Ohio | Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

New

OHR 000 162 644

Re: Huggins Auto Parts
Complaint #3008
Putnam County
Hazardous Waste
Notice of Violation

December 14, 2010

Mr. Tony Imm, Owner
Huggins Auto Parts Inc.
402 West Main Street
Ottawa, Ohio 45875

Dear Mr. Imm:

Thank you for accompanying me during Ohio EPA's December 6, 2010, complaint investigation **(CI)** and compliance evaluation inspection **(CEI)** of Huggins Auto Parts Inc. (HAP) located at 402 West Main Street, in Ottawa, Ohio. I inspected HAP to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). My inspection included observations of facility operations and a review of written documentation. According to the complaint, received by Ohio EPA on August 27, 2010, HAP has been improperly removing hazardous waste. This letter will explain the violations I found, what you need to do to correct the violations, and the validity of the complaint.

HAP performs towing services, vehicle service and repair, parts and tools sales and used car sales. HAP is also a PPG paint distributor. HAP uses a building at its facility on Maple Street to paint cars. Most of the painting work is done on its used cars and some collision work is done. I observed the 5-gallon safety can that HAP properly accumulates its hazardous waste lacquer thinner in. **Therefore, this complaint is not valid.**

HAP was operating as a hazardous waste conditionally exempt small quantity generator at the time of my inspection. HAP generates the following wastes:

1. Waste Lacquer Thinner (F003 & F005): HAP uses a lacquer thinner that contains significant concentrations of toluene and methanol, for cleaning its paint spray gun. It generates a very small amount of waste thinner. It may take more than two years to fill the five gallon safety can.

2. Used Oil: HAP accumulates used oil, from vehicle service and repair, in drums and totes. It is drained from the cars into collection pans, pumped into 55-gallon drums and then pumped into totes in the back room. From the totes, the used oil is pumped into a used oil-fired space heater. The heater has a capacity less than 500,000 BTUs and is vented to the atmosphere. HAP also accepts a very small amount of used oil from DIY sources (customers).

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402-9398

419 | 352 8461
419 | 352 8468 (fax)
www.epa.ohio.gov

3. Used Batteries: Used vehicle batteries are recycled through Auto Wares Inc. of Grand Rapids, Michigan.

4. Waste Lamps: HAP has been placing its spent fluorescent lamps in the trash.

If antifreeze must be removed from a vehicle, it is stored and sold.

If HAP generates any waste paint residue, it must sample and analyze the waste before discarding it. Your analysis must include, at least, the RCRA metals found in OAC Rule 3745-51-24.

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

1. Waste Evaluation
OAC Rule 3745-52-11

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

HAP has failed to evaluate its spent lamps (all types), according to this rule and has been placing them in the trash. In order to abate this violation, HAP must evaluate its spent lamps. Instead of obtaining a sample of the lamps and having the sample analyzed in a laboratory, HAP may elect to manage its spent lamps (all types) as Universal Waste (recycling). During the inspection, we discussed these two options and you indicated you would like to manage your spent lamps as Universal Waste. The requirements for Universal Waste lamps include:

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

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

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

Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil." On December 6, 2010, I observed used oil in three totes in the back room, one tote in the back lot, and several pails inside the shop, that were not labeled in this manner.

In order to correct this violation, HAP must immediately mark or label all used oil containers with the words "Used Oil" and provide me with photographic documentation that this has been done.

3. **Used Oil Container Condition**
OAC Rule 3745-279-22(B)

Containers and aboveground tanks used to store used oil at generator facilities must be in good condition (no severe rusting, apparent structural defects or deterioration). On December 6, 2010, I observed several used oil pails inside the shop, that were not closed (a structural defect), with some minor visible leaks surrounding them.

In order to correct this violation, HAP must immediately close all used oil containers or place the used oil into containers that can be closed and provide me with photographic documentation that this has been done.

As a result of my inspection, I found the following general concern. In order to correct this general concern, you must do the following and send me the required information, **within 30 days** of your receipt of this letter:

On December 6, 2010, I observed two 55-gallon drums containing unknown material, in the back lot of your facility. HAP must open these drums, determine their contents and report this to Ohio EPA. If the material is a waste and cannot be used at HAP (if it is not used oil or antifreeze that can be sold) HAP must properly evaluate the waste to determine if it possesses a characteristic of hazardous waste and arrange for its proper disposal. You must submit to Ohio EPA a copy of the shipping paper or hazardous waste manifest demonstrating that this has been done.

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

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. I have enclosed copies of the following documents to assist you in properly managing your spent lamps: Fluorescent Lamps: What You Should Know and Computer, Fluorescent Lamp and Ballast Recyclers. I recommend that you review these documents carefully and contact me if you have any questions. The first document describes the rules you must follow in order to manage lamps as a universal waste.

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

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

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

Enclosed you will find copies of all checklists completed during the inspection. If you have any questions, please feel free to contact me at (419) 373-3074.

You can find copies of the rules and other information on the division's web page at http://www.epa.ohio.gov. Ohio EPA also has helpful information about pollution prevention at http://www.epa.ohio.gov/ocapp.

Sincerely,

Don North

Don North
District Representative
Division of Hazardous Waste Management

llr

Enclosures

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
Paul Chad, DAPC, NWDO
DHWM, NWDO File: Putnam County, Huggins Auto Parts (New)

ec: Don North, DHWM, NWDO

NOTICE:

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

Send to Central Office ☒	Ohio Environmental Protection Agency **RCRA SUBTITLE C SITE** **IDENTIFICATION/VERIFICATION FORM**	For Ohio EPA use only

Completed verification forms required to be submitted to CO should be e-mailed to paula.canter@epa.state.oh.us.

Site EPA ID No. **Site Name**	EPA ID Number: Name: **Huggins Auto Parts Inc.**				Website: (Optional)			
Site Location Information	Street Address: **402 West Main Street**							
	City, Town, or Village: **Ottawa**				State: OH			
	County Name: **Putnam**				Zip Code: **45875**			
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: **Tony**	MI:	Last Name: **Imm**
	Title: **Owner**		
	Phone Number: **419-523-5188**	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:			Date Became Owner (mm/dd/yyyy):				
	Owner Type:	Private ☐	County ☐	District ☐	Federal ☐	Indian ☐	Municipal ☐	State ☐	Other ☐
	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 ☐	County ☐	District ☐	Federal ☐	Indian ☐	Municipal ☐	State ☐	Other ☐
	Street or P.O. Box:							
	City, Town or Village:			Operator Phone #:				
	State:			Country		Zip Code:		

VIOLATIONS CITED?	☒ Yes ☐ No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

☐ Not a HW Generator	☐ UNKNOWN: Cited for violation of 3745-52-11	☐ Large Quantity Generator (LQG)
	☐ 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.*	☐ 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)

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

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 Used Oil
- ☐ Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

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

- ☐ College or University
- ☐ Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
- ☐ Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

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

F003 **F005**

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	
Containers	☒ Yes	☐ No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Don North		**12/06/2010**

Comments:

Revised 07.26.10

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Huggins Auto Parts Inc. **Facility Type:** ☐LQG ☐SQG ☒CESQG ☐TSD **Date of Inspection:** 12-6-10 **EPA ID#:**

***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	Cleaning paint gun	Waste Lacquer Thinner F003 & F005	Less than a gallon	None	Not shipped yet. Very small quantity		
2	Vehicle service and repair	Used Oil	More than 55 gallons	Burned in used oil-fired space heater		Burned for energy recovery	
3	Vehicle service and repair	Used Batteries	Few occassionally	None	Auto Wares Inc. Grand Rapids, MI Recycled	Recycling	
4	Facility lighting	Waste Lamps	Few occassionally	Discarded in trash	Must be recycled as Universal Waste		
5							
6							
7							

8							
9							

REMARKSBGENERAL INFORMATION

General Process Information:

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

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? ☐ Yes* ☐ No *If yes, refer promptly to your district P2 coordinator.
Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other:

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

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

Safety Equipment Used:

WASTE EVALUATION			
1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11] **Spent lamps have not been evaluated; instead have been placed in the trash.**		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)] **New source and facility has not needed to dispose of hazardous waste yet.**		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#? [3745-279-24]		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.			