



State of Ohio Environmental Protection Agency

Northeast District Office



2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

May 2, 2008

RE: JMW TRUCKING SERVICES
STARK COUNTY *DHR 000-020-594*
~~NON-NOTIFIER~~
NOTICE OF VIOLATION (NOV)
COMPLAINT NUMBER 7087

John Slutz
President
JMW Trucking Services, Welding and Manufacturing, Inc.
512 45th Street, SW
Canton, OH 44706

Dear Mr. Slutz:

On April 15, 2008, I, as a representative of the Ohio EPA Division of Hazardous Waste Management (DHWM), conducted an inspection of JMW Trucking Services, Welding and Manufacturing, Inc. (JMW), located at 512 45th Street, S.W., Canton, Ohio, for compliance with Ohio's hazardous waste and used oil regulations. You represented JMW during the inspection.

This inspection was in response to a complaint received by Ohio EPA DHWM requesting that DHWM investigate used oil management practices and parts cleaner sludge management practices at JMW.

The facility conducts the following activities at the site:

- Operates a trucking company
- Conducts maintenance on its trucks
- Operates a weld shop to fabricate equipment (e.g., tarping machines)

Used oils and wastes generated by the facility include:

- Used oil from vehicle oil changes for its trucks;
- Sludge from parts washer;
- Used anti-freeze;
- Used cutting fluid; and
- Used fluorescent bulbs.

Parts washer solvent is mineral spirits, which per the MSDS has a flash of 105 F. Facility had no data on flash point of the sludge, so I assumed that it is 105 F, (i.e., same as fresh mineral spirits) and so is a hazardous waste. The facility may challenge this classification as hazardous waste if it acquires data that flash is greater than 140 F.

The inspection included reviews of facility records, interviews with facility personnel and a facility walk-through. The results of these reviews are discussed below.

JMW is a conditionally exempt small quantity generator (CESQG) of hazardous waste and my inspection was for compliance with the CESQG and used oil requirements.

Based on the facility documents reviewed and observations made during the facility walk-through, Ohio EPA has determined that JMW has violated the following state hazardous waste and used oil regulations.

1. OAC Rule 3745-52-11 Hazardous waste determination by waste generator

OAC Rule 3745-52-11 requires a generator of waste to determine if it is hazardous waste.

The facility generates used fluorescent bulbs. The facility reported that used fluorescent bulbs are disposed with the trash. The facility did not provide evidence during the inspection that it had evaluated its used fluorescent bulbs to determine if they are hazardous wastes.

To return to compliance the facility must:

- Either manage the used fluorescent bulbs as hazardous or universal waste or obtain information to document that they are not hazardous waste.
- Develop a plan to manage used fluorescent bulbs as either hazardous waste or universal waste. Submit a copy of the plan to this office. (Most generators of used fluorescent bulbs elect to manage them as universal waste since this entails a lower regulatory burden.)
- Submit photos to this office of the container(s) that will be used to accumulate used bulbs. The appropriate marking or labels on the container must be visible on the photos.
- If you elect to manage as universal waste, train appropriate personnel with universal waste management duties on applicable universal waste requirements.
- Submit copies of training documentation to this office.

Here is a link to an Ohio EPA fact sheet on used fluorescent bulbs that you might wish to review when responding to this violation:

http://www.epa.state.oh.us/dhwm/pdf/Universal_Waste_Rules_for_Handlers_of_Lamps.pdf

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

A partially full drum of used oil in the maintenance garage was labeled "Waste Oil" instead of "Used Oil". A storage tank located outdoors (estimated capacity 3,000 to 5,000 gallons) and two 250-gallon tanks located indoors were labeled "Waste Oil" instead of "Used Oil".

To return to compliance the facility must:

- Clearly mark or label all containers and tanks used to store used oil with the words "Used Oil."
- Submit photos of all containers and tanks used to store used oil with labels or markings of the words "Used Oil" clearly visible.

**3. OAC Rule 3745-279-72(A) Analysis of used oil fuel.
OAC Rule 3745-279-72 (B) Record Retention.
OAC Rule 3745-279-74(B) Used Oil Marketer Must Maintain Records of On-Spec Used Oil Delivery**

OAC Rule 3745-279-72(A) requires that prior to managing used oil as "on-spec", one of the parties in the chain of custody (e.g., a generator, transporter, processor/re-refiner, or burner) must determine that the used oil meets the "on-spec" fuel specifications of OAC Rule 3745-279-11 by performing analyses or obtaining copies of analyses or other information documenting that the used oil fuel meets the specifications.

OAC Rule 3745-279-72(B) requires that the generator, transporter, processor/re-refiner, or burner, who first claims that used oil meets the "on-spec" fuel specifications keep copies of analyses of the used oil (or other information used to make the determination) for three years.

OAC Rule 3745-279-74(B) requires that a generator, transporter, processor/re-refiner, or burner who first claims that used oil that is to be burned for energy recovery meets on-spec fuel specifications must keep a record of the information identified in the rule for each shipment of used oil to an on-specification used oil burner.

In addition to burning used oil generated by the facility for space heating, JMW also transports used oil from Countywide Landfill to provide additional used oil for building space heating. The facility estimates that it gets about 500 gallons per quarter of used oil from Countywide. The facility does not have any data on whether used oil from Countywide is on-spec used oil, because apparently no party has met the requirements of OAC Rule 3745-279-72. The facility's knowledge is apparently limited to reports that the used oil is from engine oil changes of heavy equipment at Countywide.

The facility may burn any used oil that it generates on-site without determining whether it is on-spec used oil. All used oil acquired from another business for burning in the facility space heaters must be on-spec used oil, as JMW does not meet the regulatory requirements to burn "off spec" used oil. The determination that the used oil from Countywide is on-spec should be made prior to the oil leaving Countywide, so as to minimize the used oil transporter and marketer rules that JMW must comply with. Either JMW or Countywide may make the determination that the used oil from Countywide is on-spec used oil.

To return to compliance the facility must:

- Develop a plan to determine that used oil from Countywide that is to be burned for JMW space heating is on-spec used oil by performing analyses or obtaining copies of analyses or other information documenting that the used oil fuel meets the specifications. One way this could be done is by an initial analysis for the parameters in OAC Rule 3745-279-11, followed by annual verification that the process generating the waste has not changed and a follow-up confirmatory sample every 3 to 5 years.
- Develop a plan to comply with the recordkeeping rules of OAC Rule 3745-279-72(B) and OAC Rule 3745-279-74(B).
- Submit a copy of the above plan and the analytical results of the first sampling and analysis event to this office.

JMW should be aware that if the data should indicate that the used oil from Countywide is not "on-spec" used oil, JMW may be the subject of additional citations for non-compliance with the used oil rule requirements for transportation, marketing and burning of "off-spec" used oil.

4. OAC Rule 3745-279-73(A) Notification By A Used Oil Fuel Marketer.

Under the used oil rules, the party who first claims that used oil meets the "on-spec" specifications is a "marketer" of used oil. OAC Rule 3745-279-73(A) requires that used oil fuel marketers who have not previously obtained an EPA identification number (i.e., not previously notified Ohio EPA or U.S. EPA of regulated waste activity) must obtain a U.S. EPA identification number.

When JMW is the party who first claims that used oil meets the "on-spec" specifications, JMW is a "marketer" of used oil. JMW does not have an EPA I.D. number. Pursuant to OAC Rule 3745-279-73(A) JMW must obtain an EPA I.D. number.

OAC Rule 3745-279-73 (B) specifies how a marketer who has not received a U.S. EPA identification number may obtain one. This is done by notifying the Ohio EPA of their used oil activity by submitting either:

- (1) A completed Ohio EPA form EPA9029 (to obtain this form, call Ohio EPA's division of hazardous waste management at 614-644-2917); or
- (2) A letter requesting a U.S. EPA identification number. Call Ohio EPA's division of hazardous waste management at 614-644-2917 to determine where to send a letter requesting a U.S. EPA identification number. The letter should include the following information:
 - (a) Marketer company name;
 - (b) Mailing address of the marketer;
 - (c) Name of the owner of the marketer;
 - (d) Name and telephone number of the marketer point of contact; and
 - (e) Type of used oil activity (e.g., generator directing shipments of off specification used oil to a burner).

Under the used oil rules, a marketer must also be a generator, transporter, processor/refiner, or burner of off-spec used oil. JMW's activities apparently are closest to those of a transporter.

To return to compliance the facility must:

- Notify Ohio EPA of its used oil activity as specified in OAC Rule 3745-279-73 (B); and,
- Submit a duplicate copy of the above notification to this office.

Here are links to some Ohio EPA used oil fact sheets that you might wish to review prior to responding to violations 3 and 4:

http://www.epa.state.oh.us/dhwm/pdf/Used_Oil_Transporters_Guidance.pdf

http://www.epa.state.oh.us/dhwm/pdf/Used_Oil_Generators_Guidance.pdf

All requested documentation is to be submitted to this office within 45 days of the date of this letter.

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

Concerns

SPCC Plans

Per OAC 3745-279-22, generators of used oil that store used oil in tanks are subject to all applicable spill prevention, control and countermeasures (SPCC) requirements. I contacted Bruce Miller who is the Ohio EPA NEDO coordinator for SPCC requirements. Mr. Miller informed me that, based on the information obtained during the inspection, JMW is subject to the SPCC requirements. JMW is requested to work with Mr. Miller to ensure that the facility is in compliance with the SPCC rules.

JMW TRUCKING SERVICES

MAY 2, 2008

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Other Information

A list of Ohio EPA DHWM guidance documents can be found at the following Internet site: <http://www.epa.state.oh.us/dhwm/guidancedocuments.html>. You can find copies of Ohio's hazardous waste laws and regulations at our web page at: <http://www.epa.state.oh.us/dhwm/Law&Regs.html>.

The Division of Hazardous 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://www.epa.state.oh.us/dhwm/listserv.html>.

The OEPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes and pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image through pollution prevention. More information about pollution prevention can be found on our website at <http://www.epa.state.oh.us/ocapp/ocapp.html>.

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: Natalie Oryshkewych, Ohio EPA, DHWM, NEDO
ec: Bruce Miller, Ohio EPA, DERR, NEDO
Ed D'Amato, DHWM, 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.





State of Ohio Environmental Protection Agency

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

August 21, 2008

RE: JMW TRUCKING SERVICES
STARK COUNTY
OHR 000 020 594
RETURN TO COMPLIANCE
COMPLAINT NUMBER 7087

John Slutz, President
JMW Trucking Services, Welding and Manufacturing, Inc.
512 45th Street SW
Canton, OH 44706

Dear Mr. Slutz:

Thank you for Robert Liston's correspondence dated July 29, 2008 and received on July 30, 2008, responding to Ohio EPA's NOV letter dated May 2, 2008.

JMW Trucking Services submitted documentation including: used fluorescent bulb recycling procedures, photos of tanks labeled "Used Oil", determination that used oil from Countywide is 'on-spec'; procedures for managing used oil from Countywide and an application for EPA ID number.

My review of this documentation indicates JMW Trucking Services has adequately demonstrated abatement of the violations from the April 15, 2008 inspection cited in my letter of May 2, 2008, specifically:

1. OAC Rule 3745-52-11 Hazardous waste determination by waste generator
2. OAC Rule 3745-279-22(C)(1) Used oil containers and tanks must be labeled with the words "Used Oil".
3. OAC Rule 3745-279-72(A) Analysis of used oil fuel.
OAC Rule 3745-279-72 (B) Record Retention.
OAC Rule 3745-279-74(B) Used Oil Marketer Must Maintain Records of On-Spec Used Oil Delivery
4. OAC Rule 3745-279-73(A) Notification By A Used Oil Fuel Marketer.

I have one comment on JMW Trucking Services responses. You should be aware that it is not necessary to submit future analysis reports on Countywide Oil to Ohio EPA. Rather JMW Trucking Services should keep these data on file as part of its used oil marketer records and should be able to provide them to Ohio EPA, if Ohio EPA should conduct a future inspection.

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

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
tammy.mcconnell@epa.state.oh.us or mail it to Tammy
McCConnell, Central Office

2. Site EPA ID No.	EPA ID Number: NON-NOTIFIER								
3. Site Name	Name: JMW Trucking Services, Welding and Manufacturing, Inc..					Website: (Optional)			
4. Site Location Information	Street Address: 512 45th Street, S.W.d								
	City, Town, or Village: Canton					State: OH			
	County Name: Stark					Zip Code: 44706			
5. Site Land Type (check only one)	Private <input checked="" type="checkbox"/>	County <input checked="" type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input checked="" type="checkbox"/>	Other <input type="checkbox"/>	
6. NAICS code(s) www.census.gov/epcd/www/naics.html									
7. Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address.	First Name: John			MI:	Last Name: Slutz				
	Phone Number: 330-484-2428				Phone Number Extension:				
	E-Mail Address:								
	Fax Number: 330-484-2021				Fax Number Extension:				
	Street or P.O. Box:								
	City, Town or Village:								
	State:				Country:		Zip Code:		
	Name of Site's Legal Owner:								
Date Became Owner (mm/dd/yyyy):									
8. 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	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"/>
	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):				
	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"/>
	Street or P.O. Box:								
	City, Town or Village:				Operator Phone #:				
State:				Country:		Zip Code:			
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Not Regulated				<input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste					
<input type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)									
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Underground Injection Control Facility									

10B. 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"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	
<input type="checkbox"/> Destination Facility for Universal Waste			
Check all boxes below that apply for each of the three types of facilities above:		10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
	Managed	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input type="checkbox"/>	<input checked="" type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
11. 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 RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.			
Same Annual report			
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.			
Announced	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives: John Slutz
Tanks	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Other Comments:
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Neil Wasilk			4/15/2008 8:10 a.m.
14. 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)

PROCESS DISCRIPTION
and
Hazardous Waste Compliance Inspection Notes

Facility:

JMW Trucking Services Welding and Manufacturing, Inc.
512 45th Street, S.W.
Canton, OH 44706

Inspector: N. Wasilk

Arrived at 8:10 a.m. on 4-15-08.

(This was a scheduled time since when I arrived unannounced at 2:05 p.m. on 4-8-08, no management personnel were on-site or were able to return to the site that day.)

Facility contact during the inspection was John Slutz (President).

Opening Meeting

Informed facility that OEPA DHWM had received a complaint from Mr. Ron Fodo requesting that DHWM follow-up on some issues regarding used oil and parts cleaner sludge that were not resolved during Mr. Fodo's 2-21-08 complaint inspection.

Current owners purchased the facility in 1989 from a distant relative. Facility covers is approximately 8 acres. Offices, maintenance garage and welding shops are in one large building.

Facility conducts following major activities at the site:

- Operates a trucking company
- Conducts maintenance on its trucks
- Operates a weld shop to fabricate equipment (e.g., tarping machines)

Reportedly the facility does not conduct any painting activities. No painting operations were observed.

Facility reports that used fluorescent bulbs are placed in the trash. No waste evaluation documentation was available for the used fluorescent bulbs.

Plant Walk Through

Weld shop.

Tapping oil is used to lubricate bit on large drill press. Oil that is lost via spatter is reportedly collected with floor dry and placed in trash.

Truck maintenance garage

Facility conducts vehicle oil changes for its trucks in the truck maintenance garage. To drain oil, truck is driven over an oil change pit. Mechanic stands in the pit to remove oil from vehicle. Used oil is drained from the vehicle into a large pan, which is then emptied into a pail that is emptied into a 55-gallon drum. The 55-gallon drum was labeled "waste oil" instead of "used oil". Facility reported that it drained oil filters and then placed into trash dumpster.

Some ground water infiltrates into the pit change pit. Reportedly infiltrated water and any oil in the pit is absorbed with oil dry and placed into facility trash. Facility reportedly is discussing with Canton city sewer district whether this water could be discharged to their sewers, perhaps after processing in an oil/water separator.

A "System One" brand parts washer is located in the truck maintenance garage. The parts washer is a self-contained recycling parts washer, apparently with an internal distillation unit. Solvent is mineral spirits, which per the MSDS has a flash of 105 F. Parts washer has a heating system that separates oil and solids from solvent. Oil and solids are concentrated into the "sludge" stream that is drained from the parts washer approximately weekly. Facility reported that the sludge from the parts washer is placed into a tank along with various other liquids that are recycled as "waste oil" through Akron-Canton Waste Oil Co. Estimated rate of generation of parts cleaner sludge is one gallon per week, which is about 35 pounds per month. Facility has no data on flash point of the sludge, so I assumed that it is 105 F, (i.e., same as fresh mineral spirits) and so assumed it is a hazardous waste. Facility could challenge this classification as hazardous waste if facility acquires data that flash is greater than 140 F.

Break and Shear Room

Used cutting fluid is generated and reportedly is placed in the "waste oil" tanks for shipment offsite.

Outdoors

An aboveground storage tank is located just outside the building. Facility believes tank capacity is in the 3,000 to 5,000 gallons range. Tank is in a rolloff box that provides secondary containment. Tank is used for storage of used oil for building heating. The tank was labeled "waste oil" instead of "used oil".

In addition to used oil generated by the facility, facility also transports used oil from Countywide landfill to provide additional used oil for building heating. Facility estimates that it gets about

500 gallons per quarter of used oil from Countywide. Facility does not have any data on whether used oil from Countywide is on-spec used oil, but reports that the oil is from oil changes of heavy equipment at Countywide.

Because of tank size advised facility that an SPCC Plan is probably required. Facility was not familiar with SPCC Plan requirements.

Area that is outdoors and behind building contains equipment that is no longer usable, scrap metal, etc. A creek runs through the property, mostly along the south edge of the truck parking lot.

A 250-gallon tank labeled "Used Oil" in a containment box is located outdoors. This is the tank in which reportedly parts cleaner sludge, used anti-freeze, used cutting oils, etc are placed and stored until pick-up by Akron-Canton Waste Oil.

Un-named room

Two 250-gallon tanks are in this room. These tank hold used oil after it is filtered. Used oil is pumped from these tanks to building space heaters. The tanks were labeled "waste oil" instead of "used oil".

Records review.

Facility provided receipts from pick-ups by Akron-Canton Waste Oil that indicate monthly pickups of used oil/anti-freeze/parts cleaner sludge mixture in 2008.

Departed facility at about 10:40 a.m.



MW TRUCKING

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 USED FLUORESCENT BULBS NOT EVALUATED

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
LIQUID HAZ. WASTE FROM PARTS WASHED PHILADELPHIA USA D.O.C.

TREATMENT OF HAZARDOUS WASTE NOT TREATED

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.

REMARKS



JM TRUCKING
USED OIL INSPECTION CHECKLIST (Long Version)

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-oil 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#

*BURNS OWN OIL AND
USED OIL FROM COUNTRY
W/RR LANDFILL*

b. Is the heater designed to have a maximum capacity of not more than 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 a 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#

USED FLUORESCENT LAMPS NOT EVALUATED

REMARKS

USED OIL TRANSPORTER AND TRANSFER FACILITIES

16. Does the used oil transporter process used oil? [3745-279-41(A)] If so: Yes ___ No ___ N/A ___ RMK#
- Is the used oil transporter in compliance with the requirements for processors/re-refiners in 3745-279-50 to 3745-279-59 (except as provided in 3745-279-41(B) and (C))? [3745-279-41(A)] Yes ___ No N/A ___ RMK#
17. Has the used oil transporter notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-42(A)] Yes ___ No N/A ___ RMK# ___
18. Has the used oil transporter delivered all used oil to:
- a. Another used oil transporter that has a U.S. EPA ID#? [3745-279-43(A)(1)] Yes ___ No N/A ___ RMK#
 - b. A used oil processing/re-refining facility that has a U.S. EPA ID#? [3745-279-43(A)(2)] Yes ___ No N/A ___ RMK#
 - c. An off-spec used oil burning facility that has a U.S. EPA ID#? [3745-279-43(A)(3)] Yes ___ No N/A ___ RMK#
 - d. An on-spec used oil burning facility? [3745-279-43(A)(4)] Yes ___ No N/A ___ RMK#
19. Has the used oil transporter complied with all applicable USDOT regulations (49 CFR 171 to 180)? [3745-279-43(B)] Yes ___ No N/A ___ RMK#
20. Has the used oil transporter had a discharge of used oil? If so: Yes ___ No ___ N/A ___ RMK#
- Did they take the appropriate action as outlined in 3745-279-43(C)? Yes ___ No N/A ___ RMK#
21. Has the used oil transporter determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? [3745-279-44(A)] Yes ___ No N/A ___ RMK#
22. Does the transporter retain all records of analyses and information used to comply with 3745-279-44 for at least three years? [3745-279-44(D)] Yes ___ No N/A ___ RMK#
23. Does the owner/operator of a used oil transfer facility:
- a. Stored used oil in tanks, containers, or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-45(B)] Yes ___ No N/A ___ RMK#

b. Stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-45(C)]

Yes No N/A RMK#

c. Provide secondary containment for containers used to store used oil as required by 3745-279-45(D)? [3745-279-45(D)]

Yes No N/A RMK#

d. Provide secondary containment for existing aboveground tanks required by 3745-279-45(E)? [3745-279-45(E)]

Yes No N/A RMK#

e. Provide secondary containment for new aboveground tanks as required by 3745-279-45(F)? [3745-279-45(F)]

Yes No N/A RMK#

f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-45(G)]

Yes No N/A RMK#

g. Upon detection of a release of used oil: [3745-279-45(H)]

i. Stopped the release?

Yes No N/A RMK#

ii. Contained the release?

Yes No N/A RMK#

iii. Cleaned up and managed the used oil and other materials?

Yes No N/A RMK#

iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary?

Yes No N/A RMK#

24. Does the used oil transporter keep a record of each shipment of used oil? [3745-279-46(A)]

Yes No N/A RMK#

a. Does each record include the name and address of the generator, transporter or processor/re-refiner who provides the used oil for transport? [3745-279-46(A)(1)]

Yes No N/A RMK#

b. Does each record include the U.S. EPA ID# of the generator, transporter or processor/re-refiner (if applicable) that provides the used oil for transport? [3745-279-46(A)(2)]

Yes No N/A RMK#

c. Does each record include the quantity of used oil accepted? [3745-2679-46(A)(3)]

Yes No N/A RMK#

- d. Does each record include the date of acceptance? [3745-279-46(A)(4)] Yes No N/A RMK#
 - e. Does each record include the signature of a representative of the generator, transporter, processor/re-refiner that provided the used oil for transport? [3745-279-46(A)(5)] Yes No N/A RMK#
 - 25. Does the used oil transporter keep a record of each shipment of used oil that is delivered to another used oil transporter, burner, processor/re-refiner, or disposal facility? [3745-279-46(B)] Yes No N/A RMK#
 - a. Does each record include the name and address of the receiving facility or transporter? [3745-279-46(B)(1)] Yes No N/A RMK#
 - b. Does each record include the U.S. EPA ID# of the receiving facility or transporter? [3745-279-46(B)(2)] Yes No N/A RMK#
 - c. Does each record include the quantity of used oil delivered? [3745-279-46(B)(3)] Yes No N/A RMK#
 - d. Does each record include the date delivered? [3745-279-46] Yes No N/A RMK#
 - e. Does each record include the signature of a representative of the receiving facility or transporter (intermediate rail transporters are not required to sign a record of delivery)? [3745-279-46(B)(5)] Yes No N/A RMK#
 - 26. Does the used oil transporter who exports used oil to a foreign country comply with 3745-279-46(B)(1) to (B)(4)? [3745-279-46(C)] Yes No N/A RMK#
 - 27. Does the used oil transporter retain all records required under 3745-279-46 for at least three years? [3745-279-46(D)] Yes No N/A RMK#
 - 28. Does the used oil transporter generate residues from the storage or transportation of used oil? Yes No N/A RMK#
- If so, are they managed as specified in 3745-279-10(E)? [3745-279-47] Yes No N/A RMK#

FACILITY TRANSPORTS USED OIL THOUGHT TO BE ON-SPEC FROM REMARKS COUNTYWIDE LANDFILL TO FACILITY FOR BURNING FOR SPACE HEATING. NO DOCUMENTATION THAT OIL IS ON-SPEC.

USED OIL STANDARDS FOR PROCESSORS AND RE-REFINERS

NOT A PROCESSOR OR RE-REFINER

29. Has the used oil processor and/or re-refiner notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-51(A)] Yes ___ No N/A ___ RMK# ___
30. Does the owner/operator of a used oil processing or re-refining facility comply with the following:
- a. Is the facility maintained and operated to minimize the possibility of fire, explosion, or release of used oil? [3745-279-52(A)(1)] Yes ___ No N/A ___ RMK# ___
 - b. Is the facility equipped with the equipment in 3745-279-52(A)(2), if necessary? Yes ___ No N/A ___ RMK# ___
 - c. Are all communication systems, alarm systems, fire protection equipment, spill control equipment, and decontamination equipment tested and maintained as required? [3745-279-52(A)(3)] Yes ___ No N/A ___ RMK# ___
 - d. Is there access to communication or alarm system(s)? [3745-279-52(A)(4)] Yes ___ No N/A ___ RMK# ___
 - e. Is the required aisle space being maintained? [3745-279-52(A)(5)] Yes ___ No N/A ___ RMK# ___
 - f. Are arrangements maintained with local authorities? [3745-279-52(A)(6)] Yes ___ No N/A ___ RMK# ___
31. Has the owner/operator of a used oil processing and re-refining facility complied with the following requirements:
- a. Has a contingency plan been developed? [3745-279-52(B)(1)] Yes ___ No N/A ___ RMK# ___
 - b. Does the contingency plan contain the requirements of 3745-279-52(B)(2)? Yes ___ No N/A ___ RMK# ___
 - c. Have copies and revisions been maintained and submitted to all local authorities? [3745-279-52(B)(3)] Yes ___ No N/A ___ RMK# ___
 - d. Is the contingency plan reviewed and amended whenever one of the events in 3745-279-52(B)(4) occurs? Yes ___ No N/A ___ RMK# ___
 - e. Is an emergency coordinator on the premises or on call at all times to meet the requirements of 3745-279-52(B)(5) and (6)? Yes ___ No N/A ___ RMK# ___

32. Does the used oil processor/re-refiner determine whether the total halogen content of the used oil being managed at the facility is above or below 1000 ppm? [3745-279-53(A)] Yes ___ No N/A ___ RMK# ___
33. Does/has the used oil processor/re-refiner:
- a. Only store used oil in tanks, containers or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-54(A)] Yes ___ No N/A ___ RMK# ___
- b. Only store used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-54(B)] Yes ___ No N/A ___ RMK# ___
- c. Provide secondary containment for containers as required by 3745-279-54(C)? Yes ___ No N/A ___ RMK# ___
- d. Provide secondary containment for existing aboveground tanks as required by 3745-279-54(D)? Yes ___ No N/A ___ RMK# ___
- e. Provide secondary containment for new aboveground tanks as required by 3745-279-54(E)? Yes ___ No N/A ___ RMK# ___
- f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil" [3745-279-54(F)] Yes ___ No N/A ___ RMK# ___
- g. Upon detection of a release of used oil, done the following in accordance with 3745-279-54(G):
- i. Stopped the release? Yes ___ No N/A ___ RMK# ___
- ii. Contained the release? Yes ___ No N/A ___ RMK# ___
- iii. Cleaned up and managed the used oil and other materials? Yes ___ No N/A ___ RMK# ___
- iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A ___ RMK# ___
- h. Performed closure of aboveground tanks and containers in accordance with 3745-279-54(H)? Yes ___ No N/A ___ RMK# ___

34. Has the owner/operator of the used oil processing/re-refining facility developed, kept on-site, and followed a written waste analysis plan which meets the requirements in 3745-279-53 and, if applicable 3745-279-72? [3745-279-55] Yes No N/A RMK# _____
35. Does the used oil processor/re-refiner keep a record of each shipment of used oil accepted for processing/re-refining? [3745-279-56(A)] Yes No N/A RMK# _____
- a. Does each record include the name and address of the transporter who delivered the used oil to the processor? [3745-279-56(A)(1)] Yes No N/A RMK# _____
- b. Does each record include the name and address of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(2)] Yes No N/A RMK# _____
- c. Does each record include the U.S. EPA ID # of the transporter who delivered the used oil to the processor/re-refiner? [3745-279-56(A)(3)] Yes No N/A RMK# _____
- d. Does each record include the U.S. EPA ID # (if applicable) of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(4)] Yes No N/A RMK# _____
- e. Does each record include the quantity of used oil accepted? [3745-279-56(A)(5)] Yes No N/A RMK# _____
- f. Does each record include the date of acceptance? [3745-279-56(A)(6)] Yes No N/A RMK# _____
36. Does the used oil processor/re-refiner keep a record of each shipment of used oil that is shipped to a used oil burner, processor/re-refiner, or disposal facility? [3745-279-56(B)] Yes No N/A RMK# _____
- a. Does each record include the name and address of the transporter who delivers the used oil to the burner, processor/re-refiner or disposal facility [3745-279-56(B)(1)] Yes No N/A RMK# _____
- b. Does each record include the name and address of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(2)] Yes No N/A RMK# _____

- c. Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner, processor/re-refiner or disposal facility? [3745-279-56(B)(3)] Yes ___ No N/A ___ RMK# ___
- d. Does each record include the U.S. EPA ID# of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(4)] Yes ___ No N/A ___ RMK# ___
- e. Does each record include the quantity of used oil shipped? [3745-279-56-(B)(5)] Yes ___ No N/A ___ RMK# ___
- f. Does each record include the date of shipment? [3745-279-56(B)(6)] Yes ___ No N/A ___ RMK# ___
37. Does the used oil processor/re-refiner retain all records required under 3745-279-56 for at least three years? [3745-279-56(C)] Yes ___ No N/A ___ RMK# ___
38. Does the owner/operator keep an operating record at the facility? [3745-279-57(A)(1)] Yes ___ No N/A ___ RMK# ___
- a. Does the operating record include records and results of used oil analysis performed as described in the analysis plan required under 3745-279-55? [3745-279-57(A)(2)(a)] Yes ___ No N/A ___ RMK# ___
- b. Are summary reports and details of all incidents that require implementation of the contingency plan as specified in 3745-279-52(B) maintained in the operating record? [3745-279-57(A)(2)(b)] Yes ___ No N/A ___ RMK# ___
39. Does the used oil processor/re-refiner report to the director in the form of a letter, on a biennial basis by March 1, the following information:
- a. The U.S. EPA ID#, name and address of the processor/re-refiner? [3745-279-57(B)(1)] Yes ___ No N/A ___ RMK# ___
- b. The calendar year covered by the report? [3745-279-57(B)] Yes ___ No N/A ___ RMK# ___
- c. The quantities of used oil accepted for processing/re-refining and the manner in which the used oil is processed/re-refined, including the specific processes employed? [3745-279-57(B)] Yes ___ No N/A ___ RMK# ___
40. Does the used oil processor/re-refiner, who initiates a shipment of used oil off-site, use a used oil transporter that has a U.S. EPA ID#? [3745-279-58] Yes ___ No N/A ___ RMK# ___

41. Does the used oil processor/re-refiner generate residues from the storage, processing or re-refining of used oil? [3745-279-59]

Yes ___ No ___ N/A ___ RMK# ___

If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-59]

Yes ___ No N/A RMK# ___

REMARKS

STANDARDS FOR USED OIL BURNERS WHO BURN OFF-SPEC USED OIL FOR ENERGY RECOVERY

42. Is off-spec used oil fuel burned for energy recovery only in industrial furnaces identified in 3745-50-10, or boilers as defined in 3745-50-10 and identified in 3745-279-61(A)(2), or hazardous waste incinerators? [3745-279-61(A)]

Yes ___ No N/A ___ RMK#

43. Does the used oil burner process used oil? [3745-279-61(B)]

Yes ___ No ___ N/A ___ RMK#

If so, have they complied with the requirements for processors in 3745-279-50 to 3745-279-59? [3745-279-61(B)]

Yes ___ No N/A ___ RMK#

44. Has the used oil burner notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-62(A)]

Yes ___ No N/A ___ RMK#

45. Does the used oil burner determine whether the total halogen content of the used oil being managed at the facility is above or below 1000 ppm? [3745-279-63(A)]

Yes ___ No N/A ___ RMK#

46. Does the used oil burner retain records of all analyses conducted or information used to comply with 3745-279-63 for at least three years? [3745-279-63(D)]

Yes ___ No N/A ___ RMK#

47. Does the used oil burner:

a. Only store used oil in tanks, containers; or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-64(A)]

Yes ___ No N/A ___ RMK#

b. Only stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-64(B)]

Yes ___ No N/A ___ RMK#

c. Provided secondary containment for containers as required by 3745-279-64(C)?

Yes ___ No N/A ___ RMK#

- d. Provided secondary containment for existing aboveground tanks as required by 3745-279-64(D)? Yes No N/A RMK#
- e. Provided secondary containment for new aboveground tanks as required by 3745-279-64(E)? Yes No N/A RMK#
- f. Labeled all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-64(F)] Yes No N/A RMK#
- g. Upon detection of a release of used oil, done the following in accordance with 3745-279-64(G):
- i. Stopped the release? Yes No N/A RMK#
 - ii. Contained the release? Yes No N/A RMK#
 - iii. Cleaned up and managed the used oil and other materials? Yes No N/A RMK#
 - iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A RMK#
48. Does the used oil burner keep a record of each used oil shipment accepted for burning? [3745-279-65(A)] Yes No N/A RMK#
- a. Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-65(A)(1)] Yes No N/A RMK#
 - b. Does each record include the name and address of the generator or processor/re-refiner who sent the used oil to the burner? [3745-279-65(A)(2)] Yes No N/A RMK#
 - c. Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-65(A)(3)] Yes No N/A RMK#
 - d. Does each record include the U.S. EPA ID# (if applicable) of the generator or processor/re-refiner who sent the used oil to the burner? [3745-279-65(A)(4)] Yes No N/A RMK#
 - e. Does each record include the quantity of the used oil accepted? [3745-279-65(A)(5)] Yes No N/A RMK#
 - f. Does each record include the date of acceptance? [3745-279-65(A)(6)] Yes No N/A RMK#

49. Are the records described in 3745-279-65(A) maintained for at least three years? [3745-279-65(B)]

Yes No N/A RMK#

50. Prior to accepting the first shipment of off-spec used oil fuel from a generator, transporter, or processor/re-refiner, does the used oil fuel burner provide to the generator, transporter, or processor/re-refiner a one-time written and signed notice certifying that:

a. The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-279-66(A)(1)]

Yes No N/A RMK#

b. The burner will burn the used oil only in an industrial furnace or boiler identified in 3745-279-61?

Yes No N/A RMK#

51. Is the certification maintained for at least three years from the date the burner last received a shipment of off-spec used oil from the generator, transporter, or processor/re-refiner? [3745-279-66(B)]

Yes No N/A RMK#

52. Does the used oil burner generate residues from the storage or burning of used oil? [3745-279-67]

Yes No N/A RMK#

If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-67]

Yes No N/A RMK#

REMARKS

SEE TRANSPORTATION SECTION REMARKS

STANDARDS FOR USED OIL MARKETERS

53. Does the used oil fuel marketer initiate shipments of off-spec used oil only to a used oil burner that has an 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 No N/A RMK#

54. 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 No N/A RMK#

55. Has the used oil marketer notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-73(A)]

Yes No N/A RMK#

56. 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 ___ No N/A ___ RMK# ___
- 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 ___ No N/A ___ RMK# ___
- b. Does each record include the name and address of the burner who receives the oil? [3745-279-74(A)(2)] Yes ___ No N/A ___ RMK# ___
- 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 ___ No N/A ___ RMK# ___
- d. Does each record include the U.S. EPA ID# of the burner? [3745-279-74(A)(4)] Yes ___ No N/A ___ RMK# ___
- e. Does each record include the quantity of the used oil shipped? [3745-279-74(A)(5)] Yes ___ No N/A ___ RMK# ___
- f. Does each record include the date of shipment? [3745-279-74(A)(6)] Yes ___ No N/A ___ RMK# ___
57. 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 ___ No N/A ___ RMK# ___
- a. Does each record include the name and address of the facility receiving the shipment? [3745-279-74(B)(1)] Yes ___ No N/A ___ RMK# ___
- b. Does each record include quantity of used oil fuel delivered? [3745-279-74(B)(2)] Yes ___ No N/A ___ RMK# ___
- c. Does each record include date of shipment or delivery? [3745-279-74(B)(3)] Yes ___ No N/A ___ RMK# ___
- d. Does each record include a cross-reference to the record of used oil 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)] Yes ___ No N/A ___ RMK# ___
58. Are the records described in 3745-279-74(A) and (B) maintained for at least three years? [3745-279-74(C)] Yes ___ No N/A ___ RMK# ___

59. 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:

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 ___ No N/A ___ RMK#

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 ___ No N/A ___ RMK#

60. 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 ___ No N/A ___ RMK#

C:\My Documents\OEPA Forms\Inspection\USED OIL.11.2004.fin.wpd

REMARKS

SEE REMARKS AT END OF TRANSPORTATION SECTION.