



State of Ohio Environmental Protection Agency

**Southeast District Office**

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

December 2, 2008

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

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

Dear Mr. Crowe:

On October 7, 2008, Ohio EPA conducted a complaint investigation of CV Transportation, Towing and Garage in response to a complaint received by this office. I sent you a Notice of Violation letter (NOV) on October 15, 2008 specifying violations observed during the investigation. To date, CV Transportation has failed to respond and remains in violation of Ohio's hazardous waste laws:

- (1) **OAC Rule 3745-279-22,(C), Used Oil Storage Requirements for Generators:** Containers and tanks of used oil must be labeled with the words "Used Oil."

Three drums of used oil and numerous open buckets of used oil were not properly labeled. The drums were labeled during the inspection.

In order to abate this section of the violation, you must label all buckets of used oil with the words "used oil" and submit photographs to me at this office. Alternatively, you may transfer the buckets of used oil into a labeled drum of used oil and submit photographs to me which document this. Note that you should not store open buckets of used oil outdoors, as rainfall will cause them to overflow onto the ground. This would require a costly cleanup.

**GENERAL COMMENTS**

- (a) 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 our

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 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. All spent sandblasting waste must be collected and placed in a closed container and evaluated to determine if it is a hazardous waste prior to disposal. If hazardous, it must be disposed of as such. 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) Batteries awaiting recycling should be stored under roof and on an impermeable surface such as concrete or blacktop.
- (d) During the investigation, we observed several whole and broken spent fluorescent lamps. Spent 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](http://www.epa.state.oh.us/dhwm/pdf/Universal_Waste_Rules_for_Handlers_of_Lamps.pdf)

- (e) During the 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.

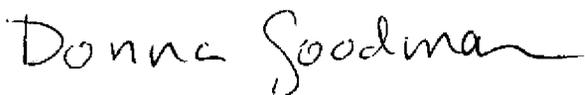
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- (f) The following is a link to an Environmental Compliance Guide for Auto Service Shops which I believe will be helpful to you:

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

Please submit all information requested in this letter within **15 days**. **Failure to abate the above violations within 15 days may result in escalated enforcement action which may include fines and penalties.** Should you have any questions, please feel free to call me at (740) 380-5293. You can find copies of the rules and other information on the division's web page at: <http://www.epa.state.oh.us/dhwm>.

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.