

**Environmental  
Protection Agency**

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

Re: L.T. Harnett Trucking  
OHR000164905  
Wood County  
Hazardous Waste  
NOV-RTC

August 17, 2012

Mr. Tony Carros  
L.T. Harnett Trucking Inc.  
18487 N. Dixie Highway  
Bowling Green, Ohio 43402

Dear Mr. Carros:

On August 14, 2012, Jesse Donnett and you accompanied Melissa Boyers and me during the Ohio Environmental Protection Agency's (Ohio EPA's) hazardous waste compliance evaluation inspection of your facility, L. T. Harnett Trucking (hereafter referenced as LTHT) located at 18487 North Dixie Highway in Bowling Green, Ohio. Specifically, we inspected your facility to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC), and Chapter 3745 of the Ohio Administrative Code. This letter will explain the violation we found.

LTHT opened in June and is a service shop for diesel trucks. LTHT has a fleet of eight trucks which transport general freight. Wastes generated include used oil and oil filters. No antifreeze or spent lamps have been generated as of yet. LTHT recycles scrap metal, oil filters and will also be using a used oil burner.

At the time of our inspection, you were operating as a non-generator of hazardous waste.

I found the following violation of Ohio's hazardous waste law:

**1. OAC Rule 3745-279-22(C)(1), Used Oil Labeling:**

Containers and tanks that are holding used oil, must be labeled with the words "Used Oil".

LTHT had one container and one tank which were not properly labeled "Used Oil".

**At the time of the inspection, LTHT properly labeled the container and tank with the words "Used Oil". Therefore, this violation is considered abated.**

Ohio EPA has issued an EPA ID number in the past for your address, 18487 North Dixie Highway. I have deactivated this number since you do not generate hazardous waste. LTHT cannot use this number for manifesting hazardous waste shipments. If LTHT wants to use an EPA ID number for manifesting and other hazardous waste, used oil or universal waste activities, you must complete and submit a Notification of Regulated Waste Activity form (EPA Form 9029 (Rev. 11/2002)) to Ohio EPA.

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This form is available on our Web page at <http://www.epa.ohio.gov/dhwm> or LTHT can call the Division of Materials and Waste Management, Central Office, at (614) 644-2977 and we will mail you a copy.

Also, I gave you two fact sheets at the time of our inspection:

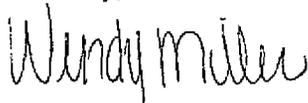
- Universal Waste Rules for Handlers of Lamps (included a lamp/ballast recycler list)
- The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil

You can find copies of the rules and other information on the division's web page at <http://www.epa.ohio.gov/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.ohio.gov/opp>.

The Division of Materials and 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 Web link <http://www.epa.ohio.gov/dhwm> (click on the hazardous waste links and then click on DMWM's Electronic News Service).

If you have any questions, please contact me by telephone at (419)373-3114 or by e-mail at [wendy.miller@epa.ohio.gov](mailto:wendy.miller@epa.ohio.gov).

Sincerely,



Wendy Miller  
Division of Materials and Waste Management

/llr

Enclosures

pc: Cindy Lohrbach, DMWM, NWDO  
Colleen Weaver, DMWM, NWDO (w/original checklist)

ec: Colleen Weaver, DMWM, NWDO  
Wendy Miller, DMWM, NWDO

Send to Central Office <input type="checkbox"/>	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE</b> <b>IDENTIFICATION/VERIFICATION FORM</b>	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to [brad.hauser@epa.state.oh.us](mailto:brad.hauser@epa.state.oh.us).

<b>Site EPA ID No.</b>	EPA ID Number: <b>OHR000164905</b>	
<b>Site Name</b>	Name: <b>L.T.Harnett Trucking</b>	Website: (Optional)
<b>Site Location Information</b>	Street Address: <b>18487 N. Dixie Highway</b>	
	City, Town, or Village: <b>Bowling Green</b>	State: <b>OH</b>
	County Name: <b>Wood</b>	Zip Code: <b>43402</b>
<b>Site Land Type</b> (check only one)	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"/>	
<b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>		

<b>Facility Representative</b>	First Name: <b>Tony</b>	MI:	Last Name: <b>Carros</b>
Additional names can be recorded in number 12	Title: <b>Operations Mgr.</b>		
	Phone Number: <b>419-352-5770</b>	Phone Number Extension:	
	E-Mail Address:		
Only provide address information if it is different than the site address	Fax Number: <b>419-352-4771</b>	Fax Number Extension:	
	Street or P.O. Box:		
	City, Town or Village:		
	State:	Zip Code:	

<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner:		Date Became Owner (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:		Owner Phone #:		
	City, Town or Village:		Country:	Zip Code:	
	State:		Date Became Operator (mm/dd/yyyy):		
	Name of Site's Operator:	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:		Operator Phone #:		
	City, Town or Village:		Country:	Zip Code:	
	State:				

**VIOLATIONS CITED?**  Yes  No

**TYPE OF HANDLER - MARK "X" AS APPROPRIATE**

<input checked="" type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input type="checkbox"/> Short-Term/Temporary 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"/> 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"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Hazardous Waste Transfer Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility
<input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Receives Hazardous Waste from Off-site

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY))	
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES	
<input type="checkbox"/> Batteries	
<input type="checkbox"/> Pesticides	
<input type="checkbox"/> Mercury containing equipment	
<input checked="" type="checkbox"/> Lamps	

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))	
<input checked="" type="checkbox"/> Used Oil Generator	
<input type="checkbox"/> Used Oil Transporter	
<input type="checkbox"/> Used Oil Transfer Facility	
<input type="checkbox"/> Used Oil Processor	
<input type="checkbox"/> Used Oil Re-refiner	
<input type="checkbox"/> Off-Specification Used Oil Burner	
<input type="checkbox"/> Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil	
<input type="checkbox"/> Used Oil Fuel Marketer who first claims the Used Oil meets the specifications	

**Eligible Academic Entities with Laboratories:** Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

<input type="checkbox"/> College or University	
<input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university	
<input type="checkbox"/> Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university	

**Waste Codes for Federally Regulated Hazardous Wastes.** Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. 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	Additional Facility Representatives:
Tanks	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Containers	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Melissa Boyers	Wendy Miller	08/14/2012

**Comments:**  
 Have not had lamps yet, business just started up - they plan to recycle them as universal waste .

**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 checked="" 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 type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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:	
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 that	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	0.5 million BTU per hour?	
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>		
<b>GENERATOR TRANSPORTATION</b>		
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 type="checkbox"/> N/A <input checked="" 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]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).</i>		
<b>COLLECTION CENTERS AND AGGREGATION POINTS</b>		
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.</i>		

RCRA Site Detail

*truck buldy*

Report run on: August 13, 2012 - 10:33 AM

\*\*\* WARNING \*\*\* Sensitive information may be displayed on this report. \*\*\* WARNING \*\*\*

**TRANS TECH LOGISTICS INC**

**OHR000164905**

EPA Region:05 Extract:Y County:WOOD

State District: NW

<b>Universes</b>	Federal Generator:	N	Transporter:	Y	Operating TSD:	---	Active:	Y
	State Generator:	N	Importer:	N	Commercial:	N	EI Indicator (HE / GW):	N / N
	Short Term Generator:	N	Mixed Waste Generator:	N	HSM:	N	IC In Place:	N
	Subpart K/College:	N	Subpart K/Hospital:	N	Subpart K/Non-profit:	N	Subpart K/Withdrawal:	N

Latitude/Longitude Measure - Owner: Seq #:  
Coordinates:

Receive Date: 08/08/2011 Source Type: Notification Seq. Number: 1

<b>Location</b> 18487 N DIXIE HWY <b>Address:</b> BOWLING GREEN, OH 43402	<b>Mailing Address:</b> 18487 N DIXIE HWY BOWLING GREEN, OH 43402 UNITED STATES
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**Contact Person** DEBORA K. SMITH  
For Source SAFETY & COMPLIANCE  
Information (419) 352-3500 ext. 21  
DSMITH@TRANSTECHLOGISTICS.COM  
Fax: (419) 353-1761  
18487 N DIXIE HWY  
BOWLING GREEN, OH 43402  
UNITED STATES

**Owner (current)** 18487 N DIXIE HWY Type: Private  
JOSEPH T NACHTRAB BOWLING GREEN, OH 43402 Phone: (419) 352-3500  
From: 08/21/1995 To: BOWLING GREEN

**Operator (current)** 18487 N DIXIE HWY Type: Private  
JAMES EILERMAN BOWLING GREEN, OH 43402 Phone: (419) 352-3500  
From: 09/01/2010 To: BOWLING GREEN

Land Type: Private Non Notifier: No TSD Date: Accessibility:

NAICS Codes: 48411 GENERAL FREIGHT TRUCKING, LOCAL

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator, State: OH-N Not a Generator, Verified

Other Hazardous Waste Generator Activities

Short Term Generator:	No
Importer Activity:	No
Mixed Waste Generator:	No
Transporter Activity:	Yes
Transfer Facility:	No
TSD Activity:	No
Recycler Activity:	No
Off-Site Receipt:	No

Used Oil Activities		
Used Oil Transporter Activity		Off-Specification Used Oil Burner: No
Transporter:	No	Used Oil Fuel Marketer Activity
Transfer Facility:	No	
Used Oil Processor and/or Re-refiner Activity		Marketer who directs shipment off-specification used oil to off-specification used oil burner: No
Processor:	No	Marketer who first claims the used oil meets the specifications: No
Refiner:	No	

**Exempt Boiler and/or Industrial Furnace**

Small Quantity Onsite Burner Exemption:	No
Smelting, Melting, Refining Furnace Exemption:	No

Subpart K		
College/University:	No	Non-profit Research Institute: No
Teaching Hospital:	No	Withdrawal: No

Underground Injection Control: No  
Destination Facility for Universal Waste: No

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D008

\* End of Report \*