



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
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 Korleski, Director

Re: Waterville Bodyworks
Lucas County
OHD986980464
Hazardous Waste
Notice of Violation

February 15, 2008

Mr. John Spilker, Owner
Waterville Bodyworks
815 Michigan Avenue
Waterville, Ohio 43566

Dear Mr. Spilker:

Thank you for accompanying me during the Ohio Environmental Protection Agency's (Ohio EPA's) February 12, 2008, hazardous waste compliance evaluation inspection of Waterville Bodyworks (WB) located in Waterville, Ohio. I inspected WB 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. Pollution prevention options were also discussed during this inspection. This letter will explain the violations found and what you need to do to correct these violations.

WB is a collision repair facility. WB generates approximately five gallons of spent solvent (D001, D035, F003, F005) a month from their painting operations. WB has one paint booth and changes the floor filters once every 60 days and the wall and ceiling filters approximately every 6 months. Limited maintenance work is performed on the vehicles and a small amount of used oil is generated. Used oil is stored in 55-gallon drums. Batteries are stored outside and exchanged when a new battery is purchased. At the time of our investigation there was no evidence of cracked or leaking batteries. During our investigation, Ohio EPA recommended that you move your battery storage area to an inside location to protect them from cracking and possibly leaking on to the ground. At the time of my inspection, WB was operating as a conditionally exempt small quantity generator of hazardous waste.

I found the following violations of Ohio's hazardous waste and used oil 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. ORC 3734.02 (E & F): Permitted Facilities for the Treatment, Storage, and Disposal of Hazardous Waste:

No person shall store, treat, or dispose of hazardous waste identified or listed under this chapter and rules adopted under it, regardless of whether generated on or off the premises where the waste is stored, treated, or disposed of, or transport or cause to be transported any hazardous waste identified or listed under this chapter and rules adopted under it to any other premises, except at or to any of the following: (1) A hazardous waste facility operating under a permit issued in accordance with this chapter; (2) A facility in another state operating under a license or permit issued in accordance with the "Resource Conservation and Recovery Act of 1976" 90 Stat. 2806, 42 U.S.C.A. 6921, as amended ...

WB currently cleans the paint spray guns by using lacquer thinner and disposing of the spent solvent by spraying it into the air inside the paint booth. WB has historically disposed of these spent paint booth filters as solid waste in a solid waste landfill.

This practice is not legal as the spent solvent contains xylene, toluene, and methyl ethyl ketone and therefore is categorized as a listed hazardous waste (i.e. F003, F005) as per OAC Rule 3745-51-31, and the filters would carry this listing since the solvent was disposed by spraying onto them.

WB must properly dispose of the spent paint filters located in the paint booth as a listed hazardous waste. A copy of the hazardous waste manifest for the next shipment of paint filters, complete with Land Disposal Restriction (LDR) form, must be submitted to the Ohio EPA.

WB must submit a copy of an internal policy outlining how the paint guns are to be cleaned in the future. Spraying spent solvent into the air and onto filters is illegal disposal. WB must begin collecting the spent solvent and dispose of it properly.

Since WB violated ORC Section 3734.02(E&F), WB is subject to all applicable general facility standards found in OAC Chapters 3745-54 and 55. Additionally, at any time Ohio EPA may assert its right to have WB begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

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

Any person who generates a waste must determine if that waste is a hazardous waste by using generator knowledge or by testing the waste.

- a. At the time of the inspection, WB did not have waste evaluation documentation for the spent paint filters. WB has historically disposed of this spent material as a non-hazardous waste. WB must immediately cease disposing of the waste paint filters as non-hazardous waste until a proper waste evaluation has been completed. WB must properly dispose of the hazardous waste filters that were being used at the time of the inspection. Additionally, once you have installed new filters, you must have those analyzed prior to disposal. As we discussed, the new filters may not be considered a listed hazardous waste once you no longer spray solvent into the paint booth to clean the spray guns. However, they must be evaluated to determine if they are a characteristic hazardous waste.

WB must obtain a representative sample of the spent paint filters and have it analyzed for Toxic Characteristic Leaching Procedure (TCLP) Resource Conservation and Recovery Act (RCRA) metals (SW-846 Method 1311/6010) and volatile organics (SW-846 Method 1311/8260). You must notify me at least seven days prior to the sampling event date so that a representative from Ohio EPA can be present to observe the sampling and to split samples if necessary. To abate this violation, WB must submit a copy of the analytical results, along with any waste codes that apply, to Ohio EPA. Once analytical results have been reviewed, Ohio EPA will advise WB on proper disposal options for this waste stream.

- b. Also, WB failed to properly evaluate the spent solvent prior to disposal. WB has historically disposed of this spent material by spraying it into the air inside the paint booth. WB must immediately cease disposing of the spent solvent by spraying it into the paint booth. WB must begin to properly manage the spent solvent by collecting it in a closed container. Based upon the information you provided during the inspection, the spent solvent would be a listed hazardous waste (F003, F005) due to the presence of xylene, toluene, and methyl ethyl ketone. In order to achieve compliance, WB must begin to manage the spent solvent properly and submit documentation to Ohio EPA for review.

Ohio EPA may use the data you collect, in part, to make regulatory decisions concerning the waste(s) tested. A data review process, referred to as data validation, may be utilized to confirm the validity of the data. This data validation can include a review of the following components: sampling techniques, sample containers, representativeness of sample, laboratory test methods, laboratory data completeness, documentation of holding time(s), chain(s) of custody and quality assurance/quality control (QA/QC) data.

Please include data sufficient for Ohio EPA to perform the data validation review. Information on conducting a data validation can be obtained from Ohio EPA's web page: http://www.epa.state.oh.us/dhwm/tier_i_data_validation_manual.html.

Ohio EPA will review the submitted waste evaluation information and determine if there is a change in your generator status. Additional violations may be cited based upon your determined generator status. You will be notified of any additional violations in a separate letter.

- c. WB also failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility.

Hazardous bulbs are considered "spent materials" and remain hazardous waste even when recycled. Hazardous waste lamp generators have the option of handling their lamps as hazardous waste or as universal waste. Managing hazardous waste lamps under the universal waste rules eases certain regulations imposed on generators of spent lamps.

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. At the time of the inspection I gave you a copy of the guidance document: Fluorescent Lamps: What You Should Know. I recommend that you review this document and contact me if you have any questions.

WB must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If WB decides to conduct waste sampling, please notify me at least seven days prior to the sampling event date, so that a representative from Ohio EPA can be present to observe the sampling and to split samples if necessary. If WB plans to manage the spent fluorescent bulbs as universal waste, please submit photographic documentation showing the storage containers properly closed, labeled, and dated. WB must also properly train employees, who handle or have responsibility for managing universal waste, on waste handling and emergency procedures relative to their responsibilities. In addition, WB must submit the name of the facility where you plan to recycle the bulbs.

3. OAC Rule 3745-279-22(C)(1): Labeling

Containers, aboveground tanks, and fill pipes used for underground storage tanks shall be labeled or marked clearly with the words "used oil."

WB had two 55-gallon drums of used oil located in the outside storage area that were not properly labeled.

WB properly labeled the two 55-gallon drums with the words "used oil" at the time of our investigation.

Therefore, this violation is considered abated.

Request for Information:

At the time of the inspection, you stated that you were planning to give your used oil to B&L Auto for them to burn in their on-site burner. OAC Rule 3745-279-24 states that generators shall ensure that their used oil is transported only by transporters who have obtained an EPA identification number. As a business, WB is not permitted to give your used oil to another business to burn at their facility. WB must notify Ohio EPA with how you plan to manage your used oil in the future and provide the applicable documentation for review.

Mr. John Spilker, Owner
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A Fact Sheet outlining the Used Oil Regulations for generators was given to you at the time of my inspection. Enclosed is a list of used oil recyclers. Please review this information and contact me if you have any questions.

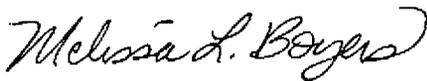
WB has historically disposed of the spent paint booth filters as a solid waste. WB must provide Ohio EPA with the name of the company who collects your solid waste and the name of the landfill where the solid waste is taken for disposal.

Enclosed you will find copies of the checklists that I completed during the investigation, a guidance document: Environmental Compliance Guide for Auto Body Shops, and several fact sheets related to painting and coatings, solvent recycling options and how to identify your hazardous waste. Please review this information and contact me if you have any questions.

Ohio EPA has helpful information about compliance assistance and pollution prevention at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp.html>. In addition, you can also find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

If you have any questions or I can be of assistance, please contact me at (419) 373-3066.

Sincerely,



Melissa L. Boyers
Division of Hazardous Waste Management

/llr

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
DHWM, NWDO Waterville Bodyworks File
ec: Melissa Boyers, DHWM, NWDO

Notice:

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

E-mail this completed form to tammy.mcconnell@pa.state.oh.us or mail it to Tammy McConnell, Central Office	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM		For Ohio EPA use only																	
2. Site EPA ID No.	EPA ID Number: OHD986980464																			
3. Site Name	Name: Waterville Bodyworks		Website (optional):																	
4. Site Location Information	Street Address: 815 Michigan Avenue																			
	City, Town, or Village: Waterville	State: OH																		
	County Name: Lucas	Zip Code: 43566																		
5. Site Land Type (check only one)	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	X								
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X																				
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A.		B.																	
	C.		D.																	
7. Facility Representative: Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	First Name: John		MI:																	
	Last Name: Spilker																			
	Phone Number: 419-878-2521		Phone Number Extension:																	
	E-Mail Address:																			
	Fax Number:		Fax Number Extension:																	
	Street or P.O. Box:																			
	City, Town or Village:																			
State:		Country:																		
Zip Code:																				
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	A. Name of Site's Legal Owner:		Date Became Owner (mm/dd/yyyy):																	
	Owner Type: Mark with an X	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other								
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	Street or P.O. Box:																			
	City, Town, or Village:		Owner Phone #:																	
	State:		Country: Zip Code:																	
	B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):																	
	Operator Type: Mark with an X	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other								
	Private	County	District	Federal	Indian	Municipal	State	Other												
Street or P.O. Box:																				
City, Town, or Village:		Operator Phone #:																		
State:		Country: Zip Code:																		
9. Violations Cited?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																		
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)																				
<input type="checkbox"/> Not Regulated																				

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

A. Hazardous Waste Activities

(choose only one of the following categories)

- UNKNOWN: Cited for violation of 3745-52-11
- a. Large Quantity Generator (LQG):
- b. Small Quantity Generator (SQG)
- c. Conditionally Exempt Small Quantity Generator
- d. United States Importer of Hazardous Waste
- e. Mixed Waste (hazardous and radioactive) Generator

- 3. Treater, Storer or Disposer of Hazardous Waste
- 4. Recycler of Hazardous Waste
- 5. Exempt Boiler and/or Industrial Furnace
 - a. Small Quantity On-site Burner Exemption
 - b. Smelting, Melting, Refining Furnace Exemption
- 6. Underground Injection Control Facility

B. Universal Waste Activities

- 1. Small Quantity Handler of Universal Waste
(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):
- 2. Large Quantity Handler of Universal Waste
(accumulates 5,000 kg or more).
- 3. Destination Facility for Universal Waste
(Check all boxes below that apply for each of the three types of facilities above.)

Generated Accumulated

- | | | |
|----------------|--------------------------|--------------------------|
| A. Batteries | <input type="checkbox"/> | <input type="checkbox"/> |
| B. Pesticides | <input type="checkbox"/> | <input type="checkbox"/> |
| C. Thermostats | <input type="checkbox"/> | <input type="checkbox"/> |
| D. Lamps | <input type="checkbox"/> | <input type="checkbox"/> |

C. Used Oil Activities

- 1. Used Oil Generator
- 2. Used Oil Transporter Indicate Type(s) of Activity(ies)
 - Transporter
 - Transfer Facility
- 3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)
 - Processor
 - Re-refiner
- 4. Off-Specification Used Oil Burner
- 5. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)
 - a. Marketer Who Directs Shipment of Off-Specification Oil
 - b. Used Oil to Off-Specification Used Oil Burner

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

D001	D035	F003	F005			
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12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

N	Announced ?	Additional Facility Representatives:	Other comments:
N	Tanks?	Randy Sikorski	
Y	Containers?		

13. Name of Inspector(s) Name of Inspector(s) Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)

Melissa Boyers 2-12-2008 10:15

14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of owner, operator, or an authorized representative	Name and Title (Print)	Date (mm-dd-yyyy)

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Waterville Bodyworks

Facility Type: LQG/SQG/CESQG/TSD

EPA ID#: OHD986980464

Description of Waste				On-Site Management			Off-Site Management
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, 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>(recycle, wwt, etc)</small>	Waste Location <small>(Include map if possible)</small>	Name, state, and type of activity occurring at the facility.
1 Lighting	Spent Fluorescent Bulbs						Currently managed as a solid waste
2 General vehicle maintenance and oil changes	Used Oil & Filters			Two 55-gallon storage drums		Outside enclosed storage area	No off-site management in place at this time
3 Painting	Spent Solvent	D001, D035, F003, F005	5 gallons	55-gallon drums		Outside enclosed storage area	Chemtron Corp.
4							

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

CESQG: ≤ 100 Kg. (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: $\geq 1,000$ 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

Waste evaluations needed for: Fluorescent Bulbs and future spent paint booth filters

**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 No N/A
- a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] Yes No N/A
2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes No N/A
3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? Yes No N/A

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 No N/A
- a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] Yes No N/A

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 No N/A

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 No N/A
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No N/A
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes No N/A

9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes No N/A
- b. Contained the release? Yes No N/A
- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A

ON-SITE BURNING IN SPACE HEATER

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: Yes No N/A
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes No N/A
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A

GENERATOR TRANSPORTATION

11. 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 No N/A
- a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24] Yes No N/A
- b. Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24] Yes No N/A

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

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes No N/A
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes No N/A
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes No N/A

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.

Keyword: UsedOilChecklistforGenerators.Oct.2007.doc