



State of Ohio Environmental Protection Agency

FILE COPY

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

November 05, 2009

Abdul Farah
Lake City Ventures
3280 Westerville Road
Columbus, OH 43224

**Re: Lake City Ventures LLC
Used Oil Inspection
Franklin County
Notice of Violation**

Dear Mr. Farah:

On November 2, 2009, Ohio EPA staff conducted an inspection at Lake City Ventures. This inspection was conducted in conjunction with the Mifflin Township Police Officer Steve Blake, the Mifflin Township Division of Fire Inspector Steve Welch, Franklin County Zoning Enforcement Officer Joe Bailey and the Ohio Board of Motor Vehicle Collision Repair Registration Investigator Daniel Gibson.

We inspected Lake City Ventures 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).

We found the following violations of Ohio's used oil rules. In order to correct these violations you must do the following. A return to compliance inspection will be conducted within **30 days** of your receipt of this letter:

1. OAC Rule 3745-279-22 (D) states that any release of used oil must be cleaned up and properly managed.

Lake City Ventures is in the process of cleaning up a spill around their used oil container. The used oil has been partially cleaned up by using an oil absorbent. Now the absorbent with used oil on it should be removed, evaluated and properly disposed. Absorbent-contaminated with only used oil can usually be disposed of in your dumpster going to a sanitary landfill if it has not picked up any hazardous constituents through use.

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

Ohio EPA is an Equal Opportunity Employer

To avoid spills in the future here are a few suggestions. The container provided by your used oil hauler is very tall and it appears the addition of used oil to the container may be difficult if the person adding the oil is not tall enough. Also the top of the container is not an appropriate place to hot drain oil filters. Oil filters must be hot drained into a pan for a minimum of 12 hours with the dome end punched if it has an anti drain valve. Alternatively oil filters can be crushed, disassembled, or air pressure can be used to force the oil from the filter. After they are drained of oil the oil filter can be disposed of in your dumpster with other solid waste trash. Water can also get into the container from rainfall and if enough collects, it will float the oil out of the container. Please keep a lid or at least something to keep the water out.

A return to compliance inspection will be conducted within 30 days to determine if the absorbent with used oil has been cleaned up. You can also call me when the work is complete if you feel it is easier and I will come out and take a look.

2. OAC Rule 3745-279-22 (C) requires that used oil containers be labeled with the words "used oil".

It was determined during the inspection that Lake City Ventures did not label the container used to manage used oil with the words "Used Oil," as required by OAC Rule 3745-279-22 (C).

One of your associates stated there had been a label on the container recently. The container is outside and the label could easily have fallen off due to wind and rain. An alternative would be to write the words "used oil" on the container with a permanent magic marker or grease pencil.

A return to compliance inspection will be conducted within 30 days to determine if the container is labeled with the words "used oil". You can also call me when the work is complete if you feel it is easier and I will come out and take a look.

While we were on site we provided you with the Office of Compliance Assistance and Pollution Prevention publication "Environmental Compliance Guide for Auto Repair Shops" March 2007. This booklet contains valuable information for you and your associates. We are enclosing information on fluorescent lamps because these are regulated by Ohio EPA and you will be generating them in the future.

Abdul Farah
Lake City Ventures
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Enclosed you will find a copy of the Site Identification Form and used oil checklist that we completed as a result of the inspection. Should you have any questions, please feel free to call me at (614) 728-5036. You can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov>.

Sincerely,



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

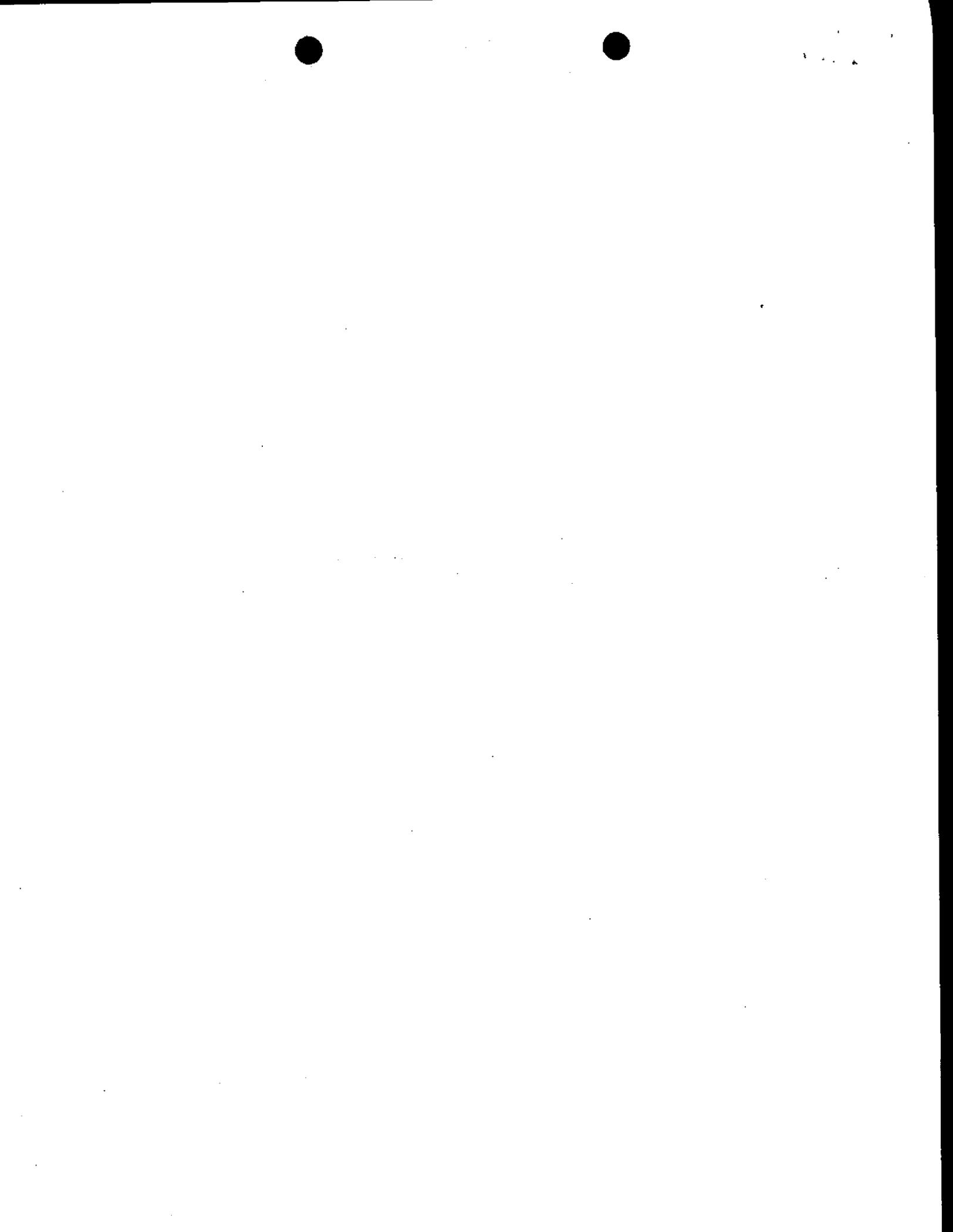
Enclosures

c: Kristina Durnell, DHWM/CO
Officer Steve Blake, Mifflin Township Police
Luke Mountjoy, CDO/DAPC
CDO/DHWM file

CB/nsm LakecityNOV 2009

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.



**Ohio Environmental Protection Agency
RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to kristina.durnell@epa.state.oh.us
or mail it to Kristina Durnell, Central Office

| | |
|---|---|
| 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: Name: Lake City Ventures LLC Website: (Optional) Street Address: 3280 Westerville Road City, Town, or Village: Columbus County Name: Franklin State: OH Zip Code: 43224 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"/> 811111 |
| Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address | First Name: Abdul MI: Last Name: Farah Phone Number: 614-337-2910 Phone Number Extension: E-Mail Address: Fax Number Extension: Fax Number: 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: Al-khasawneh Raed M Owner Private County District Federal Indian Municipal State Other Type: <input checked="" type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: 2128 Carloway Court City, Town or Village: Miamisburg State: Ohio Date Became Owner (mm/dd/yyyy): Owner Phone #: Zip Code: 45342 Name of Site's Operator: Paul Kwane Operator Private County District Federal Indian Municipal State Other Type: <input type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: Operator Phone #: City, Town or Village: United States Zip Code: State: |

VIOLATIONS CITED? Yes No

TYPE OF HANDLER-- A MINIMUM OF ONE BOX MUST BE CHECKED

| | | |
|--|--|---|
| <input checked="" type="checkbox"/> Not a HW Generator | <input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 | <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"/> Recycler of Hazardous Waste | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace |
| <input type="checkbox"/> Underground Injection Control Facility | <input type="checkbox"/> Small Quantity On-Site Burner Exemption |
| <input type="checkbox"/> Hazardous Waste Transporter | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | |

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. Oil
 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 if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. 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 type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Other Comments: |
| 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 | | 11/2/2009 11:30 PM |

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) |
| | | |

REMARKS - GENERAL INFORMATION

Lake City Ventures LLC is located at 3280 Westerville Road, Columbus, Ohio 43224. Lake City Ventures does mechanical maintenance on vehicles.

Used oil from oil changes and other oils such as brake fluid, and transmission fluid are stored in a 400 gallon container outside which is not labeled "Used Oil". The used oil is picked up by BMD Oil, Steve Profitt 740-403-3656 EPA # OHR000138669 5266 Briarcliff Road Nashport, Ohio 43830. No fluorescent lamps were in accumulation at the time of the inspection. They said they had not changed a lamp in years and pointed out that almost all of them were burned out.



**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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input 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"/> |
|----|--|--|

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 type="checkbox"/> No <input checked="" 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 type="checkbox"/> No <input checked="" 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 type="checkbox"/> No <input checked="" 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 SPACE HEATER

| | | | |
|-----|--|------------------------------|---|
| 10. | Does the generator burn used oil 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"/> |

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

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-transported 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"/> |

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).

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"/> |

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.