



State of Ohio Environmental Protection Agency

Northeast District Office

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

March 20, 2007

**RE: KINGSVILLE TRAVEL CENTER
COMPLAINT #6860**

Mr. Gary Sturgeon
TravelCenters of America
5551 State Route 193
Kingsville, OH 44048-7715

Dear Mr. Sturgeon:

On March 9, 2007, I conducted a Resource Conservation and Recovery Act (RCRA) investigation of your facility located at 5551 State Route 193, Kingsville, Ohio.

This investigation was in response to a citizen's complaint alleging the possible mismanagement of used oil at the property.

Your facility, TravelCenters of America truck stop (TA), contains a truck repair facility operated by TA. Used oil is generated by the facility through the routine maintenance of trucks. This used oil is collected in one below-ground tank located outside the south wall of the repair shop building. You indicated that all used oil generated at the facility is collected monthly by Safety-Kleen, Inc. You further indicated that the facility does not generate any hazardous waste.

I inspected the building and grounds outside the buildings and did not find evidence of significant oil spillage/contamination as a result of your operations. During this inspection, one violation of Ohio's used oil regulations was identified:

1. Used Oil Generator Standards, OAC 3745-279-22C:

Used oil is accumulated in a below-ground tank located adjacent to and outside of the south wall of the truck repair building. Fill piping extends into the building to a repair trench in the southernmost repair bay. This fill pipe was not labeled with the words, used oil. This is a violation of OAC 3745-279-22 C which requires containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "used oil." To return to compliance with this regulation, within 14 days of receipt of this letter, submit a photograph showing that the fill pipe has been properly labeled with the words "used oil."

For your reference, I have enclosed a copy of Ohio's guidance document for the management of used oil and a copy of the used oil inspection checklist completed during the inspection.

Mr. Gary Sturgeon
TravelCenters of America
March 20, 2007
Page 2

Thank you for your cooperation regarding this matter. If you should have any questions or if you should need assistance, please do not hesitate to call me at (330) 963-1231.

Sincerely,

A handwritten signature in black ink that reads "Tom Roth". The signature is written in a cursive style with a large, stylized "R" and "T".

Thomas J. Roth
Environmental Specialist
Division of Hazardous Waste Management

TJR/cl
Enclosure

ec: Harry Courtright, DHWM, NEDO

cc: Natalie Oryshkewych, DHWM, NEDO

USED OIL INSPECTION CHECKLIST (Short Version)

NOTE: This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes ___ No N/A ___ RMK# ___
Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes ___ No N/A RMK# ___
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No N/A ___ RMK# ___
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes ___ No N/A RMK# ___

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes ___ No N/A RMK# ___
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 ___ No N/A RMK# ___
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes No N/A ___ RMK# ___
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 RMK# ___
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes ___ No N/A ___ RMK# ___
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes ___ No N/A RMK# ___
- b. Contained the release? Yes ___ No N/A RMK# ___

- c. Cleaned up and properly managed the used oil and other materials? Yes ___ No N/A RMK# ___
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A RMK# ___
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes ___ No N/A ___ RMK# ___
- 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 ___ No N/A RMK# ___
- b. Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour? Yes ___ No N/A RMK# ___
- c. Are the combustion gases from heater vented to the ambient air? Yes ___ No N/A RMK# ___
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes No N/A ___ RMK# ___

USED OIL 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 RMK# ___
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes ___ No N/A RMK# ___
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes ___ No N/A RMK# ___

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes No N/A ___ RMK# ___

C:\Documents and Settings\TRoth\Desktop\USED OIL.SHORT.11.2004.fin.megaset.wpd

REMARKS