



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Rd.  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468  
www.epa.ohio.gov

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

**Re: Don's Automotive Group**  
OHD018421594  
Small Quantity Generator  
Fulton, NWDO  
NOV

June 7, 2010

Mr. Don Hayati, President  
Don's Automotive Group  
720 North Shoop Avenue  
P. O. Box 208  
Wauseon, Ohio 43567

Dear Mr. Hayati:

On May 4, 2010, I inspected Don's Automotive Group's Chevrolet, Buick, GMC, Cadillac dealership located at 720 North Shoop Avenue in Wauseon, Ohio. I inspected Don's Automotive Group to determine the facility's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). My inspection included a tour of the facility service department and body shop as well as a review of facility records. I also helped Don's Automotive Group identify ways to prevent pollution by reducing waste the facility generates.

Don's Automotive Group is a full service automotive dealership which operates a service shop and auto body repair facility at the 720 North Shoop Avenue location. Facility records reviewed during this inspection indicate that Don's Automotive Group generates approximately 20 gallons of spent parts washer solvent in the service department once a year. At the time of the inspection, Don's Automotive Group had no records for the purchase or disposal of the solvent used in the parts washer located in the service department. Don's Automotive Group also generates approximately 15 gallons of spent paint gun cleaning solvent in the body shop every three months. The spent gun cleaning solvent is distilled in the body shop. Approximately 15 gallons of distillation bottoms are generated every three months which are disposed as solid waste in the on-site solid waste dumpster. After the inspection, I obtained an Material Safety Data Sheet (MSDS) from the solvent manufacturer. The MSDS indicates that the virgin solvent contains 30%-60% toluene, 10%-30% methanol, 7%-13% acetone and 5%-10% Ligroine. Based on the MSDS, the spent solvent and distillation bottoms are classified as a F003/F005 listed hazardous waste.

Don's Automotive Group also generates approximately 20 spent lead acid automotive batteries each month which are exchanged with new batteries by a battery wholesaler, approximately 800 gallons of used oil each month which is either burned on-site in the service department for heat or shipped off-site for recycling, approximately 200 used oil filters each month which are crushed and disposed as solid waste in the solid waste dumpster located on-site, approximately 200 gallons of used anti-freeze/coolant each year which is sent off-site for recycling, and approximately 15 used automotive tires each month which are sent off-site for shredding.

Don's Automotive Group also generates used paint filters from the facility body shop and spent fluorescent light bulbs from throughout the facility. Don's Automotive Group uses water-based paint for the base coat and solvent-based paint for the top coat. The filters in the floor of the paint booth are replaced on a monthly basis and the filters in the ceiling of the paint booth are replaced annually. The filters are currently managed as solid waste and disposed in the solid waste dumpster located on-site. The spent fluorescent light bulbs are changed as needed and disposed as solid waste in the solid waste dumpster located on-site.

Mr. Don Hayati  
June 7, 2010  
Page Two

Don's Automotive Group was inspected as a conditionally exempt small quantity generator of hazardous waste. However, the generator status of the facility will be re-assessed upon completion of the evaluation of all wastes generated at the facility.

I found the following violations of Ohio's hazardous waste laws during the inspection. 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. **Unlawful Transportation, ORC § 3734.02(F)**

Don's Automotive Group has caused F003/F005 hazardous waste distillation solids to be unlawfully transported to a facility other than a permitted hazardous waste treatment, storage or disposal facility.

Don's Automotive Group cleans the facility paint guns using Painters Supply & Equipment #50 Acrylic Lacquer Thinner. A small amount of solvent is used to clean the paint gun cup and gun tip. According to Winston Nichols, body shop manager, the facility uses approximately 15 gallons of new solvent every three months. After each use, the paint guns are cleaned and the spent solvent is distilled. Approximately every three months, 15 gallons of distillation solids are removed from the distillation unit and disposed in the solid waste dumpster located on-site. This practice has been occurring for at least seven years.

The MSDS provided by Painters Supply & Equipment indicates that the solvent contains 30%-60% toluene, 10%-30% methanol, 7%-13% acetone and 5%-10% Ligroine. Based on the MSDS, the spent solvent and distillation solids are classified as a F003/F005 listed hazardous waste.

**To abate this violation, Don's Automotive Group must immediately begin managing the spent solvent and distillation solids as F003/F005 hazardous waste. The spent solvent and distillation solids must be stored in closed containers marked or labeled with the words "Hazardous Waste". Within 30 days of receipt of this letter, Don's Automotive Group should provide me with the name of the licensed hazardous waste transporter and permitted hazardous waste treatment, storage or disposal facility that Don's Automotive Group intends to use for the management of the hazardous waste distillation bottoms. In addition, Don's Automotive Group should provide me with a photograph of the properly labeled containers used to store the spent solvent and distillation solids.**

2. **OAC Rule 3745-52-11, Hazardous Waste Determination:** "Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste..."

- a. Don's Automotive Group has failed to evaluate the paint filters from the facility paint booth to determine if they are hazardous waste. Don's Automotive Group currently manages the spent paint filters as solid waste and disposes of the spent filters in a solid waste dumpster.

**To abate this violation, Don's Automotive Group must analyze a representative sample of the spent paint filters for total volatile organic compounds (VOC's) and Resource Conservation and Recovery Act (RCRA) metals using methods as outlined in U.S. EPA's SW-846. Don's Automotive Group should not dispose of any spent paint filters until analysis of the samples has been received. Don's Automotive Group should notify me at least 24 hours prior to sampling the filters. In addition, Don's Automotive Group should provide me with a copy of the analysis with 10 days of receipt of the analysis from the laboratory.**

- b. Don's Automotive Group has failed to evaluate the spent parts washer solvent generated in the facility service department. According to Jeff Harman, Service Manager, the spent parts washer solvent is serviced once a year by a third party vendor (possibly Heartland Petroleum). However, the facility has no records of the purchase or disposal of this parts washer solvent.

**To abate this violation, Don's Automotive Group must immediately analyze a representative sample of the spent solvent for TCLP volatile organic compounds (VOC's) and TCLP Resource Conservation and Recovery Act (RCRA) metals using methods as outlined in U.S. EPA's SW-846. Don's Automotive Group should not dispose of any spent solvent until analysis of the samples has been received. Don's Automotive Group should notify me at least 24 hours prior to sampling the spent solvent. In addition, Don's Automotive Group should provide me with a copy of the analysis with 10 days of receipt of the analysis from the laboratory.**

- c. Don's Automotive Group has failed to evaluate the spent solvent and distillation solids generated from the cleaning of paint guns used in the facility body shop. According to Winston Nichols, body shop manager, the facility uses approximately 15 gallons of new solvent every three months. After each use, the paint guns are cleaned and the spent solvent is distilled. Approximately every three months, 15 gallons of distillation solids are removed from the distillation unit and are disposed as solid waste in the dumpster located outside the facility.

**To abate this violation, Don's Automotive Group must immediately begin managing the spent solvent and distillation solids as F003/F005 hazardous waste. Don's Automotive Group must immediately begin storing the spent solvent and distillation solids removed from the distillation unit in containers marked with the words hazardous waste. Within 30 days of receipt of this letter, Don's Automotive Group should provide me with the name of the licensed hazardous waste transporter and permitted hazardous waste treatment, storage or disposal facility that Don's Automotive Group intends to use for the management of the hazardous waste distillation solids. In addition, Don's Automotive Group should provide me with a photograph of the properly labeled containers used to store the spent solvent and distillation solids.**

- d. Don's Automotive Group has failed to evaluate the spent fluorescent lamps used throughout the facility to determine if they are hazardous waste. Don's Automotive Group currently manages the spent lamps as solid waste and disposes of the spent lamps in a solid waste dumpster.

Don's Automotive Group must immediately cease disposing of the spent lamps as non-hazardous waste until a proper waste evaluation has been completed. The spent lamps typically contain mercury and other heavy metals which could make them a hazardous waste.

Don's Automotive Group has the option of handling spent lamps as hazardous waste or as universal waste. Managing hazardous waste lamps under the universal waste rules eases certain regulations imposed on generators of spent fluorescent lamps.

**To abate this violation, Don's Automotive Group must choose one of the following options for the spent lamps:**

**i. Disposal Option:**

Don's Automotive Group may manage the lamps as a hazardous waste. Don's Automotive Group must sample each type and brand of lamp used at the facility for RCRA metals using a Toxicity Characteristic Leaching Procedure (TCLP) test. Don's Automotive Group must ensure that all spent lamps that are determined to be hazardous waste are disposed of at a permitted hazardous waste disposal facility. Don's Automotive Group must submit all analytical results to Ohio EPA along with a description of how the spent lamps will be managed or,

**ii. Recycling Option:**

In lieu of evaluating and disposing of the spent lamps, Don's Automotive Group may manage spent lamps as universal waste. Universal waste spent lamps must be stored in a closed and labeled container. This container must be properly labeled with the wording "**Universal Waste Lamp(s)**", "**Waste Lamp(s)**", or "**Used Lamp(s)**". Don's Automotive Group must also track the accumulation of the spent lamps to ensure spent lamps are **not stored for greater than 365 days**. This can be accomplished with recycling receipts or by marking the container with the accumulation start date (the day the first spent lamp is placed in the container).

No spent lamps were in storage at the time of the inspection.

Ohio EPA recommends that spent lamps be managed as a universal waste and recycled. If Don's Automotive Group should choose the recycling option, you should submit to me the name of the recycling facility Don's Automotive Group intends to use.

I provided Don's Automotive Group with the following fact sheets at the time of the inspection: Universal Waste Rules for Handlers of Lamps, dated June 2005; Fluorescent Lamps: What You Should Know, dated January 2007; and Computer, Fluorescent Lamp and Ballast Recyclers, dated April 2008. These fact sheets are also enclosed

**To abate this violation, Don's Automotive Group must identify how the facility intends to properly manage the facility's spent lamps. This information should be submitted to my attention at the Ohio EPA within 30 days of receipt of this letter.**

Mr. Don Hayati  
June 7, 2010  
Page Five

As we discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce or eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs as well as regulatory requirements. If you can find a way to reduce your hazardous waste generation to less than 25 gallons per month you will reduce your regulatory requirements to those of a conditionally exempt small quantity generator. During the inspection, I observed the following potential pollution prevention (P2) opportunities associated with your operations:

1. Facility records reviewed during the inspection indicate that Don's Automotive Group currently sends approximately 200 used oil filters off site each month for disposal. Don's Automotive Group should consider recycling the used oil filters for the metal content.

The Ohio Department of Development's Office of Energy Efficiency may be able to help with energy efficiency issues. Their website is at: <http://development.ohio.gov/cdd/oeef>.

If you would like a free, no regulatory on-site pollution prevention assessment or if you would like more information about pollution prevention, please contact me at the number listed below. Ohio EPA has helpful information about this at the following web address: <http://epa.ohio.gov/ocapp>.

Enclosed you will find a copy of the checklists that we completed as a result of the inspection. Should you have any questions, please feel free to call me at (419-373-3056). You can find copies of the rules and other information on the division's web page at: <http://epa.ohio.gov/dhwm>.

Sincerely,



Gary S. Deutschman  
Environmental Specialist III  
Division of Hazardous Waste Management

/cs

pc: Winston Nichols, Don's Automotive Group Body Shop Manager  
Jeff Harman, Don's Automotive Group Service Manager  
Cindy Lohrbach, DHWM, NWDO  
Colleen Weaver, Supervisor, DHWM, NWDO  
Harry Sarvis, Manager, CAS, DHWM, CO  
DHWM, NWDO File - Don's Automotive File, Fulton County  
ec: Gary Deutschman, DHWM, NWDO

Send to Central Office

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

For Ohio EPA use only

Completed verification forms required to be submitted to CO should be e-mailed to [kristina.durnell@epa.state.oh.us](mailto:kristina.durnell@epa.state.oh.us).

<b>Site EPA ID No.</b> <b>Site Name</b>	EPA ID Number: <b>OHD018421594</b>		Website: <b>donsautogroup.com</b> (Optional)	
	Name: <b>Don's Automotive Group</b>			
<b>Site Location Information</b>	Street Address: <b>720 North Shoop Avenue</b>			
	City, Town, or Village: <b>Wauseon</b>		State: <b>OH</b>	
<b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/eprd/www/naics.html">www.census.gov/eprd/www/naics.html</a>	County Name: <b>Fulton</b>		Zip Code: <b>43567</b>	
	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>
	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	

<b>Facility Representative</b>  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: <b>Don</b>		MI:	Last Name: <b>Hayati</b>	
	Title: <b>President</b>				
	Phone Number: <b>419-337-3010</b>			Phone Number Extension:	
	E-Mail Address: <b>d.hayati@donsautogroup.com</b>				
	Fax Number: <b>419-337-4002</b>			Fax Number Extension:	
	Street or P.O. Box:				
City, Town or Village:					
State:			Zip Code:		

<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	Name of Site's Legal Owner: <b>D&amp;D Investors LLC</b>		Date Became Owner (mm/dd/yyyy): <b>01/10/2000</b>		
	Owner Type:	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"/>
	Street or P.O. Box: <b>720 N. Shoop Avenue, PO Box 208</b>				
	City, Town or Village: <b>Wauseon</b>			Owner Phone #:	
	State: <b>Ohio</b>			Country: <b>USA</b>	
				Zip Code: <b>43567</b>	
	Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):		
Operator Type:	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"/>	
Street or P.O. Box:					
City, Town or Village:			Operator Phone #:		
State:			Country:		
			Zip Code:		

**VIOLATIONS CITED?**     Yes     No
**TYPE OF HANDLER - MARK "X" AS APPROPRIATE**

<input type="checkbox"/> Not a HW Generator	<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
	<input type="checkbox"/> Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). <i>Check the box for the applicable generator status and provide a comment.</i>	<input 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 type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility
	<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. Oil
<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner

**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.

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:	Jeff Harman, Winston Nichols
Tanks	<input checked="" type="checkbox"/> Yes	<input 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)
Gary Deutschman		05/04/2010

**Comments:**  
 Generator Status can not be determined until all wastes evaluated.

**PROCESS, WASTE, P2 SUMMARY SHEET**

<b>Facility Name:</b> Don's Automotive Group		<b>Facility Type:</b> CESQG		<b>Date of Inspection:</b> 5/4/10		<b>EPA ID #:</b> OHD018421594	
<b>Waste Generated</b>			<b>On- or Off-Site Management</b>		<b>P2 Activities</b>		
<b>Process/Activity Generating Waste</b> (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	<b>Waste Description</b> (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	<b>QTY. Generated per Month, Type of Accumulation</b> (container, tank, etc) and location of waste accumulation area	<b>Type of On-Site Treatment</b> (recycle, wwt, etc)	<b>Name, state, and type of activity occurring at the off-site facility.</b>	<b>Current P2 Activities</b>	<b>P2 Opportunities</b>	
1	Parts Cleaning	Uncharacterized Spent Solvent	20 gallons/ year		Heartland Petroleum?		Solvent Substitution / Distillation
2	Battery Replacement	Spent Lead Acid Batteries	20 / month		Fort Meigs, 6610 Fairfield Drive, Suite D, Northwood, Ohio 43619	Shipped off-site for Recycling	
3	Oil Change	Used Oil	800 gallons / month	Burned in One On-site Used Oil Heating Unit	DISC Environmental Services, 151 East Andrus Road, Northwood, Ohio 43619	Used for Heating Value	Installation of Used Oil Burner in Body Shop
4	Oil Change	Used Oil Filters	200 filters / month	Hot Drained	Solid Waste Disposal		Recycle metal content

5	Coolant Replacement	Used Anti-freeze	200 gallons / year		DISC Environmental Services, 151 East Andrus Road, Northwood, Ohio 43619	Recycled	
6	Lighting	Spent Fluorescent Light Bulbs	Varies		Solid Waste Disposal		Recycling
7	Air Conditioning Re-charge	Spent Freon	Varies	Captured and Re-generated on-site		Captured and Re-generated on-site	
8	Tire Replacement	Used Tires	15 / month		Enviro Tire, 2709 Bradeberry Road, Fostoria, Ohio (419)435-5611	Shredding	
9	Paint Booth	Uncharacterized Paint Filters	Floor Filters Monthly, Ceiling Filters Annually		Solid Waste Disposal		
10	Paint Gun Cleaning	F003/F005 Spent Solvent	15 Gallon / Every 3 Months	Distillation		Distillation	Solvent Substitution,
11	Solvent Distillation	F003/F005 Spent Solvent Sludge	15 Gallons / Every 3 Months		Solid Waste Disposal		

12	Cleaning	Contaminated rags	Varies	Laundered		Laundering	
----	----------	-------------------	--------	-----------	--	------------	--

**REMARKS-GENERAL INFORMATION**

**General Process Information: Automotive Service and Auto Body Shop. Retailer of Chevrolet, Buick, GMC and Cadillac Trucks and Automobiles. Body Shop and Service Shop On-Site.**

**Regulatory/Enforcement History (if applicable):**

**Additional P2 remarks and information: Don's Automotive Group should consider installation of a second used oil heater to heat the body shop to reduced disposal cost and heating costs, recycling used oil filters for metal content and recycling of spent fluorescent lamps.**

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](mailto:p2mail@epa.state.oh.us) or [www.epa.ohio.gov/ocapp](http://www.epa.ohio.gov/ocapp)

**Other:**

**OAC 3745-266-80 SPENT LEAD ACID BATTERIES BEING RECLAIMED**

1.	Has the handler of reclaimed batteries notified Ohio EPA or US EPA of regulated waste activity?		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Are the handler's batteries reclaimed through regeneration (such as by electrolyte replacement)?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: If yes, the handler is subject to OAC Chapter 3745-51 and OAC rule 3745-52-11</i>			
3.	Are the handler's batteries reclaimed other than through regeneration?		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a.	If yes, does the handler:	
	i.	Generate, collect, and/or transport these batteries?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	ii.	Store these batteries but is not the reclaimer?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iii.	Store these batteries before reclaiming them?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iv.	Not store these batteries before reclaiming them?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: If the answer to any question 3ai through 3aiv is yes, the handler is subject to OAC Chapters 3745-51 and 3745-270, and OAC rule 3745-52-11. If the handler stores batteries before reclaiming them, the handler is subject to permitting requirements (e.g., general or interim standard facilities). Complete other appropriate checklists (e.g., LDR, TSD).</i>			
4.	Has the handler adequately evaluated all waste generated at their facility?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

#4 – Spent Solvent, Distillation Solids, Paint Filters and Fluorescent Lamps not evaluated.

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

*NOTE: 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.*

**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 checked="" 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"/>
----	--	--

*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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

**NOTE:** Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

**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"/>

**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).

**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"/>

**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.