



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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

August 22, 2008

**COSHOCTON COUNTY
GENERAL FILE
(HILLTOP SALVAGE & SALES)
DHWM/SEDO
OHR 000113118**

Mr. Gene Hickman
Salvage & Sales
PO Box 1133
Coshocton, Ohio 43812

Dear Mr. Hickman:

On August 19, 2008, Donna Goodman and I performed a compliance inspection of your facility to determine its compliance with Ohio's hazardous waste laws and regulations, as found in the Ohio Revised Code and the Ohio Administrative Code (ORC and OAC, respectively).

Based on our inspection, the following violation of the hazardous waste rules was found:

- 1) **Used oil storage requirements for generators, OAC rule 3745-279-22(C):** Paragraph (C): Containers and aboveground tanks used to store used oil at generator facilities shall be marked clearly with the words "Used Oil."

We observed two totes and several drums of used oil that were not labeled "used oil". These containers must be labeled "used oil". Please provide photographs showing that they have been properly labeled.

- 2) **Used oil storage requirements for generators, OAC Rule 3745-279-22(D):** Upon detection of a release of used oil... a generator shall perform the following cleanup steps: (1) stop the release; (2) contain the released used oil; (3) clean up and properly manage the released used oil and other materials; and (4) if necessary, to prevent future releases, repair or replace any leaking used oil storage containers or tanks prior to returning them to service.

We observed three areas at the site with significant used oil stained-soils: one is by the road, an area behind the parts storage building, and one behind the main shop building. As we discussed, please provide photographs of these areas once all the used oil-contaminated soil has been removed and provide the name of the solid waste landfill where it has been disposed.

Gene Hickman
Hilltop Salvage & Sales
August 22, 2008
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Comment:

- (a) During the inspection, we observed several open drums that are stored outside, allowing precipitation to enter. Good housekeeping practices include keeping containers closed to reduce the possibility of releases or moving the container inside.
- (b) As we discussed, please see the attached information regarding the mercury switch buy-back program.

Please provide the documentation cited above **within 30 days** of the date of this letter.

I have included the checklists I used for your facility for your information. If you have any questions regarding waste management, you can view Ohio EPA's rules and guidance at www.epa.state.oh.us or feel free to call me at (740) 380-5278.

Sincerely,



Richard Stewart
District Representative
Division of Hazardous Waste Management

RS/mlm

Attachments

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 Kristina.Durnell@epa.state.oh.us
or mail it to Kristina Durnell, Central Office

| | | | | | | | | | |
|---|---|-------------------------------------|--------------------------------------|--|-------------------------------------|---------------------------------------|---------------------------------------|-----------------------------------|-----------------------------------|
| Site EPA ID No. | EPA ID Number: OHR000113118 | | | | | | | | |
| Site Name | Name: Hilltop Salvage & Sales | | | | Website: (Optional) | | | | |
| Site Location Information | Street Address: 46200 SR 541 W POBox 1133 | | | | | | | | |
| | 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: Gene | | | MI: | Last Name: Hickman | | | | |
| | Phone Number: 740-622-4200 | | | | Phone Number Extension: | | | | |
| | E-Mail Address: | | | | | | | | |
| | Fax Number: | | | | Fax Number Extension: | | | | |
| | Street or P.O. Box: PO Box 1132 | | | | | | | | |
| | City, Town or Village: Same | | | | | | | | |
| | 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"/> Conditionally Exempt Small Quantity Generator | | | | | |
| <input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 | | | | <input type="checkbox"/> United States Importer of Hazardous Waste | | | | | |
| <input type="checkbox"/> Large Quantity Generator (LQG) | | | | <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator | | | | | |
| <input type="checkbox"/> Small Quantity Generator (SQG) | | | | | | | | | |
| 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 type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | | |
| Name of Inspector(s) | | Name of Inspector(s) | | Date of Inspection/Time (mm/dd/yyyy) (hh:mm) |
| Rich Stewart | | Donna Goodman | | 08/19/08 12:45 |
| 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) |
| | | | | |

USED OIL CHECKLIST

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes ___ No X N/A ___ RMK# ___
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 X RMK# ___
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes ___ No X 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 X 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 X 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 X 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 X RMK# ___
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes X 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# 1
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# 2
 - b. Contained the release? Yes ___ No N/A ___ RMK# 2
 - c. Cleaned up and properly managed the used oil and other materials? Yes ___ No N/A ___ RMK# 2
 - d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No ___ N/A X RMK# ___
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes ___ No X 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 X 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 X RMK# ___
- c. Are the combustion gases from heater vented to the ambient air? Yes ___ No ___ N/A X 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 X 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 X RMK# ___
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes ___ No ___ N/A X 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 X RMK# ___

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes X No ___ N/A ___ RMK# ___

REMARKS

- 1) Several open, unlabeled containers of used oil were observed, out by the road and behind the shop building.
- 2) Three areas of significant used-oil staining on soil were observed: by the road, behind the shop and behind the storage building.

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Hilltop Salvage and Sales

Facility Type: LQG SQG CESQG TSD **Date of Inspection:** 8/19/08 **EPA ID#:** OHR 000113118

| 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 | Vehicle salvage Used Antifreeze/NA | varies NA | NA | | recycled | |
| 2 | Vehicle salvage Used Oil/NA | <10 gallons/mo | NA | Heartland PetroLLC, Columbus, OH | recycled | |
| 3 | Vehicle salvage Batteries/scrap metal/ NA | varies | NA | J&J Cores Coshocton, OH | recycled | |
| 4 | Vehicle salvage Solid waste/NA | varies | NA | Skip's Refuse Coshocton, OH | disposal | |
| 5 | | | | | | |
| 6 | | | | | | |
| 7 | | | | | | |

REMARKS - GENERAL INFORMATION

General Process Information:

Hilltop parts out cars and sells the remainder for scrap. On-site operations include vehicle disassembly and occasional on-site car crushing.

Regulatory/Enforcement History (if applicable):

The last DHWM inspection was performed in 2003, several violations were cited and subsequently returned to compliance.

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: