



State of Ohio Environmental Protection Agency

FILE COPY

SP

STREET ADDRESS:

Central District Office

MAILING ADDRESS:

Lazarus Government Center  
50 W. Town St., Suite 700  
Columbus, Ohio 43215

TELE: (614) 728-3778 FAX: (614) 728-3898  
www.epa.state.oh.us

P.O. Box 1049  
Columbus, OH 43216-1049

October 5, 2010

Ms. Trina Allison  
Central Ohio Auto Solutions LLC.  
4350 Karl Road  
Columbus, OH 43224

Re: **Franklin County**  
**Central Ohio Auto Solutions LLC.**  
**Complaint Investigation**  
**NOV-RTC**

Dear Ms. Allison:

On September 29, 2010, Ohio EPA, CDO (Central District Office), DHWM (Division of Hazardous Waste Management) staff (myself) investigated a complaint filed against Central Ohio Auto Solutions LLC. The complaint alleged oil, antifreeze and other fluids were being dumped in the sewer behind the building. It was also alleged that none of the automotive fluids were collected and multiple employees were doing the dumping at night.

CDO staff arrived on site at 1:00 PM, I introduced myself to you and informed you Ohio EPA had received a complaint and the nature of that complaint as stated above. Central Ohio Auto Solutions LLC. operates an automobile sales and maintenance shop at 4350 Karl Road Columbus, Ohio 43224.

Thank you for your assistance during the complaint investigation. We did not find any evidence of automotive fluid dumping. Contrary to the complaint the used oil and antifreeze was being collected in a 275-300 gallon indoor tank. Central Ohio Used Oil was purchasing and hauling the used oil. Oil spills inside and outside the garage are cleaned up with cat litter and disposed as solid waste. Midwest Battery supplies batteries and buys the 12 volt cores.

In response to the allegation of dumping at night, you noted the facility closes at 6:00 PM every night and no employees remain on site.

From the information gathered during the complaint investigation there was no evidence to support the complaint.

During the complaint investigation we noticed one violation. The used oil tank was not labeled with the word used oil.

1. **OAC Rule 3745-279-22(C)(3), Used Oil Labeling:** Containers and above ground tanks and fill pipes for underground tanks must clearly be labeled or marked "used oil"

During the inspection, the used oil tank was not labeled with the words "Used Oil".

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

Ms. Trina Allison  
Central Ohio Auto Solutions LLC.  
09-29-2010  
Page 2

The words "Used Oil" was placed on the tank during the inspection. Therefore Central Ohio Auto Solutions LLC. is returned to compliance for this violation. No further action is required.

The Ohio Department of Development's Office of Energy Efficiency may be able to help with energy efficiency issues. Their website is at: <http://www.development.ohio.gov/cdd/oeef/>

If you would like a free, non-regulatory on-site pollution prevention assessment or if you would like more information about pollution prevention, please contact 614-728-8575. Ohio EPA has helpful information about this at the following web address: <http://www.epa.ohio.gov/ocapp/>

Division of Hazardous Waste Management (the division) has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link:

[http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc\\_serve.php?2=subscriptionpage](http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage)

You can find Ohio's hazardous waste rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>

Should you have any questions, please feel free to call me at 614 (728-5036).

Sincerely,



Chris Bulinski  
Environmental Specialist  
Division of Hazardous Waste Management  
Central District Office

Enclosures

c: CDO/File

Send to Central Office <input checked="" type="checkbox"/>	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE</b> <b>IDENTIFICATION/VERIFICATION FORM</b>		For Ohio EPA use only																		
Completed verification forms required to be submitted to CO should be e-mailed to <a href="mailto:paula.canter@epa.state.oh.us">paula.canter@epa.state.oh.us</a> .																					
<b>Site EPA ID No.</b> <b>Site Name</b>  <b>Site Location Information</b>  <b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	EPA ID Number: <b>Used Oil</b> Name: <b>Central Ohio Auto Solutions LLC.</b> Website: <b>www.autofinanceohio.com</b> (Optional) Street Address: <b>4350 Karl Road</b> City, Town, or Village: <b>Columbus</b> State: <b>OH</b> County Name: <b>Franklin</b> Zip Code: <b>43224</b> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 12.5%;">Private <input checked="" type="checkbox"/></td> <td style="width: 12.5%;">County <input type="checkbox"/></td> <td style="width: 12.5%;">District <input type="checkbox"/></td> <td style="width: 12.5%;">Federal <input type="checkbox"/></td> <td style="width: 12.5%;">Indian <input type="checkbox"/></td> <td style="width: 12.5%;">Municipal <input type="checkbox"/></td> <td style="width: 12.5%;">State <input type="checkbox"/></td> <td style="width: 12.5%;">Other <input type="checkbox"/></td> </tr> </table> <b>423110</b>			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"/>										
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<b>Facility Representative</b>  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: <b>Trina</b> MI:      Last Name: <b>Allison</b> Title: <b>Owner - Operator</b> Phone Number: <b>614-262-7100</b> Phone Number Extension: E-Mail Address: Fax Number:      Fax Number Extension: Street or P.O. Box: City, Town or Village: State:      Zip Code:																				
<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: <b>Central Ohio Auto Solutions LLC.</b> Date Became Owner (mm/dd/yyyy): <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 12.5%;">Owner Type:</td> <td style="width: 12.5%;">Private <input checked="" type="checkbox"/></td> <td style="width: 12.5%;">County <input type="checkbox"/></td> <td style="width: 12.5%;">District <input type="checkbox"/></td> <td style="width: 12.5%;">Federal <input type="checkbox"/></td> <td style="width: 12.5%;">Indian <input type="checkbox"/></td> <td style="width: 12.5%;">Municipal <input type="checkbox"/></td> <td style="width: 12.5%;">State <input type="checkbox"/></td> <td style="width: 12.5%;">Other <input type="checkbox"/></td> </tr> </table> Street or P.O. Box: <b>4350 Karl Road</b> City, Town or Village: <b>Columbus</b> Owner Phone #: <b>614-262-7100</b> State: <b>Ohio</b> Country: <b>USA</b> Zip Code: <b>43224</b> Name of Site's Operator:      Date Became Operator (mm/dd/yyyy): <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 12.5%;">Operator Type:</td> <td style="width: 12.5%;">Private <input type="checkbox"/></td> <td style="width: 12.5%;">County <input type="checkbox"/></td> <td style="width: 12.5%;">District <input type="checkbox"/></td> <td style="width: 12.5%;">Federal <input type="checkbox"/></td> <td style="width: 12.5%;">Indian <input type="checkbox"/></td> <td style="width: 12.5%;">Municipal <input type="checkbox"/></td> <td style="width: 12.5%;">State <input type="checkbox"/></td> <td style="width: 12.5%;">Other <input type="checkbox"/></td> </tr> </table> Street or P.O. Box: City, Town or Village:      Operator Phone #: State:      Country      Zip Code:			Owner Type:	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"/>	Operator 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"/>
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<b>VIOLATIONS CITED?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																					
<b>TYPE OF HANDLER - MARK "X" AS APPROPRIATE</b>																					
<input checked="" type="checkbox"/> Not a HW Generator	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> <input 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). <i>Check the box for the applicable generator status and provide a comment.</i> </td> <td style="width: 50%; vertical-align: top;"> <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         </td> </tr> </table>			<input 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). <i>Check the box for the applicable generator status and provide a comment.</i>	<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	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
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)
Chris Bulinski		09/29/2010 1:00 PM

**Comments:**

## REMARKS

Central Ohio Auto Solutions LLC. is a generator of used oil. Central Ohio Auto Solutions accumulates used motor oil, brake fluid, transmission fluid and antifreeze in a 275-300 gallon tank. The tank was not labeled with the words "used oil" but the tank was labeled during the complaint investigation. Oil filters are drained directly into the tank and disposed as solid waste. According to the Ohio Administrative Code (OAC) 3745-51-04 (B) (13), oil filters which are punctured and hot-drained, crushed and drained, dismantled and drained or any equivalent method are not considered to be hazardous waste and can be disposed of as solid waste. The used oil is purchased and picked up by Central Ohio Oil, Inc. when the tank is near full. Midwest Battery picks up the used 12 volt batteries and pays a core charge and they purchase new batteries from them. Cat litter is used to clean up any used oil spills and this material is placed in the dumpster.

**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](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](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)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Stopped the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Contained the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Cleaned up and properly managed the used oil and other materials?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

<b>ON-SITE BURNING IN SPACE HEATER</b>		
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>		
<b>GENERATOR TRANSPORTATION</b>		
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>		
<b>COLLECTION CENTERS AND AGGREGATION POINTS</b>		
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>		

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11-11-11

11-11-11