



State of Ohio Environmental Protection Agency

FILE COPY 

STREET ADDRESS:

Central District Office

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

May 28, 2010

Mr. Jim Cowan
The Import Doctor
52 E. Brickel Street
Columbus, OH 43215

Dear Mr. Cowan:

**Re: CDO Complaint #3834, The Import Doctor
5/25/2010, Franklin County**

Thanks to Chad Cogar, your employee, for his time during my visit to The Import Doctor at 52 E. Brickel St. on May 25, 2010. The purpose of my visit was to investigate a complaint that Ohio EPA had received alleging problems with the handling of used oil at your facility. Ohio's laws under Chapter 3745 of the Ohio Administrative Code and Chapter 3734 of the Ohio Revised Code establish a system for safe and responsible management of used oil and hazardous wastes. This letter summarizes our findings.

A small spill of fuel onto your gravel parking area from a customer vehicle that pulled up in front of the shop while leaking about a week ago had since evaporated. The driveway ramp to the shop is going to be concrete paved soon, Mr. Cogar said. This should make it easier to clean up any such spills as they happen, using granular absorbents which you have on hand. Housekeeping in the shop was generally good. A guidance document for used oil generators was provided to Mr. Cogar. One apparent violation of Ohio's used oil rules, was noted and corrected during my visit:

Used Oil Container Marking, OAC Rule 3745-279-22(C)(1): Containers for accumulating/ storing used oil must be clearly marked as "Used Oil".

Ten unmarked drums of used oil were being held inside the shop, for reuse of the contents as diesel admixture in the shop owner's vehicle.

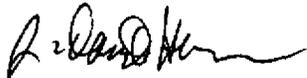
Proper marking with a stencil, was provided for these containers during my afternoon visit.

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

Mr. Jim Cowan
The Import Doctor
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I am enclosing a checklist completed during this inspection. Ohio EPA is assigning an "internal" tracking I.D. number to your facility. If you have any questions about items discussed in this letter, do not hesitate to contact me by phone at (614) 728-3885.

Sincerely,



J. David Hohmann
Environmental Specialist
Division of Hazardous Waste Management
Central District Office

c: Kristina Durnell
CDO File

JDH/nsm Import Dr NOV-NOC

"Notice: Ohio EPA's failure to list specific deficiencies/violations in this letter does not relieve your company from having to comply with all applicable regulations."

Send to Central Office <input 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 kristina.durnell@epa.state.oh.us.

Site EPA ID No. Site Name	EPA ID Number:		Website: (Optional)					
Site Location Information	Name: The Import Doctor		Street Address: 52 E. Brickel St.					
Site Land Type (check only one)	City, Town, or Village: Columbus		State: OH					
NAICS code(s) www.census.gov/epcd/www/naics.html	County Name: Franklin		Zip Code: 43215					
	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"/>

Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Chad		MI:	Last Name: Cogar	
	Title:		Phone Number: 614-228-8637		Phone Number Extension:
	E-Mail Address: jcowan@iwaynet.net		Fax Number:		Fax Number Extension:
	Street or P.O. Box:		City, Town or Village:		
	State:		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: Jim Cowan, PhD		Date Became Owner (mm/dd/yyyy):						
	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"/>
	Street or P.O. Box:		City, Town or Village:						
	State:		Country:		Zip Code:				
	Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):						
	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"/>
	Street or P.O. Box:		City, Town or Village:						
	State:		Country:		Zip Code:				

VIOLATIONS CITED?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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TYPE OF HANDLER - MARK "X" AS APPROPRIATE		
<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input type="checkbox"/> Short-Term 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

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"/> 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
<input type="checkbox"/> Batteries
<input type="checkbox"/> Pesticides
<input type="checkbox"/> Mercury containing equipment
<input type="checkbox"/> Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))
<input checked="" type="checkbox"/> Used Oil Generator
<input type="checkbox"/> Used Oil Transporter
<input type="checkbox"/> Used Oil Transfer Facility
<input type="checkbox"/> Used Oil Processor
<input type="checkbox"/> Used Oil Re-refiner
<input type="checkbox"/> Off-Specification Used Oil Burner
<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner

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 type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Containers	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
David Hohmann		05/25/2010 1100

Comments:
 No HW generation was noted, other than used oil, during the complaint investigation visit. Container marking violation was corrected during the inspection visit, by the shop employee.

USED OIL INSPECTION CHECKLIST

GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If so: (N/A)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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 checked="" type="checkbox"/> N/A <input type="checkbox"/>

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so, (N/A)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
5.	Does the generator of 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"/>
6.	Does the generator store used oil in tanks; or containers; or in a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] <i>RMK: Ten 55-gallon drums for used oil were located in the shop building.</i>	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 as "Used Oil"? [3745-279-22(C)] <i>RMK: The containers were unmarked, but this was corrected during the inspection visit by company staff using a stencil and paint.</i>	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)] <i>RMK: There was no evidence of any current releases. A recent small spill of fuel from a customer vehicle that pulled up and sat overnight, had since evaporated. The gravel driveway ramp is going to be concrete paved within about a month. Drips to the floor in the building had been cleaned up using floor-dry absorbent material, and the floor drains had been previously plugged and sealed off.</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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"/>

ON-SITE BURNING IN A SPACE HEATER

10.	Does the generator burn used oil in a used-oil fired space heater? [3745-279-23] If so:	N/A.
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GENERATOR TRANSPORTATION (N/A, all used oil is burned in a vehicle owned by the shop owner.)

COLLECTION CENTERS AND AGGREGATION POINTS (N/A)

