OhioEPA

State of Ohio Environmental Protection Agency

Northwest District Office

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Bowling Green, OH 43402-9398

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

RE: H&K Chevy Pontiac Buick
OHD 017 929 969
Putnam County
DHWM, NWDO
Notice of Violation

March 16, 2009

Mr. Bob Quigley
H&K Chevy Pontiac Buick
200 South Main Street
Continental, OH 45831

Dear Mr. Quigley:

Thank you for accompanying Amber Hicks and me during the Ohio Environmental Protection Agency's (Ohio EPA's) February 23, 2009, compliance evaluation inspection of H&K Chevy Pontiac Buick's (H&K's) facility located at 200 South Main Street, Continental, Ohio. I inspected H&K 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). During the inspection, I also helped you identify ways to prevent pollution by reducing waste.

This letter will explain the violations I found, what you need to do to correct the violations, other general concerns I have, what you need to do to respond to my general concerns, and the pollution prevention opportunities I identified.

H&K is a car dealership that also conducts general car maintenance and some body work. At the time of the inspection, H&K generated hazardous waste paint related material (D001, D035, F003, F005). H&K also generates used oil, universal waste batteries, and spent lamps. H&K was inspected as a conditionally exempt small quantity generator (CESQG) of hazardous waste. However, not all waste streams generated at H&K have been properly evaluated. Based on the results of the waste evaluations that are required below, additional violations may be cited at a later date.

Ohio EPA 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 receipt of this letter:***

Violations:

1. **OAC Rule 3745-52-11, Hazardous Waste Determination:** "Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste..."

   H&K failed to evaluate the following waste streams to determine if they were a hazardous waste in accordance with OAC Rule 3745-52-11, prior to sending them off site: a) spent lamps, b) waste paint booth filters, c) water from the paint pit, d) parts washer solution, and e) antifreeze.

   In order to abate this violation, H&K must do the following and submit the requested information to Ohio EPA **within 30 days of receipt of this letter.**

   a. Spent Lamps-H&K failed to have waste evaluation documentation or an established recycling plan in place for spent lamps generated at the facility.

      H&K must immediately cease disposing of the spent lamps as non-hazardous waste until a proper waste evaluation has been completed. Spent lamps can contain mercury and other heavy metals which could make them a hazardous waste. Hazardous waste lamps 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.

      Within 30 days of receipt of this letter, H&K must choose one of the following options and submit to Ohio EPA the requested information as documentation to demonstrate how you plan to properly manage your spent lamps: **1)** If H&K decides to manage the lamps as a waste, then H&K will need to sample each type and brand of lamp at the facility using a Toxicity Characteristic Leaching Procedure (TCLP) test for Resource Conservation and Recovery Act (RCRA) metals. H&K must then submit all analytical results to Ohio EPA along with a summary describing whether the spent lamps are a hazardous waste or non-hazardous waste and how the spent lamps will be managed. **2)** The other alternative is that H&K can begin to manage all spent lamps as universal waste. If H&K chooses this option, then H&K must submit a summary that outlines how

the spent lamps will be managed as universal waste and where they will be shipped. H&K must also submit photographic documentation that the containers used to store the spent lamps are all closed and have the proper labels and accumulation start dates located on them. Ohio EPA recommends that spent lamps be managed as a universal waste and recycled.

It should also be noted that even though green tipped lamps or "environmentally friendly" lamps are sometimes guaranteed by the manufacturers to pass a TCLP test, more information is needed to dispose of these lamps as solid waste. Most manufacturers base this guarantee on the amount of mercury contained in the lamp. Without analytical results showing a representative sample of these lamps passing the TCLP test for ALL RCRA metals (mercury, cadmium, lead, etc.), these lamps cannot be disposed of as solid waste. Spent lamps can contain other RCRA metals such as cadmium and lead which could be above the hazardous waste limits.

For more information the following fact sheets on spent lamps have been enclosed: Universal Waste Rules for Handlers of Lamps, dated June 2005; Fluorescent Lamps: What You Should Know, dated January 2007; Universal Waste, dated December 2004; and Computer, Fluorescent Lamp and Ballast Recyclers, dated November 2008.

b. Waste Paint Booth Filters-H&K failed to have proper waste evaluation documentation for waste paint booth filters generated at the facility.

H&K changes the paper filters approximately twice a year. At the time of the inspection, H&K was disposing of the waste paint booth filters in the trash.

In order for H&K to determine whether the waste paint booth filters exhibit any hazardous waste characteristics, H&K must obtain a chemical analysis of a representative sample of the waste paint booth filters. H&K will need to contract the services of an environmental laboratory to analyze this material. H&K must at least determine the concentrations of the RCRA metals and volatile organic compounds (VOCs) in the waste. If the waste paint booth filters can be considered a liquid as defined in OAC Rule 3745-51-21, then the flashpoint of the material must also be evaluated.

Due to the cost of sampling and analyzing this material, H&K has the option of analyzing the waste paint booth filters for total RCRA metals and total VOCs. However, based on the results of this test, a TCLP test for RCRA metals and TCLP test for VOCs may also be required.

H&K shall submit the analytical results indicating the proper evaluation of the waste paint booth filters. The results must document if the waste is hazardous or not and, if hazardous, whether it is restricted from land disposal. If the waste is hazardous, H&K must explain what treatment, storage, or disposal facility the waste will be sent 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 notify me at least five days prior to taking the sample(s) so that I may be present.

For more information, the following fact sheets have been enclosed: Handling Paint Waste from Your Business, dated August 2000; Identifying Your Hazardous Waste, dated November 2006; Use of Generator Knowledge In Complying with OAC rule 3745-52-11 *Hazardous Waste Evaluation*, dated July 18, 2005; Violations Most Frequently Cited by Division of Hazardous Waste Management Inspectors, printed November 19, 2008; and Commercial Environmental Laboratories, printed February 2, 2009.

c. Water from the Paint Pit-H&K failed to have proper waste evaluation documentation for the water generated from the paint pit.

During the inspection, H&K showed Ohio EPA the paint booth. According to H&K, the paint booth has a pit where groundwater accumulates during the rainy season. H&K stated that this pit is pumped out and the water is sent down a drain or drained behind the building. H&K must immediately cease disposing of the pit water until a proper waste evaluation has been completed.

In order for H&K to determine whether the paint pit water exhibits any hazardous waste characteristics, H&K must obtain a chemical analysis of a representative sample of the waste paint pit water. If any sludge is generated at the bottom of this pit, then a separate sample of the waste paint pit sludge must also be obtained. H&K will need to contract the services of an environmental laboratory to analyze these materials. H&K

must at least determine the concentrations of the RCRA metals and VOCs for both the water and sludge, if present.

Due to the cost of sampling and analyzing this material, H&K has the option of analyzing the water and sludge for total RCRA metals and total VOCs. However, based on the results of this test, a TCLP test for RCRA metals and TCLP test for VOCs may also be required.

H&K shall submit the analytical results indicating the proper evaluation of the water and sludge, if present. The results must document if the waste is hazardous or not and, if hazardous, whether it is restricted from land disposal. If the waste is hazardous, H&K must explain what treatment, storage, or disposal facility the waste will be sent 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 notify me at least five days prior to taking the sample(s) so that I may be present.

In addition, H&K must submit information to Ohio EPA concerning where the drained water is being discharged. If this waste is being sent to the local waste water treatment plant (wwtp), then H&K will need to include a letter from the wwtp stating that they can accept and properly treat the waste water. If the water is being placed down a storm drain, then H&K must submit this information as well.

d. Waste Parts Washer Fluid- H&K failed to have proper waste evaluation documentation for the waste parts washer solution.

Waste parts washer fluid can be hazardous waste based on the characteristic of ignitability (D001) or the concentration of RCRA metals. According to the Material Safety Data Sheet (MSDS) for the parts washer fluid, this specific fluid is hazardous for ignitability (D001). However, H&K has not evaluated this fluid for RCRA metals.

In order for H&K to determine whether the waste parts washer fluid exhibits any hazardous waste characteristics, H&K must obtain a chemical analysis of a representative sample of the waste parts washer fluid. H&K will need to contract the services of an environmental laboratory to analyze this material. H&K must at least determine the concentrations of the RCRA metals in the waste and the flashpoint of the waste.

Due to the cost of sampling and analyzing this material, H&K has the option of analyzing the waste parts washer fluid for total RCRA metals. However, based on the results of this test, a TCLP test for RCRA metals may also be required.

H&K shall submit the analytical results indicating the proper evaluation of the waste parts washer fluid. The results must document if the waste is hazardous or not and, if hazardous, whether it is restricted from land disposal. If the waste is hazardous, H&K must explain what treatment, storage, or disposal facility the waste will be sent 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 notify me at least five days prior to taking the sample(s) so that I may be present.

For more information the booklet titled Ohio EPA's Parts Washer Handbook, dated November 2007, has been included.

e. Antifreeze-H&K failed to have proper waste evaluation documentation for the antifreeze.

In order for H&K to determine whether the antifreeze exhibits any hazardous waste characteristics, H&K must obtain a chemical analysis of a representative sample of the antifreeze. H&K will need to contract the services of an environmental laboratory to analyze this material. H&K must at least determine the concentrations of the RCRA metals in the waste.

Due to the cost of sampling and analyzing this material, H&K has the option of analyzing the antifreeze for total RCRA metals. However, based on the results of this test, a TCLP test for RCRA metals may also be required.

H&K shall submit the analytical results indicating the proper evaluation of the antifreeze. The results must document if the waste is hazardous or not and, if hazardous, whether it is restricted from land disposal. If the waste is hazardous, H&K must explain what treatment, storage, or disposal facility the waste will be sent to. H&K must also submit an MSDS for the parts washer solution.

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 notify me at least five days prior to taking the sample(s) so that I may be present.

2. **OAC Rule 3745-279-22 (C)(1), Used oil storage requirements for generators:** "Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words 'Used Oil'".

   H&K failed to mark two used oil tanks located in the back shop and ten used oil tanks located in the front shop with the words "Used Oil."

   H&K marked all twelve tanks with the words "Used Oil" while Ohio EPA was on site.

   Therefore, this violation was abated on February 23, 2009.

General Concerns:

A. **Used Oil:** During the inspection, H&K told Ohio EPA that used oil was generated from changing oil filters on automobiles. Ohio EPA would like to remind H&K that prior to crushing the oil filters, H&K must hot drain all oil filters to remove the excess used oil. Once the used oil is removed from the filter, the filter is no longer considered a waste if recycled as a scrap metal.

   Ohio EPA would also like to remind H&K that only used oil that is generated at H&K or received from household do-it-yourselfers can be burned at the facility without following additional regulations. If H&K would like to burn used oil from other businesses, then additional regulations must be followed. For more information on used oil the following fact sheets have been enclosed: The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil, dated April 2006; and Used Oil Burners-New Guidance for Rebuttable Presumption, dated April 2008.

B. **Sandblasting Sand and Other Waste Streams:** During the inspection, H&K stated that the sandblasting machine was rarely used. H&K said the sand from the machine had never been replaced since the machine had only been used a couple of times. Ohio EPA would like to remind H&K that prior to disposing of the sand in the trash, a proper waste evaluation should be

completed. Sandblasting sand can be hazardous for RCRA metals. Therefore, H&K should obtain a representative sample of the sand and submit it to an environmental laboratory to determine the concentrations of RCRA metals in the sand prior to disposal.

As a business all waste streams that are generated at the facility need to be evaluated prior to disposal. This includes waste streams that are generated from daily business and waste streams generated from the maintenance or upkeep of the facility itself. Any waste streams generated by H&K now that have not been evaluated or any waste streams generated in the future by H&K should be evaluated prior to disposal to determine if they are hazardous waste. If H&K has any questions on waste evaluation, please call Ohio EPA at the number listed below.

C. **Parts Washer Fluid:** OAC rule 3745-51-01(C)(1) states "A "spent material" is any material that has been used and as a result of contamination can no longer serve the purpose for which it was produced without processing..." A secondary material that is further used, for its intended purpose as a product, is not spent or a waste. It does not necessarily need to serve its original use. Solvents that are still fit for use are not spent materials (and hence not hazardous wastes) when used for their intended purposes. This practice is considered continued use of a product.
At the time of the inspection, H&K was having both parts washers serviced once a month. Each servicing generates between 30 and 50 gallons of parts washer solution per month. This solution was being taken by Vesco Oil Corporation (Vesco). Ohio EPA contacted Vesco during the inspection to see if the parts washer fluid was in a continued use program. Although Vesco is reusing the parts washer fluid, Vesco filters the parts washer fluid before it is reused. This filtering is considered processing of a material. Since the parts washer fluid has to be filtered prior to reuse, and cannot be used "as is" once it leaves H&K, it is not considered to be in a continued use program.

Ohio EPA spoke to H&K during the inspection about the frequency of the parts washer servicing. According to H&K, the parts washers do not get used on a regular basis. Therefore, the parts washer fluid may be able to be serviced only once every two or three months. At the time of the inspection, H&K seemed very open to changing the frequency of the parts washer servicing. Ohio EPA recommends that H&K change the frequency of servicing the parts washers to as infrequent as possible. This practice will not only reduce the cost associated with servicing the parts washers, but also reduce the amount of waste being generated from the parts washers.

H&K may also want to research other companies that will service parts washers to find a facility that can use the parts washer fluid for continued use once it leaves H&K. If H&K can find a facility that will place the parts washer fluid in a continued use program, then this waste will not be counted toward H&K's hazardous waste generator status. For more information on hazardous waste generator status, the following fact sheet titled Hazardous Waste Generator Categories And Episodic Generation, dated March 2007, has been enclosed.

Within 30 days of receipt of this letter, H&K should submit information to Ohio EPA that documents the changes made to the frequency of the parts washer servicing. This could include a contract with the company servicing the parts washers that spells out the frequency of servicing, a written letter from the company stating they understand the reduction in frequency and will abide by H&K's request, or other documentation that states the new frequency of servicing.

As we discussed during the inspection, you may be able to 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 treatment and disposal costs. Ohio EPA also has helpful information about pollution prevention at the following web address: http://www.epa.state.oh.us/ocapp/ocapp.html. If you would like to be considered for an in-depth on-site pollution prevention assessment, or if you would like more information about pollution prevention assessments, please contact me at (419) 373-3065.

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 site: www.epa.state.oh.us/dhwm/listserv.html. Please feel free to share this with your colleagues.

Enclosed you will find a copy of the checklists that were completed during the inspection. Should you have any questions, please feel free to call me at (419) 373-3065. You can find copies of the rules and other information on the division's web page at http://www.epa.state.oh.us/dhwm.

Please send all correspondence **within 30 days of receipt of this letter** to Ohio EPA, Northwest District Office, Attn: Kara Reynolds, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,

Kara Reynolds

Kara Reynolds
Environmental Specialist
Division of Hazardous Waste Management

/lb

Enclosures

cc: Colleen Weaver, DHWM, NWDO
Kara Reynolds, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
DHWM, NWDO Putnam County File: H&K Chevrolet Pontiac Buick

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.	EPA ID Number: **OHD 017 929 969**
Site Name	Name: **H&K Chevy Pontiac Buick** Website: (Optional)
Site Location Information	Street Address: **200 South Main Street** City, Town, or Village: **Continental** State: OH County Name: **Putnam** Zip Code: **45831**
Site Land Type (check only one)	Private ☒ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other ☐
NAICS code(s) www.census.gov/epcd/www/naics.html	
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: **Bob** MI: Last Name: **Quigley** Phone Number: **419-596-3808** Phone Number Extension: E-Mail Address: Fax Number: 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: **Ron Winkle** Date Became Owner (mm/dd/yyyy): **2005** Owner Type: Private ☒ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other ☐ Street or P.O. Box: **21936 County Road D** City, Town or Village: **Continental** Owner Phone #: State: **Ohio** Country: **USA** Zip Code: **45831** Name of Site's Operator: Date Became Operator (mm/dd/yyyy): Operator Type: Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other ☐ Street or P.O. Box: City, Town or Village: Operator Phone #: State: United States Zip Code:

VIOLATIONS CITED? ☒ Yes ☐ No

TYPE OF HANDLER– A MINIMUM OF ONE BOX MUST BE CHECKED

☐ Not a HW Generator	☒ UNKNOWN: Cited for violation of 3745-52-11	☐ Large Quantity Generator (LQG)
		☐ Small Quantity Generator (SQG)
		☐ Conditionally Exempt Small Quantity Generator
		☐ U.S. Importer of Hazardous Waste
		☐ Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

- ☐ Recycler of Hazardous Waste
- ☐ Underground Injection Control Facility
- ☐ Hazardous Waste Transporter
- ☐ Treater, Storer or Disposer of Hazardous Waste
- ☐ Exempt Boiler and/or Industrial Furnace
- ☐ Small Quantity On-Site Burner Exemption
- ☐ Smelting, Melting, Refining Furnace Exemption

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY)

- ☐ Small Quantity Handler of Universal Waste
- ☐ Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)
- ☐ Destination Facility for Universal Waste

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 RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

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

Announced	☐ Yes	☒ No	Additional Facility Representatives:
Tanks	☐ Yes	☒ No	Other Comments:
Containers	☒ Yes	☐ No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Kara Reynolds	**Amber Hicks**	**2/23/2009** 11:45 AM

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) _____

5	Painting	Water from Paint Pit	Removed twice a year or as Needed		Unknown Drain or Behind Lot		
6	Maintenance	Used Oil Filters	Unknown Drums Front Shop	Storage	Lyden	Recycle	
7	Maintenance	Parts Washer Fluid	30-50 Gallons Not Stored Changed Directly from Parts Washer		Vesco Oil Corporation, Detroit, Michigan - Filtered and then Reused	Continued Use	
8	Maintenance	Antifreeze	2-4 Drums per Year Drums Antifreeze Storage Area	Storage	PetroChem, Michigan		
9	Body Work	Sandblasting Sand	Not yet been generated				

REMARKS/GENERAL INFORMATION

General Process Information: See Attached Letter.
Regulatory/Enforcement History (if applicable): N/A
Additional P2 remarks and information: See Attached Letter.
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: N/A

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: H&K Chevy Pontiac Buick **Facility Type:** CESQG **Date of Inspection:** 02-23-2009 **EPA ID#:**OHD 017 929 969

***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	Maintenance	Spent Lamps	Unknown		Landfill		Recycle
2	Maintenance	Used Oil	~50 Gallons Tanks Used Oil Area in Front Shop and Back Shop	Storage/ Burnt on site		Recycle	
3	Painting	Paint Related Material D001, D035, F003, F005	1-2 Drums per Year Drums Paint Mixing Room in Back Shop	Storage	PetroChem, Michigan		
4	Painting	Paint Booth Filters	Changed twice a year		Local Landfill		

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")] **May change with the results of the requested waste evaluations.**		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.			
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 ☐ No ☒ N/A ☐
	a.	Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes ☐ No ☐ N/A ☒

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 ☒
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 ☐ 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)]		Yes ☒ No ☐ N/A ☐
	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:		
	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 that 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 ☐
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 ☐ No ☐ N/A ☒
12.	If the generator self-transports 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 ☐ 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			
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 ☐ No ☐ N/A ☒
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]		Yes ☐ No ☐ N/A ☒
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 ☐ 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.			