



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, OH 43138

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www.epa.state.oh.us

Bob Taft, Governor  
Bruce Johnson, Lieutenant Governor  
Joseph P. Koncelik, Director

January 4, 2007

**SCIOTO COUNTY  
GENERAL FILE  
(GEORGE ELDRIDGE)  
DHWM/SEDO  
NON GENERATOR / UOG**

Mr. George Eldridge  
4187 Bonser Road  
Portsmouth, Ohio 45662

Dear Mr. Eldridge:

On December 27, 2006, Mr. Ken Mettler, Mr. Bob Stern and I conducted a complaint investigation at your automotive dismantling and scrap operation located at your home at 4187 Bonser Road in Portsmouth. The complaint investigation was made in response to a complaint received by this office. The complainant alleged that used oil and other automotive fluids and solid waste were being disposed of on the ground and in the creek in front of your home. In addition, it was alleged that copper wire burning and burning of trash, was occurring at your home located at the above address. In addition, it was alleged that wire burning was occurring by you at the bottom of a hill on Bonser Road below the intersection of Woods Ridge Road, on property which is not owned by you but is north of your home.

During the investigation, I observed that used oil and gasoline has been chronically disposed of on the ground in numerous areas of your property, and that this may have run off into the stream in front of your home. The used oil and gasoline is released onto the ground as a result of your dismantling of automobiles without capturing automotive fluids. In addition, you are storing these leaking auto parts directly on the ground. In addition, I observed four partially full 55-gallon drums of unevaluated waste in your yard, which you later stated contained small volumes of used oil. I also observed that you were improperly storing rimless tires and spent automotive batteries. In addition, I observed evidence of many burn piles on your property, one of which you said had been used for burning the insulation from copper wire.

This letter will address violations of Ohio's hazardous waste and used oil regulations only. Violations of Ohio's air pollution laws and solid waste laws will be addressed in separate letters that you will receive from the Portsmouth Local Air Agency and from Mr. Bob Stern, Litter Control Officer for the Scioto Lawrence Solid Waste Management District.

Based on my observations, I found the following violations of the Ohio Administrative Code. In order to correct these violations, you must do the following and send me the required information **within thirty days** of your receipt of this letter:

- (1) **OAC Rule 3745-279-22 (C), Used Oil Storage Requirements for Generators:** Used oil generators must store used oil in containers which are labeled with the words "used oil."

Four partially filled drums of used oil were not labeled with the words "used oil". You must immediately label these containers and submit photographs of each container in order to document that it has been properly labeled.

- (2) **OAC Rule 3745-279-22 (D), Used Oil Storage Requirements for Generators:** Used oil generators must, upon detection of a release, stop the release, contain the released oil, clean up and properly manage the released oil, and ensure that storage containers are in good condition prior to returning them to service.

You failed to stop the release of used oil from automotive parts being dismantled and stored on the ground. In addition, you failed to contain the released oil, clean it up and manage the cleanup materials properly.

You must immediately stop all oils and other automotive fluids from leaking onto the ground by capturing all fluids during dismantling activities. In addition, you must drain all auto parts of oil prior to storage, and you must develop a way to store parts so they will not continually drain oil onto the ground. You must immediately excavate all oily soils affected by dismantling of cars, storage of parts or other activities. The soils must be containerized and disposed of in a licensed solid waste landfill. In order to document compliance with this regulation, please submit photographs of the area where oily soils were cleaned up, photographs of properly managed oil drums, and auto dismantling and parts storage activities. In addition, you must submit landfill receipts for disposal of oily soils.

Used oil that is captured must be stored onsite in closed containers, labeled with the words "Used Oil" and sent offsite for recycling by a reputable used oil recycler. Enclosed is a fact sheet on proper management of used oil for generators of used oil. For more information and a list of used oil recyclers, see Comment C below.

## GENERAL COMMENTS

- (a) All automotive fluids from dismantling of automobiles must be captured and contained. These fluids may not be allowed to run off the onto the ground or into the stream. In addition, all auto parts must be drained of oil and other fluids prior to storage. You may not store parts in such a way that it allows fluids and oil to drain onto the ground or into the stream. You must immediately develop a way to capture all automotive fluids generated from these activities, containerize them and dispose of or recycle them properly. Enclosed is an "Environmental Compliance Guide for Motor Vehicle Salvage Yards" which contains information on how to properly manage your automotive wastes.
- (b) During the investigation, I observed numerous automotive batteries stored improperly throughout the salvage yard. These batteries are destined for recycling. Until they are sent offsite for recycling, please place these on a blacktop or concrete surface, and under roof or a tarp. This will prevent weathering and leakage onto the ground.

Mr. George Eldridge  
January 4, 2007  
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- (c) Used oil contained in the four drums at your facility must be sent offsite for recycling or disposal. Enclosed is a list of used oil recyclers. During the investigation, you mentioned that in the past you have sent used oil to Ted's Towing in Camp Bennet. Apparently this company has a used oil burner. Note that used oil must be sent to a recycler that is registered with Ohio EPA as a Used Oil Collection Center and has an EPA ID number. Ted's Towing does not meet this criteria, therefore, you cannot take your oil to them. Enclosed is a list of use oil recyclers and collection sites which can accept your used oil.
- (d) During the investigation, I noticed several one-gallon containers of paint that you said were generated from your household and no longer usable. Note that your county has an annual Household Hazardous Waste Recycling Day each year in the fall. During that day, you may dispose of any household generated waste such as paint and other items. For more information, contact the Scioto Lawrence Solid Waste Management District office at (740) 532-1231. Note that any such wastes generated by your business may not be disposed of in this annual collection day as it is only for wastes generated by your own household activities.

Enclosed, please find checklists I completed as a result of the investigation. Should you have any questions, please feel free to contact 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/mim

Enclosure

cc: Clint Shuff, DSIWM  
Phil Thompson, Portsmouth Local Air Agency  
Bob Stern, Lawrence-Scioto County Solid Waste District

**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.

E-mail this completed form to [tammy.mcconnell@epa.state.oh.us](mailto:tammy.mcconnell@epa.state.oh.us) or mail it to Tammy McConnell, Central Office

**Ohio Environmental Protection Agency  
RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

2. Site EPA ID No.	EPA ID Number: NA								
3. Site Name	Name: George Eldridge						Website (optional):		
4. Site Location Information	Street Address: 4187 Bonser Road								
	City, Town, or Village: Portsmouth				State: OH				
	County Name: Scioto				Zip Code: 45662				
5. Site Land Type (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other	
	<input checked="" type="checkbox"/>								
6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	A. 441310			B.					
	C.			D.					
7. Facility Representative:  Additional names can be recorded in number 12.  Only provide address information if it is different than the site address.	First Name: George			MI:	Last Name: Eldridge				
	Phone Number:				Phone Number Extension:				
	E-Mail Address:								
	Fax Number:				Fax Number Extension:				
	Street or P.O. Box:								
	City, Town or Village:								
	State:			Country:			Zip Code:		
8. 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.	A. Name of Site's Legal Owner:			Date Became Owner (mm/dd/yyyy):					
	Same as above								
	Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
		<input checked="" type="checkbox"/>							
	Street or P.O. Box:								
	City, Town, or Village:			Owner Phone #:					
	State:			Country:		Zip Code:			
	B. Name of Site's Operator:			Date Became Operator (mm/dd/yyyy):					
	Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
	<input checked="" type="checkbox"/>								
Street or P.O. Box:									
City, Town, or Village:			Operator Phone #:						
State:			Country:		Zip Code:				
9. Violations Cited?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No					
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)									
<input type="checkbox"/>	Not Regulated								

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

A. Hazardous Waste Activities

(choose only one of the following categories)

- UNKNOWN: Cited for violation of 3745-52-11
- a. Large Quantity Generator (LQG):
- b. Small Quantity Generator (SQG)
- c. Conditionally Exempt Small Quantity Generator
- d. United States Importer of Hazardous Waste
- e. Mixed Waste (hazardous and radioactive) Generator

- 3. Treater, Storer or Disposer of Hazardous Waste
- 4. Recycler of Hazardous Waste
- 5. Exempt Boiler and/or Industrial Furnace
  - a. Small Quantity On-site Burner Exemption
  - b. Smelting, Melting, Refining Furnace Exemption
- 6. Underground Injection Control Facility
- 7. Hazardous Waste Transporter

B. Universal Waste Activities

- 1. Small Quantity Handler of Universal Waste  
(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):
- 2. Large Quantity Handler of Universal Waste  
(accumulates 5,000 kg or more).
- 3. Destination Facility for Universal Waste  
(Check all boxes below that apply for each of the three types of facilities above.)

- 1. Used Oil Generator
- 2. Used Oil Transporter Indicate Type(s) of Activity(ies)
  - Transporter
  - Transfer Facility
- 3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)
  - Processor
  - Re-refiner

	Generated	Accumulated
A. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
D. Lamps	<input type="checkbox"/>	<input type="checkbox"/>

- 4. Off-Specification Used Oil Burner
- 5. Used Oil Fuel Marketer -  
Indicate Type(s) of Activity(ies)
  - a. Marketer Who Directs Shipment of Off- Specification Oil
  - b. Used Oil to Off-Specification Used Oil Burner

11. 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.

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12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

Y / N	Announced ?	Additional Facility Representatives:
Y / N	Tanks?	Other comments: Unannounced complaint investigation. Containers were used oil.
Y / N	Containers?	

13. Name of Inspector(s) Name of Inspector(s) Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)

Donna Goodman Ken Mettler 12/27/06 11:00 AM

14. 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)

# USED OIL INSPECTION CHECKLIST (Short Version)

## PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_  
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  N/A  RMK# \_\_\_
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes  No  N/A \_\_\_ RMK# \_\_\_
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes \_\_\_ No  N/A  RMK# \_\_\_

## 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  N/A  RMK# \_\_\_
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  N/A  RMK# \_\_\_
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  N/A \_\_\_ RMK# \_\_\_
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes  No  N/A \_\_\_ RMK# \_\_\_
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  N/A \_\_\_ RMK# 1
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  N/A \_\_\_ RMK# 2
- b. Contained the release? Yes \_\_\_ No  N/A \_\_\_ RMK# 2
- c. Cleaned up and properly managed the used oil and other materials? Yes \_\_\_ No  N/A \_\_\_ RMK# 2

d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary?

Yes  No  N/A  RMK#

10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so:

Yes \_\_\_ No  N/A \_\_\_ RMK#

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  N/A  RMK#

b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?

Yes \_\_\_ No  N/A  RMK#

c. Are the combustion gases from heater vented to the ambient air?

Yes \_\_\_ No  N/A  RMK#

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  N/A \_\_\_ RMK#

#### 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  N/A  RMK#

13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]

Yes \_\_\_ No  N/A  RMK#

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  N/A  RMK#

#### WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11]

Yes  No  N/A \_\_\_ RMK#

L:\DATA\DHWMIA GOODMAN\1 A IN BOX\DG Eldridge UO cklst.wpd

#### REMARKS

#1. Four containers of used oil were not labeled.

#2. Used oil and other automotive fluids were disposed of on the ground in several areas.