



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Central District Office

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Columbus, Ohio 43215

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P.O. Box 1049
Columbus, OH 43216-1049

June 25, 2008

Mr. Ken Haertling
Air Technologies
1900 Jetway Blvd.
Columbus, OH 43219

Dear Mr. Pickering:

**Re: Air Technologies
OHR000128975 (CESQG) Franklin County**

Thank you for your time during my inspection visit on June 12, 2008, to the Air Technologies facility at 1900 Jetway Boulevard in Columbus. At the time of my inspection, your business was operating as a conditionally exempt small quantity generator (CESQG) of hazardous waste. Ohio's laws under Chapter 3745 of the Ohio Administrative Code and Chapter 3734 of the Ohio Revised Code establish a system for safe and responsible management of hazardous waste and used oil.

One violation was noted, but has now been corrected by Air Technologies:

Used Oil Tank Marking, OAC rule 3745-279-22(C): Containers must be marked as "Used Oil".

Four 55-gallon used oil accumulation drums lacked the required marking.

The necessary corrections were made, as documented by photographs received from you via email on June 13, 2008.

In addition to the above noted violation, the following comments are offered:

- We discussed some housekeeping issues in the oil accumulation area, which was located inside the building. Oil products and wastes should be clearly marked and/or stored separately from each other to minimize problems and confusion. Any non-empty waste aerosol cans that could be generated by the repair tech operations, would likely become a hazardous waste.
- A partial 55-gallon drum containing unused caustic soda material (no longer needed for a tank that had been removed from service) was being stored in the warehouse. Air Technologies should determine if another user or business would like to have this material for its intended purpose as a product and if not, make arrangements to manage it as probable hazardous waste.

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

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- We discussed how your combustible (143 degree flashpoint) spent parts cleaning solvent may be able to be combined with your used oil for management under OAC Rule 3745-279. You should check with your oil recycler just to be sure this does not pose any problems for them to reclaim the used oil mixture.

Enclosed is a copy of the checklist that was completed for this inspection. Our website, www.epa.state.oh.us/dhwm, provides links to copies of Ohio hazardous waste rules. Should you have any questions now or in the future about these matters, please feel free to call me at (614) 728-3885.

Sincerely,



J. David Hohmann
Environmental Specialist
Division of Hazardous Waste Management
Central District Office

Enclosure

c: Kristina Durnell, DHWM/CO
CDO File

"Notice: Ohio EPA's failure to list specific deficiencies/violations in this letter does not relieve your company from having to comply with all applicable regulations."

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS

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

Safety Equipment Used: Safety glasses, steel toed boots.

WASTE EVALUATION

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

GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg. of hazardous waste per month? Yes No N/A

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

TREATMENT OF HAZARDOUS WASTE [N/A—no hazardous waste treatment was occurring at this facility]

USED OIL INSPECTION CHECKLIST

GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

PROHIBITIONS

1. Does the generator manage used oil in a surface impoundment or waste pile? Yes No N/A
 If yes: [N/A]
2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes No N/A
3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? *RMK: No burning for energy recovery was being done here..* Yes No N/A

GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil? If so, [N/A] Yes No N/A
 Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] Yes No N/A
5. Does the generator of 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
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 No N/A
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
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] *RMK: Four 55-gallon drums in the warehouse lacked the required marking. The problem was corrected by June 16th* Yes No N/A
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] [N/A]

ON-SITE BURNING IN SPACE HEATER [N/A]

GENERATOR TRANSPORTATION

11. 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 No N/A
- b. Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24] Yes No N/A

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
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes No N/A
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] *RMK: See above. Labeling of containers was needed, and subsequently provided.* Yes No N/A

[Facility Name/Inspection Date]

[ID number]

CESQG/ June 2008

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