



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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

Central District Office

TELE: (614) 728-3778 FAX: (614) 728-3888
www.epa.state.oh.us

MAILING ADDRESS:

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

February 28, 2007

Re: Franklin County
G.C. Firestone
OH0000450288
Used oil generator

Mr. Mike Keenan
G.C. Firestone
3084 Southwest Boulevard
Grove City, OH 43123

Dear Mr. Keenan:

Thank you for accompanying me during Ohio EPA's February 21, 2007 inspection of G.C. Firestone (Firestone) in Grove City, Ohio. I inspected Firestone 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 aboveground 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.

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.

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

Ohio EPA is an Equal Opportunity Employer

1. 2. 3.

Mr. Mike Keenan
G.C. Firestone
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Additionally, our website, 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: Tammy McConnell, DHWM, CO
CDO File

Enclosure

EL/cl DSHWMFirestone 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



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|--|---|--------------------------|---|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|-----------|----------|---------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| E-mail this completed form to tammy.mccconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office | Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM | | For Ohio EPA use only | | | | | | | | | | | | | | | | | | | | |
| 2. Site EPA ID No. | EPA ID Number: OH0000450288 | | | | | | | | | | | | | | | | | | | | | | |
| 3. Site Name | Name: Grove City Firestone | | Website (optional): | | | | | | | | | | | | | | | | | | | | |
| 4. Site Location Information | Street Address: 3084 Southwest Blvd. | | | | | | | | | | | | | | | | | | | | | | |
| | City, Town, or Village: Grove City | State: OH | | | | | | | | | | | | | | | | | | | | | |
| | County Name: Franklin | Zip Code: 43123 | | | | | | | | | | | | | | | | | | | | | |
| 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> </tr> </table> | | | Private | County | District | Federal | Indian | Municipal | State | Other | <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"/> | | | | | | | | | | | | | | | | |
| 6. NAICS code(s) www.census.gov/epcd/www/naics.html | 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: Mike | | MI: | Last Name: Keenan | | | | | | | | | | | | | | | | | | | |
| | Phone Number: 614-871-1393 | | Phone Number Extension: | | | | | | | | | | | | | | | | | | | | |
| | E-Mail Address: | | | | | | | | | | | | | | | | | | | | | | |
| | Fax Number: | | 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: | | 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> </tr> </table> | | | | | Private | County | District | Federal | Indian | Municipal | State | Other | <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: | | 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"/> |
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| <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 | | | | | | | | | | | | | | | | | | | | | | | |

PROCESS DESCRIPTION SECTION

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

G.C. Firestone is a full service auto repair shop. The company generates used oil, transmission fluid, brake fluid, and brake cleaner.

WASTE ACTIVITIES 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, (3) EPA waste codes, (4) quantity generated per month, (5) type of accumulation container used, (6) waste accumulation location in facility, (7) type of on-site treatment (if used), (8) name of off-site management facility (9) type of activity occurring at off-site management facility and (10) P2 activities

Used oil - The used oil, used transmission fluid, used brake fluid, and used brake cleaner are all collected in drip pans and placed in the 250-gallon used oil tank. The used oil is picked up by Heartland Petroleum. The last shipment of used oil was on February 5, 2007.



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 than 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 used oil tank and drip pans were not labeled with the word "used oil." Please properly label these containers and submit a photo.