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

April 11, 2013

Mr. Charlie Golden
Charlie's Autobody
4309 Directors Blvd.
Groveport, OH 43125

Re: **Charlie's Autobody**
3/26/2013 Complaint Investigation
Franklin County (NOV/RTC)

Dear Mr. Golden:

Thanks for your help during my visit to your facility on March 26th. The purpose was to investigate a complaint (#4498) that Ohio EPA had received regarding waste oil and solvent management and disposal practices. 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 hazardous wastes and used oil.

Your business appears to be a Conditionally Exempt Small Quantity Generator of hazardous waste, and a used oil generator. One violation was noted and has been promptly corrected:

Used oil container marking, OAC rule 3745-279-22(C): Containers and tanks for accumulating used oil must be clearly marked as "Used Oil"

A 250-gallon tote container of used oil outside the shop, containing used oil, lacked this required marking.

The tote was properly marked by a worker at the time of my visit. Any smaller containers that may be utilized from time to time for collecting used oil inside the building should also be properly marked. This violation is considered resolved.

The following comments and/or concerns are also noted:

- A 5-gallon can of waste solvent in the paint mixing room, had an open funnel. Please ensure that containers of hazardous waste are kept closed when waste is not being added to them, to avoid improper evaporation losses of this material which you otherwise would be recycling on site in the distillation unit.
- We noted your solvent recycling still was processing 5-gallon batches, about once a week. The working quantity of solvent in use is 10 gallons, and about 5 gallons of new makeup solvent were being added each month. Still bottom "pucks" were being properly collected in a closed, marked hazardous waste container, for shipment to a permitted treatment and disposal facility (Veolia, in Wisconsin).

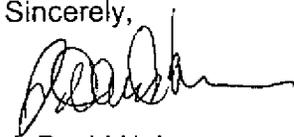
Mr Charlie Golden

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- A metal, threaded screw-in funnel with a latching, gasketed hinged lid is the best option for use on waste paint solvent accumulation containers to reduce the chance of spills while filling it, and enable proper closure of the top opening whenever waste is not being added to the container.
- A spatula is the recommended method to ensure that any product which can be removed from any paint cans, is properly removed prior to disposing or recycling the empty cans.

No other follow-up correspondence or response is needed at this time, since the one violation has been resolved. Thank you for your continued attention to hazardous waste compliance matters. If you have any related questions now or in the future, do not hesitate to contact me by phone at (614) 728-3885.

Sincerely,



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

c: CDO File

JDH/nsm Charlies Autobody 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"/> | |
| | a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" 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)] | 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: This problem was corrected by facility staff during the time of my inspection visit.</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)] <i>RMK: No releases or evidence of past releases were observed. Repair operations were being done inside and/or under cover, with use of absorbent materials as needed to clean up any incidental spills or drips.</i> | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> | |
| | a. Stopped the release? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> | |
| | b. Contained the release? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> | |
| | c. Cleaned up and properly managed the used oil and other materials? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> | |
| | d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> | |

ON-SITE BURNING IN SPACE HEATER *N/A, this was not being done on site*

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>N/A, no self-transportation or aggregation of used oil was being done.</i> | | | | |

COLLECTION CENTERS AND AGGREGATION POINTS *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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|--|

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"/> |
|----|---|--|

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"/> |
|----|---|--|

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