



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 Korleski, Director

August 18, 2008

**COSHOCTON COUNTY  
GENERAL FILE  
(TRI-STATE ENVIRONMENTAL  
SERVICES LLC)  
DHWM/SEDO  
OHR 000124128**

Mr. Patrick Thress  
Tri-State Environmental Services LLC  
PO Box 1132  
Coshocton, Ohio 43812

Dear Mr. Thress:

On August 12, 2008, Melody Stewart and I performed a compliance inspection of your facility at 499 Pine Street in Coshocton 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 a tote and a drum 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.

**Comment:**

- (a) During the inspection, we observed several containers (a bucket, a drum, and a few totes) that are stored outside, allowing precipitation to enter. Good housekeeping practices include keeping containers closed to reduce the possibility of releases. You may want to make employees aware of this issue.

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

Patrick Thress  
Tri-State Environmental Services LLC  
August 18, 2008  
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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](http://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](mailto:Kristina.Durnell@epa.state.oh.us)  
 or mail it to Kristina Durnell, Central Office

Site EPA ID No.	EPA ID Number: OHR000128124								
Site Name	Name: Tri-State Environmental Services, LLC				Website: (Optional)				
Site Location Information	Street Address: 499 Pine 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) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>									
Facility Representative  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: Patrick		MI:	Last Name: Thress					
	Phone Number: 740-622-7100				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									

<b>Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply))</b>			
<input type="checkbox"/> <b>Small Quantity Handler of Universal Waste</b>		<input type="checkbox"/> <b>Large Quantity Handler of Universal Waste</b> (accumulates 5,000 kg. or more)	
<input type="checkbox"/> <b>Destination Facility for Universal Waste</b>			
(Check all boxes below that apply for each of the three types of facilities above)		<b>Used Oil Activities (Indicate Type(s) of Activity(ies))</b>	
	<input checked="" type="checkbox"/> <b>Generated</b>	<input type="checkbox"/> <b>Accumulated</b>	<input checked="" type="checkbox"/> <b>Used Oil Generator</b>
<b>Batteries</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Transporter</b>
<b>Pesticides</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Transfer Facility</b>
<b>Thermostats</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Processor</b>
<b>Lamps</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Re-refiner</b>
<b>Waste Codes for Federally Regulated Hazardous Wastes.</b> 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 RCRA Info 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.			
<b>Announced</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Additional Facility Representatives:</b>
<b>Tanks</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Other Comments:</b>
<b>Containers</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
<b>Name of Inspector(s)</b> Rich Stewart		<b>Name of Inspector(s)</b> Melody Stewart	
		<b>Date of Inspection/Time (mm/dd/yyyy) (hh:mm)</b> 08/12/08 13:00	
<b>OPTIONAL CERTIFICATION.</b> 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.			
<b>Signature of Owner, Operator, or an Authorized Representative</b>		<b>Name and Title (Print)</b>	<b>Date (mm/dd/yyyy)</b>

**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

**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? [3745-273-18(E)(2)]  Yes  No  NA
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? [3745-273-18(F)(1)]  Yes  No  NA
- 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

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

## HAZARDOUS WASTE TRANSPORTER REQUIREMENTS

### REMARKS - GENERAL INFORMATION

Please provide a brief description of site activity/waste handling procedures:

1. Registration with Public Utilities Commission of Ohio [3745-53-11] Yes  No  N/A   
RMK# \_\_\_\_\_
2. Has the transporter received a U.S. EPA ID number? [3745-53-11(B)] Yes  No  N/A   
RMK# \_\_\_\_\_
3. All hazardous wastes accepted have been accompanied by a manifest? Yes  No  N/A   
RMK# \_\_\_\_\_
  - a. **If no**, was the waste generated by a CESQG or by a SQG shipped under a reclamation agreement? [3745-53-20(H)(1)] Yes  No  N/A   
RMK# \_\_\_\_\_
4. The transporter has signed the manifest as required by 3745-53-20 and carried the manifest with the waste shipment? [3745-53-20(C)] Yes  No  N/A   
RMK# \_\_\_\_\_
5. Manifests are retained for at least three years? [3745-53-22(A)] Yes  No  N/A   
RMK# \_\_\_\_\_
6. The transporter has delivered the entire quantity of waste accepted from the generator in accordance with manifest instructions? Yes  No  N/A   
RMK# \_\_\_\_\_
  - a. If not, did the transporter contact the generator for further instructions and revise the manifest accordingly? [3745-53-21(A)(B)] Yes  No  N/A   
RMK# \_\_\_\_\_
7. **For hazardous waste delivered by the original transporter to a rail or water transporter:** Did the original transporter comply with the manifest handling requirements of 3745-53-20(E)(F)? Yes  No  N/A   
RMK# \_\_\_\_\_

8. **For hazardous waste shipped out of the country:** Yes \_\_\_ No  N/A X  
 Has the transporter retained signed copies of the  
 manifest for at least three years indicating that the  
 waste left the U.S.A.? [3745-53-22(D)] RMK# \_\_\_\_\_
9. Has the transporter ever had a discharge of hazardous  
 waste during the time that the waste was under the  
 transporter's control? If so: Yes \_\_\_ No  N/A X  
 RMK# \_\_\_\_\_
- a. Was immediate action taken? [3745-53-30(A)] Yes \_\_\_ No  N/A \_\_\_\_\_  
 RMK# \_\_\_\_\_
- b. Was Ohio EPA's Office of Emergency  
 Response immediately notified as required by  
 3745-53-30(C)(1)? Yes \_\_\_ No  N/A \_\_\_\_\_  
 RMK# \_\_\_\_\_
- c. Did the transporter report in writing to Ohio  
 EPA's Office of Emergency Response?  
 [3745-53-30(C)(2)] Yes \_\_\_ No  N/A \_\_\_\_\_  
 RMK# \_\_\_\_\_
- d. Was the discharge cleaned up as required by  
 Ohio EPA or a federal agency to remove hazard  
 to human health or the environment?  
 [3745-53-31] Yes \_\_\_ No  N/A \_\_\_\_\_  
 RMK# \_\_\_\_\_
10. Does the transporter store manifested hazardous  
 wastes in containers temporarily while wastes are in  
 transit? If so: Yes \_\_\_ No X N/A \_\_\_\_\_  
 RMK# \_\_\_\_\_
- a. Are wastes stored for only ten days or less? Yes \_\_\_ No  N/A X  
 RMK# \_\_\_\_\_
- b. Do wastes remain properly DOT packaged  
 during storage? [3745-53-12] Yes \_\_\_ No  N/A X  
 RMK# \_\_\_\_\_

**NOTE:** *Temporary storage in stationary tanks is not permitted under transfer facility requirements and such storage requires a RCRA permit and is subject to interim status requirements for storage facilities. Any type of storage by the transporter which is not specifically authorized under OAC 3745-53-12 transfer facility requirements is subject to full RCRA regulations.*

*A "transfer facility" means any transportation-related facility, including loading docks, parking areas, storage areas and other similar areas where hazardous waste is held during the normal course of transportation. (This does not include the designated facility.)*

11. Does the transporter import hazardous waste into the United States? If so: Yes  No  N/A   
RMK# \_\_\_\_\_
- a. Did the transporter comply with OAC Chapter 3745-52? [3745-53-10(C)(1)] Yes  No  N/A   
RMK# \_\_\_\_\_
12. Does the transporter mix hazardous wastes of different U.S. DOT descriptions by placing them into a single container? If so: Yes  No  N/A   
RMK# \_\_\_\_\_
- a. Did the transporter comply with OAC Chapter 3745-52? [3745-53-10(C)(2)] Yes  No  N/A   
RMK# \_\_\_\_\_
13. Does the transporter receive SQG wastes for transport pursuant to a reclamation agreement? Yes  No  N/A   
RMK# \_\_\_\_\_
- If so, was the following information recorded in a log or shipping paper carried with the shipment as required by 3745-53-20(H):
- a. Name, address and U.S. EPA ID # of SQG? Yes  No  N/A   
RMK# \_\_\_\_\_
- b. Quantity of waste? Yes  No  N/A   
RMK# \_\_\_\_\_
- c. DOT required shipping information? Yes  No  N/A   
RMK# \_\_\_\_\_
- d. Date waste was accepted? Yes  No  N/A   
RMK# \_\_\_\_\_
14. If the transporter receives SQG wastes for transport as described in Question No. 13, are records related to the shipments maintained for at least three years following expiration of the reclamation agreement? [3745-53-20(H)(4)] Yes  No  N/A   
RMK# \_\_\_\_\_

**REMARKS**

## 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 X No N/A \_\_\_ RMK# \_\_\_
- b. Contained the release? Yes X No N/A \_\_\_ RMK# \_\_\_
- c. Cleaned up and properly managed the used oil and other materials? Yes X No N/A \_\_\_ RMK# \_\_\_
- 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) An open, unlabeled drum of used oil was observed behind the building.

## PROCESS, WASTE, P2 SUMMARY SHEET

**Facility Name:** Tri-State Environmental Services, LLC  
 **Facility Type:**  LQG  SQG  CESQG  TSD  
 **Date of Inspection:** 8/12/08  
**EPA ID#:** OHR000128124

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	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	lighting  Spent Bulbs UW	varies  NA	NA	Environmental Recycling, Bowling Green, OH	recycled	
2	Vehicle maintenance  used oil/NA	<10 gallons/mo	NA	Central Ohio Oil, Columbus, OH	recycled	
3						
4						
5						
6						
7						
8						

## REMARKS GENERAL INFORMATION

### **General Process Information:**

Tri-State transports solid waste, hazardous waste and hazardous materials for clients. On-site operations are limited to vehicle maintenance.

### **Regulatory/Enforcement History** (if applicable):

No documentation other than the initial notification form were found in DHWM's files.

### **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](mailto:p2mail@epa.state.oh.us) or [www.epa.state.oh.us/ocapp/ocapp.html](http://www.epa.state.oh.us/ocapp/ocapp.html)

### **Other:**