



State of Ohio Environmental Protection Agency

FILE COPY

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

December 4, 2009

Mr. John Allen
NTB, Inc.
150 E. Long St.
Columbus, OH 43215

Re: N.T.B. *OHRO00158196*
11/23/09 Complaint Investigation
Franklin County

Dear Mr. Allen:

Thanks for your time and assistance during my visit to your facility at 150 E. Long St. on November 23rd. The purpose of my visit was to investigate a complaint (#3710) that Ohio EPA had received alleging improper disposal 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.

I did not see anything to support the allegations of the complaint. However, one violation was noted:

1. **Used Oil Container Marking, OAC rule 3745-279-22(C):** Containers of used oil must be clearly labeled or marked, as "Used Oil".

Several mobile caddy containers with funnels and mounted on wheels inside the shop, that held used oil, were unmarked.

Please provide proper labeling/markings of these containers and send photo(s) showing that you have corrected this problem.

In addition to the above-noted violation, the following comments are also provided:

- Housekeeping in the shop area was good at the time of my visit, and spent absorbents were being managed with used oil filters, sent to Safety Kleen for recycling.

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

Mr. John Allen
NTB, Inc.
Page -2-

- Used oil was being collected for burning in a space heater in your shop. A fact sheet on that practice was shared with you during my visit.
- Lead tire weights from your shop operations are being collected for recycling as scrap metal, by your battery supplier. New vehicle manufacturers have ceased using the toxic lead weights, in favor of safer alternatives (including zinc, steel and composites). The use of lead tire weights ended in Europe a few years ago, and I understand the U.S. may follow suit by 2011. The US EPA's National Lead Free Wheel Weight Initiative positively recognizes companies which are taking this step now [see <http://www.epa.gov/osw/hazard/wastemin/nlffwi.htm>]. NTB is encouraged to switch to the safer alternatives soon, to demonstrate leadership in environmental sustainability and help reduce potential environmental risks from lead pollution by weights which may fall off of wheels onto roadways which drain to local rivers and streams. A Midwestern program called Lead Free Wheels, offers to help cover any cost difference from making the switch. See <http://www.leadfreewheels.org/program.shtml> for more information.

Please send me a response in 30 days, describing corrections made to address the marking of the oil caddy containers.. A photo showing things labeled, would suffice.

If you have any other questions about my visit or 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: CDO File

JDH/nsm NTB NOV

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.

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: 10-gallon containers + a 250-gallon aboveground storage tank 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 "Used Oil"? [3745-279-22(C)] <i>RMK: The tank was properly marked, but the 10-gallon caddy containers were unmarked.</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: N/A, There was no evidence of any current releases. 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:	
	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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Is the heater designed to have a maximum capacity of < 0.5 million BTU per hour?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Are the combustion gases from heater vented to the ambient air?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

GENERATOR TRANSPORTATION (N/A, all used oil is burned on site in the space heater). Used oil filters and spent absorbent materials are taken by Safety-Kleen for proper recycling of both the oil and metal.

COLLECTION CENTERS AND AGGREGATION POINTS (N/A)

