a precautionary measure.
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 in used fired space heaters? [3745-279-23] 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 ACTIVITIES SUMMARY

Facility Name: ODOT District 9 – Pike County Garage

Facility Type: CESQG

EPA ID#: OHD982064636

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	Name, State, and Type of Activity Occurring at the Facility	Current Pollution Prevention Activities	Pollution Prevention Opportunities
1	Vehicle maintenance Used oil Used oil filters	NA recycled	~ 150 G	Oil in one 500-G UST, Filters in one 55-G drum in garage	NA	PermaFix Environmental Svc. Dayton OH Recycled	Oil is recycled Filters crushed and drained	NA
2	Vehicle maintenance Oil-water separator waste (oil, water, sludge)	NA recycled	NA ~1000 G when generated	NA	NA	Refuel Environmental Svc. Columbus OH Recycled	Oil is recycled	NA
3	Vehicle maintenance Spent antifreeze	NA recycled	Varies	One 55-G drum in garage	NA	Refuel Environmental Svc. Columbus OH Recycled	Antifreeze is collected and recycled	NA
4	Vehicle maintenance Lead-acid batteries	NA recycled	Varies	None accumulated at time of inspection	NA	Managed via core exchange program	Managed via core exchange program	NA
5	Vehicle maintenance Solvent contaminated shop rags	TBD not yet sent off-site	NA	One ~ 30-G container in garage	NA	NA not yet sent off-site	In process of switching to commercial laundry service	NA
6	Vehicle maintenance Sludge from parts washer clean out	TBD not yet sent off-site	NA	NA	NA	NA not yet sent off-site	Switched from solvent-based to hot water-based	NA

WASTE ACTIVITIES SUMMARY

Facility Name:

Facility Type:

EPA ID#:

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	Name, State, and Type of Activity Occurring at the Facility	Current Pollution Prevention Activities	Pollution Prevention Opportunities
7	Building maintenance	Spent (empty) aerosol cans	NA scrap metal	Varies	One 55-G drum in garage	NA	Managed as scrap metal	NA	NA
8	Building or equipment maintenance	Spent fluorescent lamps	NA Univ. waste	Varies	None accumulated at time of inspection	NA	Managed as univ. waste	NA	NA

GENERAL FACILITY INFORMATION

Ohio Department of Transportation (ODOT) District 9's Highway Management Department is responsible for construction and maintenance work performed on the state highway system in District 9 and oversees the operations of the highway maintenance facilities located in the district. The department also administers the Adopt-A-Highway and Tree Seedling programs. District 9 includes Adams, Brown, Highland, Jackson, Lawrence, Pike, Ross, and Scioto counties. The ODOT District 9 Garage in Pike County maintains state and federal highways within Pike County.

PROCESS INFORMATION

ODOT's District 9 Garage in Pike County maintains about 367 miles of state and U.S. highway in Pike County, including S.R. 32, S.R. 41, S.R. 104, S.R. 124, S.R. 220, S.R. 335, S.R. 551, S.R. 552, S.R. 772, S.R. 776, and U.S. Route 23 (the only federal highway in Pike County). Activities include snow and ice removal, pavement maintenance, mowing, sign maintenance, and bridge repair. The facility also services vehicles and equipment and stores salt and cinders for snow and ice operations. Wastes are generated from vehicle and building maintenance, and include used oil, spent antifreeze, spent lead-acid batteries, shop rags, spent fluorescent lamps, and used aerosol (spray paint) cans from touch up painting on equipment.

*Information received during the inspection and from the facility's web site at
<http://www.dot.state.oh.us/dist9/CountyGarages.htm>*

REGULATORY HISTORY

The ODOT District 9 Garage in Pike County was last inspected for compliance with Ohio's hazardous waste laws on March 7, 1994. No violations were found during the inspection.