



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

RE: Toledo Optical Laboratory
OHD063711980
Lucas County
DMWM, NWDO
Notice of Violation

July 10, 2013

Mr. Robert Lommerse
Toledo Optical Laboratory
1201 Jefferson Avenue
Toledo, Ohio 43604

Dear Mr. Lommerse:

Thank you for accompanying Megan Shortridge and me during the Ohio Environmental Protection Agency's (Ohio EPA's) June 19, 2013, inspection of Toledo Optical Laboratory's (TOL's) facility located at 1201 Jefferson Avenue, Toledo, Ohio. We inspected TOL to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). During the inspection, we also helped you identify ways to prevent pollution by reducing waste. My inspection included an evaluation of facility operations and a review of written documentation.

TOL is a wholesale optical laboratory that manufactures prescription eye ware. TOL manufactures lenses for safety glasses, reading glasses, etc. but does not manufacture contact lenses or eyeglass frames. TOL receives polycarbonate lenses as a raw material and tints, cuts, and polishes the lenses to the exact size and prescription ordered by the customer. On average, TOL manufacturers 500 pairs of lenses per day.

TOL generates spent lamps, swarf (polycarbonate strips), polishing mud, spent sandblasting media, AR vacuum coating machine waste, and lens tint which have not been adequately evaluated to determine if they are hazardous wastes. At this time TOL's generator status is unknown due to inadequate waste evaluations. TOL additionally generates used oil which is being properly recycled, however, no used oil was on-site during the inspection.

I found the following violations of Ohio's hazardous waste laws. In order to correct these violations you must do the following and send me the required information **within 14 days of your receipt of this letter**.

Violations:

1. Ohio Administrative Code (OAC) Rule 3745-52-11, Hazardous Waste

Determination: "Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste..."

TOL failed to adequately evaluate the waste streams listed below to determine if they were a hazardous waste in accordance with OAC Rule 3745-52-11.

- a. Spent lamps-TOL failed to have waste evaluation documentation or an established recycling plan in place for spent lamps generated at the facility.

TOL must immediately cease disposing of the spent lamps as non-hazardous waste until a proper waste evaluation has been completed. Spent lamps can contain mercury and other heavy metals which could make them a hazardous waste. Hazardous waste lamps are considered "spent materials" and remain hazardous waste even when recycled. Hazardous waste lamp generators have the option of handling their lamps as hazardous waste or as universal waste. Managing hazardous waste lamps under the universal waste rules eases certain regulations imposed on generators of spent lamps.

Within 14 days of receipt of this letter, TOL must choose one of the following options and submit to Ohio EPA the requested information as documentation to demonstrate how you plan to properly manage your spent lamps: **1)** If TOL decides to manage the lamps as a waste, then TOL will need to sample each type and brand of lamp at the facility using a Toxicity Characteristic Leaching Procedure (TCLP) test for Resource Conservation and Recovery Act (RCRA) metals. TOL must then submit all analytical results to Ohio EPA along with a summary describing whether the spent lamps are a hazardous waste or non-hazardous waste and how the spent lamps will be managed. **2)** The other alternative is that TOL can begin to manage all spent lamps as universal waste. If TOL chooses this option, then TOL must submit a summary that outlines how the spent lamps will be managed as universal waste and where they will be shipped. TOL must also submit photographic documentation that any spent lamps on site are properly contained in closed containers and have the proper labels and accumulation start dates located on them. If no spent lamps are currently on site, please state this. Ohio EPA recommends that spent lamps be managed as a universal waste and recycled.

It should also be noted that even though green tipped lamps or "environmentally friendly" lamps are sometimes guaranteed by the manufacturers to pass a TCLP test, more information is needed to dispose of these lamps as solid waste. Most manufacturers base this guarantee on the amount of mercury contained in the lamp. Without analytical results showing a representative sample of these lamps passing the TCLP test for ALL RCRA metals (mercury, cadmium, lead, etc.), these lamps cannot be disposed of as solid waste. Spent lamps can contain other RCRA metals such as cadmium and lead which could be above the hazardous waste limits.

For more information I have enclosed the fact sheets titled Universal Waste Rules for Handlers of Lamps, dated June 2005, Fluorescent Lamps: What You Should Know, dated January 2007, Universal Waste, dated August 2011, and Computer, Fluorescent Lamp and Ballast Recyclers, dated February 2013.

- b. Swarf-During the edging and grinding process, the lenses are ground down to the prescription ordered and to fit the optical frames. This process generates swarf, which is the name given to the strips of polycarbonate being removed from the lenses. This waste stream is very light and contains a lot of "air space" between strips. TOL generates several garbage bags of this waste stream every day which is disposed of in the local landfill.

- c. Polishing mud-During the polishing process, TOL generates polishing water. This water is filtered and is reused in the polishing process repeatedly. The particulates that are filtered out of the polishing water between cycles are called polishing mud. The amount of polishing mud generated per month is unknown but this waste stream is sent to the local landfill as well.
- d. Spent sandblasting media-TOL sandblasts the shields from the AR vacuum coating machine in order to remove the excess coating from the shields. TOL generates approximately 5 gallons of the spent sandblasting media per month. This waste stream is sent to the local landfill.
- e. AR vacuum coating machine waste-The vacuum machine utilizes several different ingredients (including chromium) in the machine. The ingredients are utilized repeatedly until they need to be replenished. Prior to replenishing these ingredients, the used ingredients are removed and disposed. The amount of waste generated from this machine is minimal and it is sent to the local landfill.
- f. Lens tint-TOL uses several different dyes/inks in order to tint the lenses. The gray color dye/ink is disposed of through the sanitary sewer. The remaining dye/ink colors are not used as regularly and do not become a waste. The other colors are only replenished since some of the dyes/inks evaporate off during the process. The gray dye/ink waste stream is generated approximately once every two weeks and consists of approximately one pint of waste.

In order for TOL to determine whether the wastes listed in b. through f. exhibit any hazardous waste characteristics, TOL must obtain a chemical analysis of a representative sample of the wastes. TOL will need to contract the services of an environmental laboratory to analyze these materials.

For the swarf, polishing mud, spent sandblasting media, AR vacuum coating machine waste, and lens tint, TOL must determine the concentrations of TCLP RCRA metals, TCLP volatile organic compounds (VOCs), and TCLP semi-volatile organic compounds (SVOCs) of the wastes. If any of the wastes can be considered a liquid, then TOL must also determine the flashpoint and pH of the wastes. Please call me at the number listed below to discuss additional sampling details.

To abate these violations TOL shall submit the analytical results indicating the proper evaluation of the wastes for Ohio EPA's review. The results must document if the waste is hazardous or not and, if hazardous, whether it is restricted from land disposal. If the waste is hazardous, TOL must also submit information as to what treatment, storage, or disposal facility the waste will be sent to.

Once Ohio EPA acknowledges TOL's proper characterization of the wastes, TOL must dispose of the wastes at a proper disposal facility. TOL must then submit the appropriate manifest documents or shipping papers indicating proper disposal of the wastes to Ohio EPA.

Please notify me at least five days prior to sampling so that I may be present.

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If the waste is hazardous, I will determine the status of your compliance with other hazardous waste laws and notify you of my findings in a separate letter.

For more information I have enclosed the fact sheets titled Identifying Your Hazardous Waste, dated April 2010, Use of Generator Knowledge In Complying with OAC rule 3745-52-11 Hazardous Waste Evaluation, dated July 18, 2005, and Commercial Environmental Laboratories, printed July 8, 2013.

For more information, I have enclosed the fact sheet titled Hazardous Waste Generator Categories and Episodic Generation, dated March 2007, and Hazardous Waste Generator Handbook, dated October 2009.

Pollution Prevention:

1. **General Recycling:** During the inspection, Ohio EPA noted that TOL does not participate in any general recycling of office paper, cardboard, plastics, aluminum cans, etc. The reason TOL does not participate is due to a lack of space. Although these types of activities do take up space, TOL may be able to save money by recycling. Additionally, TOL generates a large amount of swarf and has been unsuccessful in finding an industry to utilize or recycle this material. I encourage TOL to contact the following organizations to discuss recycling options for these waste streams.
 - a. Lucas County Solid Waste Management District
1011 Matzinger Road
Toledo, Ohio 43612
419-213-2230
 - b. Keep Toledo/Lucas County Beautiful, Inc.
1011 Matzinger Road
Toledo, Ohio 43612
419-213-2255
 - c. Earth 911
<http://earth911.com/>
 - d. Ohio EPA's Office of Compliance Assistance and Pollution Prevention
Ron Nabors
347 North Dunbridge Road
Bowling Green, Ohio 43402
419-373-3147

TOL needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, TOL is requested to provide documentation to this office including the steps taken to abate the violations cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to kara.reynolds@epa.state.oh.us.

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, TOL is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

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As we discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce, or altogether eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs as well as regulatory requirements. Ohio EPA has helpful information about pollution prevention at the following web address: <http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/ocapp>. If you would like to be considered for a free, non-regulatory on-site pollution prevention assessment, or if you would like more information about pollution prevention assessments, please contact me at the number listed below.

The Division of Materials and Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign up for this free service. You can find more information at the following web link: <http://ohioepa.custhelp.com/ci/documents/detail/2/subscriptionpage> . Please feel free to share this with your colleagues.

Enclosed you will find a copy of the checklists that were completed during the inspection. Should you have any questions, please feel free to call me at (419) 373-3065. You can find copies of the rules and other information on the division's web page at <http://epa.ohio.gov/dmwm/Home.aspx> .

Should you have any questions, please contact me at 419-373-3065. Please send all correspondence **within 14 days of receipt of this letter**, to Ohio EPA, Northwest District Office, Attn: Kara Reynolds, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,



Kara Reynolds
Environmental Specialist
Division of Materials and Waste Management

/cg

Enclosures

pc: Colleen Weaver, DMWM, NWDO (with checklists)
Kara Reynolds, DMWM, NWDO (without checklists)
Lisa Gifford, DMWM, NWDO (without checklists)

ec: Colleen Weaver, DMWM, NWDO (with checklists)
Kara Reynolds, DMWM, NWDO (with checklists)
RCRAInfo Data Entry, RCRAInfoData@epa.state.oh.us (with checklists)

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.

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 RCRAInfoData@epa.state.oh.us.

Site EPA ID No. Site Name Site Location Information Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html	EPA ID Number: OHD063711980 Name: Walman Optical Company DBA Toledo Optical Laboratory Website: www.toledooptical.com (Optional) <hr/> Street Address: 1201 Jefferson Avenue <hr/> City, Town, or Village: Toledo State: OH <hr/> County Name: Lucas Zip Code: 43604 <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">Private <input type="checkbox"/></td> <td style="text-align: center;">County <input type="checkbox"/></td> <td style="text-align: center;">District <input type="checkbox"/></td> <td style="text-align: center;">Federal <input type="checkbox"/></td> <td style="text-align: center;">Indian <input type="checkbox"/></td> <td style="text-align: center;">Municipal <input type="checkbox"/></td> <td style="text-align: center;">State <input type="checkbox"/></td> <td style="text-align: center;">Other <input type="checkbox"/></td> </tr> </table>	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"/>
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"/>		

Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Robert MI: Last Name: Lommerse <hr/> Title: General Manager <hr/> Phone Number: 419-248-3384 Phone Number Extension: 8615 <hr/> E-Mail Address: bobl@toledooptical.com <hr/> Fax Number: 419-321-6361 Fax Number Extension: <hr/> Street or P.O. Box: P.O. Box 2028 <hr/> City, Town or Village: Toledo <hr/> State: Ohio Zip Code: 43603-2028
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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: Walman Optical Laboratory Owner Type: Private County District Federal Indian Municipal State Other <input type="checkbox"/> <input type="checkbox"/> <hr/> Street or P.O. Box: 801 12th Avenue North <hr/> City, Town or Village: Minneapolis Owner Phone #: 612-520-6000 <hr/> State: Minnesota Country: USA Zip Code: 55411 <hr/> Name of Site's Operator: Walman Optical Laboratory DBA Toledo Optical Laboratory Operator Type: Private County District Federal Indian Municipal State Other <input type="checkbox"/> <input type="checkbox"/> <hr/> Street or P.O. Box: 1201 Jefferson Avenue <hr/> City, Town or Village: Toledo Operator Phone #: <hr/> State: Ohio Country: USA Zip Code: 43604
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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"/> 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"/> Large Quantity Generator (LQG) <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
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TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Hazardous Waste Transfer Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility
<input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Receives Hazardous Waste from Off-site

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY))

<input type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

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.

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

Announced Yes No Additional Facility Representatives:
Tanks Yes No
Containers Yes No

Name of Inspector(s) Kara Reynolds	Name of Inspector(s) Megan Shortridge	Date of Inspection/Time (mm/dd/yyyy) (hh:mm) 06-19-2013 9:50 AM
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Comments:

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Toledo Optical Laboratory Facility Type: Unknown Date of Inspection: 06-19-2013 EPA ID#: OHD063711980

Waste Generated			On-or-Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, bag house, 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	Machine maintenance	Used oil 4-5 gallons per year None on site during inspection		Disc Environmental, Ohio	Recycle	
2	Building maintenance	Spent lamps Minimal		Local landfill		Recycle
3	Grinding and edging of lenses	Swarf (polycarbonate spaghetti type strips) Several trash bags per day Lab area		Local landfill		
4	Polishing lenses	Non-hazardous polishing process water ~13 gallons every 3 weeks Hard piped to sanitary sewer		City of Toledo waste water treatment plant		
5	Polishing lenses	Polishing mud Minimal		Local landfill		
6	Sandblasting machine	Spent sandblasting media 5 gallons per month Container Sandblasting area		Local landfill		
7	Tinting of lenses	Dyes/inks 1 pint of gray ink every two weeks		City of Toledo waste water treatment plant		

8	AR vacuum coating machine	AR vacuum coating waste	Very minimal		Local landfill		
9							
10							
11							

REMARKS/GENERAL INFORMATION

General Process Information: See Letter

Regulatory/Enforcement History (if applicable): N/A

Additional P2 remarks and information: N/A

Would this facility be interested in a P2 assessment? **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/ocaop.html

Other: N/A

**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 checked="" type="checkbox"/>

NOTE: For example, used oil contaminated scrap metal stored in a pile.

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/> No <input checked="" 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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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)] No used oil on site during inspection	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] No used oil on site during inspection	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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)] No used oil on site during inspection	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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 checked="" 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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).</i>		
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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).</i>		
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"/>
<i>NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.</i>		