



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korteski, Director

October 26, 2007

**COSHOCTON COUNTY
GENERAL FILE
(CASCO AUTOMOTIVE RESTORATIONS)
DHWM/SEDO
OHD000008474**

Mr. James K. Brown
President
CASCO Automotive Restoration
795 High Street
Coshocton, Ohio 43812

Dear Mr. Brown:

On October 16, 2007, I performed an inspection to determine CASCO Automotive Restorations' (CASCO) compliance with Ohio's hazardous waste laws regulations as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC).

Based on this inspection, the following violations of the hazardous waste rules were found:

- (1) **OAC rule 3745-52-11, Waste Evaluation:** Any person who generates a waste in Ohio must evaluate the waste to determine if it is hazardous. If so, it must be managed as such.

We observed that spent lamps are disposed with solid waste and have not been evaluated to determine whether they are hazardous waste. Spent fluorescent bulbs, like any waste that may be hazardous, must be evaluated prior to disposal. However, Ohio EPA strongly suggests that these wastes be recycled as universal waste (I provided a factsheet during the inspection; it and additional information can be found on Ohio EPA's website at www.epa.state.oh.us). As universal waste, these bulbs must be collected and stored properly prior to off-site transportation to appropriate recycling facilities. To demonstrate compliance, state whether CASCO will manage these bulbs as a universal waste or provide waste evaluation documentation.

Other Compliance Issues:

- (a) If CASCO intends to manage these bulbs as a universal waste, please provide the name and address of the recycling facility that CASCO will use to recycle these wastes (an up-to-date list of universal waste handlers is maintained on our website). Also provide photographs demonstrating that all spent lamps are accumulated in proper containers (to prevent breakage or leakage) and which are properly labeled and dated. Please see the attached checklist for additional details regarding the management of these wastes.

Mr. James K. Brown
CASCO Auto Restorations
October 24, 2007
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- (b) If CASCO intends to manage these bulbs as a hazardous waste, please provide the name and address of the treatment/disposal facility that CASCO will use for these wastes and provide photographs demonstrating that spent lamps are accumulated in proper containers which are properly labeled.

Please provide the documentation requested above within **thirty days** of the date of your receipt of this letter.

If you have any questions regarding waste management or pollution prevention activities, please call me at (740) 380-5278.

Sincerely,



Richard Stewart
District Representative
Division of Hazardous Waste Management

RS/mlm

Enclosures

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.

Ohio Environmental Protection Agency
**RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to
tammy.mcconnell@epa.state.oh.us or mail it to Tammy
McConnell, Central Office

Site EPA ID No.	EPA ID Number: OHR000008474								
Site Name	Name: CASCO Automotive Restorations				Website: (Optional)				
Site Location Information	Street Address: 795 High Street								
	City, Town, or Village: Coshocton				State: OH				
	County Name: Coshocton				Zip Code: 43812				
Site Land Type (check only one)	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"/>	
NAICS code(s) www.census.gov/epcd/www/naics.html									
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: James		MI: K		Last Name: Brown				
	Phone Number: 740-662-8561				Phone Number Extension:				
	E-Mail Address:								
	Fax Number:				Fax Number Extension:				
	Street or P.O. Box: same								
	City, Town or Village:			State:		Country:		Zip Code:	
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: Same				Date Became Owner (mm/dd/yyyy):				
	Owner Type:	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 <input type="checkbox"/>
	Street or P.O. Box:								
	City, Town or Village:				Owner Phone #:				
	State:			Country:		Zip Code:			
	Name of Site's Operator:				Date Became Operator (mm/dd/yyyy):				
	Owner Type:	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 <input type="checkbox"/>
	Street or P.O. Box:								
	City, Town or Village:				Operator Phone #:				
	State:			Country:		Zip Code:			
Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
Type of Generator	<input type="checkbox"/> Not Regulated <input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG)								
	<input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator <input type="checkbox"/> United States 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"/> Recycler of Hazardous Waste				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Underground Injection Control Facility				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste									

Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply))					
<input type="checkbox"/> Small Quantity Handler of Universal Waste			<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)		
<input type="checkbox"/> Destination Facility for Universal Waste					
(Check all boxes below that apply for each of the three types of facilities above)			Used Oil Activities (Indicate Type(s) of Activity(ies))		
	Generated	Accumulated	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner	
Batteries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil	
Pesticides	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner	
Thermostats	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor		
Lamps	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner		
Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. 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	Other Comments:		
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)	
Rich Stewart		Melody Stewart		10/16/2007 11:00-11:30	
OPTIONAL CERTIFICATION: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.					
Signature of Owner, Operator, or an Authorized Representative		Name and Title (Print)		Date (mm/dd/yyyy)	

CONDITIONALLY EXEMPT SMALL QUANTITY (CESQG) GENERATOR REQUIREMENTS

CESQG: <100Kg. (Approximately 25-30 gallons) of waste in a calendar month.

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.

WASTE EVALUATION

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No NA

GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes No NA

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").

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 NA

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 No NA
 - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C) Yes No NA
 - c. Drip pad that meets 3745-69-40 to 3745-69-45? Yes No NA
 - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No NA

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use the LDR checklist.

REMARKS

USED OIL CHECKLIST - CASCO

PROHIBITIONS

- 1. Is used oil being managed in a surface impoundment or waste pile? If so:
Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 or 3745-65 to 3745-69? [3745-279-12(A)]
Yes ___ No N/A ___ RMK# ___
Yes ___ No N/A RMK# ___
- 2. Is used oil being used as a dust suppressant? [3745-279-12(B)]
Yes No N/A ___ RMK# ___
- 3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)?
Yes ___ No N/A RMK# ___

USED OIL GENERATOR STANDARDS

- 4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)]
Yes ___ No N/A RMK# ___
- 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 RMK# ___
- 6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 or 3745-65 to 3745-69? [3745-279-22(A)]
Yes ___ No N/A RMK# ___
- 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 ___ RMK# ___
- 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 RMK# ___
- 9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
 - a. Stopped the release? Yes No N/A ___ RMK# ___
 - b. Contained the release? Yes No N/A ___ RMK# ___
 - c. Cleaned up and properly managed the used oil and other materials? Yes No N/A ___ RMK# ___
 - d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A ___ RMK# ___
- 10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so:
Yes ___ No N/A ___ RMK# ___
 - 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 ___ No N/A RMK# ___

b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?

Yes ___ No N/A RMK# ___

c. Are the combustion gases from heater vented to the ambient air?

Yes ___ No N/A RMK# ___

11. Does the generator have the used oil hauled only by transporters that have obtained an EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24]

Yes No ___ N/A ___ RMK# ___

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. 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 ___ No N/A RMK# ___

13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]

Yes ___ No N/A RMK# ___

14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]

Yes ___ No N/A RMK# ___

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11]

Yes No N/A ___ RMK# ___

REMARKS

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: CASCO Facility Type: LQG SQG CESQG TSD Date of Inspection: 10/16/07 EPA ID#: OHR000008474

Waste Generated			On- or Off-Site Management		P2 Activities		
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY. Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities	
1	Auto painting	paint waste/ D001/D035/ F003/F005	25 gallons/mo behind garage	NA	Petro-Chem Detroit, MI		
2	compressor	used oil/NA	varies behind garage	NA	Petro-Chem Detroit, MI		
3	lighting	spent bulbs/?	varies NA	NA	local SW landfill		
4	auto cleaning	rags/NA	varies in garage & parts shop	NA	Cintas Columbus, OH		
5							
6							
7							

8							
9							

REMARKS-GENERAL INFORMATION

General Process Information:

CASCO operates a small machine shop which fabricates parts and a paint/body shop for restoring 1953-1955 Thunderbirds. Operations include welding, machining, and painting. Painting is performed in the building in the back of the property, used oil and painting wastes are stored on a covered concrete pad behind this building.

Regulatory/Enforcement History (if applicable):

This facility was last inspected by DHWM in October, 1998. Eight violations were cited and were subsequently abated.

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.
 Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other:

**SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS
BATTERIES AND LAMPS**

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more

Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

Example:

- see lamps - next page

PROHIBITIONS

- 1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No NA
- 2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes No NA

WASTE MANAGEMENT - LABELING/MARKING

UNIVERSAL WASTE BATTERIES

- 3. Are batteries that show evidence of leakage spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes No NA
- 4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the batteries, and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes No NA
- 5. Does the SQUWH conduct any of the following activities:
 - a. Sort batteries by type? Yes No NA
 - b. Mix battery types in one container? Yes No NA
 - c. Discharge batteries to remove the electric charge? Yes No NA
 - d. Regenerated used batteries? Yes No NA
 - e. Disassemble them into individual batteries or cells? Yes No NA
 - f. Remove batteries from consumer products? Yes No NA
 - g. Remove the electrolyte from the battery? Yes No NA

If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)?
[3745-273-13(A)(2)]

- 6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] Yes No NA
 - a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] Yes No NA
 - b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] Yes No NA

7. Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Batteries" or "Used Batteries"? [3745-273-14(A)] Yes No NA

*** UNIVERSAL WASTE LAMPS**

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] Yes No NA
9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes No NA
10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamps" or "Waste Lamps" or "Used Lamps"? [3745-273-14(E)] Yes No NA

NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

NOTE: Accumulation is defined as date generated or date received from another handler.

11. Is the waste accumulated for less than one year? [3745-273-15(A)] Yes No NA
If not:
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes No NA
12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes No NA
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes No NA
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes No NA
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes No NA

- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes No NA
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes No NA
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes No NA

EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] Yes No NA

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes No NA
15. Is the material released characterized? [3745-273-17(B)] Yes No NA
16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes No NA

OFF-SITE SHIPMENTS

NOTE: If a SQUWH self-transportes waste, then they must comply with the Universal Waste transporter requirements.

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes No NA

NOTE: SQUWHs are prohibited to send waste to any other facility.

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes No NA
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No NA
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes No NA

b. Agree to where the shipment will be sent? Yes No NA
[3745-273-18(E)(2)}

21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following: Yes No NA

a. Sending the waste back to the originating handler? Yes No NA
[3745-273-18(F)(1)]

b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes No NA

22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes No NA

23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes No NA

EXPORTS NA

24. Is waste being sent to a foreign destination? If so: Yes No NA

a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes No NA

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to 3745-52-57? [3745-273-20(B)] Yes No NA

c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes No NA

REMARKS