



State of Ohio Environmental Protection Agency

Northeast District Office

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

May 11, 2010

Mr. Dale Sirl, Sr.
Sirl's Automotive, Inc.
7541 York Road
Parma, OH 44130

**RE: SIRL'S AUTOMOTIVE, INC., OHR000017129, CUYAHOGA COUNTY
COMPLIANCE EVALUATION INSPECTION, CESQG, NOTICE OF VIOLATION**

Dear Mr. Sirl:

On April 23, 2010, Ohio Environmental Protection Agency (EPA), represented by Tom Roth and me, conducted an inspection at Sirl's Automotive, Inc., in Parma, Ohio. Sirl's was represented by you, the company president, and Doug Wieder, the manager of your auto body shop. The purpose of the inspection was to determine Sirl's Automotive, Inc.'s compliance with Ohio hazardous waste laws and regulations found in Chapters 3734 of the Ohio Revised Code (ORC) and 3745 of the Ohio Administrative Code (OAC).

Based on discussions at the time of the inspection and review of shipping papers you provided, it appears Sirl's Automotive generates less than 220 pounds of non-acute hazardous waste in any calendar month. Consequently, you were inspected for compliance with the conditionally exempt small quantity generator (CESQG) requirements. Enclosed you will find the completed CESQG inspection checklist, a used oil checklist, and a Subtitle C Site Identification/Verification Form. The form was submitted to Ohio EPA's Central Office to update your generator status as Sirl's Automotive was on our small quantity generator list.

The following violations and concerns were noted. In order to correct them, you must send me the requested information within 30 days of the date of this letter.

VIOLATIONS

1. **OAC rule 3745-279-22 (C). Used oil container labeling. Section (1)** of this rule states, "Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words, "Used Oil".

We observed the used oil storage area near the outbuilding adjacent to the car impoundment lot. One 55-gallon metal drum was being used to accumulate used oil. The drum was not identified with the words, "Used Oil". You stated a label had been attached but had fallen off. We left several labels with you, but suggested the words, "Used Oil", be painted on the container if you continue to have a problem with the labels falling off.

Please submit a photograph of the container with the label, and/or words, "Used Oil" clearly visible.

2. **OAC rule 3745-279-22(D). Release of used oil.** This rule states: Upon detection of a release of used oil to the environment....a generator must perform 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 containers prior to...using them for used oil storage.

We observed evidence of used oil releases under and around empty metal drums stacked on pallets along the east side of the outbuilding and on the north side of the building.

Sirl's must clean up the released used oil to beyond the visible extent of contamination. That is, excavate until there is no visible evidence of the release.

If you are certain the stained soil is a result of used oil release **only**, the clean up residue can be managed as a solid waste and sent off-site with your trash. If the soil was contaminated from other sources, i.e., hazardous waste constituents such as ignitable solvents or liquid from a lead acid battery, the clean up residue must be managed in accordance with the hazardous waste rules. If you have any questions with regard to characterizing this waste, do not hesitate to contact me.

Please submit photographs documenting the clean up of the areas of stained soil and explain how the clean up residue was managed.

CONCERNS

- We observed a lead-acid battery on a pallet in the used oil storage area. The concern is leakage of the battery contents onto the ground. To eliminate the potential for leakage, Sirl's may store used batteries on a concrete base or in a containment vessel. If you continue to store batteries on pallets, periodic inspection for leakage could prevent contamination of the ground and the required clean up.
- Sirl's Automotive serves as an impoundment lot for the local police department. The concern is the possibility for release of oil to the ground from the engine block/oil pan of wrecked cars. If a release should occur, Sirl's automotive would be in violation of **OAC rule 3745-279-22(D)**, if the facility fails to clean up the release in a timely manner as described above in #2.

You mentioned plans to dispose of (some/all) the 23 empty metal drums currently stacked along the outbuilding near the used oil storage area. Enclosed is a list of drum reconditioners and recyclers that may help with your plan.

Information Presented During the Inspection:

- Biobased Products Enhance Economic and Environmental Performance
- Ohio EPA Pollution Prevention Opportunities
- Pollution Prevention by Utilizing Green Chemistry

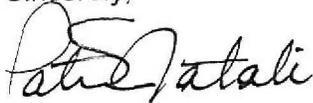
Websites of Interest:

- Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides compliance and pollution prevention assistance on environmental issues (including sources of funding) related to air, land, and water. They can be contacted at 800-329-7518 or at: <http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/ocapp>

- Entrepreneurs for Sustainability is a group that seeks to "build a sustainable regional economy in Northeast Ohio that will create prosperity and total community health." They offer workshops, conferences, a business to business directory and more. Their website is at: <http://www.e4s.org/content/index.asp>
- ENERGY STAR is a government-backed program helping businesses and individuals protect the environment through superior energy efficiency. Their website is at: <http://www.energystar.gov/>
- The Clean Air Resource Center offers help in understanding EPA air quality requirements. In addition, if your business is required to purchase new equipment, they can offer better-cost financing with special tax incentives. Their phone number is 800-225-5051 and website is <http://www.ohioairquality.org/>
- The Division of Hazardous Waste Management 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 at: http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage.
- Ohio Bureau of Workers' Compensation has an OSHA On-Site Consultation service which includes free on-site safety inspections and consultation, safety program assistance, and safety and hygiene training or seminars. More information can be found at: <http://www.ohiobwc.com/employer/programs/safety/SandHOSHAOnSite.asp>
- You can find copies of the regulations and other information on the Division of Hazardous Waste Management web page at <http://epa.ohio.gov/dhwm>.

Thank you for your cooperation with our inspection of Sirl's Automotive. Do not hesitate to contact me, (330) 963-1279, if you have any questions with regard to the violations and/or concerns listed in this letter.

Sincerely,



Patricia Natali
Environmental Specialist
Division of Hazardous Waste Management

PN:ddw
Enclosure

ec: Marlene Kinney, DHWM, NEDO
Natalie Oryshkewych, DHWM, NEDO
Frank Popotnik, DHWM, NEDO
Harry Sarvis, DHWM, CO
Tom Roth, DHWM, NEDO

NOTICE: Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with applicable regulations.

Send to Central Office

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

For Ohio EPA use only

Completed verification forms required to be submitted to CO should be e-mailed to kristina.durnell@epa.state.oh.us.

| | | | | | | | | |
|--|--|---|-----------------------------------|-----------------------------------|----------------------------------|------------------------------------|------------------------------------|--------------------------------|
| Site EPA ID No. | EPA ID Number: <u>OH R000017129</u> | | | | | | | |
| | Site Name | Name: <u>Sirl's Automotive, Inc.</u> Website: (Optional) <u>sirlsauto.com</u> | | | | | | |
| Site Location Information | Street Address: <u>7541 York Rd</u> | | | | | | | |
| | City, Town, or Village: <u>Lorain</u> | State: <u>OH</u> | | | | | | |
| | County Name: <u>Cuyahoga</u> | Zip Code: <u>44130</u> | | | | | | |
| Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html | 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: <u>Dale</u> | | MI: | Last Name: <u>Sirl, Sr</u> | | | | |
| | Title: <u>President</u> | | Phone Number: <u>216 843.9000</u> | | Phone Number Extension: | | | |
| | E-Mail Address: | | Fax Number: | | Fax Number Extension: | | | |
| | Street or P.O. Box: | | City, Town or Village: | | | | | |
| | State: | | Zip Code: | | | | | |
| | Name of Site's Legal Owner: <u>Dale Sirl, Sr</u> | | Date Became Owner (mm/dd/yyyy): | | | | | |
| | Owner Type: | 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"/> |
| Street or P.O. Box: | | City, Town or Village: | | Owner Phone #: | | | | |
| State: | | Country: | | Zip Code: | | | | |
| Name of Site's Operator: <u>Dale Sirl, Sr.</u> | | Date Became Operator (mm/dd/yyyy): | | | | | | |
| Operator Type: | Private <input type="checkbox"/> | County <input type="checkbox"/> | District <input type="checkbox"/> | Federal <input type="checkbox"/> | Indian <input type="checkbox"/> | Municipal <input type="checkbox"/> | State <input type="checkbox"/> | Other <input type="checkbox"/> |
| Street or P.O. Box: | | City, Town or Village: | | Operator Phone #: | | | | |
| State: | | Country: | | Zip Code: | | | | |

VIOLATIONS CITED?

 Yes No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

| | | |
|---|---|---|
| <input type="checkbox"/> Not a HW Generator | <input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 | <input type="checkbox"/> Large Quantity Generator (LQG) |
| | <input type="checkbox"/> Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment. | <input type="checkbox"/> Small Quantity Generator (SQG) |
| | | <input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator |
| | | <input type="checkbox"/> U.S. Importer of Hazardous Waste |
| | | <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator |

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

- | | |
|---|--|
| <input type="checkbox"/> Hazardous Waste Transporter | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace |
| <input type="checkbox"/> Hazardous Waste Transfer Facility | <input type="checkbox"/> Small Quantity On-Site Burner Exemption |
| <input checked="" type="checkbox"/> Treater, <u>Storer</u> or Disposer of Hazardous Waste | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Recycler of Hazardous Waste | <input type="checkbox"/> Underground Injection Control Facility |
| | <input type="checkbox"/> Receives Hazardous Waste from Off-site |

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED)

(CHECK ALL BOXES THAT APPLY)

- | | |
|---|---|
| <input type="checkbox"/> Small Quantity Handler of Universal Waste | <input type="checkbox"/> Destination Facility for Universal Waste |
| <input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more) | |

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

- Batteries
 Pesticides
 Mercury containing equipment
 Lamps

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

- Used Oil Generator
 Used Oil Transporter
 Used Oil Transfer Facility
 Used Oil Processor
 Used Oil Re-refiner
 Off-Specification Used Oil Burner
 Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
 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 or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

D001 + D039

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

Announced Yes No Additional Facility Representatives: *Doug Wieder, Body Shop Manager*
 Tanks Yes No
 Containers Yes No

| | | |
|--------------------------------------|------------------------------|---|
| Name of Inspector(s) | Name of Inspector(s) | Date of Inspection/Time (mm/dd/yyyy) (hh:mm) |
| <i>Patricia Natali - NEDO, DHEWM</i> | <i>Tom Roff, NEDO, DHEWM</i> | <i>04/23/2010</i> |

Comments:

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Sirl's Automotive, Inc. Facility Type: CESQG Date of Inspection: 4/23/10 EPA ID#: OHR000017129

| Waste Generated | | On- or Off-Site Management | | P2 Activities | | |
|---|--|--|--|---|--|--|
| Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc) | Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applicable. | QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area | Type of On-Site Treatment (recycle, wwt, etc) | Name, state, and type of activity occurring at the off-site facility. | Current P2 Activities | |
| 1 | Painting activities (cars and car parts) | Paint guns used require cleaning, see #2 below | Very little actual paint waste; containers are RCRA empty. | N/A | N/A | Optimize paint operations so as to produce no paint waste |
| 2 | Paint guns are cleaned in a gun (paint) cleaner | Solvent used to clean guns is pumped to a distillation unit | Waste solvent pumped to distillation unit is cleaned and transferred back to the paint gun cleaner | distillation | Occasionally generator adds solvent lost through distillation process | Solvent is "used up", no waste solvent generated |
| 3 | Painting and maintenance activities (cars and car parts) | Waste solvent used for cleaning, and degreasing | When deemed "bad", solvent goes into distillation unit connected to the paint gun cleaner; at this point, no waste is generated | distillation | N/A | Solvent that can no longer be used for its primary purpose is added to the distillation unit, no waste solvent generated |
| 4 | Solvent distillation | Still bottoms, "cookie"; D001, generated from distillation unit | Still bottoms accumulated in 55 gal DM in paint room; 30 gallon shipped off site yearly | distillation | Still bottoms picked up by Hukill Chem. Corp., OHD 001926740, on a yearly basis | N/A |
| 5 | Car maintenance | Waste fluids such as gear, hydraulic, and transmission oils and brake fluid | Accumulated in five gal containers in the shop; used oil is transferred to 55 gal DM stored outside until burned or sent off-site for recycling. | Business burns used oil in space heater | Used oil containing brake fluid and other contaminants is shipped off site to Home & Oil for recycling | Burning oil in space heater; generator does not dispose of used oil; generator recycles oil not suitable for burning in the space heater |

| | | | | | | |
|----|--|---------------------------|---|--------------------------------|--|---|
| 6 | Parts cleaner | Spent solvents, D039 | Accumulated in the base of the parts cleaner unit located in the maintenance area of shop | N/A | Safety Kleen, ILD 980613913, removes spent solvents and replaces with new every 6 to 8 weeks | Spent solvents removed and replaced with new from supplier, generator does not dispose of solvent |
| 7 | Car maintenance | Waste antifreeze | Accumulated in 55 gal drum inside building where new antifreeze and oil is stored | N/A | Picked up by Rice Oil and recycled | Recycle antifreeze; generator does not dispose of antifreeze |
| 8 | Maintenance and repair of cars and equipment | Solvent contaminated rags | Dirty rag accumulation area | N/A | Dirty rags are returned to Cintas for cleaning | Reuse of rags after cleaning by supplier; generator does not dispose of rags |
| 9 | Maintenance and repair of cars | Batteries | Accumulated outside on pallets near used oil accumulation area | N/A | Picked up by supplier (Interstate Battery) as part of an exchange program | Generator does not dispose of used or spent batteries |
| 10 | Replacement of fluorescent bulbs | Used lamps | Disposed of as solid waste with regular trash | Used lamps go in regular trash | Solid waste disposal company removes used or spent lamps | Generator provided a fact sheet from Philips describing the bulbs as non-hazardous |

REMARKS-GENERAL INFORMATION

General Process Information:

The company repairs and maintains automobiles; this involves oil changes, maintenance of air conditioners, and regular annual maintenance activities for customers. The company also repairs cars (collision repair) which include painting activities. Sirl's accumulates fluids such as transmission and gear oil, antifreeze, and brake fluid from cars. The majority of used oil is stored and used in a space heater in the automotive repair shop. The company has a paint booth regulated by DAPC. No paint waste is generated; paint guns are cleaned on site with solvents which are reclaimed in a distillation unit. Other solvents are used for thinning paint, degreasing, and in a parts washer. Sirl's provides towing for their customers and maintains a police impoundment lot on the property; we observed numerous cars in a range of conditions, i.e., some were wrecked, some were old, some were new, and some were not wrecked.

Regulatory/Enforcement History (if applicable):

A complaint investigation was conducted on 8/23/02 in response to a complaint (complaint #6191) filed 8/22/02 alleging transmission fluid and water was running on the ground from Sirl's over a sidewalk and into a creek. The investigation found the allegation to be unfounded; however a compliance evaluation inspection was conducted identifying three violations. The NOV, dated 8/29/02, cited OAC rules 3745-52-11, 3745-51-05(G)(3), and 3745-279-22(C); these were abated. There were also two concerns regarding storage activities of waste batteries and waste tires stored outside with water in them. During the 4/23/10 inspection, OEPA observed waste tires stored in a lean to and covered prior to being picked up for recycling.

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.
Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other:

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

NOTE: 1. A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

2. Inspectors can check BUSTR's web-site at https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at:

https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp.

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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

| | | |
|----|---|--|
| 4. | Does the generator mix hazardous waste with used oil? If so, | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

| | | |
|----|--|--|
| 5. | Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|----|--|--|

NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

| | | |
|----|--|--|
| 6. | Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] | Yes <input 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 type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 8. | Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil"? [3745-279-22(C)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 9. | Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Stopped the release? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Contained the release? | Yes <input type="checkbox"/> No <input checked="" 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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

Siri's Automotive
 [Facility Name/Inspection Date]
 OH R000017129 [ID Number]
 Used Oil Checklist for Generators/August 2009
 Inspection date 4/23/10 Page 1 of 2

| ON-SITE BURNING IN SPACE HEATER | | |
|--|--|--|
| 10. | Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: | |
| a. | Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil 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? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Are the combustion gases from heater vented to the ambient air? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <i>NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).</i> | | |
| GENERATOR TRANSPORTATION | | |
| 11. | Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 12. | If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] | |
| a. | Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| <i>NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).</i> | | |
| 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"/> |
| <i>NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.</i> | | |

Siri's Automotive
 [Facility Name/Inspection Date]
 04R000077129 [ID Number]
 Used Oil Checklist for Generators/August 2009
 Page 2 of 2

**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. *100 kg = 22 gal (2.2 gal/lb) or 220 lbs.*

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 <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| b. | Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| c. | Drip pads that meet 3745-69-40 to 3745-69-45? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| d. | Containment building that meets 3745-256-100 to 3745-256-102? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

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

MIX HAZARDOUS WASTE WITH USED OIL

5. Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:

| | | | | |
|----|---|------------------------------|--|------------------------------|
| a. | Does the CESQG manage the mixture in accordance with 3745-279-21? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
|----|---|------------------------------|--|------------------------------|

Sirl's Automotive, Inc / 4/23/10
 [Facility Name/Inspection Date]
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 CESQG/February 2009
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