



Environmental
Protection Agency

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

July 26, 2012

Mr. Matthew Armitage
Armitage Auto Body
2846 Banwick Drive
Columbus, Ohio 43232

Dear Mr. Armitage:

Re: CDO Complaint #4350, Armitage Auto Body OHR000171421
6/26/2012, Franklin County

Thanks to Jerry, your employee, for his time during my visit to Armitage Auto Body at 2846 Banwick Drive on June 26, 2012. The purpose of my visit was to investigate a complaint Ohio EPA had received concerning the management and disposal of hazardous waste from your business. 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 used oil and hazardous wastes. Your business appears to be a conditionally exempt small quantity generator. This letter summarizes our findings.

One violation was noted:

Used Oil Container Marking, OAC Rule 3745-279-22(C)(1): Containers for accumulating/ storing used oil must be clearly marked as "Used Oil".

A 250-gallon cage tote container was not marked as used oil. The oil was being picked up periodically by McGloughlin Oil for recycling.

Please send a photo of this problem corrected. A stencil or sign may be used.

I am enclosing a checklist completed during this inspection. Ohio EPA is assigning an "internal" tracking I.D. number to your facility.

In addition, I offer these comments/suggestions:

- Waste paint solvent containers should be kept closed to prevent evaporation losses that cause air pollution. Such waste must be sent to a RCRA permitted facility for proper recycling/treatment/disposal.
- An automated paint spray gun cleaning machine may reduce your labor and solvent usage/disposal costs.

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Ohio EPA requires timely actions for compliance with these rules. Please send me a response in 15 days, describing actions taken to correct the violation noted above. If you have any questions, 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

c: CDO File

JDH/nsm Armitage NOV

"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."

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.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used: Safety glasses

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")] Yes No N/A

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
RMK: Manifests were not reviewed during the inspection (not required/available)

TREATMENT OF HAZARDOUS WASTE

[N/A]

MIXING OF HAZARDOUS WASTE WITH USED OIL

[N/A]

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: [n/a] Yes No N/A

USED OIL GENERATOR REQUIREMENTS

PROHIBITIONS

1. Does the generator manage used oil in a surface impoundment or waste pile? If yes: (a. = N/A) Yes No N/A

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

GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil? If so, [a. = n/a] Yes No N/A

a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] Yes No N/A

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

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] [NO, therefore a. -c. = n/a]

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-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] [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 [N/A, activity not occurring at this facility]