



State of Ohio Environmental Protection Agency

011-TO
-file

Southwest District

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

November 8, 2007

Mr. Phillip Utrecht
Ford Sharonville Transmission Plant
3000 Sharon Road
Sharonville, Ohio 45241

RE: FORD SHARONVILLE PLANT - NOV/RTC - SQG (OHD004263653)

Dear Mr. Utrecht:

On October 29, 2007, I conducted an inspection of the Ford Sharonville Transmission Plant (FSTP) in order to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). Consistent with long-standing practice, the inspection was unannounced. Ken DuLaney and you represented FSTP. The inspection consisted of an introductory meeting during which we discussed our inspection process, FSTP's production processes and waste streams and we also discussed pollution prevention opportunities. After we inspected the facility, we finished with a review of manifests and storage area inspection records. Subsequently, I exchanged e-mails with Ken DuLaney who answered some questions about your processes and with your contractor, John Critzer, who provided a Material Safety Data Sheet.

FSTP last filed an Annual Hazardous Waste Report with Ohio EPA in 2004 and is currently operating as a small quantity generator (SQG). My inspection held you to the standards of a SQG even though as a matter of practice FSTP complies with the hazardous waste accumulation time requirements applicable to an LQG. You also submitted a Contingency Plan to Ohio EPA which is not required of an SQG. I did not ask to review records documenting employee training, as these records are required only for LQGs.

I found the following violation of Ohio' hazardous waste laws:

Labeling of universal waste containers or batteries: OAC 3745-273-14(A) requires that universal waste batteries or their containers be marked with the words "Universal Waste-Battery(ies) or "Waste Battery(ies) or "Used Battery(ies)".

57
2/10
Mr. Phillip Utrecht
November 8, 2007
Page 2

Neither the batteries, the spill-containment pallet, nor the work location had the labels or signs. I informed you that I would cite this omission as a violation of the OAC in my inspection letter.

- Before I completed this letter, you provided me by e-mail a photo showing the pallet and the properly worded signage. The photo is adequate to return the Ford Sharonville Transmission Plant to compliance with the hazardous waste rules.

Enclosed you will find a copy of the checklists completed to document the inspection and a process description summary form. Note that I have inserted comments and explanations into the text of the checklists.

Please feel free to call me at (937) 285-6090 if I can assist you in any way.

Sincerely,



Tom Ontko
Hazardous Waste Inspector
Southwest District Office

Enclosures

cc: Dinah/file

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.

TO\bp

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Ford-Sharonville Transmission Plant **EPA ID#:** OHD004263653 Small Quantity Generator

Description of Waste				On-Site Management			Off-Site Management	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	Waste Generated (e.g. sludge, spent solvent, ash, etc)	EPA Waste Code	QTY Generated per Month	Type of Accumulation/ Storage (e.g. container, tank, etc)	Type of On-Site Treatment (recycle, wwt, etc)	Waste Location (Include map if possible)	Name, state, and type of activity occurring at the facility.	P2 Activities
1	aerosol cans	D001	2765 lbs in '04	container			incineration at Safety-Kleen, KY	have reduced volume of aerosol cans by switching to refillable pump bottles
2	painting factory I	D001 F003	1825 lbs in '04				Safety-Kleen KY	
3	painting factory	lead paint chips	D008					
4	product testing in lab	spent acetone spent acid	D001 F003	208 lbs in '04	drums small vials over-packed in steel drums			
5	cleaning parts	spent petroleum naphtha	hi flash non-regulated	drums				continued use by Safety Kleen to clean containers

PROCESS DESCRIPTION SECTION

Give a general process description (include all processes at the facility)

FSTP makes aluminum transmissions for autos and small trucks. Process include machining grinding lathing and similar metal working operations and carburizing and final assembly. Steel and aluminum parts are fabricated. FSTP does not electroplate. No parts are painted but equipment, signage, traffic lanes, etc. are painted within the plant.

The largest hazardous waste stream is aerosol cans.

Used oil is generated mostly as skim oil from waste water treatment activities. FSTP sends almost a million gallons per year of used oil a year to recycling most of which is skim oil from the WWT operations.

FSTP has implemented numerous pollution prevention activities.

SMALL QUANTITY UNIVERSAL WASTE HANDLING REQUIREMENTS

Ford Sharonville Transmission Plant

October 29, 2007

OHD004263653

PROHIBITIONS

- | | | |
|----|---|----|
| 1. | Did the SQUWH dispose of universal waste? [3745-273-11(A)] | No |
| 2. | Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] | No |

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

FSTP stores universal waste batteries in the general receiving area on low-profile, spill containment pallets. I had my doubts regarding whether leaks from the batteries (automotive-size and slightly larger) would be captured and some of the batteries over-lapped slightly the edge of the pallet. I warned FSTP that this was a judgement call and told them the batteries should be stored so that all potential leaks are contained. I did not cite this as a violation.

- | | | |
|----|--|--|
| 3. | Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] | N/A No leaking batteries were observed |
| 4. | If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] | N/A |
| 5. | Does the SQUWH conduct any of the following activities: | |
| a. | Sort batteries by type? | Yes |
| b. | Mix battery types in one container? | Yes |
| c. | Discharge batteries to remove the electric charge? | Yes |
| d. | Regenerated used batteries? | Yes |
| e. | Disassemble them into individual batteries or cells? | Yes |
| f. | Remove batteries from consumer products? | Yes |
| g. | Remove the electrolyte from the battery? | No |

- | | |
|--|-------------------|
| If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] | N/A |
| 6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] | N/A |
| a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] | N/A |
| b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] | N/A |
| 7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)] | No See CEI letter |

UNIVERSAL WASTE PESTICIDES

FSTP does not generate or manage universal waste pesticides.

- | | |
|--|-----|
| 8. Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)] | N/A |
| 9. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)] | N/A |
| 10. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97; 3745-66-100 and -66-101 of the OAC met? (Use tank checklist) [3745-273-13(B)(3)] | N/A |
| 11. If pesticides are stored in a transport vehicle, is it closed, structurally sound and compatible with the pesticide(s)? [3745-273-13(B)(4)] | N/A |

12. Are containers, tanks, or transport vehicles that contain universal waste pesticides, labeled with either "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-14(B)] N/A

UNIVERSAL WASTE THERMOSTATS

13. Are thermostats that show evidence of leaking, spilling, or damage that could cause leaks, properly contained? [3745-273-13(C)(1)] N/A No thermostats were present during the inspection. Some older equipment may still have mercury switches and a sealed and labeled container is available if any are found.
14. If the thermostats are contained, are the containers closed, structurally sound, compatible with contents of the thermostats and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(C)(1)] N/A
15. If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]
- a. Remove the ampules in a manner to prevent breakage and are they removed over or in a containment device? [3745-273-13(C)(2)(a)(b)] N/A
 - b. Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)(d)] N/A
 - c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)] N/A
 - d. Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)] N/A
 - e. Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)] N/A

- f. Pack removed ampules in containers with packing material to prevent breaking during storage, handling and transportation? [3745-273-13(C)(2)(h)] N/A
16. If mercury, clean-up residues, or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-13(C)(3)(a)] N/A
- a. If the waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to Chapter 3745-52.) [3745-273-13] N/A
- b. If the mercury, residues and/or other wastes are not hazardous, are they managed in compliance with applicable law? [3745-273-13(C)(3)(c)] N/A
17. Are thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)"? [3745-273-14[D]] N/A

UNIVERSAL WASTE LAMPS

18. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] Yes
19. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] N/A No broken lamps were present during inspection.

20. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)" [3745-273-14(E)] Yes

NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

21. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] N/A

NOTE: Accumulation is defined as date generated or date received from another handler.

22. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] No
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] No
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] No
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] No
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] No

- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)]

Yes. STP ships all waste streams more frequently than required by the regulations.

EMPLOYEE TRAINING

23. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] Yes

RESPONSE TO RELEASES

24. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes
25. Is the material released characterized? [3745-273-17(B)] Yes
26. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes

OFF-SITE SHIPMENTS

NOTE: *If a SQUWH self-transportes waste, then they must comply with the Universal Waste transporter requirements.*

27. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes

NOTE: *SQUWHs are prohibited to send waste to any other facility.*

28. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes
29. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes

30. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] No
 - b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes
31. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes
 - b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes
33. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] No
34. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes

EXPORTS

35. Is waste being sent to a foreign destination? If so: No
- a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] N/A
 - b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)] N/A
 - c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] N/A

USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

Ford Sharonville Transmission Plant

OHD004263653

PROHIBITIONS

- | | | |
|----|---|-----|
| 1. | Does the generator manage used oil in a surface impoundment or waste pile? If yes: | No |
| a. | Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] | N/A |
| 2. | Is used oil used as a dust suppressant? [3745-279-12(B)] | No |
| 3. | Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? | No |

GENERATOR STANDARDS

- | | | |
|----|--|-----|
| 4. | Does the generator mix hazardous waste with used oil? If so, | No |
| a. | Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] | N/A |
| 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)]
FSTP does not use halogenated solvents in any processes. Safety Kleen performs screening on batches of used oil. | N/A |
| 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)] | No |
| 7. | Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]
Used oil is stored in an above-ground 18,000 gallon tank in a bermed area. Used oil is separated from water-soluble coolants and leaks and weeps from various hydraulic and lubrication systems. After separation in the WWT system, the oil is partly dried by heating.
FSTP has an SPCC Plan but it wasn't reviewed. | Yes |
| 8. | Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] | Yes |
| 9. | Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] | |
| a. | Stopped the release?
No releases of used oil reported during inspection. | N/A |
| b. | Contained the release? | N/A |
| c. | Cleaned up and properly managed the used oil and other materials? | N/A |
| d. | Repaired or replaced the containers or tanks prior to returning them to service, if necessary? | N/A |

ON-SITE BURNING IN SPACE HEATER

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: No
- 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? N/A
 - b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? N/A
 - c. Are the combustion gases from heater vented to the ambient air? N/A

GENERATOR TRANSPORTATION

11. If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] N/A
- a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24] N/A
 - b. Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24] N/A



SMALL QUANTITY GENERATOR REQUIREMENTS

Ford Sharonville Transmission Plant (FSTP)

OHD004263653

Safety equipment used during inspection: High visibility vest, ear plugs, safety glasses, safety shoes

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes
2. Has the generator obtained a U.S. EPA I.D. number? [3745-52-12] Yes
3. 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)] No
4. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)] No
5. Does the generator accumulate hazardous waste? Yes
6. Has the generator accumulated hazardous wastes **in excess of (180/270) days** without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)] No
7. Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)] No
FSTP does not treat hazardous waste.

MANIFEST REQUIREMENTS

9. Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)] Yes
Petroleum naphtha from parts cleaners is managed by Safety Kleen as a continued use product (re-used to clean drums). The pet naphtha is high flash and would not be classified as an ignitable when spent. I did not ask to see the contractual agreement (See #10 below)
10. Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)] No
FSTP does not reclaim wastes
11. Have items 1 through 20 of each manifest been completed?[3745-52-20(A)] Yes
12. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] Yes
13. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] N/A
14. Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)] Yes
15. If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? 3745-52-42(B)] N/A



16. Are signed copies of all manifests being retained for at least three years? [3745-52-40] Yes

I reviewed only the manifests for CY 2007. Waste handling is contracted out to MPS Group, FSTP contact Mike Critzer, 513-782-7043.

PREPAREDNESS AND PREVENTION

17. Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)] Yes
18. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]
- a. Name and telephone number of emergency coordinator? Yes
 - b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes
 - c. Telephone number of local fire department? Yes
19. Are employees familiar with waste handling and emergency procedures [3745-52-34(D)(5)(c)] Yes
20. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)] Yes
- The records I inspected did not document any releases.
21. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31] Yes
22. Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:
- a. Internal Alarm system? [3745-65-32(A)] Yes
 - b. Emergency communication device? [3745-65-32(B)] Yes
- Telephone located in Dock 5 Office very close to <90 day storage area.
- c. Portable fire control, spill control and decon equipment? [3745-65-32(C)]? Yes
- These items located in <90 day storage area.
- d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes
23. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency?[3745-65-33] Yes
- a. Are inspections recorded in a log or summary? [3745-65-33]? Yes
24. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)] Yes
25. If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32?) [3745-65-34(B)] Yes
26. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes
27. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes

Ohio EPAs copy of Contingency Plan contained a cover letter stating that copies have been provided to emergency authorities.



28. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes

SATELLITE ACCUMULATION AREA REQUIREMENTS

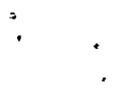
I inspected satellite accumulation areas in the Chem Lab (55-gallon drums for acids, spent acetone and used oil). The facility has 7 ECM furnaces (only six operational during this inspection) and 5 pairs of satellite accumulation drums (one for the oily waste and the other for the filters). The ECM furnaces function to burn residual organics resulting from the carburizing cells. I determined that the ECM furnaces are distinct points of generation except for two lines which are close enough together to share a pair of drums.

29. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? {3745-52-34(C)(1)} Yes
 - b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes
 - c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes
 - d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes
 - e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. Yes
 - f. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes
30. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: No
- a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes
 - b. Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] N/A

USE AND MANAGEMENT OF CONTAINERS

Containers are stored in < 90 day storage area in a locked 'cage' at Dock 5. Only intact aerosol cans were present during the inspection-there was no drummed waste.

31. Has the generator marked containers with the words "Hazardous Waste"[3745-52-34(D)(4)] Yes
32. Is the accumulation date on each container? [3745-52-34(D)(4)] Yes
33. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes
 - b. In good condition? [3745-66-71] Yes
 - c. Compatible with wastes stored in them? [3745-66-72] Yes
 - d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes
34. Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days. Yes
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes



35. Are containers of incompatible wastes stored separately from each other, by means of a dike, berm, wall or other device? [3745-66-77(C)] N/A
36. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B) 3745-66-77(A)] N/A
37. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B) ? [3745-66-77(B)] N/A

PRE-TRANSPORT REQUIREMENTS

38. Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes
39. Does each container \leq 100 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes
40. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes

