



**Environmental  
Protection Agency**

**Governor  
Lt. Governor  
Director**

October 3, 2012

Mr. Carlos R. Valle  
Los Hispanos Automotive  
5427 Sinclair Road  
Columbus, OH 43229

**Re: Los Hispanos Automotive  
Non-Notifier  
Franklin County  
Notice of Violation**

Dear Mr. Valle:

On August 30, 2012, a complaint was forwarded to me regarding the Los Hispanos Automotive (LHA) facility located at 5427 Sinclair Road, Columbus, OH 43229 in Franklin County. The complainant alleged improper management of automotive fluids and filters by LHA at the facility.

On September 19, 2012, I met with you at the LHA facility to discuss the complaint allegations and review facility operations. Based on this discussion and review, it was determined that LHA was operating in violation of the following rules stipulated within the Ohio Administrative Code (OAC):

- (1) OAC Rule 3745-279-22(B), Used Oil Storage Requirements for Generators – Condition of Units: Containers and aboveground tanks used to store used oil at generator facilities must be in good condition, with no severe rusting, apparent structural defects, or deterioration.

LHA had a blue poly 55-gallon container with the side cut out. This container for used oil accumulation was determined to not be structurally competent and/or secure.

As we discussed, the contents of this container must be immediately transferred to another container appropriate for accumulating used oil.

- (2) OAC Rule 3745-279-22(C), Used Oil Storage Requirements for Generators – Labels: Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words “Used Oil.”

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LHA had at least three (3) 55-gallon containers that were being used for accumulation of used oil that were not appropriately labeled.

As we discussed, all containers used for management of used oil must be immediately labeled with the words "Used Oil."

(3) OAC Rule 3745-279-22(D)(3): Used Oil Storage Requirements for Generators – Response to Releases: Upon detection of a release of used oil to the environment, a generator must perform the following cleanup steps:

- 1) Stop the release;
- 2) Contain the released used oil;
- 3) Cleanup and manage properly the released used oil and other materials, and;
- 4) If necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service.

Some oil staining was apparent on the ground in the general area where the used oil was being accumulated. It was reported that bungs had recently been placed into the bung holes of the containers and a cover had been placed over the top of another container to prevent any additional spillage.

As we discussed, the area of stained soil must be immediately removed and appropriately disposed.

A response should be submitted to this office within fourteen (14) days of the date of this letter. Also, I will be stopping by the LHA facility during this time schedule to review the progress made towards obtaining a full return to compliance.

#### General Comments

In regards to the used oil filters generated by LHA, OAC rule 3745-51-04(B)(13) stipulates that non-terne plated used oil filters are not considered to be hazardous wastes if the filters have been gravity hot-drained using one of the following methods:

- a) Puncturing the filter anti-drain back valve or the filter dome end and hot-draining;
- b) Hot-draining and crushing;
- c) Dismantling and hot-draining; or
- d) Any other equivalent hot-draining method which will remove used oil.

LHA must implement a process for hot-draining used oil filters prior to recycling and/or disposal. Enclosed, you will find a document titled, "Ask the Inspector" and has the

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words "Used Oil Filters" highlighted at the top of the page. This document describes acceptable methods for hot-draining used oil filters. After the hot-draining is completed, the filters could be placed into the regular trash and/or sent off-site for recycling.

Please find enclosed the following documents for your review:

- Running an Auto Maintenance Shop? Know Your Ohio EPA Regulations;
- The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil;
- Lead Acid Batteries Must Be Recycled;
- Used Oil Recyclers list;
- Oil Filter Recycling and Transportation Services list;
- Antifreeze Recycling Services list;
- Aerosol Can Questions;
- Universal Waste; and
- Fluorescent Lamps: What You Should Know.

You may find other helpful information on Ohio EPA's web site, which can be found at the following web address: <http://www.epa.state.oh.us/>. I have also included copies of the checklists completed as a result of the complaint investigation. Should you have any questions or need additional information, I can be reached by telephone at 614-728-5037.

NOTICE: Ohio EPA's failure to list specific violations or deficiencies in this letter does not relieve LHA from having to comply with all applicable rules and regulations.

Respectfully,



Randy Sheldon  
Environmental Specialist  
Division of Materials and Waste Management  
Central District Office

Enclosures

c: Ralph McGinnis, DMWM, CO  
~~DMWM-CDO File~~

## **FIELD ACTIVITY REPORT – COMPLAINT INVESTIGATION**

On August 30, 2012, Bryon Marusek, DAPC, CDO was at the Source One Auto Sales located at 5435 Sinclair Road, Columbus, OH 43229 in Franklin County regarding DAPC business. During this visit, Marusek took photographs of containers of used oil and/or used oil filters located at the rear of the property. Reportedly, this waste was generated from an auto repair business located next door to Source One Auto Sales.

On September 19, 2012, I went to the auto sales office and was told the repair shop was located next door. The auto repair shop is located at 5427 Sinclair Road and is called "Automotive Los Hispanos" (ALH). I spoke with Mr. Carlos Roberto Valle, owner/operator of ALH on this day. The property and building is owned by Mark & Jacqueline Devine.

Mr. Valle said he put the used oil, used oil filters, and used antifreeze at the rear of the property as inspectors had told him he could not keep them inside, per fire code regulations. The containers holding the used oil were not appropriately labeled as required and one of the containers was not really fit for use (~1/3 of a side had been removed). Used oil filters had previously been drained and placed into containers, but they had not been punctured or crushed. Used antifreeze had been placed into a container. It was reported that through time, different persons had managed the used oil, oil filters, and antifreeze for ALH. There is no auto body painting or parts cleaning done at this location, as mainly new parts are used. We discussed the use of brake cleaner and it was reported that any excess is captured in the used oil draining device(s) when sprayed onto the brakes. Auto batteries are traded for the core value when new ones are purchased. Although there was some soil staining near the containers of used oil et al, the inside of the building was found to be very neat and clean.

We discussed that the used oil containers had to be labeled with the words "used oil," that the oil filters should be punctured or crushed for appropriate draining, and that the container with the side removed should not be used. I told Mr. Valle I would get him a list of used oil, oil filter, and/or antifreeze recyclers for his review. We also discussed that the small area of stained soil near where the used oil containers were accumulating had to be removed and cleaned up. We discussed better waste management practices, getting new containers, and other general good housekeeping practices he might implement. I told Mr. Valle I would also supply him with other information that may help him with his business and in maintaining compliance with environmental regulations.

We discussed that he would be getting a notice of violation and that I would be back to his facility to monitor any progress he has made and/or until I could return the facility to full compliance.

Send to Central Office <input checked="" type="checkbox"/>	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE</b> <b>IDENTIFICATION/VERIFICATION FORM</b>	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to [brad.hauser@epa.state.oh.us](mailto:brad.hauser@epa.state.oh.us).

<b>Site EPA ID No.</b> <b>Site Name</b> <b>Site Location Information</b>  <b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	EPA ID Number:		Website: (Optional)		
	Name: <b>Los Hispanos Automotive</b>				
	Street Address: <b>5427 Sinclair Road</b>		State: <b>OH</b>		
	City, Town, or Village: <b>Columbus</b>		Zip Code: <b>43229</b>		
County Name: <b>Franklin</b>		Indian <input type="checkbox"/>		Municipal <input type="checkbox"/>	
Private <input checked="" type="checkbox"/>		County <input type="checkbox"/>		District <input type="checkbox"/>	
		Federal <input type="checkbox"/>		State <input type="checkbox"/>	
		Other <input type="checkbox"/>			

<b>Facility Representative</b> Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: <b>Carlos</b>		MI: <b>R</b>		Last Name: <b>Valle</b>	
	Title: <b>Owner</b>					
	Phone Number: <b>614-290-1300</b>			Phone Number Extension:		
	E-Mail Address:					
	Fax Number:					
	Fax Number Extension:					
	Street or P.O. Box: <b>5427 Sinclair Road</b>					
	City, Town or Village: <b>Columbus</b>			Zip Code: <b>43229</b>		
State: <b>OH</b>						

<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: <b>Mark &amp; Jacqueline Devine</b>		Date Became Owner (mm/dd/yyyy): <b>07/15/2003</b>			
	Owner Type:		Private <input checked="" type="checkbox"/>		County <input type="checkbox"/>	
	District <input type="checkbox"/>		Federal <input type="checkbox"/>		Indian <input type="checkbox"/>	
	Municipal <input type="checkbox"/>		State <input type="checkbox"/>		Other <input type="checkbox"/>	
	Street or P.O. Box: <b>5768 Sinclair Road</b>					
	City, Town or Village: <b>Columbus</b>			Owner Phone #:		
	State: <b>OH</b>			Country: <b>USA</b>		Zip Code: <b>43229</b>
	Name of Site's Operator: <b>Carlos Valle</b>		Date Became Operator (mm/dd/yyyy):			
	Operator Type:		Private <input checked="" type="checkbox"/>		County <input type="checkbox"/>	
	District <input type="checkbox"/>		Federal <input type="checkbox"/>		Indian <input type="checkbox"/>	
Municipal <input type="checkbox"/>		State <input type="checkbox"/>		Other <input type="checkbox"/>		
Street or P.O. Box: <b>5427 Sinclair Road</b>						
City, Town or Village: <b>Columbus</b>			Operator Phone #: <b>614-290-1300</b>			
State: <b>OH</b>			Country: <b>USA</b>		Zip Code: <b>43229</b>	

**VIOLATIONS CITED?**  Yes  No

**TYPE OF HANDLER - MARK "X" AS APPROPRIATE**

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11		<input type="checkbox"/> Large Quantity Generator (LQG)	
	<input type="checkbox"/> 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.		<input type="checkbox"/> Small Quantity Generator (SQG)	
			<input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator	
			<input type="checkbox"/> U.S. Importer of Hazardous Waste	
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator		

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)	
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Hazardous Waste Transfer Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility
<input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Receives Hazardous Waste from Off-site

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY)	
<input type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES	
<input type="checkbox"/> Batteries	
<input type="checkbox"/> Pesticides	
<input type="checkbox"/> Mercury containing equipment	
<input type="checkbox"/> Lamps	

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))	
<input checked="" type="checkbox"/> Used Oil Generator	
<input type="checkbox"/> Used Oil Transporter	
<input type="checkbox"/> Used Oil Transfer Facility	
<input type="checkbox"/> Used Oil Processor	
<input type="checkbox"/> Used Oil Re-refiner	
<input type="checkbox"/> Off-Specification Used Oil Burner	
<input type="checkbox"/> Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil	
<input type="checkbox"/> 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.

<input type="checkbox"/> College or University
<input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
<input type="checkbox"/> 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.

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

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
R Sheldon, DMWM, CDO		09/19/2012 11:30 AM

**Comments:**  
Complaint investigation.

**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"/>
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**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"/>
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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)] *(HW mixed with used oil)	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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**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 checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a. Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

**USED OIL INSPECTION CHECKLIST  
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

**NOTE:** 1. 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.

2. Inspectors can check BUSTR's web-site at [https://www.comapps.ohio.gov/sfm/fire\\_apps/bust/bustr/PublicInquiry.asp](https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp) to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at:

[https://www.comapps.ohio.gov/sfm/fire\\_apps/bust/bustr/SearchByCounty.asp](https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp).

**PROHIBITIONS**

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

**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 <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 type="checkbox"/>	N/A <input checked="" type="checkbox"/>

**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 <input checked="" type="checkbox"/>	No <input 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 checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

**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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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**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 <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 type="checkbox"/>	No <input checked="" 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)]	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)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Stopped the release?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Contained the release?	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?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

<b>ON-SITE BURNING IN SPACE HEATER</b>		
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 <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"/>
<i>NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).</i>		
<b>GENERATOR TRANSPORTATION</b>		
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]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<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).</i>		
<b>COLLECTION CENTERS AND AGGREGATION POINTS</b>		
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>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.</i>		