



State of Ohio Environmental Protection Agency

DR  
003 File

Southwest District

401 East Fifth Street  
Dayton, Ohio 45402-2911

TELE: (937)285-6357 FAX: (937)285-6249  
www.epa.state.oh.us

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

May 4, 2007

Mr. Brian Michel  
Quaker Chemical Corporation  
3431 Yankee Road  
Middletown, Ohio 45044

**Re: Quaker Chemical Corporation, 3431 Yankee Road, Middletown, Butler County, OHD 101486116, Large Quantity Generator, Notice of Violation**

Dear Mr. Michel:

Thank you for accompanying me during the April 10 and 11, 2007, inspection of Quaker Chemical Corporation at 3431 Yankee Road in Middletown, Ohio. You represented Quaker Chemical Corporation, I represented Ohio EPA and Derrick Samaranski represented U.S. EPA. I inspected your facility 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). During the inspection we also discussed ways to prevent pollution by reducing waste. This letter will explain the violations found, what you need to do to correct the violations, other general concerns, what you need to do to respond to the general concerns and any pollution prevention opportunities identified.

### Background

Quaker Chemical Corporation blends lubricants for steels and metals and also produces a cleaner to remove lubricants.

### Violations

I found the following violations of Ohio's hazardous waste laws. In order to correct these violations you must do the following and send me any required information **by the dates indicated**:

1. **OAC 3745-52-41(A), Annual Report:** Large quantity hazardous waste generators must prepare and submit to Ohio EPA the "Annual Hazardous Waste Report" by March first of each year.

Quaker Chemical has not submitted annual reports. From manifest review, it was determined that Quaker Chemical was a large quantity generator for at least one month in 2004. Based on your reported generation, Quaker Chemical was a

Mr. Brian Michel  
Quaker Chemical Corporation  
May 4, 2007  
Page 2

large quantity generator in 2005 and 2006. No annual reports were submitted for those years, in violation of OAC 3745-52-41(A).

- ▶ Quaker Chemical must submit annual reports for 2004, 2005, and 2006. This should be done by May 30, 2007.
2. **OAC 3745-52-34; ORC § 3734.02(E)&(F); Accumulation of waste without a permit:** A large quantity generator may accumulate waste for ninety days or less without an Ohio hazardous waste permit, provided that the conditions of OAC 3745-52-34 are met.

Quaker Chemical accumulated waste for greater than 90 days. Based on the amount of hazardous waste stored on site, and the reported generation, it appears some of the waste has been accumulated for approximately 18 weeks, or approximately 126 days, in violation of ORC § 3734.02(E)(F).

- ▶ Quaker Chemical must remove and properly dispose of the waste as soon as possible but no later than May 17, 2007.

Since Quaker Chemical Corporation violated ORC § 3734.02(E) and (F), Quaker Chemical Corporation is subject to all applicable general facility standards found in OAC Chapters 3745-54 and 55. Additionally, at any time Ohio EPA may assert its right to have Quaker Chemical Corporation begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law. Due to the nature of the violation Ohio EPA may require closure pursuant to OAC rules 3745-55-11 through 3745-55-20 and OAC 3745-55-42 through 3745-55-47 at this site.

Additionally, you will be required to complete generator closure at the facility pursuant to OAC 3745-52-34.

3. **Waste Manifests, OAC 3745-52-20(A):** A generator who transports, or offers for transportation, hazardous waste for off-site treatment, storage, or disposal must prepare a uniform hazardous waste manifest.

Quaker Chemical did not have manifests available for the caustic waste for 2005 or 2006. Additionally, Quaker Chemical did not have a hazardous waste manifest for the hazardous lab waste shipment on October 19, 2006. Instead, Quaker Chemical has a Hazmat Bill of Lading (tracking numbers 839634-15119 and 839634-15119-2) for the shipping document. This is in violation of OAC 3745-52-20(A).

Mr. Brian Michel  
Quaker Chemical Corporation  
May 4, 2007  
Page 3

- ▶ Quaker Chemical must supply the waste manifests for 2005 and 2006, and a waste manifest or letter of explanation as to why the Hazmat Bill of Lading was used for the shipment on October 19, 2006. This should be completed by May 30, 2007.

**4. Waste Manifests, OAC 3745-52-20(A):** Items one through twenty on the hazardous waste manifests must be completed by the generator.

During the inspection, we noted that some of the recent paperwork on the hazardous waste manifests or bills of lading listed Quaker Chemical as a conditionally exempt small quantity generator, and no ID number was given for the waste shipments. Specifically, wastes being handled by Heritage were not represented as being generated by a large quantity generator with an ID number. Item one on the manifests was not correctly filled out, in violation of OAC 3745-52-20(A).

- ▶ Since Quaker Chemical is currently operating as a large quantity generator, the ID number must be placed on the manifests. The ID number must be used on future waste manifests from here on out.

**5. Waste Manifests, OAC 3745-52-42(A)(1) and (2):** A generator who does not receive the signed copy of the manifest from the final designation facility shall contact the transporter or owner of the designated facility to determine the status of the hazardous waste. If the signed manifest is not received within 45 days, an exception report shall be submitted to Ohio EPA.

Quaker Chemical did not receive the signed copy of the manifest from the designation facility for the October 19, 2006 shipment of hazardous waste (tracking number 839634-15119-2), and Quaker Chemical did not initiate contact with the transporter or owner of the designation facility, in violation of OAC 3745-52-42(A)(1).

Quaker Chemical failed to submit an exception report for the above-mentioned manifest, in violation of OAC 3745-52-42(A)(2).

Quaker Chemical did not have available any waste manifests for the caustic waste for 2005 or 2006, and no exception reports were submitted, in violation of OAC 3745-52-42(A)(1) and (2).

Mr. Brian Michel  
Quaker Chemical Corporation  
May 4, 2007  
Page 4

- ▶ Quaker Chemical must contact the final designation facilities for the waste shipments they did not receive signed manifests for. Quaker Chemical must submit an exception report for those manifests as well. This should be completed by May 30, 2007.

**6. OAC 3745-52-40, Waste Manifests:** Copies of manifests, exception reports and annual reports must be kept on site for at least three years.

Quaker Chemical did not have available any manifests for the caustic waste for 2005 or 2006. Thus, Quaker Chemical did not retain copies of the manifests for at least three years, in violation of OAC 3745-52-40.

- ▶ Quaker Chemical must retain copies of manifests, exception reports and annual reports for three years. Quaker Chemical must attempt to obtain copies of the 2005 and 2006 caustic waste manifests. This should be completed by May 30, 2007.

**7. OAC 3745-65-16(A)(2), (B), and (C), Personnel Training:** The personnel training program must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures, relevant to the positions in which they are employed. Personnel must have annual refreshers of the training.

OAC 3745-65-16(A)(2): Quaker Chemical failed to have a hazardous waste program directed by a person trained in hazardous waste management procedures, and the training did not include instruction in hazardous waste management, in violation of OAC 3745-65-16(A)(2).

OAC 3745-65-16(B) and (C): Quaker Chemical did not have a training program which included hazardous waste management procedures, thus did not have initial training nor annual refreshers, in violation of OAC 3745-65-16 (B) and (C).

- ▶ Quaker Chemical must include hazardous waste management procedures in the training program, and train their employees in hazardous waste management, relevant to their positions. This should be completed by May 30, 2007.

**8. OAC 3745-65-52(D) and (E), OAC 3745-65-53, OAC 3745-65-54, Contingency Plan:** The contingency plan must list all persons qualified to act as emergency coordinator, list all emergency equipment, and the plan must be kept up to date.

Mr. Brian Michel  
Quaker Chemical Corporation  
May 4, 2007  
Page 5

A copy must be maintained at the facility and provided to local emergency departments, hospitals, and Ohio EPA.

Quaker Chemical was in violation of the following:

OAC 3745-65-52(D): Quaker Chemical failed to keep an updated list of emergency coordinators.

OAC 3745-65-52(E): Quaker Chemical failed to keep an updated list of emergency equipment.

OAC 3745-65-53 (A) & (B): A current copy of the contingency plan was not available at the facility nor was provided to local emergency facilities.

OAC 3745-65-54: Quaker Chemical failed to make amendments to the plan.

- ▶ Quaker Chemical must update the contingency plan to include a current list of emergency coordinators and emergency equipment. A copy of the plan must be maintained at the facility and provided to all local police departments, fire departments, hospitals, Ohio EPA, and emergency response teams. This should be completed by May 30, 2007.

9. **OAC 3745-66-73(A), Management of Containers:** A container holding waste shall always be closed during storage unless it is necessary to add or remove waste.

The tote of hazardous waste located in the bulk loading area outside and the tote at the surfactant manufacturing process were not closed, and therefore not in compliance with OAC 3745-66-73(A).

- ▶ Quaker Chemical must keep the hazardous waste containers closed unless adding or removing waste. This should be done immediately, but no later than May 17, 2007.

10. **OAC 3745-52-34(A)(2) and (3), Hazardous Waste Labels:** A generator may for 90 days or less accumulate hazardous waste on-site provided the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container, and each container is clearly labeled "Hazardous Waste".

Mr. Brian Michel  
Quaker Chemical Corporation  
May 4, 2007  
Page 6

The containers of caustic waste were not labeled as "Hazardous Waste" nor were they labeled with an accumulation start date, in violation of OAC 3745-52-34(A)(2) and (3).

- ▶ Quaker Chemical must immediately label the hazardous waste totes as "Hazardous Waste" and date the totes with the appropriate accumulation start date. This should be completed by May 17, 2007.

- 11. OAC 3745-66-74, Weekly Inspections:** The operator must inspect areas where containers are stored at least weekly.

Weekly inspections were not completed for the hazardous waste accumulation areas, in violation of OAC 3745-66-74.

- ▶ Quaker Chemical must immediately begin weekly inspections of the hazardous waste accumulation areas. The inspections must be recorded in a summary or inspection log. For your information, a "week" is defined as seven consecutive days. Provide Ohio EPA with a copy of your weekly inspection sheets by May 30, 2007.

- 12. 3745-279-22(C), Used Oil:** Containers storing used oil must be labeled with the words "Used Oil".

Quaker Chemical's above ground storage tank for used oil was not labeled with the words "Used Oil". A 55-gallon drum of used oil near the lab area was not labeled "Used Oil". All 330-gallon totes storing used oil were not labeled with the words "Used Oil", in violation of 3745-279-22(C).

- ▶ Quaker Chemical must label all tanks and totes used to store used oil with the words "Used Oil". This must be done by May 30, 2007.

- 13. 3745-279-22(D), Used Oil:** In response to releases of used oil, a generator must clean up and manage properly the released used oil and other materials.

Dark staining was observed on the ground at the above ground 12,000-gallon tank which stored used oil. The staining appeared to be from a release of oil in the vicinity of the tank. The release was not cleaned up, in violation of 3745-279-22(D).

- ▶ Quaker Chemical must remove the visibly stained soil and gravel from the apparent release at the used oil tank. This should be done by May 30, 2007.

14. **OAC 3745-52-11, Waste Evaluation:** Any person who generates a waste must determine if that waste is hazardous waste.

Quaker Chemical disposes of waste fluorescent lamps in the municipal dumpster. They have failed to evaluate the lamps to determine if they are hazardous waste, in violation of 3745-52-11.

- ▶ Quaker Chemical must either evaluate their waste lamps to determine if they are hazardous or begin to handle their lamps in accordance with Universal Waste Management regulation OAC 3745-273. Quaker Chemical must evaluate the lamps prior to the next disposal, or implement a program in accordance with the universal waste regulations immediately, but no later than May 17, 2007.

15. **OAC 3745-270-07, Land Disposal Restrictions:** Quaker Chemical failed to show the following regulations had been met.

OAC 3745-270-07(A)(1): A generator of hazardous waste must determine if the waste has to be treated before it can be land disposed. Quaker Chemical did not show that a determination had been made for some of the lab wastes and the caustic waste.

OAC 3745-270-07(A)(2): With the initial shipment of waste to a treatment facility, the generator must submit a one-time written notice. Quaker Chemical could not provide a copy of any initial notice to the treatment facility for the caustic waste nor for some of the lab waste.

OAC 3745-270-07(A)(6): Supporting data or lab analysis used to make land disposal restriction determinations must be retained on-site. Quaker Chemical failed to produce any documents used to make determinations about land disposal restrictions.

OAC 3745-270-07(8): Generators must retain on-site copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to this rule for at least three years from the date the waste that is subject of such documentation was last sent off-site. Quaker Chemical could not produce most of the documentation related to land disposal restriction determination.

OAC 3745-270-09(A): The initial generator of a waste must determine each EPA hazardous waste number applicable to the waste in order to determine the applicable treatment standards. Quaker Chemical did not produce documentation

Mr. Brian Michel  
Quaker Chemical Corporation  
May 4, 2007  
Page 8

to show the EPA waste numbers associated with the caustic waste and some of the lab waste.

- ▶ Quaker Chemical must ensure that any future shipments of hazardous waste have the appropriate land disposal restriction determinations made for that waste. Quaker Chemical must ensure that a one-time notification is provided to the off-site treatment, storage or disposal facility for the waste streams. This must be done with the next shipment of the waste streams.

#### **General Concerns**

- A. During the inspection, we noted containers near the totes labeled "oil slop" with unknown contents. You believed those totes contained either an oil mixture or waste water. You were going to check with the employee who oversaw that area for information on what was in those totes. Please provide a written response as to what was in those totes and how they are going to be handled. Provide this response by May 30, 2007.
- B. Quaker Chemical was unable to produce copies of manifests for the caustic waste from 2005 and 2006. Because of this, there is no documentation that the wastes were properly handled. I have already requested that you submit the manifests once you obtain copies. Upon my review of those documents, please understand that we may find additional violations. If so, we will notify you of those violations.
- C. During the inspection, we discussed that Quaker Chemical typically has the oil and waste pumped from the totes when it is picked up, and the totes are reused. Please be sure that if the totes are reused, they are either reused for the same materials, or cleaned to prevent possible mixtures of incompatible wastes.
- D. At this time, Ohio EPA does not consider any of the waste accumulation areas as satellite areas due to the use of 330-gallon totes for the waste accumulation. As such, each area where the hazardous waste is accumulated is considered a <90 day accumulation area which requires containers to be labeled "Hazardous Waste", dated with the accumulation start date, inspected weekly, kept closed, and not to remain at the facility for greater than 90 days. These areas include the larger accumulation area outside north of the drive, the outside area where the bulk truck loads and unloads on the south side of the drive, and the inside area near the surfactant process. If Quaker Chemical should choose to treat the inside area or the outside area at the bulk truck loading as satellite accumulation areas, you should contact Ohio EPA so we may discuss the requirements and

Mr. Brian Michel  
Quaker Chemical Corporation  
May 4, 2007  
Page 9

assist you in creating a plan that will meet Ohio EPA hazardous waste regulations.

### **Pollution Prevention**

Quaker Chemical's major source of hazardous waste is a caustic waste. Depending on its characteristics, this waste could potentially be used by another party. Ohio EPA suggests you look into finding a user for this material. As long as the material can be used beneficially in the form it leaves your facility, it could be considered a product instead of a waste.

You stated that the waste stream varies in make up as it is produced, which may make it hard to find another user for the material. It may be possible to make adjustments to your process so that the integrity and make up of the waste stream remains consistent enough to benefit another user. Again, this may make it possible for the material to be considered a product and not a waste. For assistance in making this determination, you can contact our Office of Compliance Assistance and Pollution Prevention. Specifically, Jim Pellegrino here at the Southwest District office in Dayton may be of assistance. He can be reached at (937) 285-6439. For additional assistance in determining whether the reuse of certain materials in specific applications is allowable, please contact our central office Hazardous Waste Compliance Assistance Group in our Regulatory and Information Services Section at (614) 644-2977.

In either of these situations, Quaker Chemical will still want to maintain records of any analysis it does on this material, and also keep record of who is taking the material and for what purpose. Quaker Chemical should have a written contract or agreement if this arrangement is pursued. The written documentation should explain the characteristics of the material, the end use, and the quantity of the material being used. These records would help justify the material is a product and not a waste and is being appropriately handled. If Quaker Chemical is able to remove the caustic material from the waste stream, it is likely that they will be able to operate as a conditionally exempt small quantity generator instead of a large quantity generator of hazardous waste.

Another option for this caustic waste is to neutralize the waste and send it out as wastewater or discharge it to the local public sanitary sewer. Prior to discharging it to the sewer, you would need to contact your local sanitary sewer district to discuss this process and verify that it would be allowed. You may also need to get a permit through the sanitary sewer district to pursue this option. You would need to document your treatment on a land disposal restriction form and keep a copy of that documentation on file at your facility. I have included some information on generator treatment for your review.

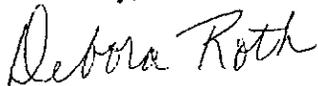
Mr. Brian Michel  
Quaker Chemical Corporation  
May 4, 2007  
Page 10

**Summary**

You have until May 17, 2007 to address violation #2, #9, #10 and #14. You have until May 30, 2007 to address violation #1, #3, #5 to #8, #11 to #13, and General Concern A. Violation #4 and #15 must be completed with the next shipments of hazardous waste. You may provide Ohio EPA a written response or photos to show these violations are corrected.

Should you have any questions, please feel free to call me at (937) 285-6080. I have enclosed copies of the checklists from this inspection, and other handouts for your reference. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,



Debora Roth  
Environmental Specialist  
Division of Hazardous Waste Management

Enclosures - inspection checklists, Hazardous Waste Generator Categories and Episodic Generation Guidance, Universal Waste Rules for Handlers of Lamps Guidance, Generator Treatment.

cc: Dinah Crawford SWDO/File with checklists  
Derrick Samaranski, U.S. EPA  
Tammy Hefflefinger, DHWM, CO

DR/plh

E-mail this completed form to <a href="mailto:tammy.mcconnell@epa.state.oh.us">tammy.mcconnell@epa.state.oh.us</a> or mail it to Tammy McConnell, Central Office	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM</b>	For Ohio EPA use only
--	---	-----------------------

2. Site EPA ID No.	EPA ID Number: OHD101486116
--------------------	-----------------------------

3. Site Name	Name: Quaker Chemical Corporation	Website (optional):
--------------	-----------------------------------	---------------------

4. Site Location Information	Street Address: 3431 Yankee Road	
	City, Town, or Village: Middletown	State: OH
	County Name: Butler	Zip Code: 45044

5. Site Land Type (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other
	<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. 324191	B. 325998
	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: A	Last Name: Michel
	Phone Number: (513) 422-9600		Phone Number Extension: 3117
	E-Mail Address: brian_michel@quakerchem.com		
	Fax Number: (513) 705-1150		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: QUAKER CHEMICAL CORP		Date Became Owner (mm/dd/yyyy): 03/01/2002						
	Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
		<input checked="" type="checkbox"/>							
	Street or P.O. Box: ONE QUAKER PARK, 901 HECTOR ST								
	City, Town, or Village: CONSHOHOCKEN		Owner Phone #: (610) 832-4000						
	State: PA		Country: USA	Zip Code: 19428					
	B. Name of Site's Operator: QUAKER CHEMICAL CORP		Date Became Operator (mm/dd/yyyy): 03/01/2002						
	Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
		<input checked="" type="checkbox"/>							
	Street or P.O. Box: ONE QUAKER PARK, 901 HECTOR ST								
City, Town, or Village: CONSHOHOCKEN		Operator Phone #: (610) 832-4000							
State: PA		Country: USA	Zip Code: 19428						

9. Violations Cited?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
----------------------	---	-----------------------------

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)	<input type="checkbox"/> Not Regulated
--	--



10/10/10

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

**A. Hazardous Waste Activities**  
 (choose only one of the following categories)

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

<p><b>B. Universal Waste Activities</b></p> <p><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):</p> <p><input type="checkbox"/> 2. Large Quantity Handler of Universal Waste          (accumulates 5,000 kg or more).</p> <p><input type="checkbox"/> 3. Destination Facility for Universal Waste          (Check all boxes below that apply for each of the three types of facilities above.)</p> <table border="0"> <tr> <td></td> <td style="text-align: center;"><u>Generated</u></td> <td style="text-align: center;"><u>Accumulated</u></td> </tr> <tr> <td>A. Batteries</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>B. Pesticides</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>C. Thermostats</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>D. Lamps</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>		<u>Generated</u>	<u>Accumulated</u>	A. Batteries	<input checked="" 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"/>	<p><b>C. Used Oil Activities</b></p> <p><input checked="" type="checkbox"/> 1. Used Oil Generator</p> <p><input type="checkbox"/> 2. Used Oil Transporter Indicate Type(s) of Activity(ies)</p> <table border="0"> <tr><td><input type="checkbox"/></td><td>Transporter</td></tr> <tr><td><input type="checkbox"/></td><td>Transfer Facility</td></tr> </table> <p><input type="checkbox"/> 3. Used Oil Processor and/or Re-refiner          Indicate Type(s) of Activity(ies)</p> <table border="0"> <tr><td><input type="checkbox"/></td><td>Processor</td></tr> <tr><td><input type="checkbox"/></td><td>Re-refiner</td></tr> </table> <p><input type="checkbox"/> 4. Off-Specification Used Oil Burner</p> <p><input type="checkbox"/> 5. Used Oil Fuel Marketer -          Indicate Type(s) of Activity(ies)</p> <table border="0"> <tr><td><input type="checkbox"/></td><td>a. Marketer Who Directs Shipment of Off-Specification Oil</td></tr> <tr><td><input type="checkbox"/></td><td>b. Used Oil to Off-Specification Used Oil Burner</td></tr> </table>	<input type="checkbox"/>	Transporter	<input type="checkbox"/>	Transfer Facility	<input type="checkbox"/>	Processor	<input type="checkbox"/>	Re-refiner	<input type="checkbox"/>	a. Marketer Who Directs Shipment of Off-Specification Oil	<input type="checkbox"/>	b. Used Oil to Off-Specification Used Oil Burner
	<u>Generated</u>	<u>Accumulated</u>																										
A. Batteries	<input checked="" 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"/>																										
<input type="checkbox"/>	Transporter																											
<input type="checkbox"/>	Transfer Facility																											
<input type="checkbox"/>	Processor																											
<input type="checkbox"/>	Re-refiner																											
<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.

D002    D001    D009    F002

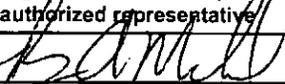
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

Y/N	Announced?	Additional Facility Representatives:
Y/N	Tanks?	Other comments:
Y/N	Containers?	

13. Name of Inspector(s)      Name of Inspector(s)      Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)

Debra Roth      Derrick Samaras      4/11/07

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)
	BRIAN A. MICHEL - FACILITY MGR	4/11/2007



10/10/10

## PROCESS, WASTE, P2 SUMMARY SHEET

**Facility Name:** Quaker Chemical    
**Facility Type:** LQG/SQG/CESQG/TSD    
**Date of Inspection:** 4/11/07    
**EPA ID#:** OHD101436114

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applicable</small>	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment <small>(recycle, incinerate, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	Lab	Lab Waste D001, F002	5 gallons / 3 months			
2	Line Cleanout	Caustic Wash D002	330 gallon / week			Search for users for this material
3						
4						
5						
6						
7						
8						
9						

### REMARKS-GENERAL INFORMATION

**General Process Information:**

Facility blends lubricants & also produces a caustic cleaner for removing the lubricants.



**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:

**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 | <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 | <input type="checkbox"/>            |
| 3. Has the generator obtained a U.S. EPA identification number? [3745-52-12]  | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/>            |
| 4. Were annual reports filed with Ohio EPA on or before March 1 <sup>st</sup> ? [3745-52-41(A)]   | Yes | <input type="checkbox"/>            | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/>            |
| 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 | <input checked="" type="checkbox"/> |
| 6. Has the generator transported or caused to be transported hazardous waste to <b>other</b> than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]                                   | Yes | <input type="checkbox"/>            | No | <input type="checkbox"/>            | N/A | <input checked="" type="checkbox"/> |
| 7. Has the generator disposed of hazardous waste <b>on-site without a permit</b> or at another facility <b>other</b> 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 | <input type="checkbox"/>            |
| 8. Does the generator accumulate hazardous waste?   | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <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 checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <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)] |     |                          |    |                          |     |                                     |
| a. Container that meets 3745-66-70 to 3745-66-77?                       | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)?     | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| c. Drip pads that meet 3745-69-40 to 3745-69-45?                        | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| d. Containment building that meets 3745-256-100 to 3745-256-102?        | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |

NOTE: Complete appropriate checklist for each unit.

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

- |   |     |                          |    |                                     |     |                                     |
|---|-----|--------------------------|----|-------------------------------------|-----|-------------------------------------|
| 11. Does the generator export hazardous waste? If so:   | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/>            |
| a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]                                      | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input checked="" type="checkbox"/> |
| b. Has the generator complied with special manifest requirements? [3745-52-54]                                  | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input checked="" type="checkbox"/> |
| c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input checked="" type="checkbox"/> |
| d. Has an annual report been submitted to U.S. EPA? [3745-52-56]  | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input checked="" type="checkbox"/> |
| e. Are export related documents being maintained on-site? [3745-52-57(A)]                                       | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input checked="" 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 type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <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 | <input type="checkbox"/> |

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]

- |  |     |                                     |    |                          |     |                          |
|--|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| 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 | <input type="checkbox"/> |
|--|-----|-------------------------------------|----|--------------------------|-----|--------------------------|

NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].

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

[Facility Name/Inspection Date]

[ID number]

LQG/February 2007

Page 1 of 1



11/11/11

NOTE: Remind the generator that the certification statement they signed indicates. 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.

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  No  N/A
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  No  N/A
19. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes  No  N/A

NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.

**PERSONNEL TRAINING**

20. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes  No  N/A
21. Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes  No  N/A
22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes  No  N/A
23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes  No  N/A
24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes  No  N/A
25. Does the generator keep records and documentation of:
- a. Job titles [3745-65-16D(1)]? Yes  No  N/A
  - b. Job descriptions [3745-65-16D(2)]? Yes  No  N/A
  - c. Type and amount of training given to each person [3745-65-16D(3)]? Yes  No  N/A
  - d. Completed training or job experience required [3745-65-16D(4)]? Yes  No  N/A
26. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes  No  N/A

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained

**CONTINGENCY PLAN**

27. Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes  No  N/A
28. Does the plan describe the following:
- a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes  No  N/A
  - b. Arrangements with emergency authorities [3745-65-52(C)]. Yes  No  N/A
  - c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes  No  N/A
  - d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes  No  N/A



- e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes  No  N/A

*NOTE: If the facility already has a "Spill Prevention, Control and Counter measures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]*

29. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes  No  N/A

30. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] Yes  No  N/A

31. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes  No  N/A

*NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.*

#### EMERGENCY PROCEDURES

32. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes  No  N/A

- a. Was the contingency plan implemented? [3745-65-51(B)] Yes  No  N/A

- b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes  No  N/A

- c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes  No  N/A

*NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.*

#### PREPAREDNESS AND PREVENTION

33. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes  No  N/A

34. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:

- a. Internal communications or alarm system? [3745-65-32(A)] Yes  No  N/A

- b. Emergency communication device? [3745-65-32(B)] Yes  No  N/A

- c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes  No  N/A

- d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes  No  N/A

*NOTE: Verify that the equipment is listed in the contingency plan.*

35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes  No  N/A

36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes  No  N/A

37. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] Yes  No  N/A

38. 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  No  N/A

39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes  No  N/A

40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes  No  N/A

41. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes  No  N/A

#### SATELLITE ACCUMULATION AREA REQUIREMENTS

42. Does the generator ensure that satellite accumulation area(s):

- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes  No  N/A

- b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes  No  N/A

- c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes  No  N/A

[Facility Name/Inspection Date]

[ID number]

LQG/February 2007

Page 2 of 2



- d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes  No  N/A
- e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes  No  N/A
- f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes  No  N/A
43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes  No  N/A
- 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  No  N/A
- b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes  No  N/A

*NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.*

**USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS**

44. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes  No  N/A
45. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes  No  N/A
46. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes  No  N/A
- b. In good condition? [3745-66-71] Yes  No  N/A
- c. Compatible with wastes stored in them? [3745-66-72] Yes  No  N/A
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes  No  N/A

*NOTE: Record location on process summary sheets, photograph the area, and record on facility map.*

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. Yes  No  N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes  No  N/A
48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes  No  N/A
49. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes  No  N/A
50. 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)] Yes  No  N/A
51. 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)] Yes  No  N/A

*NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.*

52. If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745- 66-11? [3745-52-34(A)(1)] Yes  No  N/A

*NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]*

**PRE-TRANSPORT REQUIREMENTS**

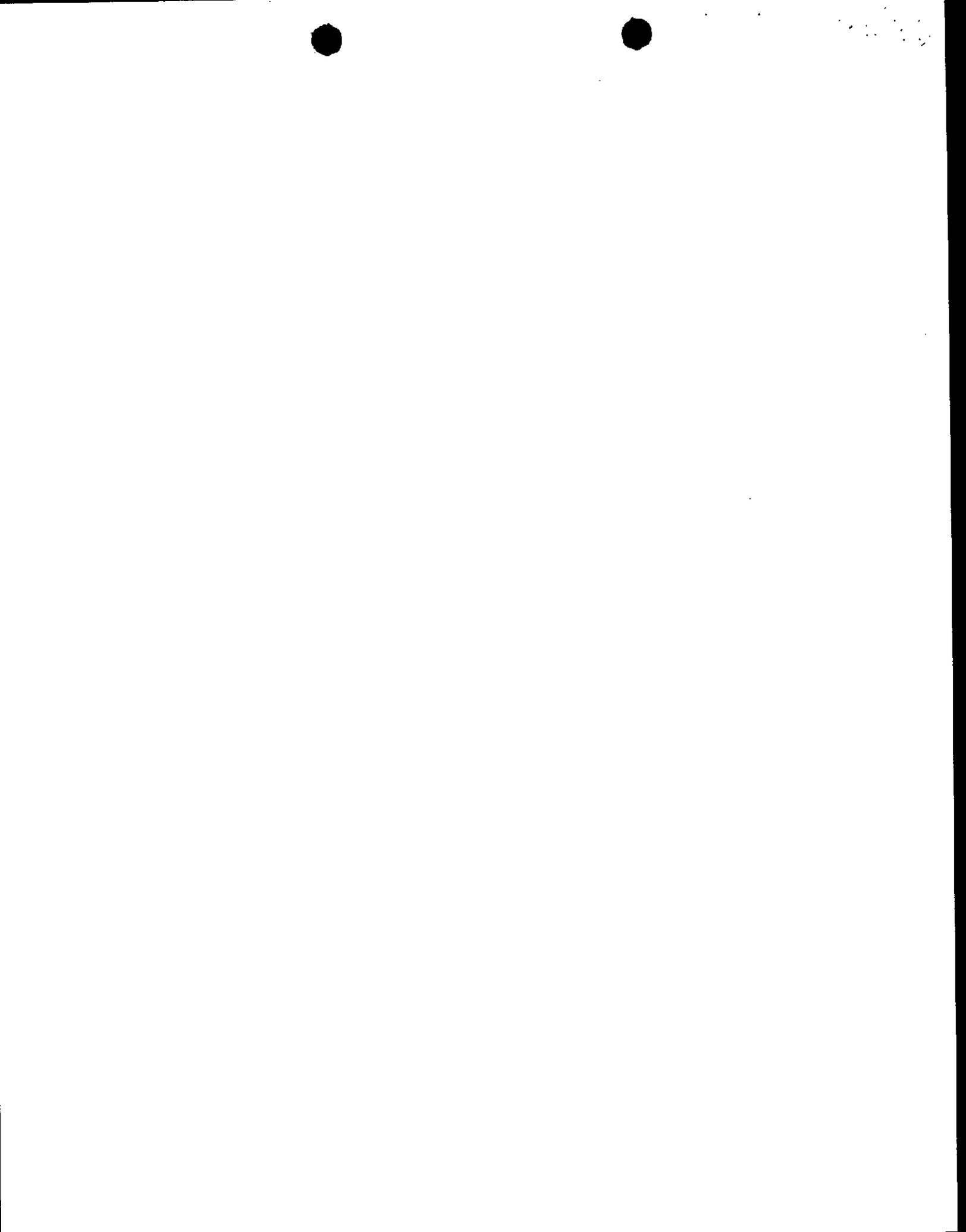
53. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes  No  N/A
54. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes  No  N/A
55. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes  No  N/A

Comments: 1. need data on rags, caustic, oil slop. 4. Need reports for 2006, 2005, 2004. 6. need signed manifest no. xxx to determine where the waste was sent. 9. Totes of caustic waste have been on-site for about 6 months. 13. one manifest has not been returned with the signature. 17/18. bill of lading/manifest was not returned from 10/19/06.



20/22/23/24. Training was not specific to hazardous waste management, though safety training is provided. 27, 28, 29, 30. the plan on site is from 1999, and outdated to the point it does not apply to current operations. An updated SPCC is in the works, but has been in the works for the past year and a half.

42/43. Satellite area by loading dock does not have any supervisor in the vicinity. Satellite totes at the tank and at the loading dock were not closed. Satellite totes were 330 gallon totes, and therefore, did exceed 55 gallons for more than three days. 44. totes not labeled with hazardous waste. 45. totes not dated. Based on generation reported of approximately one tote per week, the totes began to be accumulated there from the beginning of December 2006. 47. no inspections are conducted of the hazardous waste areas. 53/54/55 not able to verify since there was no shipment being sent off at the time of the inspection.



## LDR CHECKLIST

### GENERAL LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] If so: Yes \_\_\_ No  N/A \_\_\_ RMK# 1
- a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)] Yes \_\_\_ No  N/A \_\_\_ RMK# 1
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes \_\_\_ No  N/A \_\_\_ RMK# 1
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] Yes  No  N/A \_\_\_ RMK# \_\_\_
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
4. Does the generator generate a characteristic hazardous waste? If so: Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

---

**NOTE:** *If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes \_\_\_ No  N/A  RMK# \_\_\_

---

**NOTE:** *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*

6. Has the generator correctly determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_



**NOTE: Wastes with EPA hazardous waste numbers K174 and K175 (chlorinated aliphatic wastes) have specific requirements in rule 3745-270-33. Waste with EPA hazardous waste numbers K176, K177 and K178 (inorganic chemical wastes) have specific requirements in rule 3745-270-36.**

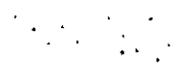
7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] Yes \_\_\_ No  N/A  RMK# \_\_\_

**NOTE: A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (§402 of CWA), that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater.[3745-270-03(B)]**

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] Yes \_\_\_ No  N/A  RMK# \_\_\_

**NOTE: In other words, is combustion a legitimate treatment method.**

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes \_\_\_ No  N/A  RMK# \_\_\_
10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05] Yes \_\_\_ No  N/A  RMK# \_\_\_
11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. The facility can land dispose of the waste. [3745-270-06] Yes \_\_\_ No  N/A  RMK# \_\_\_



12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_  
If so:

a. Has the facility complied with 3745-270-04? Yes \_\_\_ No  N/A  RMK# \_\_\_

---

**REMARKS**

1. No LDR's for manifest #9056254, dated 12-7-04 or #8117869 dated 5-4-04, no waste manifests or LDR's for 2005 or 2006 caustic shipments. Also, no documentation for underlying constituents.

**NOTIFICATION AND CERTIFICATION REQUIREMENTS**

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)] Yes \_\_\_ No  N/A  RMK# \_\_\_

15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)] Yes \_\_\_ No  N/A  RMK# \_\_\_

16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)] Yes \_\_\_ No  N/A  RMK# \_\_\_

17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes \_\_\_ No  N/A  RMK# \_\_\_

---

**NOTE: Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit.(See 270-07(A)(7))**

18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)]



**REMARKS**

1. generator does not have LDR or other information for some waste streams.

**GENERATORS TREATING HAZARDOUS WASTE**

1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)] Yes \_\_\_ No  N/A  RMK# \_\_\_
- a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] Yes \_\_\_ No  N/A  RMK# \_\_\_
- b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes \_\_\_ No  N/A  RMK# \_\_\_
3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes \_\_\_ No  N/A  RMK# \_\_\_
4. Has the generator followed their WAP [3745-270-07(A)(5)? Yes \_\_\_ No  N/A  RMK# \_\_\_
5. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes \_\_\_ No  N/A  RMK# \_\_\_

**NOTE: If the waste is a characteristic waste, which has been treated to render it non hazardous and subsequently sent to a solid waste landfill, proceed to question 7 & 8.**

6. Has the generator sent a notification and certification with the initial shipment of waste?[3745-270-07(A)(5)(c)] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
7. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
8. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following: Yes \_\_\_ No  N/A  RMK# \_\_\_
- a. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes \_\_\_ No  N/A  RMK# \_\_\_



- b. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)] Yes \_\_\_ No  N/A  RMK# \_\_\_

**NOTE:** *If the waste will be treated and monitored for all UHCs then they do not need to be listed on the notice.*

9. Has the process/operation generating the waste or the solid waste landfill facility changed? If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] Yes \_\_\_ No  N/A  RMK# \_\_\_
- b. Has the director been notified of such changes? [3745-270-09(D)] Yes \_\_\_ No  N/A  RMK# \_\_\_

**NOTE:** *The director need only be notified on an annual basis but no later than December 31.*

10. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49 (C)] Yes \_\_\_ No  N/A  RMK# \_\_\_
11. Does each notification/certification form completed, contain the information found in Table 1? [3745-270-07(A)(3)] Yes \_\_\_ No  N/A  RMK# \_\_\_

**NOTE:** *If the waste will be treated and monitored for all constituents, there is no need to put them all on the LDR notice.*

### REMARKS

### HAZARDOUS DEBRIS

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.) Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
3. Is the hazardous debris being treated by the alternative treatment



11/11/11

standards in 3745-270-45? If so:

Yes  No  N/A  RMK#

- a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)]

Yes  No  N/A  RMK#

**NOTE: If immobilization has been used in a treatment train, it must be the last treatment technology used.**

4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so:

Yes  No  N/A  RMK#

- a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)]

Yes  No  N/A  RMK#

5. Is the waste a PCB waste under 40 CFR Part 761? If so:

Yes  No  N/A  RMK#

- a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)]

Yes  No  N/A  RMK#

6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)]

Yes  No  N/A  RMK#

7. Does the owner/operator of a treatment facility that claims the debris is excluded from regulation as a hazardous waste under 3745-51-03(F)(1) maintain the following information?

Yes  No  N/A  RMK#

- a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)]

Yes  No  N/A  RMK#

- b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)]

Yes  No  N/A  RMK#

- c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)]

Yes  No  N/A  RMK#

8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F)(1) have the following information? [3745-270-07(D)(3)]

Yes  No  N/A  RMK#

- a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)]

Yes  No  N/A  RMK#

- b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)]

Yes  No  N/A  RMK#

- c. Technology used from Table 1? [3745-270-07(D)(1)(c)]

Yes  No  N/A  RMK#



100

9. Has the above notification been sent to the director? [3745-270-07(D)(1)]

Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

### REMARKS

### TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13? [3745-270-07(B)]

Yes \_\_\_ No  N/A  RMK# \_\_\_

2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)]

Yes \_\_\_ No  N/A  RMK# \_\_\_

**Note:** *No further notification is necessary until such time that the waste changes or the receiving facility changes.*

3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07? [3745-270-07(B)(3)]

Yes \_\_\_ No  N/A  RMK# \_\_\_

4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so:**

a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)]

5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? **If so:**

a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)), excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)]

Yes \_\_\_ No  N/A  RMK# \_\_\_

b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4) [3745-270-07(B)(6)]

Yes \_\_\_ No  N/A  RMK# \_\_\_

c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)]

Yes \_\_\_ No  N/A  RMK# \_\_\_

6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)]

Yes \_\_\_ No  N/A  RMK# \_\_\_

7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have:



a. Copies of all notices and certifications required in 3745-270?

Yes \_\_\_ No  N/A  RMK# \_\_\_

b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49?

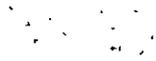
Yes \_\_\_ No  N/A  RMK# \_\_\_

c. The testing frequency specified in the facility's WAP and have they followed the protocol?

Yes \_\_\_ No  N/A  RMK# \_\_\_

---

**REMARKS**



## 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)? [2745-279-21(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#
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# 1
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#



100-100000

- 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 2 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#

C:\RCRAwork\Inspection\Quaker chemical\quakerusedoil.wpd

#### REMARKS

1. Tank was not labeled "used oil". Drum near lab was not labeled used oil.
2. Stains were observed at the used oil 12,000 gallon tank.

