



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Bosserman Aviation Equipment, Inc.
OHR000147876
Hazardous Waste
Wyandot County
Complaint # 3088
NOV

October 3, 2011

Mr. Terry L. Bosserman
Bosserman Aviation Equipment, Inc.
2327 State Route 568
Carey, Ohio 43316

Dear Mr. Bosserman:

On August 18, 2011, Gary Deutschman and I conducted a complaint investigation and hazardous waste compliance evaluation inspection (CEI) of Bosserman Aviation Equipment, Inc. (Bosserman) located at 2327 State Highway 568, Carey, Ohio. On August 16, 2011, the Ohio EPA Division of Environmental Response and Remediation (DERR) received an incident report which they forwarded to the Ohio EPA, Division of Materials and Waste Management (DMWM). This incident report stated that jet fuel was chronically leaking from a tanker in the rear of the building at your facility and that lacquer thinner was being dumped into a tanker next to the leaking jet fuel tanker which may be leaking as well. I inspected Bosserman to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC), and Ohio's hazardous waste regulations as adopted under Chapter 3745. of the Ohio Administrative Code (OAC). Bosserman was represented by James Barnhart, Production Manager. The inspection included a tour of facility operations and a review of facility paperwork. This letter will explain the violations I found, what you need to do to correct these violations, request for more information and one general comment.

Bosserman builds, services, and refurbishes aircraft re-fuelers. Bosserman is a small quantity generator of hazardous waste. Hazardous waste generated at the facility include solvent/paint waste (both spent solvent/paint waste & spent solvent/paint waste distillation bottoms) (D001, D035, F003, F005) and used oil.

During my last inspection of Bosserman on April 10, 2008, Bosserman was properly managing the facility fluorescent bulbs as universal waste. During this CEI, on August 18, 2011, we did observe your spent bulbs properly being stored; however, we did not review any paperwork pertaining to the recycling/disposal of your universal waste bulbs.

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Bosserman must ensure to recycle all bulbs within one year of generation of spent bulbs. I have enclosed the Ohio EPA fact sheets: Universal Waste Rules for Handlers of Lamps and Fluorescent Lamps: What you Should Know for information on the proper management of lamps.

I found the following violations 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. Treatment, storage, or disposal of a hazardous waste.
ORC Section 3734.02 (E) & (F)**

No person shall treat, store, or dispose of hazardous waste without a hazardous waste facility installation and operation permit.

Bosserman unlawfully stored up to 21, 55-gallon drums of their solvent/paint waste (D001, D035, F003, F005) in excess of 180 days at their facility without a permit.

Bosserman did not obtain a hazardous waste installation and operation permit or a permit by rule, to store hazardous waste for greater than 180 days, in violation of ORC Section 3734.02 (E) & (F).

Bosserman generates approximately seven (7) drums of waste per year. Bosserman has not had a shipment of waste in the last three years (last shipment date of 5-30-08) until 6-29-11. Based on this, Bosserman generated roughly 21 drums of waste over the last three years (5-30-08 to 6-29-11). The total number of drums picked up by Chemtron on 6-29-11 and 8-10-11 was 22 drums. The 22 drums also include a one-time shipment of 30-40 gallons of waste paint which was picked up by Chemtron on 6-29-11. If Bosserman generates roughly a drum every two months (approximately 30 gallons a month) then at least 18 of the 22 drums were stored for over 180 days. On your hazardous waste container storage inspections, there is a question which asks if there are any drums on-site over the 180 days storage limit (the allowable storage time for a SQG to store hazardous waste without obtaining a hazardous waste installation and operation permit or a permit by rule, to store hazardous waste for greater than 180 days). This question is there to act and ensure that there is a warning system in place to notify generators that they may be approaching or storing over the limit of 180 days. Bosserman had a pick-up of waste on 5-30-08.

Based on the container storage records, from 5-30-08 through the week of 9-26-08, Bosserman did not have any drums in storage over the 180 days. Starting the week of 10-3-08, Bosserman did have drums stored over 180 days (this column is marked yes). There is a note in the comment section which states that "Drum #24 120 days up – 10-3-08" and "Drum #25 120 days up – 10-27-08". All the weekly inspections from that point forward until the weekly inspection conducted on 8-12-11, are marked "yes" that there are drums in storage over 180 days. Thus, based on these records, Bosserman stored waste over 180 days beginning sometime in October or November of 2008 (late 2008) through August of 2011.

All the drums on-site were shipped off-site on 6-29-11 and 8-10-11. At the time of our CEI on August 18, 2011, Bosserman had one solvent paint waste drum dated 5-25-11 and one satellite drum of still bottoms.

Since Bosserman violated ORC §3734.02(E) and (F), Bosserman is subject to all applicable general facility standards found in OAC chapters 3745-54 and 55. Additionally, at any time Ohio EPA may assert its right to have Bosserman begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

Please be advised that due to the nature of the violation, Ohio EPA may require closure pursuant to OAC rules 3745-55-11 through 3745-55-20 and OAC rules 3745-55-42 through 3745-55-47 at this site. In addition, please note that violation of ORC Section 3734.02 (E) & (F) is a serious violation of Ohio's hazardous waste laws and Bosserman may be referred to Ohio EPA's Central Office for possible escalated enforcement action.

2. Use of Hazardous Waste Manifest – Must prepare a manifest appropriately. OAC Rule 3745-52-20(A)

A generator who offers for transport a hazardous waste for off-site treatment, storage or disposal must prepare a manifest according to the instructions included in the appendix to 40 CFR Part 262.

Bosserman did not receive a signed copy (completion of line 20) for the hazardous waste manifest no. 004178894 JJK and manifest no. 004178896 JJK for the hazardous waste sent to Chemtron Corporation on 5-28-08 and 5-30-08, respectively; thus Bosserman did not prepare the manifest appropriately.

This violation is considered abated as Bosserman submitted both signed copies (completion of line 20) to me via email on September 9, 2011.

**3. Returned copy of hazardous waste manifest.
OAC 3745-52-42 (B)**

A generator who does not receive a returned copy of a manifest with the signature of the owner or operator of the designated facility within sixty days of the waste being accepted for transport must notify Ohio EPA by writing (including a copy of the manifest in question) that the generator has not received confirmation of delivery.

Bosserman did not receive a returned (signed) copy of manifest number 004178894 JJK, dated May 28, 2008, and manifest number 004178896 JJK, dated May 30, 2008, from Chemtron. Bosserman did not contact Chemtron to determine the status of this waste nor did they notify the Ohio EPA that they had not received confirmation of delivery.

On September 9, 2011, Bosserman submitted both signed copies (completion of line 20) to me via email.

To abate this violation, Bosserman must submit an outline stating how they will ensure they receive signed/returned copies of their manifests in the future and when they do not receive signed copies that they will follow the procedures as outlined above.

**4. Personnel Training.
OAC 3745-52-34 (D) (5) (c)**

A generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their positions.

Bosserman has not trained their employees that handle hazardous waste on the proper waste handling and emergency procedures, relevant to their positions.

Bosserman shall immediately conduct a training which satisfies the requirements as listed above.

On August 30, 2011, Mr. Barnhart and I spoke via telephone. Mr. Barnhart and I discussed how to satisfy this regulation. Mr. Barnhart and Greg Coldren are planning to attend hazardous waste training so that they in turn may provide hazardous waste training to Bosserman employees.

In addition, on August 30, 2011, Mr. Barnhart sent me via email the training outline for the RCRA/DOT training being given by Chemtron which Mr. Barnhart and Mr. Coldren will be attending on September 23, 2011.

To abate this violation, Bosserman must submit to me a brief description of training given, a sign-in sheet with the signatures of attendees and date of training. Bosserman shall be aware that anyone who may handle hazardous waste would be required to attend this training.

Request for additional information:

On September 9 and September 21, 2011, I emailed Mr. Barnhart inquiring to the information below. Mr. Barnhart emailed me back on September 22, 2011, that he has been off that he would get this information as soon as he could. Since I have not received this information to date, please provide the following information:

- A. **Emergency inspections:** Does Bosserman perform checks on emergency equipment at the facility (to determine if you have this equipment, ready for use, etc.)? For example, fire extinguishers, spill type of equipment near your hazardous waste storage area (booms, rags - for clean-up of solvent waste, etc.). If you do perform checks on this equipment, do you record this information in a log which demonstrates that you have performed this check? I sent a sample emergency inspection log to you on 4-11-08 via email.

If you have performed this inspection, please forward this documentation to me.

Here is a link to a sample emergency equipment log .
<http://epa.ohio.gov/portals/32/pdf/equiplog.PDF>. In addition, I have enclosed this sample log.

- B. **Notify local authorities:** Has Bosserman attempted to contact the local emergency authorities – either police, fire department, hospital, ems, etc. (or all) in some fashion to let them know what you all do at the facility and any hazards associated with the facility, the lay-out of the facility, etc.?

If you have conducted this notification in some fashion, please forward any documentation to me or information to me that indicates this notification.

If you have contacted local authorities and they have declined such offers to visit your facility, has Bosserman documented this? ***If so, please forward this information as well.***

- C. **Emergency Coordinator:** Is Greg Coldren still your emergency coordinator? Back in 2008 his name/number was listed as the facility emergency response contact on the emergency numbers posted by the telephones. I am assuming he is since he still works at the facility as the Paint/Facilities Manager. ***However, please confirm this. If he is not, please state who the facility emergency coordinator is.***

General Comment:

Closure of a hazardous waste storage area.

It appears that you have moved your hazardous waste container storage. When I was last at your facility in 2008 the container storage area was outside of the main building on a concrete ramp. Now your hazardous waste container storage area is inside the building by the distillation unit.

Please be advised that Bosserman previously stored hazardous waste for over 180 days without a hazardous waste permit in the "old" hazardous waste container storage area (outside of the building on the concrete ramp). Please see the Director's Final Findings and Orders dated December 7, 2009. In the Closure Plan Review Guidance for RCRA Facilities – October 2009 (CPRG) it states that "If a generator has conducted activities that would constitute treatment, storage or disposal practices in the accumulation area without a hazardous waste permit, the generator closure rules do not apply to the closure of the accumulation area because of the unlawful treatment, storage and/or disposal of hazardous waste. Under such circumstances, the generator would be subject to and may be required to close the hazardous waste management unit in accordance with the requirements of OAC Chapter 3745-66." You can find a copy of the CPRG at the following link: <http://www.epa.ohio.gov/portals/32/pdf/2008CPRG.pdf>. Thus, Bosserman may be required to close their old container storage area in accordance with OAC Chapter 3745-66.

During the CEI, we discussed with Mr. Barnhart the regulations and proper management of your still bottoms satellite accumulation drum. I have enclosed the guidance Satellite Accumulation under Ohio Hazardous Waste Rules which contains this information.

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On August 31, 2011, I emailed Mr. Barnhart and Mr. Coldren the link and some information pertaining to Ohio EPA's compliance assistance conference being held in Columbus on November 7-8, 2011, and suggested it would be worthwhile that one or both attend. The cost is \$125 per person. The conference will provide information on hazardous waste compliance as well as other regulations. I have attached the link below with the agenda in case you all would be interested in attending.
<http://epa.ohio.gov/Default.aspx?tabid=4528>

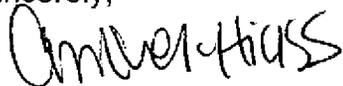
If you find additional ways to recycle, reduce, or altogether eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs. Furthermore, you may possibly reduce your regulatory requirements.

The Division of Materials and Waste Management (DMWM) has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information at the following Web link
http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage. Please feel free to share this information with your colleagues.

Enclosed you will find a copy of the checklists that I completed during the inspection. Please address all correspondence to Amber Hicks, Ohio EPA, 347 N. Dunbridge Road, Bowling Green, Ohio 43402. Should you have any questions, please feel free to call me at (419) 373-3082 or email at amber.hicks@epa.ohio.gov.

You can find copies of the rules and other information on the division's web page at <http://www.epa.ohio.gov/dmwm.aspx>.

Sincerely,



Amber M. Hicks
Division of Materials and Waste Management

//lr

Enclosures

pc: Cindy Lohrbach, DMWM, NWDO
DMWM-HW, NWDO, File: Bosserman Aviation Equipment, Inc.
ec: Amber Hicks, DMWM, NWDO
Colleen Weaver, DMWM, NWDO (w/checklists)

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.

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Bosserman Aviation Equipment, Inc. Facility Type: LQG SQG CESQG TSD Date of Inspection: 8-18-11 EPA ID#: OHR000147876

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	Painting operations/line flush	Spent solvent paint waste - D001, D035, F003, F005	~32 gallons		Chemtron Corporation - OH**	
2	Painting operations/gun cleaning	Spent solvent (gun cleaner) paint waste - D001, D035, F003, F005	~ 6 gallons		Chemtron Corporation - OH**	
3	Distillation of spent solvent	Still bottoms - F005	Unsure**		Chemtron Corporation - OH	
4	Maintenance activities	Used Oil	Varies - 10-50 gallons		DISC Environmental Services - OH	
5						
6						
7						

8							
9							

REMARKS-GENERAL INFORMATION

General Process Information:

** Facility has a distillation unit but it appears they have not been using this unit (thus they have not been generating still bottoms). It appears that the last 3 years the facility has not distilled its solvent, but rather shipped off all drums of solvent waste (line flush and gun cleaner). A total of 22 drums of solvent waste went off on 6-29-11 & 8-10-11. These 22 drums were generated from May of 2008 to present.* However, during the CEI on 8-18-11, the Production Manager stated the still is up and running and they had approximately 1/4 of a 55-gallon satellite drum of spent still bottoms.

We observed spent bulbs properly being stored; however, we did not review any paperwork pertaining to the recycling/disposal of Bosserman's universal waste bulbs. (During the last CEI on 4-10-08, facility was managing lamps as universal waste.) Sent facility information on proper management and recycling of spent lamps with letter.

Regulatory/Enforcement History (if applicable):

*Facility stored 18-21 drums of solvent paint waste (line flush and gun cleaner) for over 180 days, beginning in December of 2008 to August of 2011. Facility had a previous Director's F&O's dated 12-7-09, for unpermitted storage of the same waste solvent.

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.
 Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other:

Send to Central Office <input checked="" type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to brad.hauser@epa.state.oh.us.

Site EPA ID No. Site Name	EPA ID Number: OHR000147876		Website: www.bossermanaviationequip.com (Optional)
Site Location Information	Name: Bosserman Aviation Equipment, Inc.		
Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html	Street Address: 2327 State Highway 568		
	City, Town, or Village: Carey		State: OH
	County Name: Wyandot		Zip Code: 43316
	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>
	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>
	State <input type="checkbox"/>	Other <input type="checkbox"/>	

Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Terry		MI: L	Last Name: Bosserman	
	Title: President				
	Phone Number: 419-396-6256			Phone Number Extension:	
	E-Mail Address: tlboss@bossermanaviationequip.com				
	Fax Number: 419-396-0022			Fax Number Extension:	
	Street or P.O. Box:				
	City, Town or Village:				
	State:			Zip Code:	

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	Name of Site's Legal Owner:		Date Became Owner (mm/dd/yyyy):		
	Owner Type:	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 type="checkbox"/>	Other <input type="checkbox"/>	
	Street or P.O. Box:				
	City, Town or Village:			Owner Phone #:	
	State:			Country:	
	Name of Site's Operator:			Date Became Operator (mm/dd/yyyy):	
	Operator Type:	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 type="checkbox"/>	Other <input type="checkbox"/>	
	Street or P.O. Box:				
	City, Town or Village:			Operator Phone #:	
	State:			Country:	
	Zip Code:			Zip Code:	

VIOLATIONS CITED?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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TYPE OF HANDLER - MARK "X" AS APPROPRIATE

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.	<input type="checkbox"/> Large Quantity Generator (LQG)
		<input checked="" type="checkbox"/> Small Quantity Generator (SQG)
		<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
		<input type="checkbox"/> U.S. Importer of Hazardous Waste
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)	
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Hazardous Waste Transfer Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input checked="" type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input checked="" type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility
<input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Receives Hazardous Waste from Off-site

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY))	
<input type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES	
<input type="checkbox"/> Batteries	
<input type="checkbox"/> Pesticides	
<input type="checkbox"/> Mercury containing equipment	
<input type="checkbox"/> Lamps	

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))	
<input checked="" type="checkbox"/> Used Oil Generator	
<input type="checkbox"/> Used Oil Transporter	
<input type="checkbox"/> Used Oil Transfer Facility	
<input type="checkbox"/> Used Oil Processor	
<input type="checkbox"/> Used Oil Re-refiner	
<input type="checkbox"/> Off-Specification Used Oil Burner	
<input type="checkbox"/> Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil	
<input type="checkbox"/> Used Oil Fuel Marketer who first claims the Used Oil meets the specifications	

Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.
<input type="checkbox"/> College or University
<input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
<input type="checkbox"/> Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRA Info source record, you do not need to list them. Instead just indicate the date of the most recent source record.

D001	D035	F003	F005	
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:	James Barnhart, Production Manager
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Amber Hicks	Gary Deutschman	8-18-11 11:27

Comments:
 This was a complaint investigation and inspection based on a complaint received by DERR.

Bosserman Aviation Equipment, Inc.

OHR000147876

CEI – August 18, 2011

Narrative from inspection:

Upon arrival at the facility we discussed the complaint with Mr. Barnhart. He stated the following: your lacquer thinner/gun cleaner solvent goes through a distiller and sludge is picked up by Chemtron; you generate approximately 10 gallons of solvent per week; Bosserman stores solvent in drums by the still; Bosserman utilizes lacquer thinner to flush paint lines; gun cleaner is used to clean guns and goes in waste drum with paint waste/lacquer thinner; you generally have two drums of waste – one for paint waste/lacquer thinner to be distilled – one for sludge from still for pick-up by Chemtron; Bosserman has a test bay in back in which you test jet fuel through trucks to verify no leaks; maintenance is currently doing maintenance on the test truck not because of a spill or it was leaking but because of some corrosion; there may be an occasional drip during a testing, but no spill or leaks; jet fuel is like a high grade kerosene; no Bosserman company vehicles are fueled on-site – all fueled off-site; there is no waste (spills) from transfer of jet fuel as the hose runs inside (transfer of fuel occurs inside the building); and the only possible liquid from the test bay would be if the truck had an oil leak or some kind of fluid leak.

We toured your facility. We walked through the production areas and to the test bay. We did see where maintenance was working on the test truck. We did not see any evidence of a spill in this area. There is a grate in the test bay area which is enclosed (not connected to a sewer or storm water system). It would be possible for any fluids which may drain from the truck to accumulate in this grate. Mr. Barnhart stated as far as he knows this has never been cleaned out. I then stated that if in the future material gathers in this grate (rain water, fluids from test truck, etc.) that upon cleaning this material out and generation of a waste, Bosserman would have to ensure to evaluate this waste properly to determine whether it is a hazardous waste or not. Mr. Barnhart stated he understood. In addition, we saw a drum labeled sump waste by the test truck. Mr. Barnhart stated that is a combination of water and jet fuel from the cleaning out of the test truck which would be picked up by Chemtron. We then walked the entire perimeter of your property. We did not see any evidence of trampled grass, dead grass or any indication of spills, leaks or dumping of any types of waste. In addition, we saw your hazardous waste container storage area (inside the main shop by the distillation unit). You had one drum of solvent paint waste labeled and dated 5-25-11, which Mr. Barnhart stated will be sent through the still for distillation. In addition, you had one labeled satellite drum of still bottoms. We also looked at your "old" hazardous waste container storage area outside of the building on a concrete ramp. There were no drums on this pad. Mr. Barnhart stated that Bosserman does not utilize this as a container storage area anymore (at least since he's been at the facility since March of 2011) and that the container storage area is inside the building by the distillation unit.

Then we proceeded to discuss your management of solvent paint waste and reviewed the facility paperwork. We reviewed the following hazardous waste manifests:

- 5-28-08 for the pick-up of 10 drums of hazardous waste (D001, F003, F005). This manifest was unsigned by the designated facility.
- 5-30-08 for the pick-up of 7 drums of hazardous waste (D001, F003, F005). This manifest was unsigned by the designated facility.
- 8-10-11 for the pick-up of 12 drums of hazardous waste (D001, D035, F003, F005).

Mr. Barnhart could not find any other hazardous waste manifests in between 5-30-08 and 8-10-11. In addition, Mr. Barnhart stated that he believed the still had been broken and it may have been possible that the solvent paint waste was not processed through the still and it's possible that the drums may have been accumulating for awhile. We also reviewed a waste profile from Chemtron Corporation (Chemtron) dated 6-14-11, for waste paint related material which included paint no longer used; line flush/spray gun clean out.

We reviewed the inventory of your solvent purchases from Dick's Auto Supply in 2010 and based on this, we determined that Bosserman was still operating as a small quantity generator of hazardous waste.

On August 25, 2011, I contacted Tim Muron of Chemtron. Mr. Muron emailed me two signed hazardous waste manifests for the pick-up of waste from your facility. One being the 8-10-11, manifest for 12 drums of hazardous waste and another for 10 drums of hazardous waste picked up on 6-29-11. In addition, Mr. Muron emailed that Chemtron did not provide any other pick-ups of hazardous waste for Bosserman between 5-30-08, and 6-29-11.

On August 25, 2011, I received a fax from Dick's Auto Supply of the purchases of your 5-gallon gun cleaner (CGC111) and your 55-gallon solvent (JT501) for 2009, 2010 and 2011. Based on your inventory, Bosserman generated the following waste each year:

Year	Waste generated in gallons	Waste generated (55-gallon drums)
2009	390	7
2010	460	8
2011 (through August 15, 2011)	375	6

On August 30, 2011, Mr. Barnhart and I spoke via telephone. Mr. Barnhart stated that he did some research and there had been no pick-up of hazardous waste between 2008 and 2011 and that he never got the signed (returned) copies for the two manifests in 2008. In addition, Mr. Barnhart stated Bosserman employees have not had hazardous waste training. However, he and Greg Coldren are planning to attend hazardous waste training so that they in turn may

provide hazardous waste training to Bosserman employees. Mr. Coldren is the new Paint/Facilities Manager.

On August 30, 2011, I forwarded to Mr. Barnhart via email, the two signed copies for the manifests that I received from Chemtron (6-29-11 & 8-10-11) for his records. In addition, Mr. Barnhart emailed Mr. Muron of Chemtron requesting the two signed copies for the manifests from May of 2008.

On August 30, 2011, Mr. Barnhart sent me via email the training outline for the RCRA/DOT training being given by Chemtron. Mr. Barnhart and Mr. Coldren will be attending this hazardous waste training on September 23, 2011.

On August 31, 2011, I sent Mr. Barnhart an email inquiring if your facility had any shutdowns during the least three years and if Bosserman utilizes its solvent for any other uses. On September 1, 2011, Mr. Barnhart replied that your facility has not had a shutdown and the lacquer thinner is only used as a cleaning solvent.

On September 2 & 6, 2011, Mr. Barnhart faxed me copies of the hazardous waste container storage inspections for 2008, 2009, 2010 and 2011 (to date) which he was unable to find during our CEI.

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

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 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:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Has the generator obtained a U.S. EPA I.D. number? [3745-52-12]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.	Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
4.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
5.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: If the SQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements might still apply, e.g. manifest, marking, LDR, etc.

6.	Has the generator accumulated hazardous wastes in excess of (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]

7.	Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.

8.	Does the generator treat hazardous waste in a:	
	a. Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. Tank that meets 3745-66-101?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c. Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	d. Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

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

MANIFEST REQUIREMENTS

9.	Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	Are wastes reclaimed under a contractual agreement? If so: [3745-52-0(E)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Does the contractual agreement specify the type of waste and frequency of shipment?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. Is the transport vehicle owned and operated by the reclaimer?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

c.	Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.		
11.	Have items 1 through 20 of each manifest been completed? [3745-52-20(A)(1)] & [3745-52-27(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be complete. [3745-52-20(A)(1)]		
12.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternative facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]		
13.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.		
15.	If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? [3745-52-42(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
16.	Are signed copies of all manifests being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.		
PREPAREDNESS AND PREVENTION		
17.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]	
a.	Name and telephone number of emergency coordinator?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Location of fire and spill control equipment, and, if present, fire alarm(s)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Telephone number of local fire department?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Are employees familiar with waste handling and emergency procedures? [3745-52-34(D)(5)(c)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
20.	Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
21.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:	
a.	Internal Alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
23.		Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/> ***
	a.	Are inspections recorded in a log or summary? [3745-65-33]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/> ***
24.		Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
25.		If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance (unless not required under OAC 3745-65-32)? [3745-65-34(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
26.		Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
27.		Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/> ***
28.		Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/> ***
SATELLITE ACCUMULATION AREA REQUIREMENTS					
29.		Does the generator ensure that satellite accumulation area(s):			
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	f.	Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
30.		Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	<input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	b.	Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.					
USE AND MANAGEMENT OF CONTAINERS					
31.		Has the generator marked containers with the words "Hazardous Waste"? [3745-52-34(D)(4)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
32.		Is the accumulation date on each container? [3745-52-34(D)(4)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

33.	Are hazardous wastes stored in containers which are:				
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	In good condition? [3745-66-71]	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: Record location on process summary sheets and photograph the area.</i>					
34.	Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days.		Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
35.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]		Yes	<input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
36.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]		Yes	<input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
37.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]		Yes	<input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.</i>					
PRE-TRANSPORT REQUIREMENTS					
38.	Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]		Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
39.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]		Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
40.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]		Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>

***** Requested this information in the Notice of Violation.**

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

NOTE: 1. A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

2. Inspectors can check BUSTR's web-site at https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at: https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp.

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: For example, used oil contaminated scrap metal stored in a pile.

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Stopped the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Contained the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

ON-SITE BURNING IN SPACE HEATER		
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).</i>		
GENERATOR TRANSPORTATION		
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).</i>		
COLLECTION CENTERS AND AGGREGATION POINTS		
13.	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.</i>		