



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 Korteski, Director

April 10, 2007

**VINTON COUNTY
GENERAL FILE
(HUNTLEY TRUCKING CO.)
DHWM/SEDO
OHD054025325**

Mr. Steve Huntley
Huntley Trucking Co.
23525 Pumpkin Ridge Road
New Plymouth, Ohio 45654

Dear Mr. Huntley:

On April 3, 2007, Ralph Witte (Office of Compliance Assistance and Pollution Prevention) and I performed a compliance inspection at your facility at 23525 Pumpkin Ridge Road to determine its compliance with Ohio's hazardous waste and solid waste laws and regulations 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 hazardous waste violations we found and what you need to do to correct the violations.

Based on this inspection, you are in violation of the following hazardous waste regulations:

- (1) **OAC Rule 3745-52-11, Evaluation of Wastes:** Any person who generates a waste in the State of Ohio, as defined in rule 3745-51-02 of the Administrative Code, ...shall determine if that waste is a hazardous waste using the following method: (A) He shall first determine if the waste is excluded from regulation under rule 3745-51-04 of the Administrative Code; (B) He shall then determine if the waste is listed as a hazardous waste in rules 3745-51-30 to 3745-51-35 of the Administrative Code; and (C) For purposes of compliance with Chapter 3745-270 of the Administrative Code, or if the waste is not listed as a hazardous waste in rules 3745-51-30 to 3745-51-35 of the Administrative Code, the generator shall then determine whether the waste is identified in rules 3745-51-20 to 3745-51-24 of the Administrative Code by either: (1) Testing the waste according to the methods set forth in rules 3745-51-20 to 3745-51-24 of the Administrative Code, or according to an equivalent method approved by the Region V Administrator of U.S. EPA pursuant to 40 CFR 260.21; or (2) Applying knowledge of the hazardous characteristic of the waste in light of the materials or the process used.

Spent fluorescent lamps generated at your facility have not been evaluated to determine if they are a hazardous waste. In order to demonstrate compliance with this rule, Huntley Trucking Company must evaluate spent fluorescent

lamps and manage them accordingly. As we discussed during the inspection, spent fluorescent lamps can be managed as a universal waste. Universal waste rules can be found on Ohio EPA's web page at <http://www.epa.state.oh.us/dhwm/guidancedocs.html#UW>.

Please contact Ohio EPA with information as to the selected management of spent lamps that Huntley Trucking Company intends to pursue.

- (2) **OAC Rule 3745-279-22(C), Used oil storage requirements for generators:** Containers and aboveground tanks used to store used oil at generator facilities shall be labeled or marked clearly with the words, "Used Oil."

The indoor used oil tank and several 55-gallon used oil drums were not labeled with the words "Used Oil". Please provide photographs of the tank and containers showing that they are clearly labeled with the words "Used Oil".

- (3) **OAC Rule 3745-279-22(D), Response to Releases:** Upon detection of a release of used oil to the environment...a generator must perform the following steps: (1) Stop the release; (2) Contain the released used oil; (3) **Clean up and properly manage the released used oil and other materials;** and (4) If necessary, repair or replace any leaking used oil containers or tanks prior to returning them to service.

We observed used oil absorbent (kitty litter) near the diesel tanks and in the gravel lot area in violation of this rule. Used oil absorbent is a solid waste when spent and must be disposed at a registered solid waste facility. In order to abate this violation, Huntley Trucking must dispose of any existing spent absorbent at a registered solid waste facility (and all future spent absorbent). You can place the spent absorbent in your on-site dumpster for disposal. To demonstrate compliance with this rule, Huntley Trucking must provide photographs of areas where used oil absorbent was removed upon completion of the removal. You can find information on used oil management at the following Ohio EPA website address: <http://www.epa.state.oh.us/dhwm>. Go to "Used Oil" in the "select a link" box in the upper right-hand corner of the page.

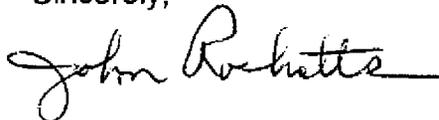
Other Compliance Issues:

- (a) Your facility has two above-ground diesel storage tanks exceeding the capacity of at least 1,320 gallons. Therefore, the federal Spill Prevention, Control and Countermeasure (SPCC) requirements (40 CFR 112) apply to your facility. Please see the attached fact sheet and the USEPA SPCC web page at <http://www.epa.gov/oilspill/spcc.htm> for more information regarding the SPCC requirements. For additional SPCC compliance assistance, please contact Dennis Deavers in the Southeast District Office Emergency Response Section.

Mr. Steve Huntley
April 10, 2007
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Please provide documentation required above **within 30 days of the date of this letter**. If you have any questions regarding waste management or pollution prevention activities, please call me at (740) 380-5262.

Sincerely,



John Rochotte
District Representative
Division of Hazardous Waste Management

JR/mlm

Attachments

cc: w/o attachments:
Ralph Witte, OCAPP, SEDO

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.

WASTE ACTIVITIES SUMMARY

Facility Name: Huntley Trucking

Facility Type: CESQG

EPA ID#: OHD054025325

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	Truck Maintenance	Used Oil	NA	~50 gallons	Tank, inside shop area	NA	Burned for energy recovery in an on-site used oil space heater.		
2	Truck Maintenance	Spent parts washer solvent	NA	< 5 gallons	NA	NA	Added to used oil and burned for energy recovery		
3	Truck Body Repair	Waste Paint/thinner	D001, F003, F005	< 2 gallons	Placed in used oil	NA	Added to used oil and burned for energy recovery	Waste minimization practices	
4	Truck Maintenance	Spent Batteries	D008	< 2	No specified location	NA	Recycled to Interstate battery		
5	Lighting	Spent fluorescent lamps	D009	< 2	Will be selected	NA	NA		Need to manage as a UW, recycle

6	Truck Maintenance	Scrap Tires	NA	< 5	Outside at facility	NA	Pike Sanitation	NA	Tire recycling,
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GENERAL FACILITY INFORMATION

Process Information: Huntley Trucking operates a freight hauling trucking business. 14 trucks are operated and primarily haul lumber to numerous locations both in-state and out-of-state.

Regulatory/Enforcement History: NA

Pollution Prevention Remarks and/or Other Information:

Would this facility be interested in a P2 assessment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
REMARKS	
Small amount of waste generated. Facility will contact Ohio EPA as needed.	

If yes, refer to Ohio EPA Southeast District Office Pollution Prevention Coordinator or to Ohio EPA's Office of Compliance Assistance and Pollution Prevention, at 1-800-329-7518, p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html.

E-mail this completed form to tammy.mcconnell@pa.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: OHD054025325								
3. Site Name	Name: Huntley Trucking						Website (optional):		
4. Site Location Information	Street Address: 23525 Pumpkin Ridge Road								
	City, Town, or Village: New Plymouth				State: OH				
	County Name: VINTON				Zip Code: 45654				
5. Site Land Type (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other	
	<input checked="" type="checkbox"/>								
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A. 484121			B.					
	C.			D.					
	First Name: Steve			MI:	Last Name: Huntley				
	Phone Number: 740-385-7615			Phone Number Extension:					
7. Facility Representative: Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	E-Mail Address:								
	Fax Number:			Fax Number Extension:					
	Street or P.O. Box: 23525 Pumpkin Ridge Road								
	City, Town or Village: New Plymouth								
	State: OH		Country: USA			Zip Code: 45654			
	A. Name of Site's Legal Owner: Steve Huntley				Date Became Owner (mm/dd/yyyy): ?				
	Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
		<input checked="" type="checkbox"/>							
	Street or P.O. Box: 23525 Pumpkin Ridge Road								
	City, Town, or Village: New Plymouth		Owner Phone #: 740-385-7615						
State: OH		Country: USA		Zip Code: 45654					
B. Name of Site's Operator: Huntley Trucking				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: 23525 Pumpkin Ridge Road									
City, Town, or Village: New Ply.		Operator Phone #: 740-385-7615							
State: OH		Country: USA		Zip Code: 45654					
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)																																
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/>	3. Treater, Storer or Disposer of Hazardous Waste																														
<input type="checkbox"/> a. Large Quantity Generator (LQG):	<input type="checkbox"/>	4. Recycler of Hazardous Waste																														
<input type="checkbox"/> b. Small Quantity Generator (SQG)	<input type="checkbox"/>	5. Exempt Boiler and/or Industrial Furnace																														
<input checked="" type="checkbox"/> c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/>	a. Small Quantity On-site Burner Exemption																														
<input type="checkbox"/> d. United States Importer of Hazardous Waste	<input type="checkbox"/>	b. Smelting, Melting, Refining Furnace Exemption																														
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/>	6. Underground Injection Control Facility																														
	<input type="checkbox"/>	7. Hazardous Waste Transporter																														
B. Universal Waste Activities		C. Used Oil Activities																														
<input type="checkbox"/> 1. Small Quantity Handler of Universal Waste	<input checked="" type="checkbox"/>	1. Used Oil Generator																														
(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):		2. Used Oil Transporter Indicate Type(s) of Activity(ies)																														
<input type="checkbox"/> 2. Large Quantity Handler of Universal Waste		<input type="checkbox"/> Transporter																														
(accumulates 5,000 kg or more).		<input type="checkbox"/> Transfer Facility																														
<input type="checkbox"/> 3. Destination Facility for Universal Waste		3. Used Oil Processor and/or Re-refiner																														
(Check all boxes below that apply for each of the three types of facilities above.)		Indicate Type(s) of Activity(ies)																														
		<input type="checkbox"/> Processor																														
		<input type="checkbox"/> Re-refiner																														
		<input type="checkbox"/> 4. Off-Specification Used Oil Burner																														
		5. Used Oil Fuel Marketer -																														
		Indicate Type(s) of Activity(ies)																														
		<input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Oil																														
		<input type="checkbox"/> b. Used Oil to Off-Specification Used Oil Burner																														
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:25%; text-align:center;">Generated</td> <td style="width:25%; text-align:center;">Accumulated</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>A. Batteries</td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td></td> <td></td> <td></td> </tr> <tr> <td>B. Pesticides</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td></td> <td></td> <td></td> </tr> <tr> <td>C. Thermostats</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td></td> <td></td> <td></td> </tr> <tr> <td>D. Lamps</td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td></td> <td></td> <td></td> </tr> </table>			Generated	Accumulated					A. Batteries	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>				C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>				D. Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/>			
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D. Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/>																														
<p>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.</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:25%;">D001</td> <td style="width:25%;">F003</td> <td style="width:25%;">F005</td> <td style="width:25%;"></td> </tr> </table>			D001	F003	F005																											
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<p>12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:10%;">N</td> <td style="width:20%;">Announced ?</td> <td style="width:70%;">Additional Facility Representatives:</td> </tr> <tr> <td>Y</td> <td>Tanks?</td> <td rowspan="2">Other comments: Used oil tank</td> </tr> <tr> <td>Y</td> <td>Containers?</td> </tr> </table>			N	Announced ?	Additional Facility Representatives:	Y	Tanks?	Other comments: Used oil tank	Y	Containers?																						
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Y	Containers?																															
<p>13. Name of Inspector(s) _____ Name of Inspector(s) _____ Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)</p> <p>John Rochotte _____ 03/03/07 9:00 - 10:00 AM</p>																																
<p>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.</p>																																
Signature of owner, operator, or an authorized representative		Date (mm-dd-yyyy)																														
Name and Title (Print)																																

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: <100 Kg. (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.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

WASTE EVALUATION

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A

Spent fluorescent lamps have not been evaluated to determine if they are a hazardous waste.

GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes No N/A

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"). If so, complete the Small Quantity Generator Requirements checklist.

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 N/A

hazardous waste paint thinner is disposed of in the on-site used oil tank where it is burned for energy recovery

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 N/A
 - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes No N/A
 - c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A
 - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

REMARKS

USED OIL INSPECTION CHECKLIST

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 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# ___
- The used oil tank and containers are not labeled with the words "Used Oil".**
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# ___

- b. Contained the release? Yes No N/A RMK#
- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A RMK#
- 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#

Spent fluorescent lamps have not been evaluated to determine if they are a hazardous waste.