



Environmental  
Protection Agency

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

Re: Transco Railway Products, Inc.  
OH0 000 969 899  
Hazardous Waste  
Complaint # 3070  
Lucas County  
Notice of Violation

July 19, 2011

Mr. Mike Hayden, Division Manager  
Transco Railway Products, Inc.  
4800 Schwartz Road  
P. O. Box 5009  
Toledo, Ohio 43611

Dear Mr. Hayden:

On June 28, 2011, Ed Pulido and I investigated a complaint at Transco Railway Products, Inc. (Transco) located at 4800 Schwartz Road, Toledo, Ohio. The complaint was received by the Division of Materials and Waste Management on May 11, 2011. The complainant alleged that Transco was dumping used coal and auto fluff near a stream which goes to a river into the Maumee Bay. This letter will explain the validity of the complaint, the violation we found, and what you need to do to correct this violation.

Upon arriving at your facility we discussed the complaint with Jim Bailey, Shop Superintendent and Greg Sargeant, Shop Foreman and we proceeded to conduct a full compliance evaluation inspection (CEI) to determine Transco's 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). They stated the following during the CEI: Transco repairs rail cars and receives these cars for maintenance; sometimes although these cars are supposed to be empty they may still contain some of the product that was being shipped in the car; any cars that come to the yard that contain material still in them are generally dumped in the dumpster; the types of materials that are thrown away include: wood, auto fluff and coal; scrap steel is recycled with OmniSource; only solids are transported in these cars – there are no liquid wastes; as Transco is emptying a car there are sometimes spills which are cleaned up with a backhoe and placed in the dumpster or appropriate recycle bin; at the time of inspection, Transco's backhoe was broken and thus the facility had been unable to clean-up any spilled material; Transco currently had some sugar that had been spilled in the rail yard; the facility is located ½ mile from the Ottawa River and the Transco property does not abut the river.

Transco repairs rail cars. Hazardous waste generated at the facility is waste paint related material (D007, D008, F003, F005). Other wastes generated at the facility include used oil, wood, scrap steel (recycled), auto fluff, and coal. Fluorescent bulbs are recycled. (We did not observe how your bulbs were being managed on-site but we did observe documentation that your bulbs were being recycled).

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Mr. Sargeant took us on a tour of the facility. We observed a small pile of coal on the ground around the dumpster area. In addition, we observed the pile of sugar on the ground in the rail car loading/unloading area. We also saw the disabled backhoe.

On July 13, 2011, you sent me pictures indicating that the coal around the dumpster area had been cleaned up and that the coal was being stored in a hopper awaiting the sample analysis of the coal that was conducted on July 12, 2011 (see below). In addition, you also emailed that the sugar pile had been cleaned up and thrown in the trash. The pile was on an asphalted area where no maintenance activities occur.

I found the following violation of Ohio's hazardous waste laws. In order to correct this violation 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

Any person who generates a waste must determine if that waste is a hazardous waste in accordance with the criteria for hazardous waste as set forth in Chapter 3745-51 of the Administrative Code.

Transco has failed to evaluate the coal that is on the ground in the dumpster area to determine if this is a hazardous waste.

On June 29, 2011, I sent you an email asking how Transco has made the determination that the coal that is being thrown in the trash is a non-hazardous waste. In addition, I stated that upon clean-up of the spill area, Transco should put this clean-up material in drums and hold for proper waste evaluation as Transco would not want to be potentially sending a hazardous waste to a solid waste landfill.

On June 30, 2011, Mr. Harold Fitz, Director Regulatory Affairs for Transco in Bucyrus, Ohio emailed me stating that the Bucyrus facility had a pile of coal on that property and that they would be sampling this coal to determine whether it is hazardous or not. In addition, Mr. Fitz stated that coal accumulation at the Bucyrus facility is approximately 1 ton per year. I emailed Mr. Fitz back on July 8, 2011, stating that Transco must ensure to sample for all applicable characteristics in light of the waste stream. In addition, I also asked Mr. Fritz to notify me when they plan to sample the Bucyrus coal pile.

If the coal generated at the Bucyrus facility is the same waste stream that is generated at the Toledo facility then proper sampling of this waste should meet the requirements for proper waste evaluation of the coal waste stream at your facility in Toledo.

On July 13, 2011, Mr. Fitz indicated to me that Transco had performed sampling of the coal pile at Bucyrus on July 12, 2011. In addition, Mr. Fitz sent pictures of the sample jars.

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- To abate this violation, Transco must submit the analytical information to me. Your results must document if the waste is hazardous or not and, if hazardous, whether it is restricted from land disposal. If it is hazardous, you must explain what treatment, storage, or disposal facility you will send it to. If the waste is hazardous, I will determine the status of your compliance with other hazardous waste laws and notify you of my findings in a separate letter.
- Please submit to me information which documents that the material being sampled at the Bucyrus facility is the same waste stream that is generated at the Toledo facility.
- Please submit to me a summary outlining how Transco will ensure to properly evaluate any wastes that will be generated in the future.

*If any additional sampling is performed, please notify me at least seven days prior to taking the samples so that I or an Ohio EPA representative may be present.*

I have enclosed the fact sheets Identifying your Hazardous Waste and Use of Generator Knowledge In Complying with OAC Rule 3745-52-11, Hazardous Waste Evaluation which you may find useful.

Transco is recycling their used oil with Heartland Petroleum and recycles their scrap metal with OmniSource. In addition, Transco recycles their fluorescent bulbs with Heritage-Crystal Clean. 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. Or if you would like a free, non-regulatory on-site pollution prevention assessment or more information about pollution prevention, please contact me at (419) 373-3082. Ohio EPA has helpful information about this at the following web address: <http://www.epa.ohio.gov/ocapp/>

Ohio EPA did find validity to this complaint.

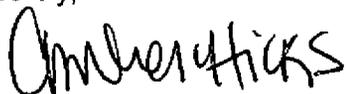
The Division of Materials and Waste Management (DMWM) has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information at the following Web link [http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc\\_serve.php?2=subscriptionpage](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](mailto:amber.hicks@epa.ohio.gov).

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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

Enclosures

pc: Colleen Weaver, DMWM, NWDO  
Cindy Lohrbach, DMWM, NWDO  
◀DMWM-HW, NWDO File: Transco Railway Products, Inc. ▶

ec: Amber Hicks, 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>OH0000969899</b>             |                                    |                                      |                                     |                                    |                                       |                                   |                                   |
| <b>Site Name</b>   | Name: <b>Transco Railway Products, Inc.</b>    |                                    |                                      |                                     | Website:<br>(Optional)             |                                       |                                   |                                   |
| <b>Site Location Information</b>   | Street Address: <b>4800 Schwartz Rd</b>        |                                    |                                      |                                     |                                    |                                       |                                   |                                   |
|  | City, Town, or Village: <b>Toledo</b>          |                                    |                                      |                                     | State: <b>OH</b>                   |                                       |                                   |                                   |
|  | County Name: <b>Lucas</b>                      |                                    |                                      |                                     | Zip Code: <b>43611</b>             |                                       |                                   |                                   |
| <b>Site Land Type</b><br>(check only one)  | Private<br><input checked="" type="checkbox"/> | County<br><input type="checkbox"/> | District<br><input type="checkbox"/> | Federal<br><input type="checkbox"/> | Indian<br><input type="checkbox"/> | Municipal<br><input type="checkbox"/> | State<br><input type="checkbox"/> | Other<br><input type="checkbox"/> |
| <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>Mike</b>                           |  | MI: | Last Name: <b>Hayden</b> |                        |
| Additional names can be recorded in number 12.                            | Title: <b>Division Manager</b>                    |  |     |                          |                        |
| Only provide address information if it is different than the site address | Phone Number: <b>419-726-3383</b>                 |  |     | Phone Number Extension:  |                        |
|   | E-Mail Address: <b>mhayden@transcorailway.com</b> |  |     |                          |                        |
|   | Fax Number: <b>419-726-3562</b>                   |  |     | Fax Number Extension:    |                        |
|   | Street or P.O. Box: <b>P.O. Box 5009</b>          |  |     |                          |                        |
|   | City, Town or Village: <b>Toledo</b>              |  |     |                          | Zip Code: <b>43611</b> |
|   | State: <b>OH</b>                                  |  |     |                          |                        |

|   |                             |                                     |                                    |                                      |                                       |                                    |                                       |                                   |                                   |
|---|-----------------------------|-------------------------------------|------------------------------------|--------------------------------------|---------------------------------------|------------------------------------|---------------------------------------|-----------------------------------|-----------------------------------|
| <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<br>(mm/dd/yyyy):    |                                    |                                       |                                   |                                   |
|   | Owner Type:                 | Private<br><input type="checkbox"/> | County<br><input type="checkbox"/> | District<br><input type="checkbox"/> | Federal<br><input type="checkbox"/>   | Indian<br><input type="checkbox"/> | Municipal<br><input type="checkbox"/> | State<br><input type="checkbox"/> | Other<br><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<br>(mm/dd/yyyy): |                                    |                                       |                                   |                                   |
|   | Operator Type:              | Private<br><input type="checkbox"/> | County<br><input type="checkbox"/> | District<br><input type="checkbox"/> | Federal<br><input type="checkbox"/>   | Indian<br><input type="checkbox"/> | Municipal<br><input type="checkbox"/> | State<br><input type="checkbox"/> | Other<br><input type="checkbox"/> |
|   | Street or P.O. Box:         |                                     |                                    |                                      |                                       |                                    |                                       |                                   |                                   |
|   | City, Town or Village:      |                                     |                                    |                                      | Operator Phone #:                     |                                    |                                       |                                   |                                   |
|   | State:                      |                                     |                                    |                                      | Country:                              |                                    | Zip Code:                             |                                   |                                   |

|                          |   |
|--------------------------|---|
| <b>VIOLATIONS CITED?</b> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
|--------------------------|---|

|  |  |  |
|--|--|--|
| <b>TYPE OF HANDLER - MARK "X" AS APPROPRIATE</b> |  |  |
| <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<br>(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 checked="" 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 checked="" 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 |  |

|   |  |
|---|--|
| <b>Eligible Academic Entities with Laboratories:</b> 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.

**D007                      D008                      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: | <b>Harold Fitz, Regulatory Affairs Director (off-site); Jim Bailey, Shop Superintendent; Greg Sargeant, Shop Foreman.</b> |
| Tanks <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No      |                                      |   |
| Containers <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |                                      |   |

|  |  |  |
|--|--|--|
| Name of Inspector(s)<br><b>Amber Hicks</b> | Name of Inspector(s)<br><b>Ed Pulido</b> | Date of Inspection/Time<br>(mm/dd/yyyy) (hh:mm)<br><b>06/28/11 10:38</b> |
|--|--|--|

**Comments:**  
**This was a complaint investigation and inspection.**

## PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Transco Railway Products, Inc. Facility Type: LQG SQG CESQG TSD Date of Inspection: 6-28-11 EPA ID#: OH0000969899

| 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 Lighting  | Fluorescent bulbs  | Unknown  | NA   | Heritage Chrystal Clean - Broadview Heights, OH                                | Recycled.             |   |
| 2 Servicing of rail cars  | Used Oil   | 110 gallons (this year)  |  | Petro-Chem Processing Group-Detroit - fuel blended                             | Recycled.             |   |
| 3 Servicing of rail cars  | Paint related waste - D007, D008, F003, F005   | ~ 2 drums/800 lbs (a year)   |  | Petro-Chem Processing Group - Detroit - stored, bulked or transferred off-site |                       |   |
| 4 Emptying of rail cars   | Coal, auto fluff, wood   | Varies   |  | Local solid waste landfill **  |                       | Potentially finding a customer which could use the virgin coal. |
| 5 Emptying of rail cars   | scrap steel  | Varies   |  | Omni-Source  | Recycling.            |   |
| 6   |  |  |  |  |                       |   |
| 7   |  |  |  |  |                       |   |

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

**REMARKS GENERAL INFORMATION**

**General Process Information:**

\*\* facility cited for a 52-11 for coal.

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

**Additional P2 remarks and information:**

Gave facility information on P2 options for auto service stations.

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:** 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](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](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?<br>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)] | 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"/> |
|----|--|--|

| <b>ON-SITE BURNING IN SPACE HEATER</b>   |  |  |
|--|--|--|
| 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>  |  |  |
| <b>GENERATOR TRANSPORTATION</b>  |  |  |
| 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-transported 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> |  |  |
| <b>COLLECTION CENTERS AND AGGREGATION POINTS</b>   |  |  |
| 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>                          |  |  |

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

CESQG:  $\leq 100$  Kg. (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:  $\geq 1,000$  Kg. (~300 gallons) of waste in a calendar month or  $\geq 1$  Kg. of acutely hazardous waste in a calendar month.  
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

**WASTE EVALUATION**

|    |  |  |
|----|--|--|
| 1. | Have all wastes generated at the facility been adequately evaluated?<br>[3745-52-11] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|----|--|--|

**GENERATOR CLASSIFICATION**

|    |   |  |
|----|---|--|
| 2. | Does the generator produce $< 100$ kg. of hazardous waste per month?<br>[conditionally exempt small quantity generator ("CESQG")] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|--|

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

**OFF-SITE SHIPMENT OF HAZARDOUS WASTE**

|    |   |  |
|----|---|--|
| 3. | Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|--|

**TREATMENT OF HAZARDOUS WASTE**

|    |  |  |
|----|--|--|
| 4. | Does the generator treat hazardous waste in a:                     |  |
|    | a. Container that meets 3745-66-70 to 3745-66-77?                  | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|    | b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? | 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 the CESQG conducts treatment they are subject to the LQG requirements.

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

**MIX HAZARDOUS WASTE WITH USED OIL**

|    |   |  |
|----|---|--|
| 5. | Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|    | a. Does the CESQG manage the mixture in accordance with 3745-279-21?  | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |