



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

February 9, 2009

**ROSS COUNTY
GENERAL FILE
(CV TRANSPORTATION)
DHWMS/SEDO
NON NOTIFIER**

Mr. John Crowe
CV Transportation, Towing and Garage
5799 Walnut Creek Road
Kingston, Ohio 45644

Dear Mr. Crowe:

On February 5, 2009, Ohio EPA conducted a re-inspection of CV Transportation, Towing and Garage after you failed to respond to two Notice of Violation letters sent after my October 7, 2008 complaint investigation of your company. Based on my February 9, 2009 re-inspection, CV transport has now abated the violation discovered during the initial complaint investigation.

GENERAL COMMENTS

(a) CV Transport has not yet sent used oil offsite for recycling since the initial investigation on October 7, 2008. Please bear in mind that as a generator of used oil, you must maintain in your files receipts for all offsite shipments of used oil to a recycler. You may self-transport no more than 55 gallons at a time of your used oil in your company vehicle or your own vehicle or that of one of your employees. Used oil must be delivered to a used oil collection center that is registered with the Ohio EPA to manage used oil. If you have your used oil transported by someone other than as described above, the transporter must have obtained a USEPA ID number. In other words, you cannot provide your used oil to someone who is using it for heating oil unless they have the proper EPA registration and have done the proper analysis to determine that your used oil is not contaminated with excess levels of hazardous waste (such as spent lacquer thinner or paint or solvents) that could be mixed into your used oil at your shop. Mixing small quantities of hazardous waste into your used oil is permissible so long as you generate no more than 27.5 gallons per month of hazardous waste. You may find a list of registered used oil recyclers at the following link:

<http://www.epa.state.oh.us/ocapp/p2/recyc/oilmark.html>

(b) During the initial investigation, I noted that you had just completed sandblasting a trailer in your shop. You stated that you typically dispose of sandblasting waste on the ground in your driveway. As I explained, should the object that you are sandblasting contain lead-based paint, the sandblasting waste could be hazardous

for lead. As observed during my February 9, 2009 re-inspection, CV Transport has now contained its spent sandblasting waste in a closed container and will be contacting a company for hazardous waste disposal when a sufficient quantity of sand has been collected. Information on how to evaluate your waste, choose a company to dispose of the waste if it is a hazardous waste, and a list of hazardous waste disposal companies can be found at the following links:

<http://www.epa.state.oh.us/ocapp/sb/publications/identifyingwaste.pdf>

<http://www.epa.state.oh.us/ocapp/sb/publications/selectingtstd.pdf>

<http://www.epa.state.oh.us/dhwm/pdf/accepting.pdf>

- c) Any batteries awaiting recycling should be stored under roof and on an impermeable surface such as concrete or blacktop.
- d) Spent fluorescent lamps must be managed in accordance with the following fact sheet:

http://www.epa.state.oh.us/dhwm/pdf/Universal_Waste_Rules_for_Handlers_of_Lamps.pdf

- e) During the initial investigation, you had several questions about underground fuel tanks at a property which you had considered purchasing. Such tanks are regulated by the Bureau of Underground Storage Tanks (BUSTR) at the State Fire Marshall's Office. You should contact them for further information. Their telephone number is (614) 752-7938.
- f) The following is a link to an Environmental Compliance Guide for Auto Service Shops which I believe will be helpful to you:

<http://www.epa.state.oh.us/ocapp/sb/publications/AutoRepairGuide.pdf>

Should you have any questions, please feel free to call me at (740) 380-5293.

Sincerely,



Donna Goodman
District Representative
Division of Hazardous Waste Management

DG/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.