



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

March 20, 2013

Mr. Jim Hunt, President
Buckeye Ford
110 U.S. Route 42
London, Ohio 43140

Re: **Buckeye Ford**
OHD154175038
Madison County

Dear Mr. Hunt:

Thank you for accompanying Andy Maneff and Grant Hewett of Ohio EPA, Central District Office's Division of Materials and Waste Management during their February 26, and March 5, 2013, inspections of Buckeye Ford's London, Ohio facility. They inspected Buckeye Ford to determine its compliance with Ohio's hazardous waste, universal waste, and used oil laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). This letter will explain the violations they found, and what you need to do to correct the violations. Be aware, as a result of these violations, Buckeye Ford has been referred to Ohio EPA's Division of Materials and Waste Management's enforcement coordinator for enforcement consideration.

The results of the February 26th and March 5th inspections have been provided to Ohio EPA's Underground Injection Control (UIC). Our Surface Water program was also updated on the results of our inspection.

Listed below you will find Violations, Findings and requested Actions as they pertain to Hazardous Waste, Underground Injection Control and Surface Water. Surface Water Violations and requested Actions previously discussed in a letter dated February 22, 2013, have been reiterated in this letter for your convenience. The letter will conclude with a Summary of Requested Actions.

Hazardous Waste

Listed below are violations of Ohio's hazardous waste laws, observations and requested actions. Please respond with the required information and actions specified below.

1. **Violation - Hazardous Waste Treatment, Storage, and Disposal, ORC 3734.02 (E) & (F):**
No person shall store, treat, or dispose of hazardous waste except at a permitted hazardous waste treatment, storage, or disposal facility (TSD).

Finding - At the time of the inspection Buckeye Ford personnel acknowledged disposal of the waste generated from their solvent distiller into their general trash. The waste or "still bottoms" generated by this recovery unit are considered listed hazardous wastes (F005).

Action - Buckeye Ford must *immediately* start collecting and disposing of this waste properly. A list of Ohio's commercial facilities permitted to accept hazardous waste is available at: <http://epawebapps.epa.state.oh.us/Recyclers/jsp/results.jsp?category=29>.

Please be advised that Ohio EPA considers this violation serious in nature.

- 2. Violation - Failure to Evaluate, OAC Rule 3745-52-11:** Any person who generates a waste in the state of Ohio shall first determine if that waste is a hazardous waste through testing, or applying generator knowledge of the hazardous waste characteristic in light of the materials or the process used.

Finding - At the time of the inspection, Buckeye Ford could not provide any records for the waste generated from the facility.

Action - Buckeye Ford needs to *immediately* clean out, segregate, and evaluate all of the waste in the trench drains throughout the facility in order to determine if it is hazardous waste. In addition, the sludge from the two oil water separators must be evaluated, along with the filters from the paint booth.

Buckeye Ford must notify Ohio EPA five days in advance of all sampling and submit all findings to Ohio EPA within seven days of their respective receipt. Once the waste has been evaluated, it must be appropriately disposed of and all appropriate documentation submitted to Ohio EPA.

- 3. Violation - Used Oil Generator Standards, OAC Rule 3745-279-22(C):** Containers and aboveground tanks used to store used oil at generator facilities shall be labeled or marked clearly with the words "Used Oil."

Finding - At the time of the inspection, three 1000-gallon tanks were not labeled with the words "Used Oil."

Action - Buckeye Ford shall label the 1000-gallon used oil tanks as "Used Oil" and submit photographic documentation to Ohio EPA *within 14 day of your receipt of this letter*.

- 4. Finding** - At the time of the inspection, Buckeye Ford provided no documentation for disposal of hazardous waste generated at the facility. In speaking with the Body Shop Manager, Buckeye Ford acknowledged that no waste had been shipped off-site since 2004. However, in 1997 during a hazardous waste inspection, Ohio EPA determined Buckeye Ford to be a small quantity generator (SQG) of hazardous waste.

Be aware, the requirements a generator must comply with depend on the amount of hazardous waste generated each month and the total amount of hazardous waste on-site at one time.

Action - Please provide Ohio EPA with an estimated generation/disposal rate and any disposal records available for waste generated in the last 3 years along with all purchase orders for solvents/paint used in the body shop. In addition, please provide Ohio EPA with Buckeye Ford's solid waste hauler and the landfill they use for disposal. Please send me the required information **within 14 days of your receipt of this letter**.

After reviewing the requested information, any additional concerns and/or violations will be addressed under separate cover.

5. **Finding** - Buckeye Ford did not provide any documentation for the disposal of their universal waste light bulbs. It was believed that Deckers Electric serviced and disposed of the bulbs.

Action - Please provide Ohio EPA with documentation for this contract/disposal. Please send me the required information **within 14 days of your receipt of this letter**.

After reviewing the requested information, any additional concerns and/or violations will be addressed under separate cover.

Enclosed please find copies of the hazardous waste checklists completed at the time of the inspection. You can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dmwm/>.

Should you have any further questions or concerns regarding Hazardous Waste requirements, please contact Andy Maneff at (614) 728-3884.

Underground Injection Control

1. **Violations** - Buckeye Ford is in violation of OAC Rules 3745-34-06 and 3745-34-11(A) for discharge of industrial fluids (waste water from the washing of vehicles) into the septic system leach field without a permit to operate from Ohio EPA.

Buckeye Ford is also in violation of OAC Rule 3745-34-11(C) for illegally discharging motor vehicle waste fluids into the septic system leach field via the floor drains and shop sinks in the maintenance and paint booth areas of the Buckeye Ford facility.

Finding - Ohio EPA inspections have demonstrated that Buckeye Ford has released motor vehicle waste fluids (oil, grease, brake fluid, transmission fluid, radiator fluid, etc.) and waste water from washing vehicles into the septic system leach field via the shop floor drains and sinks in the maintenance areas and the paint shop. The septic system leach field at Buckeye Ford is defined as a Class V underground injection well per rules 3745-34-01 and 3745-34-04 of the Ohio Administrative Code (OAC).

Action - Buckeye Ford shall **within 14 days of receiving this letter** submit a plan for preventing future violations of illegal discharges to their septic system leach field and **within 30 days of receiving this letter** cease all illegal discharges to their septic system leach field.

For additional information on automotive service waste and industrial waste disposal in Class V injection wells please visit the US EPA web page:
<http://water.epa.gov/type/groundwater/uic/class5/publications.cfm>.

For additional questions or concerns about the UIC requirements, please contact Lindsay C. Taliaferro III at 614-644-2752.

Division of Surface Water

1. **Violations** – Buckeye Ford is in violation of 40 CFR 122.26 for not obtaining an industrial storm water permit or no exposure certification (NOE).

Finding - Buckeye Ford does not have an industrial storm water permit nor a NOE.

Action - Please submit an industrial storm water permit application or NOE application within 30 days of receiving this letter.

2. **Violations** – ORC, Chapter 6111 provide that discharge of pollutants to waters of the state from any point source is unlawful. Ground waters is considered waters of the state.

Finding – Buckeye Ford has maintenance shops that repair, paint and wash vehicles. The shops have trench drains that collect wastewater from the garage area. The wastewater is discharged to a sanitary leaching field.

Action – Buckeye Ford should immediately contact an engineering consulting firm to determine the proper treatment system, such as a holding tank, for your non-domestic wastewater (mop sinks and floor drains). Buckeye Ford shall submit an application for a disposal system for the non-domestic wastewater within 60 days from the receipt of this letter.

3. **Finding** – The leaching fields that are currently used for Buckeye Ford have reached their useful life. They are approximately 40 years old, installed under pavement and/or gravel and had used automotive fluids and wash water discharged to the leaching fields

Action – Buckeye Ford shall submit an application for a disposal system for the domestic wastewater within 60 days from the receipt of this letter. It may be advantageous to contact a local sewer authority for connection of all your wastewater to a sanitary sewer. The Ohio EPA would permit the connection of your facility to a holding tank, oil-water separator and/or sanitary sewer system. If you propose to install a new soil-based system for your domestic (restroom) wastewater, you should contact the Madison County Health Department.

Please refer to the attached letter sent on February 19, 2013, for further clarification and guidance.

Should you have any further questions or concerns regarding Surface Water requirements, please contact Greg Sanders at 614-728-3851.

Summary of Requested Actions

Hazardous Waste:

1. Immediately start collecting and disposing of Hazardous waste properly.
2. Immediately clean out, segregate, and evaluate all of the waste in the trench drains throughout the facility in order to determine if it is hazardous waste. In addition, the sludge from the two oil water separators must be evaluated, along with the filters from the paint booth.

Buckeye Ford must notify Ohio EPA five days in advance of all sampling and submit all findings to Ohio EPA within seven days of their respective receipt. Once the waste has been evaluated, it must be appropriately disposed of and all appropriate documentation submitted to Ohio EPA.

3. Within 14 days of your receipt of this letter, label the 1000-gallon used oil tanks as "Used Oil" and submit photographic documentation to Ohio EPA.
4. Within 14 days of your receipt of this letter, provide Ohio EPA with an estimated generation/disposal rate and any disposal records available for waste generated in the last three years along with all purchase orders for solvents/paint used in the body shop. In addition, please provide Ohio EPA with Buckeye Ford's solid waste hauler and the landfill they use for disposal.
5. Within 14 days of your receipt of this letter, provide Ohio EPA with appropriate contract/disposal documentation for the disposal of universal waste light bulbs.

Underground Injection Control:

1. Within 14 days of receiving this letter submit a plan for preventing future violations of illegal discharges to their septic system leach field.

Within 30 days of receiving this letter cease all illegal discharges to their septic system leach field.

Surface Water:

1. Within 30 days of receipt of this letter, submit an industrial storm water permit application or NOE application.
2. Within 60 days of receipt of this letter, submit an application for a disposal system for the non-domestic wastewater.
3. Within 60 days of receipt of this letter, submit an application for a disposal system for the domestic wastewater. If you propose to install a new soil-based system for your domestic (restroom) wastewater, you should contact the Madison County Health Department.

Please note that the Ohio Environmental Protection Agency (EPA) has the authority to seek civil penalties as provided in section 3704.06 of the ORC. This letter or information pursuant to this

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letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the ORC. The decision on whether or not to seek such penalties will be made by the Ohio EPA at a later date.

If you have any additional questions please feel free to contact the respective division experts mentioned earlier or me at (614) 728-3784.

Sincerely,



Adam Ward
Assistant Chief
Central District Office,
Ohio Environmental Protection Agency

DMWM Enclosures
DSW letter dated February 19, 2013

c: CDO DMWM File
Andy Maneff, DMWM/CDO
Grant Hewett, DMWM/CDO
Greg Sanders, DSW/CDO
Lindsay C. Taliaferro III, DDAGW/CO

AW/siw

BuckeyeFordNOV2013

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.



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

February 22, 2013

Jason Hunt
Buckeye Ford
110 US Route 42
London, OH 43140

**Re: Buckeye Ford
Industrial Storm Water and Wastewater Permitting Issues**

Dear Mr. Hunt:

This letter is written regarding a site inspection I conducted on February 19, 2013, at your car dealership located along State Route 42, in London, Ohio. The reason for the inspection was due to a inquiry made by the Madison County Health Department regarding the permitting of an oil-water separator. The health department stated that a contractor requested information on permitting issues for an oil-water separator. The health department forwarded the issue to the Ohio EPA since this involved the treating of non-domestic wastewater. During the site inspection several issues were noted such as drums stored outside, the discharge of non-domestic wastewater to a leaching field and the location of a leaching field under a parking lot. Please see attached pictures.

Your facility does not have an industrial storm water permit nor a no exposure certification (NOE). Your facility is required to seek storm water permit coverage, from Ohio EPA in accordance with 40 CFR 122.26, authorizing storm water discharges or obtain a NOE. The permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP mandates specific storm water practices, which minimize storm water contamination, associated with external operations or exposed materials. Please submit an industrial storm water permit associated with industrial activities or a NOE application immediately. You may obtain additional information at the following weblink: http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx.

Your facility had three maintenance shops that repaired and washed vehicles. The shops had trench floor drains that collected wastewater from the garage area. The wastewater consisted of automotive fluids such as oil, antifreeze and transmission fluids. The wastewater also consisted of wash water from cleaning vehicles and the garage floor. Your facility also had restrooms and mop sinks in the maintenance shops. Your facility is served by two on-site systems which appear to be 30 years old or more. The on-site systems appear to be under a gravel or asphalt parking lots. Please be aware that leach field should not be under parking lots nor should they have heavy vehicles traveling over them. It is expected that your leaching fields have reached their useful life and should be replaced. Also, soil-based treatment systems, such as leaching fields, are not designed to treat non-domestic wastewater such as the wastewater that is discharged from the floor trench drains or mop sinks. The floor drains and mop sinks must not be directed to the leaching fields. The floor drains and mop sinks must be discharged to a holding tank or a sanitary sewer collection system.

Jason Hunt
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You should contact the Madison County Health Department regarding the permitting and installation of a new treatment system for your domestic (restroom) wastewater.

You should contact an engineering consulting firm to determine the proper treatment system, such as a holding tank, for your non-domestic wastewater (mop sinks and floor drains). It may be advantageous to contact a local sewer authority for connection of all your wastewater to a sanitary sewer. The Ohio EPA would permit the connection of your facility to a holding tank, oil-water separator and/or sanitary sewer system.

If you have any questions regarding this letter or my inspection, please do not hesitate to contact me at our Central District Office at 614-728-3851.

Sincerely,

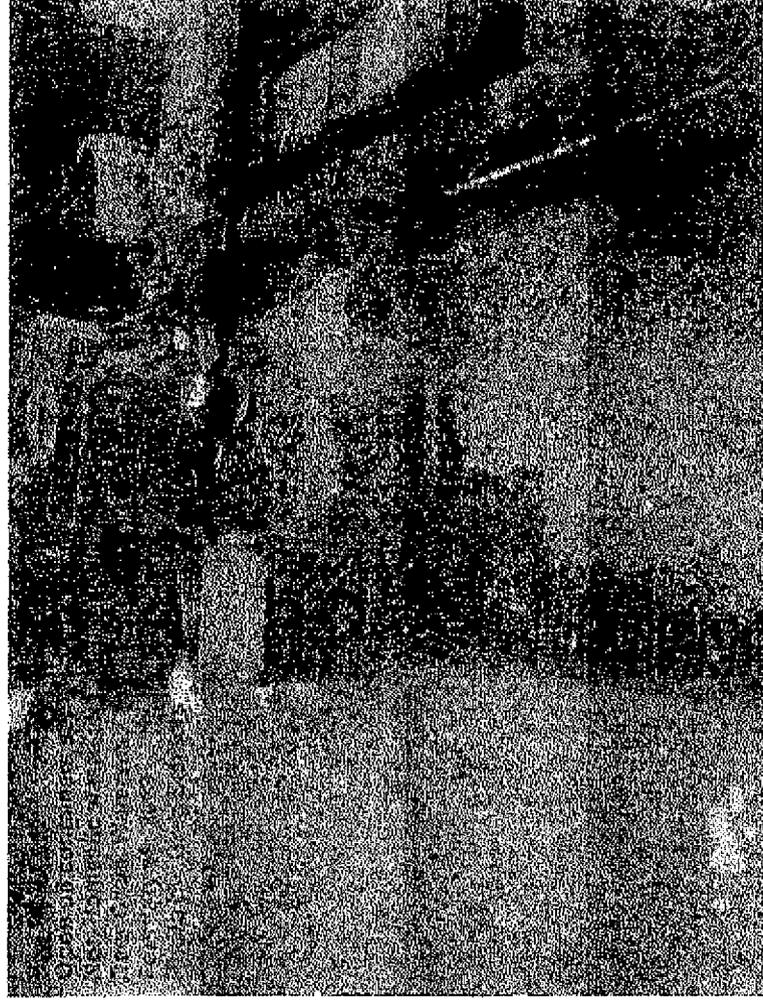


Gregory L. Sanders
Environmental Specialist
Division of Surface Water
Central District Office

cc: Jennifer Michaelson, Madison County Health Department
Madison County Sewer District
Dan Leavitt, City of London WWTP
David Shaw, Buckeye Ford

ec: Greg Sanders, DSW/CDO

GS/nsm Buckeye Ford, February 19, 2013



Send to Central Office <input checked="" type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	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.

Site EPA ID No. Site Name	EPA ID Number: OHD154175038		Website: (Optional)						
Site Location Information	Name: Buckeye Ford								
	Street Address: 110 U.S. Route 42		State: OH						
	City, Town, or Village: London		Zip Code: 43140						
Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html	County Name: Madison	<input checked="" type="checkbox"/> Private	<input 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

Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Howard		MI:	Last Name: Maynard		
	Title: Service Director					
	Phone Number: 740-852-3673		Phone Number Extension:			
	E-Mail Address: hmaynard@buckeyeford.com					
	Fax Number: 740-852-5762		Fax Number Extension:			
	Street or P.O. Box: City, Town or Village: State:					

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: Buckeye Ford				Date Became Owner (mm/dd/yyyy):					
	Owner Type:	<input checked="" type="checkbox"/> Private	<input 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	
	Street or P.O. Box: City, Town or Village: State:									
	Name of Site's Operator:				Date Became Operator (mm/dd/yyyy):					
	Operator Type:	<input checked="" type="checkbox"/> Private	<input 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	
	Street or P.O. Box: City, Town or Village: State:									
	Operator Phone #:				Zip Code:					
	Country:				Zip Code:					
	Operator Phone #:				Zip Code:					
	Country:				Zip Code:					

VIOLATIONS CITED? Yes No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE		
<input type="checkbox"/> Not a HW Generator	<input checked="" 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 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 checked="" 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

- 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.

D001 F005

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)
Peter Maneff

Name of Inspector(s)
Grant Hewett

Date of Inspection/Time
(mm/dd/yyyy) (hh:mm)
02/26/2013

Comments:

PROCESS DESCRIPTION SECTION

Give a general process description (include all processes done at the facility)

Buckeye Ford is a large car/truck dealership and service garage. It consists of a showroom, two service garages, and body shop. They do everything from routine oil changes to major repairs and body work. Oil changes and all engine maintenance are done in the two service garages, one designated for cars and the other for servicing trucks. Painting and body work for both cars and trucks are performed in the body shop building.

Used oil generated in the two service garages are stored in three 1000 gallon tanks which are hard piped to three used oil burners. These burners are used to heat the two main service shops and the paint/body shop.

Painting is performed in a paint booth in the body shop, all waste generated from the paint gun clean out is collected in 5 gallon pails and 55 gallon drums. Buckeye Ford has invested in a paint distillation unit to reduce the amount of solvent they use, however, they were unsure how often the still is run and how much solvent they use, generate, or dispose of. No disposal records could be produced at the time of the inspection. Buckeye Ford did acknowledge that they are currently disposing of the hazardous "still bottoms" in the solid waste dumpster.

Absorbent is used throughout the facility to clean up oil spills, soak up grease, and then thrown away in the dumpster. Buckeye Ford also uses a hazardous parts washer which they service and dispose of in their used oil.

Buckeye Ford has trench drains located throughout their three main service/body shop buildings. Currently these drains are designed to collect all wash waters, automotive fluids, and paint waste that may spill and funnel them to two onsite oil water separators. These separators then discharge to a soil based leach field.

WASTE ACTIVITIES SUMMARY SECTION

For each of the processes listed above that generate a waste give the following information: (1) name of process generating waste, (2) name or description of waste generated, (3) EPA waste codes, (4) quantity generated per month, (5) type of accumulation container used, (6) waste accumulation location in facility, (7) type of on-site treatment (if used), (8) name of off-site management facility (9) type of activity occurring at off-site management facility and (10) P2 activities

Paint waste (D001, F003, F005): This waste is kept in 5 gallon pails (14 onsite) and 55 gallon drums (1 onsite) throughout the body shop. Buckeye Ford has invested in a paint distillation unit to reduce the amount of solvent they use, however, they were unsure how often the still is run and how much solvent they use, generate, or dispose of. No disposal

records could be produced at the time of the inspection. Buckeye Ford did acknowledge that they are currently disposing of the hazardous "still bottoms" in the solid waste dumpster.

Parts Washer Solvent (D001): Ten to fifteen gallons of this waste is generated every month from the parts cleaner in the truck service garage. The maintenance man routinely changes this waste and empties it into the 1000 gallon waste oil tank where it is burned for energy recovery.

Paint Booth Filters: Currently this waste is being disposed of as solid waste but there is no record of an evaluation and more information has been requested.

Oil Water Separator Sludge: Currently this waste is being disposed of as solid waste but there is no record of an evaluation and more information has been requested.

Trench Drain Sludge/Cleanout: Currently this waste is being disposed of as solid waste but there is no record of an evaluation and more information has been requested.

Used oil: stored in three 1000 gallon tanks which are hard piped to three used oil burners. These burners are used to heat the two main service shops and the paint/body shop.

Batteries are accumulated and returned to Interstate for the core charge.

Lamps were not being accumulated at the time of the inspection but in the past may have been serviced through Decker's Electric. More information has been requested.

**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 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.

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 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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input 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 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)]	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 checked="" type="checkbox"/> No <input 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 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?	Yes <input 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:	
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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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

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 <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"/>

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.

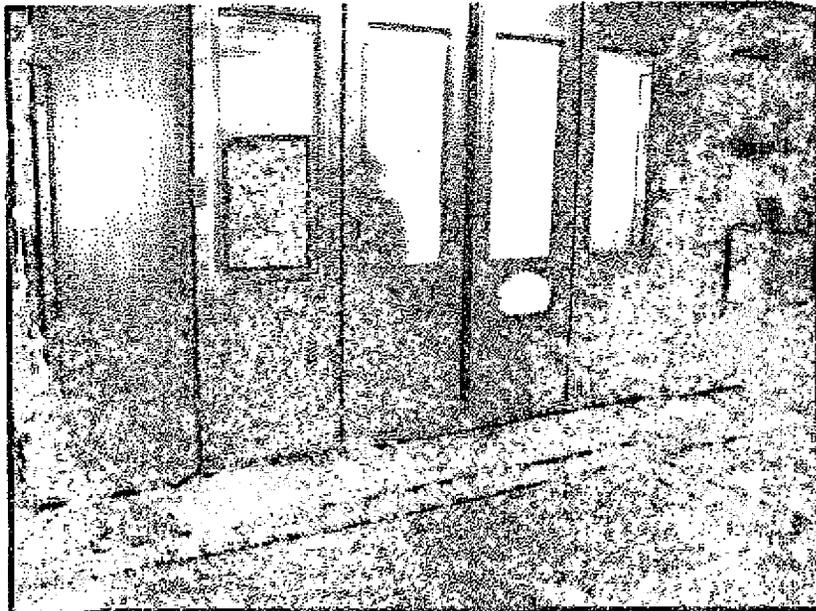


Figure 1. Buckeye Ford, 02-26-13,
Paint booth located in the body shop.
Car was in the process of being
painted, liquid running out to trench
drains in shop, additional trench drain
located in paint booth. Drains lead to
Oil water separator/leach field.



Figure 2. Buckeye Ford, 02-26-13,
Paint booth located in the body shop.
Car was in the process of being
painted, liquid on floor running out to
trench drains in shop, additional
trench drain located in paint booth.
Drains lead to Oil water
separator/leach field.

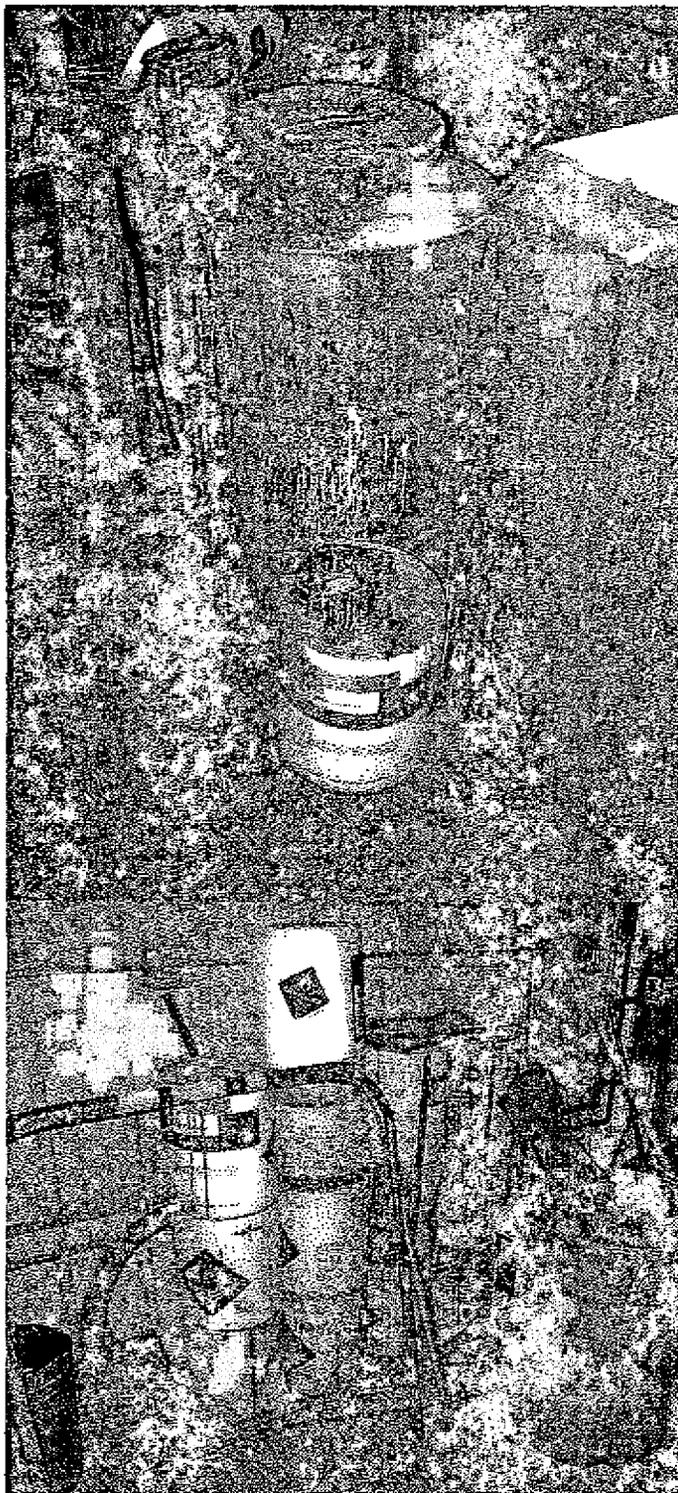


Figure 4. Buckeye Ford, 02-26-13, Paint storage/still area. A 55 gallon waste paint drum and paint distilling unit. Drum was open and paint had dried to a solid. Facility rep could not identify the length of time drum was on site, stated "we use it as a table now." The still is run on a regular basis and the "hockey pucks" (still bottoms) generated are thrown in the trash.

Figure 5. Buckeye Ford, 02-26-13, Waste paint located in the body shop, shop manager could not remember last shipment, stated "no waste shipped since 2004 or 2005."

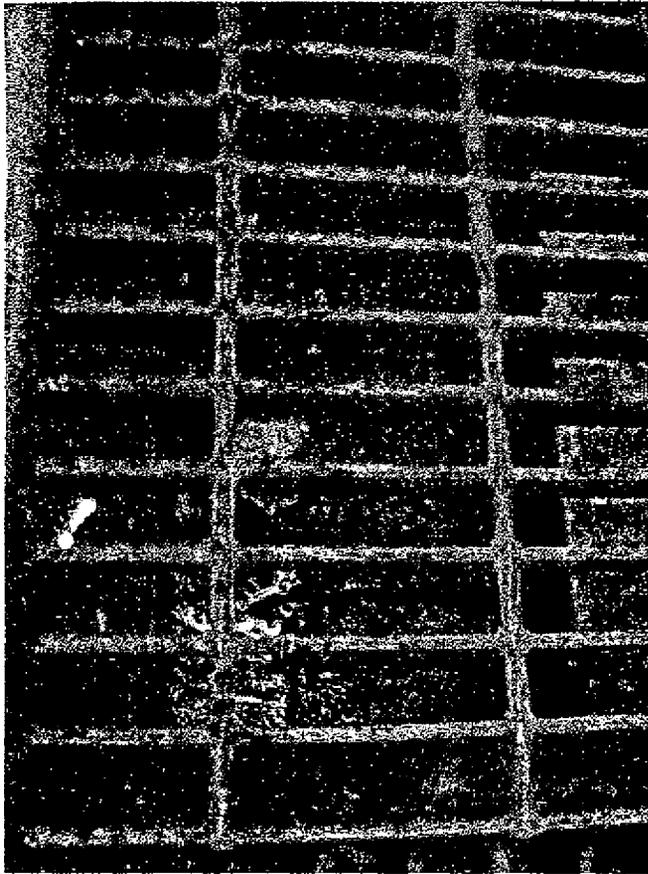


Figure 3. Buckeye Ford, 02-26-13,
Trench drains in body shop/paint
booth filled with sludge like material.
Drains lead to Oil water
separator/leach field.