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State of Ohio Environmental Protection Agency

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

March 30, 2007

Re: Compositx Corp.
Non-notifier OHD117360420
CESQG, past episodic LQG [NOV]

Mr. Sean Sharp
Compositx Corp.
23 Sisal St.
Newark, OH 43055

Dear Mr. Sharp:

Thank you for your time and assistance during my inspection visit to Compositx at its 23 Sisal Street, Newark facility on March 12, 2007. The purpose was to review your facility's generation and management of hazardous waste, used oil and universal wastes. 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 these wastes. This letter summarizes the inspection findings.

I found that Compositx is currently operating as a used oil generator, and as a conditionally exempt small quantity generator (CESQG) with less than or equal to 100 kg/month of hazardous waste. Within the past three years there was a non-recurrent large quantity generation of hazardous waste by Compositx in 2005. My review of compliance at Compositx covered the applicable recordkeeping requirements related to those recent past years, as well as the current requirements for CESQGs.

The following violations were noted:

1. **Hazardous Waste Generator Notification, OAC rule 3745-52-12(A):** A generator must not offer for transportation hazardous waste without having received a US EPA identification number from US EPA or Ohio EPA.

Compositx had not notified and received an identification number for its waste generation activities at 23 Sisal St. An ID number issued to a separate sister company (Ohio Armor) at one of their old locations (112 Jefferson St.) had been used in recent years. The identification numbers are address-specific.

Download and complete the notification form according to the instructions on the form from <http://www.epa.state.oh.us/dhwm/notiform.html> and submit it the Ohio EPA Central Office to obtain the proper site ID number. Send a duplicate copy of your form and/or submittal cover letter to David Hohmann to demonstrate abatement of this violation.

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

2. **Hazardous Waste Annual Reporting, OAC rule 3745-52-41(A):** Annual reports using forms EPA9027, EPA9027 and EPA9029 must be submitted for each calendar year in which Large Quantity Generator waste shipments are made.

An annual report was not submitted for 2005 episodic nonrecurrent Large Quantity Generator activity at 23 Sisal St.

Within 30 days of receiving the Generator ID number mentioned in Item 1 above, submit the annual report for hazardous waste generation in calendar year 2005, which was due by March 1, 2006. Annual report forms and instructions may be downloaded from http://www.epa.state.oh.us/dhwm/ann_report.html. Ensure that all hazardous waste shipments are properly accounted for using the generator ID number assigned for 23 Sisal St in accordance with compliance item #1 above.

3. **Manifest- General Requirements, OAC rule 3745-52-20(A):** Off-site shipments of regulated hazardous waste must be accompanied by a properly completed uniform hazardous waste manifest (U.S. EPA form 8700-22).

Several hazardous waste shipments in 2005 to Petro Chem Processing - Detroit (MID980615298) and to Safety Kleen- Smithfield (KYD053348108) were accompanied by manifests with an incorrect generator ID number for Composix.

Please correct any waste manifest records for shipments made in the past three years. Send corrected copies to the transporter and receiving facility(ies) in question, as well as to David Hohmann as evidence of correcting this violation.

4. **Recordkeeping, OAC rule 3745-52-40(A):** A generator must keep a copy of each manifest signed in accordance with paragraph (A) of rule 3745-52-23 for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.

Generator records from 2005 were incomplete. At least one waste shipment documented as received from Composix by Petro Chem Processing (MID980615298) was not documented in the records provided for review during the inspection. Records of a batch of hazardous waste shipped under manifest #MI9924858 on 12/13/2005 did not include the signed return copy indicating it was received by Petro Chem Processing (US EPA reports by Petro Chem appear to show they did receive it).

Locate the required records in Composix files and/or obtain copies from the receiving facility(ies) for all hazardous waste shipments since March 12, 2004. Ensure that these records are correct per compliance item #3 above, and provide a copy of any such located/corrected records to David Hohmann.

5. **Land Disposal Restriction compliance records, OAC rule 3745-270-07(A)(8)** The generator must keep on site copies of any notices, certifications, demonstrations and waste analysis data related to compliance with OAC rule 3745-270 for at least three years from the last shipment of waste sent off-site.

No records of any Land Disposal Restriction Notifications or Certifications associated with large quantity generator waste shipment activity in 2005 could be located in the facility records at the time of the inspection.

USP By checking further in your records or those of the receiving facility(ies), locate copies of any LDR notifications or certifications for all of the hazardous waste shipments in 2005. Verify the information (including generator ID number and waste description) is accurate and consistent with what the properly completed hazardous waste manifests should contain. Retain these records in a manner to be accessible for inspections in the future. Provide copies of all such located/corrected records to David Hohmann.

6. **Used Oil Container Marking, OAC rule 3745-279-22(C):** Each drum, container or tank must be marked clearly as "Used Oil".

Six drums and three cubic-yard tote containers for used oil were not marked as such. They appeared to have a variety of old (non-applicable) product labels.

USP Provide proper marking for these items and send a photo of the correction made.

7. **Used Oil shipments, OAC rule 3745-279-24:** Used oil shipments must be hauled only by transporters that have obtained US EPA ID numbers.

Used oil was being sent to Gemco, a local machine shop, to be burned without testing in a space heater. Gemco did not appear to be qualified to receive this waste as a marketer, and Composix had not complied with any marketing requirements if it was their intention to assume that role.

USP Cease the shipment of used oil to any unqualified receiving facility. Send all used oil to transporters/marketers who are qualified to receive it. Send a description of steps taken to correct this violation.

Please submit documentation showing abatement of the violations outlined above, to this office within 30 days of receipt of this letter.

In addition, I also offer the following comments, concerns and/or suggestions:

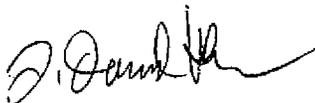
- I don't know why Composix may have begun using a generator ID number assigned to a separate sister company (Ohio Armor). I recommend you work with them to sort out past records and reports, and ensure that each company name is properly associated in Ohio EPA records only with addresses that it has actually been operating at now or in the past. Ohio EPA's information services unit (Paula Canter, Tammy McConnell and Tammy Heffelfinger) will work with you to correct the notification(s) and report(s) mentioned in items 1 and 2 above.
- During the inspection, I did not see a waste accumulation area or container for waste aerosol cans. About four cans of aerosol paint per month are used in a stenciling process. Other aerosol spray products (oils and cleaners) that may be hazardous as a waste, are also in use. Any non-empty cans of these materials (with pressure and/or any toxic/ignitable liquid inside) would in all likelihood be regulated as hazardous waste. Aerosol can puncturing/draining devices are available commercially to safely handle these and collect the contents in a closed drum, but probably would not be cost effective with the low generation rates at Composix. I recommend that waste aerosols be collected in a separate, closed drum and periodically disposed of to a permitted TSD facility. (This was evidently being done in 2005 at your facility, as indicated by description of some hazardous waste shipped under manifest number MI9374785.)

Mr. Sean Sharp
Composix Corp.
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- We also discussed how any waste fluorescent or other lamps may be regulated as universal or hazardous waste. Please refer to the fact sheet on this topic which may be downloaded from <http://www.epa.state.oh.us/dhwm/pdf/LampGuidance.pdf>.
- I provided you with information via email about stormwater regulatory requirements that could be triggered by the outdoor storage of wet cutting waste in open sacks on pallets left to air-dry. Harry Kallipolitis can assist/advise you with that issue.
- Air compressor condensate water may not be appropriate to discharge to floor drains, if that is occurring at your facility. Oil is often present in the water in incidental amounts that may not be compatible with sewer or storm drains. Collecting this liquid in a container and assessing it for proper management and disposal is advised.

Enclosed is a copy of the checklist that was completed for this inspection. Should you have any questions, please feel free to call me at (614) 728-3885. Our website, www.epa.state.oh.us/dhwm, provides copies of Ohio hazardous waste rules, and our Office of Compliance Assistance and Pollution Prevention website, <http://www.epa.state.oh.us/opp/ocapp.html>, provides industry-specific pollution prevention information.

Sincerely,



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

Enclosure

c: Tammy McConnell
Paula Canter
Tammy Heffelfinger
Harry Kallipolitis
CDO File

JDH/slj Composix 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."

E-mail this completed form to tammy.mccconnell@epa.state.oh.us or mail to Tammy McConnell, Central Office

For Ohio EPA Use Only

**Ohio Environmental Protection Agency
RCRA SUBTITLE C SITE IDENTIFICATION
Implementor Source (Source I)**

2. Site EPA ID No. EPA ID Number: OHD117360420

3. Site Name Name: Composix Co.

4. Site Location Information
 Street Address: 23 Sisal Street
 City, Town, or Village: Newark State: OH
 County Name: Licking Zip Code: 43055

5. Site Land Type (check only one)

Private	County	District	Federal	Indian	Municipal	State	Other
X							

6. NAICS code(s) www.census.gov/epcd/www/naics.html

A. 336992	B. 313230
C. 3126130	D.

7. Site Contact Person:

First Name: Sean MI: Last Name: Sharp
 Phone Number: 740-345-5574 Phone Number Extension: 29
 E-Mail Address: sean.sharp@composix.com
 Fax Number: 740-345-0154 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	Private	County	District	Federal	Indian	Municipal	State	Other

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	Private	County	District	Federal	Indian	Municipal	State	Other

Street or P.O. Box:
 City, Town, or Village: Operator Phone #:
 State: Country: Zip Code:

9. Violations Cited? Yes No

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

Not Regulated

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

A. Hazardous Waste Activities

1. Generator of Hazardous Waste

(choose only one of the following categories)

- UNKNOWN: Cited for violation of 3745-52-11
- a. Large Quantity Generator (LQG):
- b. Small Quantity Generator (SQG)
- c. Conditionally Exempt Small Quantity Generator
- d. United States Importer of Hazardous Waste
- e. Mixed Waste (hazardous and radioactive) Generator

- 2. Transporter of Hazardous Waste
- 3. Treater, Storer or Disposer of Hazardous Waste
- 4. Recycler of Hazardous Waste
- 5. Exempt Boiler and/or Industrial Furnace
 - a. Small Quantity On-site Burner Exemption
 - b. Smelting, Melting, Refining Furnace Exemption
- 6. Underground Injection Control Facility

B. Universal Waste Activities

- 1. Large Quantity Handler of Universal Waste
(accumulate 5,000 kg or more).
- 2. Small Quantity Handler of Universal Waste
Indicate types of universal waste generated and/or accumulated (check all boxes that apply):

	Generated	Accumulated
A. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
D. Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- 2. Destination Facility for Universal Waste
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

- 1. Used Oil Generator
- 2. Used Oil Transporter Indicate Type(s) of Activity(ies)
 - Transporter
 - Transfer Facility
- 3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)
 - Processor
 - Re-refiner
- 4. Off-Specification Used Oil Burner
- 5. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)
 - a. Marketer Who Directs Shipment of Off-Specification Oil
 - 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.

D001					
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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 (and sizes and types).

Y / N	Announced ?	The facility has been an episodic LQG with various nonrecurrent waste batches, most recently in 2005. CESQG activity occurred in 2006 and is anticipated in 2007. Compositix apparently erroneously used ID number OHT400010302 for several years; that ID number was only affiliated with a separate sister company called Ohio Armor.			
Y / N	Tanks No. Sizes				
Y / N	Containers No. Sizes				

13. This form is to be completed by the district office inspector after inspection of a facility. All information must be collected and reported in accordance with "Guidance for Submitting a RCRA SUBTITLE C SITE IDENTIFICATION SOURCE I Form."

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
David Hohmann		03-12-2007

USED OIL INSPECTION CHECKLIST (Short Version)

...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: [N/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# a

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# b
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# c
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# d
 - b. Contained the release? Yes ___ No N/A RMK# d
 - c. Cleaned up and properly managed the used oil and other materials? Yes ___ No N/A RMK# d
 - d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A RMK# d
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: [N/A] 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# e

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS [N/A]

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes No N/A ___RMK#___

REMARKS

- a. No burning of used oil was occurring on site.
- b. No mixing of any hazardous wastes with used oil was occurring.
- c. Used oil containers (six drums, and three cubic-yard liquid toters) were not marked as "used oil".
- d. No releases of used oil were noted. The containers for this waste had secondary containment.
- e. Composix was sending their liquid used oil to a local machine shop (Gemco in Newark) to be burned for energy recovery there in a space heater. No testing of the oil for "on-specification" marketing purposes was being performed either by Composix or by the receiving facility, to the best of the knowledge of Mr. Sharp. The other lower quality used oil oils were being sent to Central Ohio Oil, a registered used oil transporter/ marketer. For example, 2460 gallons were picked up on 11/27/2006.

C:\Documents and Settings\dhohmann\My Documents\JDH\OEPA Compliance\Composix\Composix used oil ckl's.wpd

LARGE QUANTITY GENERATOR REQUIREMENTS

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

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: safety glasses and steel toed boots. Hard hat not needed.

GENERAL REQUIREMENTS

- | | | | | | | | |
|---|-----|-------------------------------------|----|-------------------------------------|-----|-----|-------------------------------------|
| 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | RMK | |
| | | | | | | | <input type="checkbox"/> |
| 2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | RMK | <input type="checkbox"/> |
| 3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | RMK | <input type="checkbox"/> |
| | | | | | | | a |
| 4. Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | RMK | <input type="checkbox"/> |
| | | | | | | | b |
| 5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | RMK | <input type="checkbox"/> |
| | | | | | | | <input checked="" type="checkbox"/> |
| 6. Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | RMK | <input type="checkbox"/> |
| 7. Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | RMK | <input type="checkbox"/> |
| 8. Does the generator accumulate hazardous waste? | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | RMK | <input type="checkbox"/> |

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

- | | | | | | | | |
|--|-----|--------------------------|----|-------------------------------------|-----|-----|--------------------------|
| 9. Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)? | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | RMK | |
| | | | | | | | <input type="checkbox"/> |

NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G) & (H).

- | | | | | | | | |
|---|-----|--------------------------|----|-------------------------------------|-----|-----|--------------------------|
| 10. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)] | N/A | | | | | | |
| 11. Does the generator export hazardous waste? If so: [N/A] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | RMK | <input type="checkbox"/> |

MANIFEST REQUIREMENTS

- | | | | | | | | |
|---|-----|-------------------------------------|----|-------------------------------------|-----|-----|-------------------------------------|
| 12. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | RMK | |
| | | | | | | | <input type="checkbox"/> |
| 13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | RMK | <input type="checkbox"/> |
| | | | | | | | c |
| 14. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | RMK | <input type="checkbox"/> |
| 15. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | RMK | <input checked="" type="checkbox"/> |
| 16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | RMK | <input type="checkbox"/> |
| 17. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | RMK | <input type="checkbox"/> |
| | | | | | | | d |
| 18. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | RMK | <input type="checkbox"/> |
| | | | | | | | d |
| 19. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | RMK | <input type="checkbox"/> |
| | | | | | | | e |

[Facility Name/Inspection Date]

[ID number]

LQG/February 2007

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PERSONNEL TRAINING [N/A, not reviewed due to non-recurrent episodic LQG status]

CONTINGENCY PLAN [N/A, not reviewed due to non-recurrent episodic LQG status]

EMERGENCY PROCEDURES [N/A, not reviewed due to non-recurrent episodic LQG status]

PREPAREDNESS AND PREVENTION [N/A, not reviewed due to non-recurrent episodic LQG status]

SATELLITE ACCUMULATION AREA REQUIREMENTS [N/A, not reviewed due to non-recurrent episodic LQG status]

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS [N/A, not reviewed...see above]]

PRE-TRANSPORT REQUIREMENTS [N/A, not reviewed due to non-recurrent episodic LQG status]

REMARKS

- a. Composix had not notified of regulated hazardous waste activity at the current address. It has been here since April of 2001. Composix was a non-recurrent episodic LQG in 2005, and shipped CESQG waste in 2006. A one time LQG batch was also generated in 2002 about a year after another facility at 120 O'Neill Drive in Hebron was vacated. It was apparently shipped from the O'Neill Drive facility (?) using that other generator ID number (?), but no annual report was ever filed that year either, and biennial reports (for odd numbered years) do not contain sufficient corroborating information to verify that activity.
- b. No annual reports were filed to Ohio EPA for calendar years 2005 or 2002 in which Composix had episodic non-recurrent LQG hazardous waste generation activities.
- c. The manifests used the wrong generator ID number, which had been assigned to another facility at 122 Jefferson Street in Newark, to a separate subsidiary company.
- d. A return to generator copy of manifest #MI9924858 dated 12/13/2005 was missing in the facility records.
- e. Manifest records were incomplete. One or more manifest records appeared to be missing from the 2005 records. No LDR records were available in the facility files for review. No annual report had been filed for 2005.

[Facility Name/Inspection Date]

[ID number]

LQG/February 2007

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USED OIL INSPECTION CHECKLIST (Short Version)

...does not include requirements for used oil transporters & transfer facilities, processors & re-refiners, burners, & marketers.

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? Yes ___ No N/A ___ RMK# ___
If so: [N/A]
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# a

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# b
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# c
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# d
 - b. Contained the release? Yes ___ No N/A RMK# d
 - c. Cleaned up and properly managed the used oil and other materials? Yes ___ No N/A RMK# d
 - d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A RMK# d
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: [N/A] 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# e

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS [N/A]

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes No N/A ___ RMK# ___

REMARKS

- a. No burning of used oil was occurring on site.
- b. No mixing of any hazardous wastes with used oil was occurring.
- c. Used oil containers (six drums, and three cubic-yard liquid totes) were not marked as "used oil".
- d. No releases of used oil were noted. The containers for this waste had secondary containment.
- e. Composix was sending their liquid used oil to a local machine shop (Gemco in Newark) to be burned for energy recovery there in a space heater. No testing of the oil for "on-specification" marketing purposes was being performed either by Composix or by the receiving facility, to the best of the knowledge of Mr. Sharp. The other lower quality used oil oils were being sent to Central Ohio Oil, a registered used oil transporter/ marketer. For example, 2460 gallons were picked up on 11/27/2006.

C:\Documents and Settings\dhohmann\My Documents\JDH\OEPA Compliance\Composix\Composix used oil ckls.wpd

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

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: Safety glasses and steel toe boots. Hard hat not required.

WASTE EVALUATION

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

GENERATOR CLASSIFICATION

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

TREATMENT OF HAZARDOUS WASTE

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

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

Composix is currently CESQG, thus far in 2007 as well as during all of 2006. In 2005 it was an episodic LQG with non-recurrent batches of various wastes from processes that are no longer used at this facility.

