



State of Ohio Environmental Protection Agency

Northwest District Office

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Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Great Lakes Western Star
OHD982072266
Lucas County
Hazardous Waste
Notice of Violation

March 10, 2009

Mr. Les Simon, Controller
Great Lakes Western Star
6003 Benore Road
Toledo, Ohio 43612

Dear Mr. Simon:

On February 27, 2009, I was accompanied by Mr. Randy Ratz during Ohio EPA's compliance evaluation inspection of Great Lakes Western Star (GLWS) located at 6003 Benore Road in Toledo, Ohio. I inspected GLWS 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 (OAC). My inspection included observations of facility operations and a review of written documentation.

GLWS sells and services Western Star and Freightliner trucks. Service includes a body shop for restoration and painting. GLWS is listed as a small quantity generator, but is now operating as a conditionally exempt small quantity generator (CESQG). GLWS generates the following wastes:

1. Paint Waste F003 & F005: Repaired vehicles may be painted in the spray booth in the body shop. The paint gun is cleaned with a lacquer thinner that contains acetone, toluene, xylene, ethylbenzene and other constituents. Approximately 5 gallons is generated per month. It is shipped by Cousins Waste Control Corp/PSC to Petro-Chem in Detroit, Michigan.
2. Waste Lamps: GLWS has been placing its spent lamps in the trash.
3. Waste from Sludge Tank: The floor drains at GLWS flow to a 2,000 gallon underground separator tank. Water that overflows goes to the sewer. Periodically the sludge or solid material in the bottom of the separator tank is pumped out. This last occurred in June of 2007 when 1,330 gallons of waste was pumped out by DISC Environmental Service. This waste has not been analyzed in a laboratory.
4. Used Oil: Used engine oil and oil from drained filters is collected. The oil can be collected in two ways: 1. totes that are used to feed a 350,000 BTU/hour used oil fired space heater in the Back Wash Bay; and 2. in a dump station and 8,000 gallon underground storage tank, which is used to feed a 500,000 BTU/hour used oil fired space heater in the Service Department. GLWS is usually able to burn all its used oil.

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However, if it accumulates excess used oil and is unable to burn it, DISC can be used to remove and recycle some. This was last done in 2007. The metal housing from the drained filters is recycled at Omni Source.

5. Used Antifreeze: Used antifreeze is accumulated in a 250 gallon tank and is shipped by DISC Environmental Service to On-Site in Monroe, Michigan, where it is filtered and re-blended with new additives for re-use.
6. Spent Solvent from Parts Washer Benches: GLWS operates five parts washer benches. The spent material from all three units is maintained by Safety-Kleen, through a service agreement, and is part of its Continued Use program, so it is not a waste.
7. Spent Batteries: Spent lead-acid vehicle batteries are collected on pallets, stacked two high, separated by absorbent paper and shrink wrapped. They are shipped to East Penn Manufacturing Co., Inc. in Pennsylvania for recycling.

As a result of my inspection, I found the following violations of Ohio's hazardous waste laws. In order to correct these violations, you must do the following and send me the required information, **within 30 days** of your receipt of this letter:

**1. Waste Evaluation
OAC Rule 3745-52-11**

A generator must determine whether its waste is hazardous by testing the waste according to the methods set forth in rules 3745-51-20 to 3745-51-24.

GLWS has failed to evaluate its spent lamps (all types), according to this rule and has been placing them in the trash. In order to abate this violation, GLWS must evaluate their spent lamps. Instead of obtaining a sample of the lamps and having the sample analyzed in a laboratory, GLWS may elect to manage its spent lamps (all types) as Universal Waste. The requirements for Universal Waste lamps include:

- Immediately cease placing spent lamps into the trash;
- Place spent lamps into containers that are structurally sound;
- Label the containers with the words Used Lamps;
- Document the length of time that the spent lamps are stored;
- Store spent lamps for no longer than one year;
- Inform all employees with the responsibility to collect spent lamps of these requirements; and
- Ship the spent lamps to a lamp recycler (please refer to the list of recyclers that I left with Mr. Ratz).

In order to abate this violation, please explain how you intend to manage your spent lamps and to comply with the requirements listed above. Indicate how you will package the lamps, label the containers, date the containers and inform your employees of the requirements. Please submit photos demonstrating that this has been done. Also, please indicate where you will ship the Universal Waste lamps to.

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

A generator must determine whether its waste is hazardous by first determining if the waste is listed as a hazardous waste in rules 3745-51-30 to 3745-51-35; by testing the waste according to the methods set forth in rules 3745-51-20 to 3745-51-24 or by applying knowledge of the hazardous characteristic of the waste in light of the materials or the processes used.

GLWS has failed to evaluate the sludge from its wastewater separator tank. Therefore, you must evaluate this waste, according to this rule. You must obtain a representative sample of the waste sludge from the tank, according to OAC Rule 3745-51-20 and evaluate all samples, through laboratory analysis, for all appropriate characteristics, including: TCLP (Toxicity Characteristic Leaching Procedure) metals (such as cadmium, chromium, lead and mercury).

You will need to give Ohio EPA a five day advance notice of sampling activities, in order for an inspector to make arrangements to view the sampling. Your analytical results must document if the waste is hazardous or not and if it is restricted from land disposal. You must submit the laboratory results to me as soon as they become available. If your waste is hazardous waste you must immediately arrange to have it shipped to a permitted hazardous waste treatment, storage or disposal facility and submit a copy of the hazardous waste manifest used.

**3. Used Oil Container Labeling
OAC Rule 3745-279-22(C)(1)**

Containers, aboveground tanks, and fill pipes for underground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil." On February 27, 2009, I observed that the 8,000 gallon used oil underground storage tank was not labeled with the words "Used Oil".

In order to correct this violation, GLWS must immediately mark or label the fill pipe covers with the words "Used Oil" and provide me with photographic documentation that this has been done.

Please be aware that incandescent, fluorescent, metal halide, neon, high-intensity discharge, high-pressure sodium and mercury-vapor lamps could be hazardous waste when discarded. Fluorescent lamps may contain up to 40 milligrams (mg) of mercury, depending on the brand and manufacturer. Lamps may also contain lead and cadmium. Many lamps exhibit a characteristic of toxicity for heavy metals when disposed. During the inspection, I gave copies of the following documents to Mr. Ratz, to assist you in properly managing your spent lamps: Fluorescent Lamps: What You Should Know and Computer, Fluorescent Lamp and Ballast Recyclers. I recommend that you review these documents carefully and contact me if you have any questions. The first document describes the rules you must follow in order to manage lamps as a universal waste.

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As a used oil generator you are required to: store used oil in containers or aboveground tanks that are in good condition (no severe rusting, apparent structural defects or deterioration) and not leaking. Containers, aboveground tanks and fill pipes for underground tanks must be labeled with the words "Used Oil." If leaks are detected, the generator must: stop the release; contain the release; clean up and manage properly the released used oil and other materials related to the release; and, if necessary, repair or replace any leaking containers or tanks prior to returning them to service. During the inspection, I gave Mr. Ratz copies of the following used oil fact sheets: The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil, and Used Oil Recyclers. I am also enclosing a copy of Used Oil Burners – New Guidance for Rebuttable Presumption. Please review these carefully and contact me immediately if you have any questions.

You may be able to further reduce the waste your company generates. If you find ways to recycle, reduce or altogether eliminate the amount of waste that your company generates you may be able to reduce your treatment and disposal costs and you may possibly reduce your regulatory requirements. During the inspection, I gave Mr. Ratz a copy of Pollution Prevention Opportunities, a worksheet that can help you recognize opportunities for reducing waste and conserving energy at your business. I am enclosing a copy of the fact sheet Management of Electronic Waste from Businesses. I also gave Mr. Ratz a copy of Battery Recyclers/Brokers & Disposal Facilities. Please review this information and contact me if you have any questions.

I encourage you to schedule a pollution prevention assessment for your business because there are often many opportunities for businesses like yours to reduce waste and save money. If you wish to talk about an assessment or if you have other questions about pollution prevention, please feel free to contact the Office of Compliance Assistance and Pollution Prevention (OCAPP) at (614) 644-3469. There is no charge for an assessment.

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>. Please feel free to share this information with your colleagues.

If you have any questions, please feel free to contact me at (419) 373-3074. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

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Ohio EPA also has helpful information about pollution prevention at the following web address:
<http://www.epa.state.oh.us/opp>.

Sincerely,



Don North
District Representative
Division of Hazardous Waste Management

/csl

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
Randy Ratz, Great Lakes Western Star
DHWM, NWDO, Lucas County, Great Lakes Western Star File

ec: Don North, DHWM, 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.

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

For Ohio EPA use only

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

| | | | | | | | | |
|---|---|---------------------------------|---|----------------------------------|---------------------------------|------------------------------------|--------------------------------|--------------------------------|
| Site EPA ID No: Site Name | EPA ID Number: <u>OH5982072266</u> Name: <u>Great Lakes Western Star</u> | | Website: (Optional) | | | | | |
| Site Location Information: | Street Address: <u>6003 Benore Rd.</u> City, Town, or Village: <u>Toledo</u> County Name: <u>Lucas</u> | | State: <u>OH</u> Zip Code: <u>43612</u> | | | | | |
| Site Land Type (check only one) NAICS code(s) www.census.gov/eod/www/naics.html | Private <input type="checkbox"/> | County <input type="checkbox"/> | District <input checked="" type="checkbox"/> | Federal <input type="checkbox"/> | Indian <input type="checkbox"/> | Municipal <input type="checkbox"/> | State <input type="checkbox"/> | Other <input type="checkbox"/> |
| Facility Representative: <small>Additional names can be recorded in number 12</small> <small>Only provide address information if it is different than the site address</small> | First Name: <u>Les</u> Phone Number: <u>419-729-2400</u> E-Mail Address: Fax Number: <u>419-729-2046</u> Street or P.O. Box: City, Town or Village: State: | | MI: Last Name: <u>Simon</u> Phone Number Extension: Fax Number Extension: Zip Code: | | | | | |
| Legal Owner And Operator of the Site: <small>List Additional Owners and/or Operators in the Comment Section or on another copy of this form page</small> | Name of Site's Legal Owner: 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: State: Name of Site's Operator: 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: State: | | Date Became Owner (mm/dd/yyyy): Owner Phone #: Country: Zip Code: Date Became Operator (mm/dd/yyyy): Operator Phone #: United States Zip Code: | | | | | |

VIOLATIONS CITED? Yes No

| TYPE OF HANDLER - A MINIMUM OF ONE BOX MUST BE CHECKED | |
|--|--|
| <input type="checkbox"/> Not a Generator | <input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 |
| | <input type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input 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"/> Recycler of Hazardous Waste | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace |
| <input type="checkbox"/> Underground Injection Control Facility | <input type="checkbox"/> Small Quantity On-Site Burner Exemption |
| <input type="checkbox"/> Hazardous Waste Transporter | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | |

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED)

(CHECK ALL BOXES THAT APPLY)

- | | |
|---|---|
| <input 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

- 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 if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRA Info source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

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: |
| Tanks | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Other Comments: |
| Containers | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | |

Name of Inspector(s): Don North Name of Inspector(s): _____ Date of Inspection/Time (mm/dd/yyyy) (hh:mm) 2-27-09

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): _____

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

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
LQG: ≥1,000 Kg. (~300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

WASTE EVALUATION

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A

GENERATOR CLASSIFICATION

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

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes No N/A

TREATMENT OF HAZARDOUS WASTE

4. Does the generator treat hazardous waste in a:
- a. Container that meets 3745-66-70 to 3745-66-77? Yes No N/A
 - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes No N/A
 - c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A
 - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: Complete appropriate checklist for each unit.
NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.
NOTE: If waste is treated to meet LDRs, use LDR checklist.

REMARKS

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: *Great Lakes Western Star*

Facility Type: LQG/SQG/QCESQG/TSD

EPA ID#: *OH012002000*

Description of Waste

On-Site Management

Off-Site Management

| Process/Activity Generating Waste <small>(plating, bath, machining, house, painting, etc)</small> | Waste Generated <small>(e.g. sludge, spent solvent, ash, etc)</small> | EPA Waste Code | QTY Generated per Month | Type of Accumulation/Storage <small>(e.g. container, tank, etc)</small> | Type of On-Site Treatment <small>(e.g. wet, etc)</small> | Waste Location <small>(Include map if possible)</small> | Name, state, and type of activity occurring at the facility. | P2 Activities |
|--|--|------------------|-------------------------|--|---|--|---|---------------|
| <i>spray gun and paint pot cleaning Body Shop</i> | <i>Paint waste</i> | <i>F003 F005</i> | <i>5 gal</i> | <i>container</i> | <i>none</i> | | <i>Cousens Waste Control Corp / PSC Petro-Chem Detroit, Michigan</i> | |
| <i>lighting</i> | <i>spent lamps</i> | | <i>Varies</i> | <i>put in</i> | <i>trash</i> | | | |
| <i>underground waste water separator tank bottoms</i> | <i>Sludge Tank waste</i> | <i>unk</i> | <i>1-3 years</i> | <i>vac truck</i> | | | <i>need to be analyzed.</i> | |
| <i>Vehicle maintenance</i> | <i>Used oil</i> | <i>non-haz</i> | | <i>container + tank (UG)</i> | <i>used oil - fuel for heater</i> | | <i>Excess may be hauled for recycling by DISC Environmental Serv. Northwood, Ohio</i> | |
| <i>Vehicle maintenance</i> | <i>Used anti-freeze</i> | <i>non-haz</i> | | <i>container</i> | <i>none</i> | | <i>DISC Environmental Serv. to on-site Monroe, Michigan</i> | |

**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 checked="" 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"/> |
|----|--|--|

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)] <i>Tank not labeled.</i> | 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 type="checkbox"/> |
| b. | Contained the release? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Cleaned up and properly managed the used oil and other materials? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d. | Repaired or replaced the containers or tanks prior to returning them to service, if necessary? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input 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: | <i>Yes</i> |
| 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"/> |

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

GENERATOR TRANSPORTATION

| | | |
|-----|--|--|
| 11. | Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? | Yes <input 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] | No |
| 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 type="checkbox"/> |

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

COLLECTION CENTERS AND AGGREGATION POINTS

| | | |
|-----|---|--|
| 13. | Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 14. | Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input 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 type="checkbox"/> |

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.