



State of Ohio Environmental Protection Agency

Northeast District Office



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Twinsburg, Ohio 44087

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www.epa.state.oh.us

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

May 6, 2010

RE: JD SERVICES
CUYAHOGA COUNTY
NOTICE OF VIOLATION (NOV)
OHD 007 832 827
COMPLAINT NUMBER 7301

James Dupre
JD Services
P.O. Box 93823
Cleveland, OH 44101

Dear Mr. Dupre:

On April 20, 2010, Robert Almquist and I, as representatives of the Ohio EPA Division of Hazardous Waste Management, conducted an inspection of JD Services, located at 16100 S. Waterloo Road, Cleveland, Ohio 44110, for compliance with Ohio's hazardous waste and used oil regulations. You represented JD Services during the inspection. Ohio EPA had received a complaint alleging that the facility was mismanaging oil, transmission fluid, diesel fuel and possibly gasoline at this location.

You reported that you operate JD Services as a sole proprietorship, that you have been at this site for about two years and that previously it was a parking lot for a trucking company. You reported that the main building on the site (i.e., the maintenance garage) is used for repair of trucks used in your other businesses. We observed several semi-truck tractors arranged for transport, reportedly to Mexico, parked to the east of the maintenance garage.

In the yard behind (i.e., south of) the garage we observed truck engines, fuel tanks, differentials, hoses, electrical assemblies and many other truck parts on the ground. The yard behind the garage appears to be used as a salvage area and storage yard for truck components. In the south yard we saw puddles of water from recent precipitation with oil and/or oil sheens on the water surface. Areas of oily soils covering a significant portion of the yard behind the garage were observed. The oils appear to be spillage and leakage from salvage operations and appeared to consist of used oils from engines, transmissions and other components as well as diesel oil from fuel tanks.

Outdoors immediately to the east of the maintenance garage is an area drain with a grating, apparently a storm sewer. The concrete and soil near the drain was very oily. It appeared that oil could enter the drain during precipitation events.

Enclosed with this letter are copies of pictures taken of the drain and adjacent area east of the maintenance garage and in the yard to the south of the of the maintenance garage.

JD SERVICES
MAY 6, 2010
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Based on the facility documents reviewed and observations made during the facility walk-through, Ohio EPA has determined that JD Services has violated the following state used oil regulations:

1. **OAC 3745-279-22(C)(1) Used oil containers and tanks must be labeled with the words Used Oil**

JD Services collects used oil from trucks that it services. We observed one 55 gallon drum and two plastic totes partially full of used oil in the south room of the maintenance garage.

None of the used oil containers were marked with the words "Used Oil" as is required by regulation.

This violation was abated during the inspection by marking the words "Used Oil" on the drum and totes. No further action is required on this violation at this time. Be sure to mark or label all containers holding used oil in the future with the words "Used Oil".

2. **OAC Rule 3745-279-74(B) Used oil marketer must ensure used oil meets specs by proper documents**

Some of the used oil generated at this facility is reportedly burned in a wood burning stove that is used as a space heater for the maintenance garage. Some of the used oil generated at this facility is reportedly given to a friend to burn in a space heater. Transfer and disposal of used oil from a business, including giving it away, is subject to the used oil marketer rules. The facility did not provide any documentation that it had performed any analyses or possessed other documentation that indicates that the used oil met the standards for on-spec used oil as is required by the marketer rules.

As we discussed during the inspection, small businesses almost never choose to become used oil marketers. Rather they almost always choose instead to have their used oil removed by a licensed used oil transporter. You recalled information about your former used oil haulers. You indicated that you could contact them, or another licensed used oil transporter, in the future for removal of used oil.

To return to compliance the facility must:

- Indicate in writing how the facility intends to manages its used oil in future;
- Provide this information to this office within 30 days of receipt of this letter.

An Ohio EPA factsheet on used oil that you might wish to review when responding to this violation is attached.

3. OAC 3745-279-22(D) Generator must respond to used oil releases and perform cleanup steps

I observed the following releases of used oil and other oils at JD Services:

- The facility was using the area east of the maintenance garage for maintenance and/or salvage work of some sort. Oily sludge was observed on the concrete and in the soil adjacent to a sewer grating for what appeared to be a storm sewer. Oil also observed in and on the soil in front of the overhead door of the maintenance garage. Attached pictures entitled *East side of garage Bldg _1* through *East side of garage Bldg _3* were taken in this area.
- The yard behind (to the south of) the maintenance garage appears to be used as a salvage area and storage yard for truck parts; truck engines and other truck parts were observed on the ground. Numerous depressions in the south yard contained puddles of water from recent precipitation with patches of oil and/or oil sheens visible on the surface of the water. Areas of oily soils covering a significant portion of the yard were also observed. The oils appear to be spillage and leakage from salvage operations and appeared to consist of used oils from engines, transmissions and other components as well as diesel fuel from fuel tanks. Attached pictures entitled *Yard south of garage Bldg_1* through *Yard south of garage Bldg_11* were taken in this area.

OAC rule 3745-279-22(D) requires JD Services, as a generator of used oil, to respond to releases of used oil by taking the following cleanup steps:

- 1) stop the release;
- 2) contain the released used oil;
- 3) clean up and manage properly the released used oil and other materials; and
- 4) if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service.

To demonstrate compliance with the OAC rule 3745-279-22(D)(3) requirement to "clean up and manage properly the released used oil and other materials" JD Services must:

- 1) Determine whether any locations in addition to those noted above are present at the facility on which used oil has been released since October 20, 1998.
- 2) Clean up and remove all released used oil and contaminated soils and debris identified by me as well as any additional releases identified by JD Services.

Ohio EPA uses a visual standard when determining whether a clean-up of released used oil and any media (for example soil) containing used oil is adequate. Ohio EPA does not require confirmatory soil sampling and lab analysis to demonstrate that the release has been cleaned up.

3) Manage used oil and contaminated soils and debris from the clean up in one of the two following ways:

- If the clean up residue is to be burned for energy recovery, it can be managed as used oil under the used oil regulations. If JD Services wishes to have the contaminated residue burned for energy, JD Services must check with a recycler to make sure he can accept/manage the material; or
- If the clean up residue is not going to be burned for energy recovery, it must be managed as a waste.

To return to compliance, JD Services must:

- Develop procedures for containing oils when used oil could be released during future salvage and maintenance operations;
- Immediately initiate a response to all releases of used oil;
- Complete the clean-up response in accordance with the above discussion;
- Notify me when the clean-up has begun so that I have the opportunity to inspect;
- Provide documentation of the containment procedures and clean-up response, including photos of the areas after clean up and copies of manifests or other shipping papers that document receipt (including the quantity or amount received) of the used oil contaminated soil by a disposal or recycling facility to this office within 30 days of the receipt of this letter.

Copies of several Ohio EPA Guidance Documents on Used Oil management are enclosed for your assistance.

Enclosed you will find a copy of the checklists completed during the inspection.

Required Written Response and Documentation

Submit all the above requested documentation to this office within 30 days of the date of this letter demonstrating that all violations have been abated and that the designated actions have been taken.

Concerns

In the Maintenance Garage we observed some used electrical wiring harnesses lying on the floor near the furnace used to burn wood and used oil. My understanding is that the facility was concerned that an employee might have intended to burn the wires for metals recovery. You were advised that if the wiring should exhibit the characteristic of a hazardous waste, for example the characteristic for lead from the presence of lead solder, burning would constitute illegal treatment of a hazardous waste and that this would be a very serious offense. You indicated that employees had been warned and they would be reminded again that burning of wire is not permissible.

Other Information

The division has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage.

You can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm>

Should you have any questions regarding this letter, please contact me at (330) 963-1165.

Sincerely,



Neil J. Wasilk
Environmental Specialist
Division of Hazardous Waste Management

NJW:ddw

Enclosure

cc: Jeff Clark, City of Cleveland, Building Department
ec: Nyall McKenna, DHWM, NEDO
Ed D'Amato, DHWM, NEDO
Harry Sarvis, DHWM, CO
Dan Bogoevski, DSW, NEDO

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your facility from its obligation to comply with all applicable regulations.



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

For Ohio EPA use only

E-mail this completed form to kristina.durnell@epa.state.oh.us
 or mail it to Kristina Durnell, Central Office

Site EPA ID No. Site Name Site Location Information Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html	EPA ID Number: OHD 007 832 827 Name: JD Services Website: (Optional) Street Address: 16100 S. Waterloo Road City, Town, or Village: Cleveland County Name: Cuyahoga State: OH Zip Code: 44110 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"/>
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: James Phone Number: 216-481-2293 E-Mail Address: Fax Number: Street or P.O. Box: P.O. Box 93823 City, Town or Village: Cleveland State: OH MI: Last Name: Dupre Phone Number Extension: Fax Number Extension: Zip Code: 44101
Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Waterloo Properties Date Became Owner (mm/dd/yyyy): Owner Private County District Federal Indian Municipal State Other Type: <input checked="" type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: City, Town or Village: State: Name of Site's Operator: Same as above Date Became Operator (mm/dd/yyyy): Owner Private County District Federal Indian Municipal State Other Type: <input type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: City, Town or Village: State: Owner Phone #: Country: Zip Code: 44105 Operator Phone #: United States Zip Code:

VIOLATIONS CITED? Yes No

TYPE OF HANDLER- A MINIMUM OF ONE BOX MUST BE CHECKED

<input checked="" type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG) <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
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TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)	
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Underground Injection Control Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	

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 if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRA Info source record, you do not need to list them all. 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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Tanks	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Containers	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Additional Facility Representatives: Other Comments: This ID No. previously held by Wahl Moving & Transfer.	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
N. Wasilk, R. Almquist		4-20-10 10:21 a.m.

OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Owner, Operator, or an Authorized Representative	Name and Title (Print)	Date (mm/dd/yyyy)

SIGNATURE NOT REQUIRED

**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"/>
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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 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 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 type="checkbox"/>	No <input checked="" 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 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:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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? <i>PROBABLY BUT NO DATA AVAILABLE</i>	Yes <input 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#?	Yes <input type="checkbox"/>	No <input checked="" 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]	<i>USED OIL GIVEN AWAY. PRESUMABLY NOT TRANSPORTED BY TRANSPORTER WITH E.P. NO.</i>		
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 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 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.

USED OIL INSPECTION CHECKLIST - MARKETERS

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 Used Oil Marketer 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, scrap metal contaminated with used oil or used oil managed in a surface impoundment (i.e., pond).

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: All used oil burned for energy recovery is presumed to be off-specification until all requirements of OAC rule 3745-279-11 have been met.

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).

4.	Does the used oil fuel marketer initiate shipments of off-spec used oil only to a used oil burner that has a U.S. EPA ID# and burns the used oil in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-71]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
5.	Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil meets the specification for used oil fuel under 3745-279-11 keep copies of analyses of the used oil (or other information used to make the determination) for at least three years? [3745-279-72(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
6.	Has the used oil marketer notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-73(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
7.	Does the used oil marketer keep a record of each shipment of off-spec used oil directed to a used oil burner? [3745-279-74(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-74(A)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Does each record include the name and address of the burner who receives the oil? [3745-279-74(A)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-74(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Does each record include the U.S. EPA ID# of the burner? [3745-279-74(A)(4)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
e.	Does each record include the quantity of the used oil shipped? [3745-279-74(A)(5)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
f.	Does each record include the date of shipment? [3745-279-74(A)(6)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
8.	Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil meets the fuel specifications under 3745-279-11 keep a record of each shipment of used oil to an on-spec used oil burner? [3745-279-74(B)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Does each record include the name and address of the facility receiving the shipment? [3745-279-74(B)(1)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
b.	Does each record include quantity of used oil fuel delivered? [3745-279-74(B)(2)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
c.	Does each record include date of shipment or delivery? [3745-279-74(B)(3)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
d.	Does each record include a cross-reference to the record of used oil	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

[Facility Name/Inspection Date]
[ID Number]

	analysis or other information used to make the determination that the used oil meets the specification as required in 3745-279-72(A)? [3745-279-74(B)(4)]	
9.	Are the records described in 3745-279-74(A) and (B) maintained for at least three years? [3745-279-74(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	Before the used oil generator, transporter or processor/re-refiner directs the first shipment of off-spec used oil to a burner, does he obtain a one time written and signed notice from the burner certifying that:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-279-75(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	The burner will burn the off-spec used oil only in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-75(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
11.	Is the certification maintained for at least three years from the date the last shipment of off-spec used oil was shipped to the burner? [3745-279-75(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NO DATA PROVIDED ~~TO~~ ON WHETHER
 OW - SPEC OIL STANDARDS ARE MET.

OP SERVICES

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

CESQG: ≤100Kg. (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: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥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? [3745-52-11] Yes No N/A

GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes No N/A

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 No N/A

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 No N/A
b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes No N/A
c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A
d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

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 No N/A
a. Does the CESQG manage the mixture in accordance with 3745-279-21? Yes No N/A

NO HAZARDOUS WASTES WERE OBSERVED.

