

**Environmental
Protection Agency**

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

Re: LaRiche Chevrolet Cadillac
OHD981100811
Hazardous Waste
Hancock County
NOV/Request for Information

July 3, 2012

Mr. Jim Gerschutz, Body Shop Manager
LaRiche Chevrolet Cadillac
215 East Main Cross
Findlay, Ohio 45840

Dear Mr. Gerschutz:

Thank you for accompanying me during Ohio EPA's June 13, 2012, hazardous waste compliance evaluation inspection (CEI) of LaRiche Chevrolet Cadillac (LaRiche) located at 215 East Main Cross, Findlay, Ohio. I inspected LaRiche to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC), and Ohio's hazardous waste regulations as adopted under Chapter 3745. of the Ohio Administrative Code (OAC). LaRiche was represented by Steve Tong, Service Manager; Jon Hilty of The Ohio Automotive Supply Co. and you. The inspection included a tour of facility operations and a review of facility paperwork. This letter will explain the violations I found, what you need to do correct the one outstanding violation and a request for additional information.

LaRiche is a repair, auto body and collision shop for automobiles. LaRiche had notified on November 4, 1985, as a small quantity generator (SQG) of hazardous waste but is currently a conditionally exempt small quantity generator (CESQG) of hazardous waste. Hazardous waste generated is solvent/paint waste (D001, F003, F005) and distillation bottoms (F005) from the on-site solvent recycling still. Other wastes generated are used oil, antifreeze, paint booth filters and lamps.

The facility also has an aqueous/soap and water Cuda parts washer in the service area.

During the inspection, I gave you the following information: the Ohio EPA publication Environmental Compliance Guide for Auto Repair Shops; the Ohio EPA fact sheets: Universal Waste Rules for Handlers of Lamps; Fluorescent Lamps: What you Should Know; Identifying your Hazardous Waste; Handling Paint Waste from your Business; The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil and a generator category sheet with the hazardous waste characteristics.

Mr. Jim Gerschutz, Body Shop Manager
July 3, 2012
Page 2

On June 13, 2012, I also emailed you links to the following information: Ohio EPA's Hazardous Waste Generator Guidance document; a table which lists the three categories of hazardous waste generation and the regulatory requirements for each and U.S. EPA's guidance on Managing your Hazardous Waste for Small Businesses.

On June 26, 2012, I conducted a follow up site visit at your facility to my June 13, 2012, CEI. Gary Miller, a LaRiche employee, had run the solvent still on June 25, 2012, and generated still bottoms. I observed two bags of still bottoms on June 26, 2012. At this time Mr. Miller weighed the bottoms. One bag of bottoms weighed 3.5 pounds (lbs.) and one bag weighed 3.1 lbs. We discussed at this time since the still bottoms are a hazardous waste they must be placed in a good container and picked up by a hazardous waste hauler. You stated that the facility will manage as a hazardous waste and have the still bottoms picked up by Nortru, Inc. In addition, we discussed speaking with your paint supplier about utilizing a different solvent which may not be an F-listed hazardous waste. You stated that your facility plans to switch to water borne paints by November of this year and thus you would no longer be utilizing the solvent distillation unit.

I found the following violations of Ohio's hazardous waste laws. LaRiche needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. **Within 14 days of receipt of this letter**, LaRiche is requested to provide documentation to this office including the steps taken to abate the outstanding violation cited below. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to amber.hicks@epa.ohio.gov.

**1. Unlawful transportation of hazardous waste to an unauthorized facility.
ORC § 3734.02 (F)**

No person shall unlawfully allow hazardous waste to be transported to an unauthorized facility, a RCRA subtitle D solid waste (non-hazardous) landfill.

LaRiche unlawfully disposed of their solvent distillation still bottoms (F005) from their facility into their solid waste stream. Thus LaRiche's hazardous waste (F005) was transported by H & O Services to a RCRA subtitle D solid waste (non-hazardous) landfill for disposal.

On July 2, 2012, I spoke with Cindy Meyers of H & O Services. Ms. Meyers stated that H& O Services transports all solid waste to the Hancock County Landfill.

Mr. Jim Gerschutz, Body Shop Manager
July 3, 2012
Page 3

Please note that violation of ORC Section 3734.02 (F) is a serious violation of Ohio's hazardous waste laws and LaRiche may be referred to Ohio EPA's Central Office for possible escalated enforcement action.

You, Mr. Hilty and your consultant, Tiffany Hammer have all stated that LaRiche had in the past sampled the distillation bottoms (which you refer to as the solvent "hockey puck") and based on this sampling that the still bottoms are a non-hazardous waste. Please be advised that this is not accurate. Regardless of whether your waste has any hazardous waste characteristics or not, your distillation waste is an F005 listed *hazardous waste* as explained to you during the June 13, 2012, CEI and the June 26, 2012, site visit. LaRiche generates an F-listed solvent (D001, F003, F005) which it runs through its on-site solvent recovery system. Since LaRiche generates an F-listed solvent, their solvent still bottoms would also be a hazardous waste (F005), as the still bottoms are derived from a listed hazardous waste. Please consult the copy of OAC Rule 3745-51-31 (which includes the F-listings) that I gave you during the June 26, 2012, site visit. LaRiche must manage their F005 solvent distillation bottoms as a hazardous waste and dispose as a hazardous waste following all applicable hazardous waste regulations for a conditionally exempt small quantity generator of hazardous waste. Please consult the Ohio EPA fact sheet Identifying your Hazardous Waste given to you during the CEI.

In addition, please consult the information/resources outlining the conditionally exempt small quantity generator hazardous waste requirements that I emailed to you on June 13, 2012.

2. Waste Evaluation.
OAC Rule 3745-52-11

Any person who generates a waste must determine if that waste is a hazardous waste in accordance with the criteria for hazardous waste as set forth in Chapter 3745-51 of the Administrative Code.

- A. LaRiche failed to properly evaluate their solvent distillation bottoms (F005). LaRiche was disposing of the facility solvent distillation still bottoms (F005) as a non-hazardous waste in the solid waste stream.

LaRiche has stated they have ceased disposing of the solvent distillation bottoms as a non-hazardous waste in the solid waste stream.

During my site visit on June 26, 2012, you stated that LaRiche would be placing this waste in a good container with a hazardous waste label and would have this waste picked up by Nortru, Inc. (a licensed hazardous waste hauler).

- ***To abate this violation, please submit photograph documentation that the still bottoms (F005) have been placed in a hazardous waste container and a written statement indicating how you plan to manage and dispose of this waste stream in the future.***
- B. LaRiche failed to have waste evaluation documentation for the Cuda parts washing waste generated at the facility.

During the CEI, Mr. Tong showed me the Cuda parts washing solvent. Based on discussions with an employee, this material is "mostly oil" and thus they place the waste from the washer in the used oil tank for recycling.

- ***To abate this violation, please provide waste evaluation documentation for this waste which includes the Material Safety Data Sheet (MSDS) for the detergent utilized in this parts washer and information pertaining to the flash point of this waste as well as the Resource Conservation and Recovery Act (RCRA) metals (excluding mercury). In addition, please state how much of this waste stream is generated per week/month. (An estimation is fine.)***
- C. LaRiche has failed to evaluate the paint filters from the painting booth to determine if they are hazardous. LaRiche is currently disposing of this waste stream in the local landfill. LaRiche must immediately cease disposing of the paint booth filters as non-hazardous waste in the local landfill until a proper waste evaluation has been completed.

During the CEI, I inquired if you have waste evaluation information for the facility paint booth filters. You stated the paint booth filters were tested, determined to be non-hazardous and thus you are disposing as a non-hazardous waste in the solid waste stream. You have since lost this analytical as it was destroyed in the Findlay flood in 2007. In addition your consultant, Tiffany Hammer, emailed me on June 15, 2012, stating the same information. On July 3, 2012, Gloriana Culley (unsure of spelling) of Kip Prah left me a message stating that they do not have a copy of this analytical. She stated they would have advised you to conduct this testing, but that they did not perform this testing nor maintain a copy of this information.

A waste evaluation can be conducted by taking a representative sample of this waste to properly evaluate this waste stream through a laboratory analysis which lists constituents present and at what concentration or through adequate generator knowledge. LaRiche should sample the paint filters from the painting booth to determine the Toxicity Characteristic Leaching Procedure (TCLP) concentrations of all regulated constituents that may be present in the waste in light of the materials or the processes used as listed in OAC Rule 3745-51-24 following the methods as outlined in U.S. EPA's SW-846. You will need to ensure to collect **at least 100 grams of waste** to properly run the TCLP test.

- ***To abate this violation, LaRiche must submit the analytical information from sampling to me or sufficient documentation for generator knowledge. Your results must document if the waste is hazardous or not. If it is hazardous, you must explain what treatment, storage, or disposal facility you will send it to.***
- *If the waste is hazardous, I will determine the status of your compliance with other hazardous waste laws and notify you of my findings in a separate letter.*

Please consult the fact sheet Identifying your Hazardous Waste given to you during the CEI. I have enclosed the Ohio EPA fact sheet Use of Generator Knowledge In Complying with OAC rule 3745-52-11, Hazardous Waste Evaluation which you may find useful.

If sampling is performed, please notify me at least seven days prior to taking the samples so that I or an Ohio EPA representative may be present.

**3. Used oil storage requirements - proper labels.
OAC Rule 3745-279-22 (C) (1)**

Containers used to store used oil shall be labeled or marked clearly with the words "Used Oil."

LaRiche failed to mark their used oil tank with the words "Used Oil".

"Used Oil" was written on the used oil tank during the CEI on June 13, 2012; thus this violation is abated.

In addition, I discussed with Mr. Tong that used oil containers must be labeled "Used Oil" and not "Waste Oil" as outlined in OAC Rule 3745-279-22(C)(1).

Mr. Jim Gerschutz, Body Shop Manager
July 3, 2012
Page 6

Please see the fact sheet The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil given to you during the CEI.

Please be advised that the violation cited above will continue until the violation has been properly abated. Failure to comply with Chapter 3734. of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, LaRiche is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

Request for Information

During the CEI you stated that LaRiche purchases one 55-gallon drum of cleaning solvent (99 Wash Thinner) a year from The Ohio Automotive Supply Co. Likewise, you stated that you distill roughly 5-gallons of thinner every two weeks or so - sometimes a little more, sometimes a little less. During the June 26, 2012, site visit, Mr. Miller stated that he distilled roughly 10-gallons of solvent on June 25, 2012, from the past three weeks. **Please provide me the following documentation within 14 days of receipt of this letter:**

- A. How much product solvent (99 Wash Thinner) you purchase a year (please provide documentation for the past three years).
- B. How long you have been purchasing/utilizing the 99 Wash Thinner. During the site visit, you and Mr. Miller thought you had been utilizing this solvent for 7-8 years, but when I spoke with Mr. Hilty on July 2, 2012, via telephone he thought you had been using this material for less than that.
- C. Any other information which may provide information to how much solvent and distillation bottoms are generated at your facility.

During the CEI, I inquired to the management of the facility lamps. Mr. Tong stated that Joe Conine of Conine Electrical Inc. serviced the bulbs. I spoke with Mr. Conine on June 21, 2012. Mr. Conine stated that he only serviced the metal halide lamps from the parking lot and the ballasts which he recycled with McNaughton-McKay Electric Co in Findlay. Mr. Conine stated that he does not service or change your facility fluorescent bulbs. **Please provide me the following documentation within 14 days of receipt of this letter:**

- I. How many bulbs you generate per month/year. (An estimation is fine.)
- II. How this waste stream is managed including documentation of pick-up/recycling of waste.
- III. The waste evaluation documentation for this waste stream in accordance with OAC Rule 3745-52-11, if your facility is not managing as universal waste.

Mr. Jim Gerschutz, Body Shop Manager
July 3, 2012
Page 7

I have enclosed a sample universal waste management plan for lamps and a list of lamp recyclers which you may find useful.

Based on this information submitted, I will notify you of your compliance with Ohio's hazardous waste laws in another letter.

Pollution Prevention:

LaRiche recycles its used antifreeze and used oil with DISC Environmental Service. In addition, LaRiche recycles their solvent on-site for re-use.

If you find additional ways to recycle, reduce, or altogether eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs. Furthermore, you may possibly reduce your regulatory requirements.

If you would like a free, non-regulatory on-site pollution prevention assessment or if you would like more information about pollution prevention, please contact me at (419) 373-3082 or Ron Nabors with the Office of Compliance Assistance and Pollution Prevention (OCAPP). OCAPP also provides regulatory assistance to small businesses. Mr. Nabors' contact information is 419-373-3147 and ron.nabors@epa.state.oh.us. Ohio EPA has helpful information about this at the following web address:
<http://www.epa.ohio.gov/ocapp/>

The Ohio Department of Development's Office of Energy Efficiency may be able to help with energy efficiency issues. Their website is at:
<http://www.development.ohio.gov/cdd/oeef/>

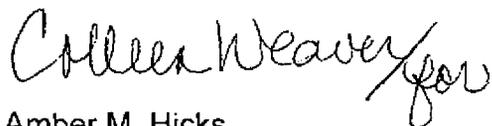
The Division of Materials and Waste Management (DMWM) has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information at the following Web link
http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage. Please feel free to share this information with your colleagues.

Enclosed you will find a copy of the checklists that I completed during the inspection. Please address all correspondence to Amber Hicks, Ohio EPA, 347 N. Dunbridge Road, Bowling Green, Ohio 43402. Should you have any questions, please feel free to call me at (419) 373-3082 or email me at amber.hicks@epa.ohio.gov.

Mr. Jim Gerschutz, Body Shop Manager
July 3, 2012
Page 8

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

Sincerely,



Amber M. Hicks
Division of Materials and Waste Management

/llr

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

ec: Amber Hicks, DMWM, NWDO
Colleen Weaver, DMWM, NWDO
Mike Reiser, DMWM, NWDO
Jeremy Scoles, DMWM, NWDO

NOTICE:

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

Send to Central Office <input checked="" type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	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.

Site EPA ID No. Site Name	EPA ID Number: OHD981100811		Website: www.larichecars.com (Optional)
Site Location Information	Name: LaRiche Chevrolet Cadillac		
Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html	Street Address: 215 E. Main Cross		State: OH
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"/>	City, Town, or Village: Findlay		Zip Code: 45840
County Name: Hancock	811111	811121	488410

Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Jim MI: Last Name: Gerschutz		
Title: Body Shop Manager	Phone Number: 419-422-1855 Phone Number Extension: 3220		
E-Mail Address: jgerschutz@larichechevrolet.com	Fax Number: 419-422-1912 Fax Number Extension:		
Street or P.O. Box:	City, Town or Village:		
State:	Zip Code:		

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

VIOLATIONS CITED?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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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/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"/> 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, Storer or Disposer of Hazardous Waste | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input checked="" 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 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 Used Oil
 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.

- College or University
 Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
 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.

D001 F003 F005

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:	Steve Tong, Service Manager
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)
Amber Hicks		6/13/12 13:45

Comments:
 Tank is one used oil tank.

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: LaRiche Chevrolet Cadillac Facility Type: LQG SQG CESQG TSD Date of Inspection: 6-13-12 EPA ID#: OHD981100811

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 applic.	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	P2 Opportunities
1	Lighting	Fluorescent bulbs	Unknown	NA	Unknown - requested information.	Gave information on Universal waste/recycling.
2	Servicing of vehicles	Used Oil	~600 gallons		DISC Environmental Service -Northwood, OH	Recycling.
3	Servicing of vehicles	Antifreeze	~ 25 gallons	NA	DISC Environmental Service -Northwood, OH	Recycling.
4	Cleaning of paint guns	Solvent/paint waste - D001, F003, F005	Still need information to determine.	Recycle on-site with a solvent distillation unit.	NA	Recycling.
5	Solvent distillation	Still bottoms (F005)	~7 lbs		Disposing in the solid waste stream - cited for 52-11.	
6	Paint booth	Paint booth filters	From floor - one roll filter per month; from ceiling 29 filters/once a year.		Disposing in the solid waste stream***	

7							
8							
9							

REMARKS GENERAL INFORMATION

General Process Information:

*** Facility states they have analytical/waste evaluation documentation that indicates this waste stream is non-hazardous. I have requested this information.

Regulatory/Enforcement History (if applicable):

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:

**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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> ***
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GENERATOR CLASSIFICATION

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*** Facility was disposing of their F005 still bottoms as non-hazardous solid waste. Facility states they have evaluated their paint booth filters but needs to provide this analytical.

**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 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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Stopped the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Contained the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Cleaned up and properly managed the used oil and other materials?	Yes <input checked="" type="checkbox"/> No <input 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"/>

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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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>		