



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

Re: City of Ashland, City Services/Street  
Department  
OHD986971620  
Ashland County  
NOV

February 27, 2013

Mr. Jerry Mack, Director  
Ashland City Street Division  
310 West 12<sup>th</sup> Street  
Ashland, Ohio 44805

Dear Mr. Mack:

On February 6, 2013, the Ohio EPA conducted a hazardous waste compliance evaluation inspection (CEI) of Ashland City Services/Street Department (Ashland) located at 310 West 12<sup>th</sup> Street, Ashland, Ohio. This inspection was conducted to determine Ashland's 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). Ashland was represented by you. Ohio EPA was represented by me. The inspection included a tour of the facility and review of facility paperwork. This letter will explain the violations I found and what you need to do to correct these violations.

Ashland is the city services department for the City of Ashland. City vehicles are repaired on-site, the facility has a car wash for city vehicles and vehicles are stored on-site (salt trucks), etc. The Street Division complex consists of four buildings, a car wash for city vehicles and a 3000 ton salt dome. Ashland is currently a conditionally exempt small quantity generator (CESQG) of hazardous waste. Ashland had notified on July 31, 1989, as a small quantity generator (SQG) of hazardous waste. Hazardous waste generated on-site is parts washing solvent (D001). Other wastes generated are rags, car wash drain waste, used oil, batteries and lamps.

During the CEI, I gave you the following information: the Ohio EPA fact sheets The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil; Identifying Your Hazardous Waste and a list of Commercial Environmental Laboratories.

I found the following violations of Ohio's hazardous waste laws. Ashland needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. **Within 14 days of receipt of this letter**, Ashland is requested to provide documentation to this office including the steps taken to abate the violations 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](mailto:amber.hicks@epa.ohio.gov).

**1. 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. Ashland failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility.

Ashland is currently disposing of their fluorescent bulbs in the trash. Ashland must cease disposing of their fluorescent bulbs as non-hazardous waste in the local landfill until a proper waste evaluation has been completed or begin managing as a universal waste.

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. Ashland must ensure that the laboratory chosen to perform this sampling utilizes the proper method(s) to evaluate these bulbs. Ashland must sample the fluorescent bulbs to determine the Toxicity Characteristic Leaching Procedure (TCLP) concentrations of barium (D005), cadmium (D006), lead (D008), and mercury (D009) as listed in OAC Rule 3745-51-24 following the methods as outlined in U.S. EPA's SW-846.

If the bulbs are determined to be hazardous through a proper waste evaluation, Ashland will have to manage their bulbs either as 1) a universal waste (OAC Chapter 3745-273), or 2) as a hazardous waste under Ohio's generator standards (OAC Chapter 3745-52). Ashland may recycle their bulbs if they are hazardous or non-hazardous. Ohio EPA would encourage this option as a pollution prevention alternative.

*In lieu of conducting a waste evaluation, Ashland may choose to manage their bulbs as a universal waste as outlined in OAC Chapter 3745-273. Please consult the fact sheet Universal Waste Rules for Handlers of Lamps enclosed with this letter for more information. If you choose this option, please provide me an outline of your universal waste management plan (see the sample universal waste management plan enclosed).*

- **To abate this violation**, please submit to me your waste evaluation of your lamps (either proper characterization from the manufacturer or your sampling analytical) or an outline of your universal waste management plan (indicating how you will manage, label, send off-site within one year, where lamps will be recycled, etc.)

- B. Ashland failed to have waste evaluation documentation for the used paper rags generated at the facility. Ashland is currently throwing the rags in the trash.

To properly evaluate the above waste stream, Ashland must take a representative sample of this waste to properly evaluate this waste stream through a laboratory analysis which lists constituents present and at what concentration. Ashland must sample the used rags to determine the concentrations of all of the Resource Conservation and Recovery Act (RCRA) metals (excluding mercury), and any other hazardous constituent that might reasonably be present in this waste stream as listed in OAC Rule 3745-51-24 following the methods as outlined in U.S. EPA's SW-846.

In lieu of conducting a waste evaluation, Ashland could consider switching to cloth rags which are then laundered. As long as your used rags are sent to a commercial laundry subject to regulation under the Clean Water Act, they are not considered a waste in OAC rule 3745-51-02 and hence not subject to the hazardous waste regulations.

- **To abate this violation**, please submit one of the two options: 1) Ashland must submit the analytical information from sampling to me. 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* or 2) documentation that Ashland is now utilizing cloth rags which will be laundered thus implementing a pollution prevention opportunity.

- C. Ashland failed to have waste evaluation documentation for the pit/trench waste generated from the drain/trench in the car washing area. This is the grime and dirt that washes off from the vehicles that go through the car wash. You stated that this drain is cleaned out approximately twice a year and the waste is thrown onto a dirt pile. Ashland must immediately cease disposing of the pit/trench sludge outside. If you are able to determine where the sludge in the dirt pile was placed, all sludge that was dumped onto the ground must be removed and put into closed containers (drums, etc). You must not dispose of this material until it is determined whether it is hazardous or not.

Ashland must conduct a proper waste evaluation. This will determine how the sludge will have to be disposed of in the future.

To do a proper waste evaluation, Ashland must obtain a representative sample of the pit/trench sludge and have it analyzed for TCLP RCRA metals (SW-846 Method 1311/6010) and volatile organics (SW-846 Method 1311/8260).

Ohio EPA requires two samples be analyzed each for the TCLP metals and TCLP volatile organics as referenced in the paragraph above. One sample should be taken of the sludge material that is outside on the ground and another sample should be taken from the actual indoor pit/trench.

- **To abate this violation**, Ashland must submit a copy of the analytical results to me. Once analytical results have been reviewed, I will advise you on proper disposal options as well as plans for the future management of this waste stream. Ashland should be able to determine from the lab results if the waste is hazardous or non-hazardous. 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. Environmental Specialists, your current waste hauler, may be able to assist you in sampling and/or consult the list of Commercial Environmental Laboratories given to you during the CEI. You may also be able to find assistance by looking under Environmental Consultants or Services in the phone book.*

When 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.

**2. 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."

Ashland failed to mark their used oil tank containing used oil and the drum which collects used oil from the draining of their used oil filters with the words "Used Oil".

- **To abate this violation, please submit photographs documenting both the tank and drum have been labeled "Used Oil".**

Please be advised that the violations cited above will continue until the violations have 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, Ashland is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

**Area of Concern:**

**Gas pump filters.**

Ashland has 4 on-site gas pumps with two handles (total of 8 pumps). Musick's Service Station (Musick's) services your filters. You stated that if/when servicing is conducted that Musick's takes the filters with them. I conducted a CEI at Musick's in 2008. At this time, Musick's was having the filters picked up from customer jobs by Heritage as a non-hazardous waste (confirmed through waste evaluation). However, as the generator of the waste, you need to evaluate this waste as well to ensure that Musick's is managing this waste properly based on this evaluation. It is unknown at this time how your gasoline filters are being managed.

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Please note that properly drained metal fuel filters meet the regulatory definition of scrap metal and therefore, if recycled, are exempt from regulation as a hazardous waste. Fuel filters must be properly drained and if they no longer contain a significant liquid component then they qualify as scrap metal. As such, if recycled, the drained fuel filters are exempt from the hazardous waste regulations. If recycled, you would not have to evaluate this waste or have it managed as a hazardous waste if upon evaluation it is determined to be hazardous.

Please contact Musick's to determine if you have generated gasoline fuel filters and if so, your generation rate. In addition, you need to determine how these filters are being managed. **To satisfy this area of concern**, please submit this information to me. Note that you may be required to conduct a waste evaluation if the gasoline fuel filters are not being recycled as scrap metal.

**General Comment:**

Ashland has a 15-gallon green parts washer which utilizes Ozzy Juice and a 20-gallon red parts washer which utilizes mineral spirits. You stated that these parts washers are used very infrequently and maybe are only changed every couple of years. When parts washing solvent from the red parts washer (D001), is generated, this is mixed in with your used oil for recycling. You have not generated waste from the green parts washer (a soap mixture – Ozzy Juice) and thus have not had to dispose. Since both of the waste streams are generated infrequently, Ashland should ensure that upon the next generation of these wastes to properly evaluate both of these waste streams for all applicable constituents (e.g. flashpoint, metals).

Likewise Ashland has a glass bead blaster. You stated this blaster is used to clean brake parts, rusty pieces, etc. but is utilized very infrequently. You were unsure how the waste bead material was managed as it's used so infrequently. As stated during the CEI, upon the next generation you should ensure to properly evaluate this material for metals by performing testing. This material may not be disposed (thrown in trash, etc.) until a waste evaluation has been conducted which will indicate how to properly dispose of this waste.

**Pollution Prevention:**

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. Or if you would like a free, non-regulatory on-site pollution prevention assessment or more information about pollution prevention, please contact me at (419) 373-3082. Ohio EPA has helpful information about this at the following web address:

<http://epa.ohio.gov/ocapp/ComplianceAssistanceandPollutionPrevention.aspx>.

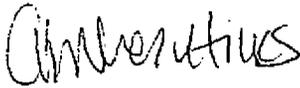
The Division of Materials and Waste Management (DMWM) has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information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

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

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

Sincerely,



Amber M. Hicks  
Division of Materials and Waste Management

/cg

Enclosures

pc: Lisa Gifford, DMWM, NWDO  
Colleen Weaver, DMWM, NWDO (w/ checklist)

ec: Amber Hicks, DMWM, NWDO  
Colleen Weaver, 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"/>	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE</b> <b>IDENTIFICATION/VERIFICATION FORM</b>	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to [RCRAInfo.Data@epa.state.oh.us](mailto:RCRAInfo.Data@epa.state.oh.us).

<b>Site EPA ID No.</b> <b>Site Name</b>	EPA ID Number: <b>OHD986971620</b>		Website: <a href="http://www.ashland-ohio.com/city-services/street-department-2">http://www.ashland-ohio.com/city-services/street-department-2</a> (Optional)				
<b>Site Location Information</b>	Name: <b>City of Ashland, City Services/Street Department</b>						
	Street Address: <b>310 W. 12<sup>th</sup> Street</b>						
	City, Town, or Village: <b>Ashland</b>		State: <b>OH</b>				
<b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	County Name: <b>Ashland</b>	Zip Code: <b>44805</b>					
	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input checked="" type="checkbox"/>	State <input type="checkbox"/>

<b>Facility Representative</b>  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: <b>Jerry</b>		MI: <b>G.</b>	Last Name: <b>Mack</b>	
	Title: <b>Director</b>				
	Phone Number: <b>419-289-9791</b>			Phone Number Extension:	
	E-Mail Address: <b>mack.jerry@ashland-ohio.com</b>				
	Fax Number: <b>419-289-7912</b>			Fax Number Extension:	
	Street or P.O. Box:				
City, Town or Village:					
State:			Zip Code:		

<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner:				Date Became Owner (mm/dd/yyyy):				
	Owner Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box:								
	City, Town or Village:				Owner Phone #:				
	State:				Country:		Zip Code:		
	Name of Site's Operator:				Date Became Operator (mm/dd/yyyy):				
	Operator Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box:								
	City, Town or Village:				Operator Phone #:				
	State:				Country:		Zip Code:		

<b>VIOLATIONS CITED?</b>	<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 type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility
<input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Receives Hazardous Waste from Off-site

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

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

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

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

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

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

**D001**

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

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Amber Hicks		02/06/13 14:24

**Comments:**  
Tank is one 275-gallon used oil tank.

## PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: City of Ashland, City Services/Street Department    Facility Type: CESQG    Date of Inspection: 02-6-13    EPA ID#: OHD986971620

Waste Generated			On-or-Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, bag-house, 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 Maintenance Activities	Parts washing solvent (D001)	~20 gallons/every 2-3 years		Mixed with used oil & picked up by Environmental Specialists, Inc./Youngstown, OH	Recycled.	
2 Maintenance Activities	Rags	Varies		Into local landfill.		Suggested instead of using paper rags switching to laundered, cloth rags.
3 Washing of cars in wash bay	Drain/pit waste	Generated twice per year		Placed onto a dirt pile (somewhere on property?)		
4 Vehicle Maintenance	Batteries	~20/year		Interstate Battery/Mansfield	Recycled.	
5 Vehicle Maintenance	Used Oil	~500-1000 gallons/year	In vehicle maintenance area/275-gallon tank	Environmental Specialists, Inc./Youngstown, OH	Recycled.	

6	Lighting	Lamps	~12/year		Into local landfill.		Suggested managing as universal waste & recycling.
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**REMARKS/GENERAL INFORMATION**

**General Process Information:** See Letter

**Regulatory/Enforcement History (if applicable):** N/A

**Additional P2 remarks and information:** N/A

Would this facility be interested in a P2 assessment? 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](mailto:p2mail@epa.state.oh.us) or [www.epa.state.oh.us/ocapp/ocapp.html](http://www.epa.state.oh.us/ocapp/ocapp.html)

**Other:** N/A

**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 checked="" type="checkbox"/>	No <input 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 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"/>
	c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/>	No <input 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 checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

**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](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](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 checked="" type="checkbox"/>	No <input 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 checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input 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"/>

<b>ON-SITE BURNING IN SPACE HEATER</b>		
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 checked="" 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 checked="" 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 checked="" 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>		
<b>GENERATOR TRANSPORTATION</b>		
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 checked="" 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 checked="" 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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).</i>		
<b>COLLECTION CENTERS AND AGGREGATION POINTS</b>		
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/> No <input checked="" 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 checked="" 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 checked="" 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>		