



State of Ohio Environmental Protection Agency

## 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

March 12, 2007

Re: Franklin County  
City of Bexley  
OHR000023770  
Used oil generator

Ms. Dorothy Pritchard  
City of Bexley  
2242 East Main Street  
Bexley, OH 43209

Dear Ms. Pritchard:

Thank you for accompanying me during Ohio EPA's March 6, 2007, inspection of the City of Bexley (Bexley) in Bexley, Ohio. I inspected Bexley to determine its compliance with Ohio's hazardous waste and used oil laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). Ohio EPA's inspection included a review of the company's operations and written documentation.

I found the following violations of Ohio's hazardous waste and used oil laws. In order to correct these violations, you must do the following and send me the required information **within 30 days** of your receipt of this letter:

- OAC Rule 3745-279-22 (C) Used oil storage requirements for generators:** Containers and above ground tanks used to store used oil at generator facilities shall be labeled or marked clearly with the words "Used Oil."

The facility failed to properly label the used oil tank and drip pans with the words "used oil."

The facility must properly label the used oil tank and all containers that contain used oil with the words "used oil." The company must submit a photo of the properly labeled containers.

**Comments:**

- During the inspection, I informed the facility representative that any waste generated from your parts washer unit must be evaluated prior to disposal. Since the parts washer has not been serviced in a couple of years, you need to evaluate the waste by using generator knowledge or analytical testing.

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

Ms. Dorothy Pritchard  
City of Bexley  
Page -2-

I am enclosing information on fluorescent bulbs and used batteries. I am also including a list of used fluorescent bulb recyclers along with a list of used battery recyclers.

Enclosed you will find a copy of the checklists and process description. Should you have any questions, please feel free to call me at (614) 728-3882.

Additionally, our website, [www.epa.state.oh.us/dhwm](http://www.epa.state.oh.us/dhwm), provides copies of Ohio hazardous waste rules, and the Office of Compliance Assistance and Pollution Prevention website, <http://www.epa.state.oh.us/opp/ocapp.html>, provides industry-specific pollution prevention information.

Sincerely,



Elizabeth D. Lamerson  
Environmental Specialist  
Division of Hazardous Waste Management  
Ohio EPA, Central District Office

c: Andy Bashore, City of Bexley  
Tammy McConnell, DHWM/CO  
CDO File

Enclosure

EL/ct Bexley NOV

**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 rules

E-mail this completed form to <a href="mailto:tammy.mcconnell@epa.state.oh.us">tammy.mcconnell@epa.state.oh.us</a> or mail it to Tammy McConnell, Central Office	Environmental Protection Agency <b>RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM</b>		For Ohio EPA use only																		
2. Site EPA ID No.	EPA ID Number: OHR000023770																				
3. Site Name	Name: City of Bexley		Website (optional):																		
4. Site Location Information	Street Address: 2242 East Main Street																				
	City, Town, or Village: Bexley	State: OH																			
	County Name: Franklin	Zip Code: 43209																			
5. Site Land Type (check only one)	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>						
Private	County	District	Federal	Indian	Municipal	State	Other														
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>														
6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	A.		B.																		
C.		D.																			
7. Facility Representative:  Additional names can be recorded in number 12.  Only provide address information if it is different than the site address.	First Name: Dorothy		MI:	Last Name: Pritchard																	
	Phone Number: (614) 235-8694		Phone Number Extension:																		
	E-Mail Address:																				
	Fax Number: (614) 235-3420		Fax Number Extension:																		
	Street or P.O. Box:																				
	City, Town or Village:																				
	State:		Country:		Zip Code:																
8. 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.	A. Name of Site's Legal Owner: City of Bexley		Date Became Owner (mm/dd/yyyy):																		
	Owner Type: Mark with an X		<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Private	County	District	Federal	Indian	Municipal	State	Other													
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>													
	Street or P.O. Box: Same																				
	City, Town, or Village:		Owner Phone #:																		
	State:		Country:		Zip Code:																
	B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):																		
	Operator Type: Mark with an X		<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input type="checkbox"/></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Private	County	District	Federal	Indian	Municipal	State	Other													
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>														
Street or P.O. Box:																					
City, Town, or Village:		Operator Phone #:																			
State:		Country:		Zip Code:																	
9. Violations Cited?		<input checked="" type="checkbox"/> Yes		<input type="checkbox"/> No																	
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)																					
<input type="checkbox"/> Not Regulated																					

10. Type of Regulated Waste Activity (Mark  in all of the appropriate boxes.)

**A. Hazardous Waste Activities**  
 (choose only one of the following categories)

<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> 3. Treater, Storer or Disposer of Hazardous Waste
<input type="checkbox"/> a. Large Quantity Generator (LQG):	<input type="checkbox"/> 4. Recycler of Hazardous Waste
<input type="checkbox"/> b. Small Quantity Generator (SQG)	<input type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace
<input checked="" type="checkbox"/> c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/> a. Small Quantity On-site Burner Exemption
<input type="checkbox"/> d. United States Importer of Hazardous Waste	<input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/> 6. Underground Injection Control Facility

<p><b>B. Universal Waste Activities</b></p> <p><input type="checkbox"/> 1. Small Quantity Handler of Universal Waste          (Indicate types of universal waste generated and/or accumulated (check all boxes that apply):</p> <p><input type="checkbox"/> 2. Large Quantity Handler of Universal Waste          (accumulates 5,000 kg or more).</p> <p><input type="checkbox"/> 3. Destination Facility for Universal Waste          (Check all boxes below that apply for each of the three types of facilities above.)</p> <table border="0"> <tr> <td></td> <td style="text-align: center;"><u>Generated</u></td> <td style="text-align: center;"><u>Accumulated</u></td> </tr> <tr> <td>A. Batteries</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>B. Pesticides</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>C. Thermostats</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>D. Lamps</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>		<u>Generated</u>	<u>Accumulated</u>	A. Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/>	B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>	C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>	D. Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p><b>C. Used Oil Activities</b></p> <p><input checked="" type="checkbox"/> 1. Used Oil Generator</p> <p><input type="checkbox"/> 2. Used Oil Transporter Indicate Type(s) of Activity(ies)</p> <p><input type="checkbox"/> Transporter</p> <p><input type="checkbox"/> Transfer Facility</p> <p><input type="checkbox"/> 3. Used Oil Processor and/or Re-refiner          Indicate Type(s) of Activity(ies)</p> <p><input type="checkbox"/> Processor</p> <p><input type="checkbox"/> Re-refiner</p> <p><input type="checkbox"/> 4. Off-Specification Used Oil Burner</p> <p><input type="checkbox"/> 5. Used Oil Fuel Marketer -          Indicate Type(s) of Activity(ies)</p> <p><input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Oil</p> <p><input type="checkbox"/> b. Used Oil to Off-Specification Used Oil Burner</p>
	<u>Generated</u>	<u>Accumulated</u>														
A. Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/>														
B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>														
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>														
D. Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/>														

11. 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 RCRA info source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

--	--	--	--

12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

N	Announced ?	Additional Facility Representatives:
N	Tanks?	Other comments:
Y	Containers?	

13. Name of Inspector(s) \_\_\_\_\_ Name of Inspector(s) \_\_\_\_\_ Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)

Elizabeth Lamerson \_\_\_\_\_ March 6, 2007

14. 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)

\*\*\*\*\*

**PROCESS DESCRIPTION SECTION**

Give a general process description ( include all processes at the facility )

The City of Bexley is located at 2242 East Main Street. This address contains the City Hall, the police station, and the maintenance garage. The maintenance garage conducts maintenance of the City's vehicles and paints lamp post and lines streets among other things around the city.

The City's maintenance garage generates used oil, brake cleaner, and used antifreeze. The facility has a parts washer. The used rags generated at the facility are laundered by Aramark.

\*\*\*\*\*

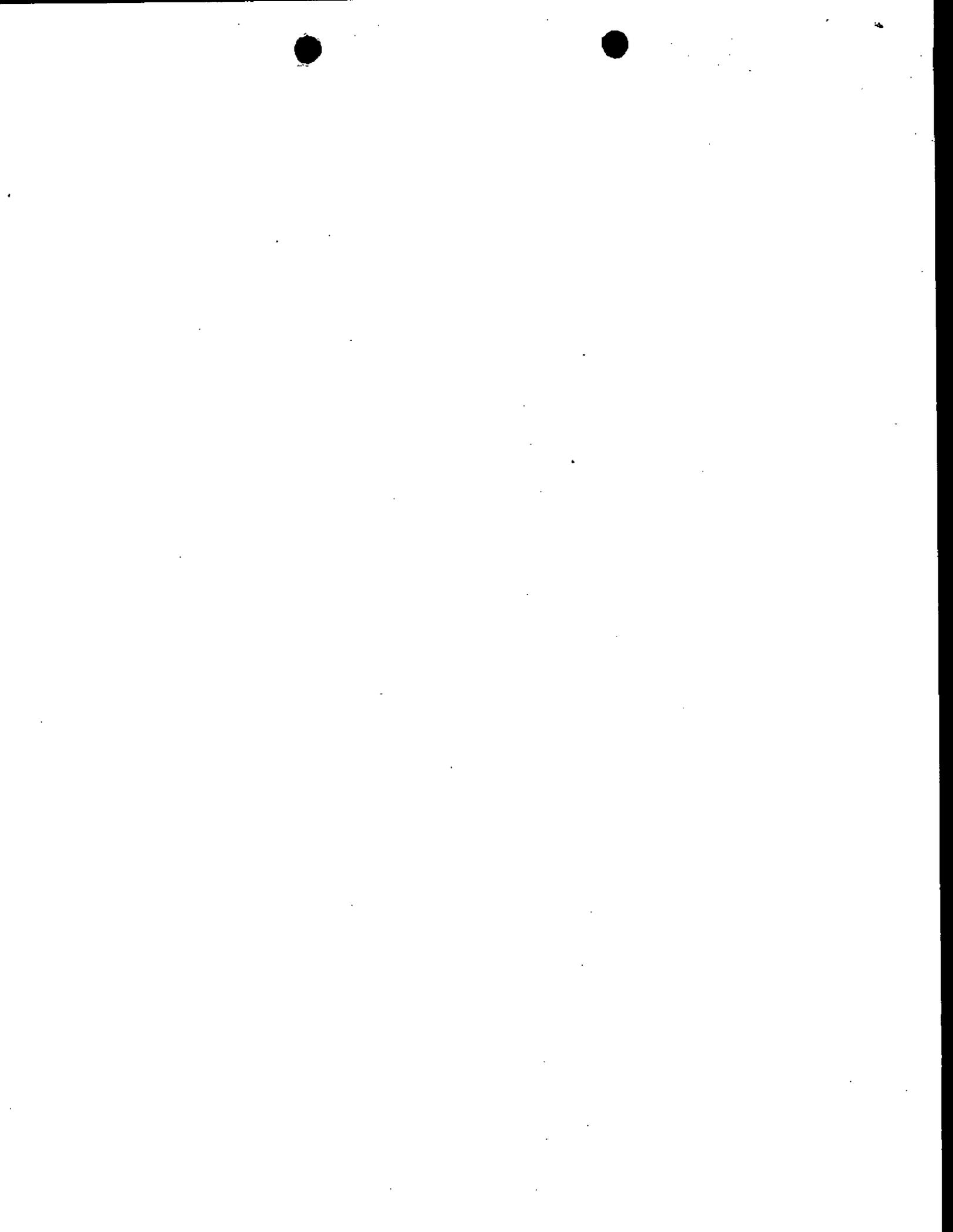
**WASTE ACTIVITIES AND P2 SUMMARY SECTION**

For each of the processes listed above that generate a waste give the following information: (1) name of process generating waste, (2) name or description of waste generated (e.g. sludge, solvent, ash, used oil, spent lamps, etc.), (3) EPA waste codes, if applicable, (4) quantity generated per month, (5) type of accumulation (container, tank, etc.) (6) waste accumulation location in facility, (7) type of on-site treatment (if used), (8) name of off-site management facility and type of waste management activity occurring there, (9) Current P2 activities, and (10) P2 opportunities.

**Used oil** - The used oil is generated from conducting maintenance on the vehicles and equipment. The used oil is collected and placed in a 500-gallon tank located outside of the facility. The used oil is picked up by Thompson Oil.

**Brake cleaner** - The brake cleaner is collected on the used rags. The used rags are laundered by Aramark.

**Parts washer** - The parts washer contains mineral spirits. It is serviced on site by the City of Bexley. The solvent is strained. It has not been cleaned out in a couple of years. Ohio EPA would remind that you must evaluate the parts washer waste prior to disposal.



## USED OIL INSPECTION CHECKLIST (Short Version)

**NOTE:** *This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.*

### PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_  
Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes \_\_\_ No  N/A  RMK# \_\_\_
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes  No  N/A \_\_\_ RMK# \_\_\_
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes \_\_\_ No  N/A  RMK# \_\_\_

### USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes \_\_\_ No  N/A  RMK# \_\_\_
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes \_\_\_ No  N/A  RMK# \_\_\_
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes  No  N/A \_\_\_ RMK# \_\_\_
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes  No  N/A \_\_\_ RMK# \_\_\_
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes \_\_\_ No  N/A \_\_\_ RMK# 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# \_\_\_
- b. Contained the release? Yes \_\_\_ No  N/A  RMK# \_\_\_

- c. Cleaned up and properly managed the used oil and other materials? Yes \_\_\_ No  N/A  RMK# \_\_\_
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes \_\_\_ No  N/A  RMK# \_\_\_
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes \_\_\_ No  N/A  RMK# \_\_\_
- b. Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour? Yes \_\_\_ No  N/A  RMK# \_\_\_
- c. Are the combustion gases from heater vented to the ambient air? Yes \_\_\_ No  N/A  RMK# \_\_\_
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes  No  N/A \_\_\_ RMK# \_\_\_

**USED OIL COLLECTION CENTERS AND AGGREGATION POINTS**

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes \_\_\_ No  N/A  RMK# \_\_\_
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes \_\_\_ No  N/A  RMK# \_\_\_
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes \_\_\_ No  N/A  RMK# \_\_\_

**WASTE EVALUATION**

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

**REMARKS**

1. The 500-gallon used oil tank nor the used oil collection units were properly labeled with the words "used oil." City of Bexley must properly label the units and submit a photo of the properly labeled units.