



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

January 2, 2008

Mr. Brian Shonkwiler  
Perry Township  
7125 Sawmill Road  
Dublin, OH 43017

**Re: Perry Township  
Franklin County  
OHD099723926  
CESQG  
Notice of Violation**

Dear Mr. Shonkwiler:

On December 28, 2007, I met with Mr. Ian Warren of Perry Township to conduct a compliance evaluation inspection at the Perry Township facility located at 7125 Sawmill Road in Dublin, Ohio. The purpose of the inspection was to determine Perry Township's compliance with Ohio's hazardous waste, used oil, and universal waste rules as found in Chapter 3734. of the Ohio Revised Code and Chapter 3745. of the Ohio Administrative Code (OAC). A hazardous waste generator identification number for a large quantity generator of hazardous waste was previously issued to Perry Township resulting in this inspection.

Based on the findings of this inspection, it has been determined that Perry Township is currently in violation of the following OAC Rules:

1. OAC Rule 3745-51-04(B)(13), Exclusions: Non-terne plated used oil filters that are not mixed with listed hazardous wastes are not considered to be hazardous wastes if these oil filters have been gravity hot-drained using one of the following methods:
  - a. Puncturing the filter anti-drain back valve or the filter dome end and hot-draining;
  - b. Hot-draining and crushing;
  - c. Dismantling and hot-draining; or
  - d. Any other equivalent hot-draining method which will remove the used oil.

Although Perry Township was gravity draining the used oil filters, no other method was being employed to aide in this draining method, as required.

Perry Township must specify standard operating procedures to be implemented that will meet the requirements of this rule (puncturing, crushing, dismantling, etc.) prior to disposal of the used oil filters.

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

2. OAC Rule 3745-279-22(C)(1), Used Oil Storage Requirements for Generators: Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

An aboveground tank located outside on the west side of a building and several smaller used oil containers (i.e., drip pans, 5-gallon buckets, 1-gallon containers, etc.) located inside in the maintenance area were not labeled with the words "used oil" as required. Many of these containers were on the floor area and were not closed and/or covered.

Perry Township must immediately label any containers used to manage used oil with the words "Used Oil." Evidence that the labeling has been completed should be provided for review (i.e., photographs, statement(s) that the labeling has been completed, etc.). Perry Township should take care when accumulating used oil and other liquids that the containers are closed/covered and located in areas where there is limited potential for spilling/tripping.

Please provide all requested information demonstrating abatement of the listed violations to this office for review within thirty (30) days of receipt of this letter.

Please find enclosed the checklists completed as a result of this inspection. Also find enclosed information regarding the management of fluorescent light bulbs and other universal wastes as well as management of used oils. Should you have any questions, I can be reached by telephone at 614-728-5037.

NOTICE: Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve Perry Township from having to comply with all applicable regulations.

Respectfully,



Randy Sheldon  
Environmental Specialist  
Division of Hazardous Waste Management  
Central District Office

Enclosures

c: Tammy McConnell, DHWM/CO  
DHWM/CDO File

CONDITIONAL EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
LQG: ≥1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

WASTE EVALUATION

- 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes [x] No [ ] N/A [ ]

GENERATOR CLASSIFICATION

- 2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes [x] No [ ] N/A [ ]

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

- 3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes [x] No [ ] N/A [ ]

TREATMENT OF HAZARDOUS WASTE

- a. Container that meets 3745-66-70 to 3745-66-77? Yes [ ] No [ ] N/A [x]
b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes [ ] No [ ] N/A [x]
c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes [ ] No [ ] N/A [x]
d. Containment building that meets 3745-256-100 to 3745-256-102? Yes [ ] No [ ] N/A [x]

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

REMARKS

This facility is a CESQG, but is currently listed as a LQG. A generator status change has been requested. Any hazardous waste generated is managed with the used oil.



E-mail this completed form to <a href="mailto:tammy.mcconnell@pa.state.oh.us">tammy.mcconnell@pa.state.oh.us</a> or mail it to Tammy McConnell, Central Office	<b>U.S. Environmental Protection Agency</b> <b>RCRA SUB-C SITE IDENTIFICATION/VERIFICATION FORM</b>	For Ohio EPA use only
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2. Site EPA ID No.	EPA ID Number: OHD099723926
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3. Site Name	Name: Perry Township	Website (optional:)
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4. Site Location Information	Street Address: 7125 Sawmill Road	
	City, Town, or Village: Dublin	State: OH
	County Name: Franklin	Zip Code: 43017

5. Site Land Type (check only one)	<table 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 checked="" type="checkbox"/></td> </tr> </table>	Private	County	District	Federal	Indian	Municipal	State	Other	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>										

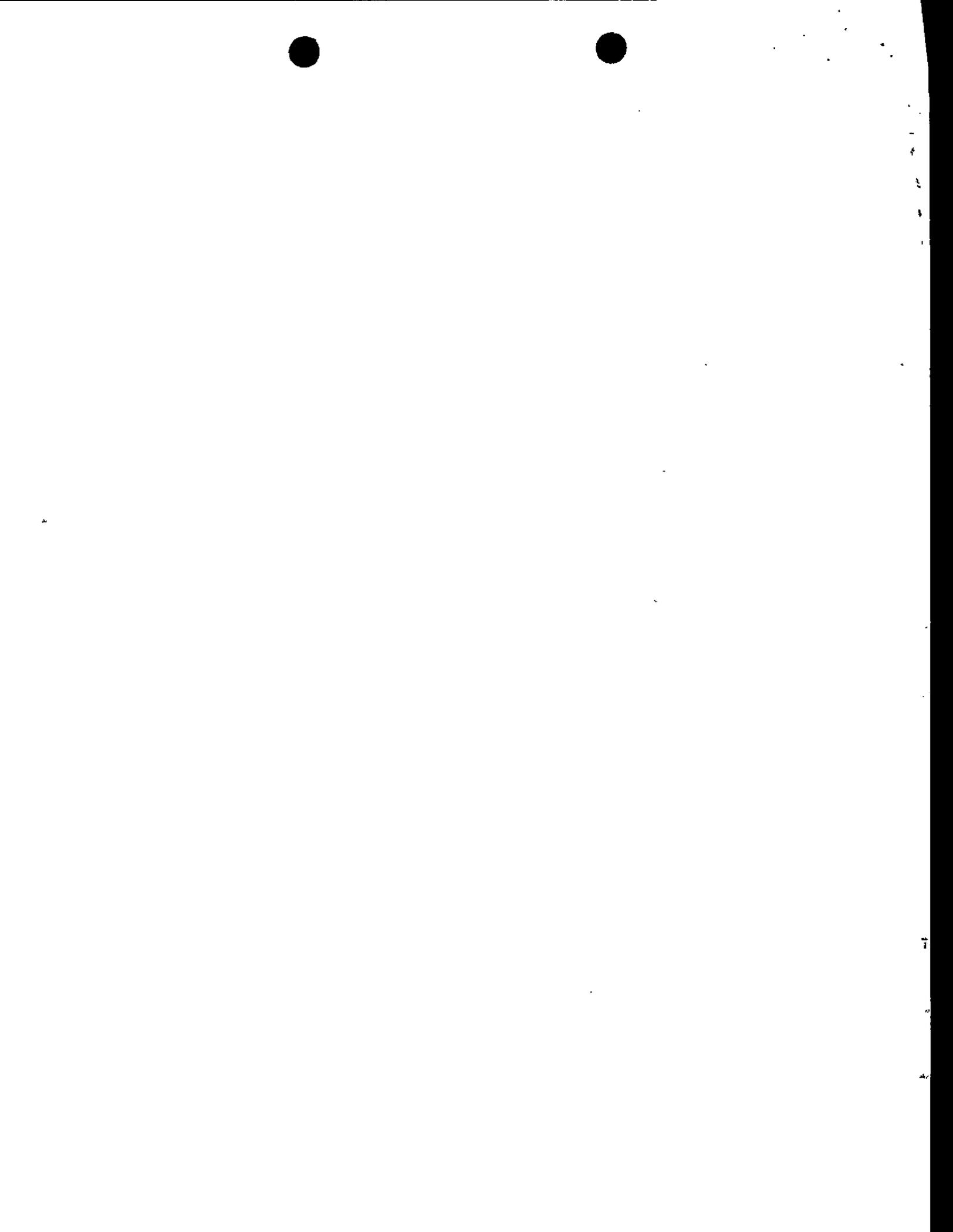
6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	A.	B.
	C.	D.

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: Brian	MI:	Last Name: Shonkwiler
	Phone Number: 614-889-8781		Phone Number Extension:
	E-Mail Address:		
	Fax Number:		Fax Number Extension:
	Street or P.O. Box: 7125 Sawmill Road		
	City, Town or Village: Dublin		
	State: Ohio	Country: USA	Zip Code: 43017

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):						
	Perry Township Board of Trustees		010/13/1962						
	Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Street or P.O. Box: 7125 Sawmill Road								
	City, Town, or Village: Dublin			Owner Phone #:					
	State: CA			Country: USA		Zip Code: 43017			
	B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):						
	Operator Type: Mark with an X	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"/>	<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
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10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)	<input type="checkbox"/> Not Regulated
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10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

<b>A. Hazardous Waste Activities</b>	
(choose only one of the following categories)	<input type="checkbox"/> 3. Treater, Storer or Disposer of Hazardous Waste
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> 4. Recycler of Hazardous Waste
<input type="checkbox"/> a. Large Quantity Generator (LQG):	<input type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> b. Small Quantity Generator (SQG)	<input type="checkbox"/> a. Small Quantity On-site Burner Exemption
<input checked="" type="checkbox"/> c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> d. United States Importer of Hazardous Waste	<input type="checkbox"/> 6. Underground Injection Control Facility
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/> 7. Hazardous Waste Transporter

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

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

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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: CESQG and any hazardous wastes are managed with the used oil.
N	Containers?	

13.	Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
	R. Sheldon		12/28/2007 11:30 AM

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)
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## FACILITY INFORMATION

### General Information

Perry Township administration and services headquarters are located at 7125 Sawmill Road in Dublin, Ohio 43017, Franklin County. Hazardous waste generator ID number OHD099723926 was given to Perry Township and is listed with a generator status of a large quantity generator of hazardous waste. Service buildings and warehouses are located at the rear (west) of the administration building located adjacent to Sawmill Road.

The township services department is located at this address and maintenance is performed on the associated vehicles and equipment as needed. Very little hazardous waste would be generated at this facility, and if so, it would be mixed with the used oil. Product purchasing and usage (paints, chemicals, etc.) is scrutinized and all product is normally used resulting in little if any wastes.

Perry Township is a conditionally exempt small quantity generator of hazardous waste, a used oil generator, and a small quantity universal waste handler.

### Waste Generation and Management

Used oils are generated from performing general maintenance on vehicles and equipment. Used oils are managed in an estimated 250 gallon above ground tank that was not labeled. Used oils were also being managed in several smaller unlabeled containers in the service building. McClaughlin Oil manages the used oil.

Used oil filters were being drained, but were not being punctured or crushed or dismantled in any manner to aide the draining of the filters. We discussed the possible recycling of metal from the filters.

A small parts cleaner is on-site but reportedly is not used often. No waste solvent has been removed to the employee's knowledge.

Water based paints are used for small striping jobs as needed.

Any hazardous/solvent wastes generated from cleaning the painting equipment is managed with the used oil.

Used antifreeze is containerized and managed by McClaughlin Oil.

Aerosol cans contents are used and the empty can is disposed. We discussed the possible recycling of the metal from the cans.

Vehicle batteries are purchased/recycled through InterState Batteries.

Long fluorescent light bulbs are used throughout the buildings. No spent bulbs were



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currently in accumulation. We discussed the universal waste rules and the appropriate management of bulbs containing mercury above regulatory limits.



## 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)? [3745-279-21(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# 1
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# 2
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# 2
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#

H:\DSHWM\SHELDON\perry twp\usedoil.wpd

#### REMARKS

- Generator is a CESQG and mixes any hazardous wastes with the used oil.
- Used oil was being managed in an estimated 250 gallon tank and several smaller containers, none of which were appropriately labeled. Used oil filters were being drained, but were not being punctured or crushed prior to disposal.



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Site Prov:  
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**Summary**

Street Address  
1 of 2

**Parcel Info**

Parcel ID	Address	Index Order	Card
273-008259-00	7125 SAWMILL RD	Street Address	1 of 1

**Summary**

- Print View
- Residential
- Commercial NEW!
- Improvements
- Sketch/Photo
- Map (GIS)
- Transfer
- Property Report
- Tax Information
- Levy Info
- Tax Estimator
- Tax Distribution

**Owner Information**  
**Call 614-462-4663 if incorrect**  
 PERRY TOWNSHIP BD OF TRS

**Tax Bill Mailing Information**  
**Mail Changes Only - Click Here**  
 PERRY TOWNSHIP BD OF TRS

7125 SAWMILL RD  
 DUBLIN OH 43016

**Value Information**  
**Market Land Value** 252,700  
**Agricultural Value** 0  
**Market Impr. Value** 222,300  
**Market Total Value** 475,000

**Legal Description**  
 TULLER RD 1.0 ACRE  
 R19 T2 1/4T2  
 LOT 11-14  
 273-0071D -006-00

**Search By**

- Parcel ID
- Owner
- Street Address

**Sales Data**  
**Sale Amount** \$0  
**Date** 05/04/1972  
**# of Parcels**  
**Conveyance #**  
**Exempt #**

**Building Data**  
**Year Built** 1975

**Site Functions**

- Property Search
- On-Line Help
- Email Auditor
- Home
- Auditor's Home
- Tax Estimator by School/District
- Contact Us

**Tax Dist** 273 CITY OF DUBLIN-WASH TWP-DUBLIN CSD  
**School Dist** 2513 DUBLIN CSD  
**Land Use** [630] EXMPT PROP OWNED BY TOWNSHIPS  
**Neighborhood** 00103

**Board of Revision** No  
**Homestead** No  
**2.5% Reduction** No  
**Assessments** No  
**CDQ Year**

**2007 Annual Taxes** \$0.00

**2007 Total Taxes Paid** \$0.00

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Data updated on 12/27/2007



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12  
13



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**Summary**

Street Address  
2 of 2

**Parcel Info Summary**

**Parcel ID** 273-008792-00 **Address** 7125 SAWMILL RD

**Index Order** Street Address **Card** 1 of 2

- Print View
- Residential
- Commercial NEW!
- Improvements
- Sketch/Photo
- Map (GIS)
- Transfer
- Property Report
- Tax Information
- Levy Info
- Tax Estimator
- Tax Distribution

**Owner Information**  
Call 614-462-4663 if incorrect  
PERRY TOWNSHIP BD OF TRS

**Tax Bill Mailing Information**  
Mail Changes Only - Click Here  
PERRY TOWNSHIP BD OF TRS

6170 LINWORTH RD  
WORTHINGTON OH 43085

**Value Information**  
**Market Land Value** 218,900  
**Agricultural Value** 0  
**Market Impr. Value** 581,100  
**Market Total Value** 800,000

**Legal Description**  
TULLER RD  
R19 T2 1/4 T2  
.77 ACRE LOT 11-14  
273-0071D -005-00

**Search By**  
Parcel ID  
Owner  
Street Address

**Sales Data**  
**Sale Amount** \$0  
**Date** 10/13/1962  
**# of Parcels**  
**Conveyance #**  
**Exempt #**

**Building Data**  
**Year Built** 1963

**Site Functions**

- Property Search**
- On-Line Help
- Email Auditor
- Home
- Auditor's Home
- Tax Estimator by School/District
- Contact Us

**Tax Dist** 273 CITY OF DUBLIN-WASH TWP-DUBLIN CSD  
**School Dist** 2513 DUBLIN CSD  
**Land Use** [630] EXMPT PROP OWNED BY TOWNSHIPS  
**Neighborhood** 00103

**Board of Revision** No  
**Homestead** No  
**2.5% Reduction** No  
**Assessments** No  
**CDQ Year**

**2007 Annual Taxes** \$0.00

**2007 Total Taxes Paid** \$0.00

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Data updated on 12/27/2007



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