



MS
FILE COPY

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

November 29, 2012

Ms. Carrie Samandar
Global Recycling, Inc.
1465 E. 17th Ave.
Columbus, OH 43219

Re: [NOV-RTC] Global Recycling, Inc.
OHR000124859, Franklin County

Dear Ms. Samandar:

Thanks for your time and assistance during my inspection visit to your facility on October 26, 2012. The purpose was to review your facility's generation and management of used oil. Three different businesses under common ownership were operating at the time of our visit, with Global Recycling having the most activity subject to our review. Ohio's laws under Chapter 3745 of the Ohio Administrative Code and Chapter 3734 of the Ohio Revised Code establish a system for safe and responsible management of this waste. This letter summarizes the inspection findings.

One violation was noted, and was corrected later on the day of the inspection:

1. **Used oil container & tank marking, OAC rule 3745-279-22(C):** Containers and tanks of used oil must be clearly labeled or marked as "Used Oil".

Two red 250-gallon aboveground tanks, about 6 cubic yard tote containers, two wheeled oil caddy units, and a red 55-gallon drum lacked this required marking at the time of the inspection visit.

Photos showing the corrections made were received by email late in the day of our visit. This violation is considered resolved.

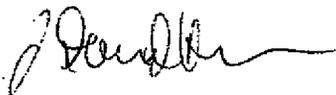
The following comments are also provided at this time:

- Past spills or releases of used oil were cleaned up and disposition of the soils was being arranged. We recommended covering the soil pile (which you had determined to be not exhibiting any characteristic of hazardous waste) and sending it to a solid waste landfill (due to presence of various debris in it). Additional paving and berming near the dismantling and crushing areas, and upgrades to the storm water system on site were also being planned and implemented.

- Mercury switches if present, should be removed from older scrap vehicles that contain them prior to vehicle crushing, to prevent possible on-site and off-site pollution by that toxic heavy metal. They should be collected and recycled, and may be managed as universal waste under OAC Rule 3745-273-04.

Enclosed is a checklist completed during the inspection. If you have any questions about this letter, do not hesitate to contact me by phone at (614) 728-3885.

Sincerely,



J. David Hohmann
Division of Materials and Waste Management
Central District Office

JDH/nsm Global NOV RTC

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

USED OIL INSPECTION CHECKLIST

GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes: N/A	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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 checked="" type="checkbox"/> N/A <input type="checkbox"/>

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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"/>
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)] <i>RMK: Some single wall tote containers were being taken out of use and replaced with double-wall steel aboveground storage tanks.</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil"? [3745-279-22(C)] <i>RMK: At the time of the inspection visit, several tote containers and the two new aboveground used oil accumulation tanks lacked this required marking.</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	
	a. Stopped the release? <i>RMK: None were observed ongoing during our visit, and some identified previously had been cleaned up.</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Contained the release? <i>RMK: Additional containment concrete pad and berm were being designed for around the dismantling area and crusher machine.</i>	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? <i>RMK: Spilled used oil identified as a concern during a recent visit by DSW-CDO staff had been scraped up and stockpiled, evaluated, determined not to be hazardous, and was awaiting disposal to an offsite solid waste landfill.</i>	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? <i>RMK: some of the tote containers were being replaced with more solidly designed steel tanks.</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

ON-SITE BURNING IN SPACE HEATER

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: <i>RMK: No, not at this time.</i>	
	a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/> No <input 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 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 type="checkbox"/> N/A <input checked="" type="checkbox"/>

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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] <i>RMK: N/A</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).

COLLECTION CENTERS AND AGGREGATION POINTS *RMK: N/A, not accepted from other generators or DIY-ers*