



Environmental  
Protection Agency

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

Re: Lefeld Implement  
OHR000006189  
Mercer County  
Hazardous Waste  
**Notice of Violation**

September 23, 2011

Mr. Tim Berkenstock  
Service Manager  
Lefeld Implement  
5228 State Route 118  
Coldwater, Ohio 45828

Dear Mr. Berkenstock:

Thank you for accompanying me during Ohio EPA's September 19, 2011, compliance evaluation inspection (CEI) of Lefeld Implement (LI) located at 5228 State Route 118, in Coldwater, Ohio. I inspected LI to determine its 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 observations of facility operations and a review of written documentation. This letter will explain the violations I found and what you need to do to correct the violations.

LI sells and services all types of farm equipment including large equipment like tractors and harvesters. LI generates the following wastes:

1. Used Oil: Used oil is generated from engine maintenance. As much as 200-300 gallons could be accumulated in a month. LI operates two used oil-fired space heaters; one in each of the shops.
2. Spent Parts Washer Solvent: LI operates three parts washers: one uses an aqueous solution and the other two use a solvent solution. The units are used to clean equipment/implement parts. The three units are serviced by Heritage-Crystal Clean, LLC. The premium solvent has a flash point over 145°F.
3. Spent Antifreeze: A small amount of antifreeze is accumulated from service work. It is accumulated in a drum and sold to customers to weatherproof equipment like sprayers.
4. Used Batteries: Spent lead acid batteries are accumulated in a closed trailer and picked up and recycled by Exide Technologies of Indianapolis, Indiana.
5. Used Lamps: LI has been placing used lamps into the trash.

Mr. Tim Berkenstock  
September 23, 2011  
Page Two

As a result of my inspection, 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. Waste Evaluation  
OAC Rule 3745-52-11**

A generator must determine whether its waste is hazardous by testing the waste according to the methods set forth in rules 3745-51-20 to 3745-51-24. LI has failed to evaluate its spent lamps (all types) according to this rule, and they have been disposed of in the facility's trash. In order to abate this violation, LI must evaluate its spent lamps. Instead of obtaining a sample of the lamps and having the sample analyzed in a laboratory, LI may elect to manage its spent lamps (all types) as Universal Waste. The requirements for Universal Waste lamps include:

- **Immediately prevent** spent lamps from being disposed of in the facility's trash;
- Place spent lamps into containers that are structurally sound (boxes for example);
- Label the containers with the words "Used Lamps";
- Document the length of time that the spent lamps are stored (place a date on the boxes);
- Store spent lamps for no longer than one year;
- Inform all employees with the responsibility to collect spent lamps of these requirements; and
- Ship the spent lamps to a lamp recycler (please refer to the list of lamp recyclers that I have enclosed with this letter and provided during my inspection).

In order to correct this violation, please explain how you intend to manage your spent lamps and to comply with the requirements listed above. Indicate how you will package the lamps, label the containers, and date the containers. Please submit photos demonstrating that this has been done. Also, please indicate where you will ship the Universal Waste lamps to.

**2. Used Oil Container Labeling  
OAC Rule 3745-279-22(C)(1)**

Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil." On September 19, 2011, I observed one tank, more than six 55-gallon drums and several 5-gallon pails that were not labeled in this manner.

In order to correct this violation, LI must immediately mark or label all used oil containers and tanks with the words "Used Oil" and provide me with photographic documentation that this has been done.

**3. Used Oil Container Condition  
OAC Rule 3745-279-22(B)**

Containers and aboveground tanks used to store used oil at generator facilities must be in good condition (no severe rusting, apparent structural defects or deterioration). On September 19, 2011, I observed several 5-gallon pails of used oil that were not closed (a structural defect), with some minor visible leaks surrounding them.

In order to correct this violation, LI must immediately close all used oil containers or place the used oil into containers that can be closed and provide me with photographic documentation that this has been done.

Please be aware that incandescent, fluorescent, metal halide, neon, high-intensity discharge, high-pressure sodium and mercury-vapor lamps could be hazardous waste when discarded. Fluorescent lamps may contain up to 40 milligrams (mg) of mercury, depending on the brand and manufacturer. Lamps may also contain lead and cadmium. Many lamps exhibit a characteristic of toxicity for heavy metals when disposed. I have enclosed copies of the following documents to assist you in properly managing your spent lamps: Fluorescent Lamps: What You Should Know and Computer, Fluorescent Lamp and Ballast Recyclers. I recommend that you review these documents carefully and contact me if you have any questions. The first document describes the rules you must follow in order to manage lamps as a universal waste.

As a used oil generator you are required to store used oil in containers or aboveground tanks that are in good condition (no severe rusting, apparent structural defects or deterioration) and not leaking. Containers, aboveground tanks and fill pipes for underground tanks must be labeled with the words "Used Oil." If leaks are detected, the generator must stop the release; contain the release; clean up and manage properly the released used oil and other materials related to the release; and, if necessary, repair or replace any leaking containers or tanks prior to returning them to service. I have enclosed copies of the following used oil fact sheets: The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil, and Used Oil Recyclers. Please review these carefully and contact me immediately if you have any questions.

You may be able to further reduce the waste your company generates. If you find ways to recycle, reduce or altogether eliminate the amount of waste that your company generates you may be able to reduce your treatment and disposal costs and you may possibly reduce your regulatory requirements. I have enclosed a copy of Pollution Prevention Opportunities, a worksheet that can help you recognize opportunities for reducing waste and conserving energy at your business. I have also enclosed copies of the fact sheets Management of Electronic Waste from Businesses and Battery Recyclers/Brokers & Disposal Facilities. Please review this information and contact me if you have any questions.

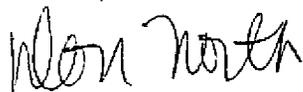
Mr. Tim Berkenstock  
September 23, 2011  
Page Four

I encourage you to schedule a pollution prevention assessment for your business because there are often many opportunities for businesses like yours to reduce waste and save money. If you wish to talk about an assessment or if you have other questions about pollution prevention, please feel free to contact the Office of Compliance Assistance and Pollution Prevention (OCAPP) at (614) 644-3469. There is no charge for an assessment.

The Division of Materials and Waste Management 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](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.

If you have any questions, please feel free to contact me at (419) 373-3074. You can find copies of the rules and other information on the division's web page at <http://www.epa.ohio.gov>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.ohio.gov/ocapp>.

Sincerely,



Don North  
District Representative  
Division of Materials and Waste Management

/cs

Enclosures

pc: Colleen Weaver, DMWM, NWDO  
Cindy Lohrbach, DMWM, NWDO  
DMWM-HW, NWDO, Mercer County, Lefeld Implement File

ec: Don North, DMWM, NWDO

**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.

|   |   |                       |
|---|---|-----------------------|
| Send to Central Office<br><input checked="" type="checkbox"/> | <b>Ohio Environmental Protection Agency</b><br><b>RCRA SUBTITLE C SITE</b><br><b>IDENTIFICATION/VERIFICATION FORM</b> | For Ohio EPA use only |
|---|---|-----------------------|

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

|  |   |   |
|--|---|---|
| <b>Site EPA ID No.</b>   | EPA ID Number: <b>OHR000006189</b>  |   |
| <b>Site Name</b>   | Name: <b>Lefeld Implement</b>   | Website: <b>www.kennfeldgroup.com</b><br>(Optional) |
| <b>Site Location Information</b>   | Street Address: <b>5228 St. Rt. 118</b>   |   |
|  | City, Town, or Village: <b>Coldwater</b>  | State: <b>OH</b>                                    |
|  | County Name: <b>Mercer</b>  |   |
| <b>Site Land Type</b><br>(check only one)  | 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"/> | Zip Code: <b>45282</b>                              |
| <b>NAICS code(s)</b><br><a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a> |   |   |

|   |   |                         |                               |
|---|---|-------------------------|-------------------------------|
| <b>Facility Representative</b>  | First Name: <b>Tim</b>                                | MI:                     | Last Name: <b>Berkenstock</b> |
| Additional names can be recorded in number 12                             | Title: <b>Service Manager</b>                         |                         |                               |
|   | Phone Number: <b>419-678-2375</b>                     | Phone Number Extension: |                               |
|   | E-Mail Address: <b>tberkenstock@kennfeldgroup.com</b> |                         |                               |
| Only provide address information if it is different than the site address | Fax Number:   |                         | Fax Number Extension:         |
|   | Street or P.O. Box:                                   |                         |                               |
|   | City, Town or Village:                                |                         |                               |
|   | State:  |                         | Zip Code:                     |

|   |  |   |
|---|--|---|
| <b>Legal Owner And Operator of the Site.</b><br>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"/>    | 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:    Zip Code:   |
|   | 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"/> | 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:<br>Cited for violation of 3745-52-11   | <input type="checkbox"/> Large Quantity Generator (LQG)                    |
|   | <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"/> 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"/> 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<br>(accumulates 5,000 kg. or more) |   |

**CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES**

- Batteries
- Pesticides
- Mercury containing equipment
- Lamps

**USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))**

- Used Oil Generator
- Used Oil Transporter
- Used Oil Transfer Facility
- Used Oil Processor
- Used Oil Re-refiner
- Off-Specification Used Oil Burner
- Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil
- 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.

- College or University
- Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
- 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 RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

**COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.**

- Announced  Yes  No      Additional Facility Representatives:
- Tanks  Yes  No
- Containers  Yes  No

Name of Inspector(s)  
**Don North**

Name of Inspector(s)

Date of Inspection/Time  
(mm/dd/yyyy) (hh:mm)  
**09/19/2011**

**Comments:**

## PROCESS, WASTE, P2 SUMMARY SHEET

**Facility Name:** Lefeld Implement   
 **Facility Type:**  LQG  SQG  CESQG  TSD   
 **Date of Inspection:** 9-19-11   
 **EPA ID#:** OHR000006189

| Waste Generated   |  | On- or Off-Site Management   |  |   | P2 Activities   |                  |
|---|--|--|--|---|---|------------------|
| Process/Activity Generating Waste<br>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc) | Waste Description<br>(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<br>(recycle, wwt, etc) | Name, state, and type of activity occurring at the off-site facility. | Current P2 Activities   | P2 Opportunities |
| 1   | Implement service and maintenance  | Used Oil   | 200-300 gallons                                  | Burned in 2 used oil-fired space heaters                              |   |                  |
| 2   | Implement service and maintenance  | Spent Parts Washer Solvent   | 45 gallons/3 months                              | None  | Heritage-Crystal Clean, LLC<br>Vandalia, Ohio<br>ILR000130062 | Recycled         |
| 3   | Implement service and maintenance  | Spent Antifreeze   | 20 gallons                                       | None  | Sold to customers for weather proofing sprayers               |                  |
| 4   | Implement service and maintenance  | Used Batteries   | Few  | None  | Exide Technologies<br>Indianapolis, Indiana                   |                  |
| 5   | Facility lighting  | Used Lamps   | Few  | LI has placed used lamps into the trash                               |   |                  |

|   |  |  |  |  |  |  |  |
|---|--|--|--|--|--|--|--|
| 6 |  |  |  |  |  |  |  |
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| 8 |  |  |  |  |  |  |  |
| 9 |  |  |  |  |  |  |  |

**REMARKS** **GENERAL INFORMATION**

**General Process Information:**

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

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

**Other:**

**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 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)] <b>Several open 5-gallon pails observed and signs of minor spills surrounding them. LI should put used oil in closed containers.</b> | Yes <input type="checkbox"/> No <input checked="" 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 type="checkbox"/> No <input checked="" 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 | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

|    |  |  |
|----|--|--|
|    | generators?  |  |
| 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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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.*