



State of Ohio Environmental Protection Agency

Southwest District Office

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CA
File

401 E. Fifth St.
Dayton, Ohio 45402

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www.epa.state.oh.us

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

July 1, 2008

R&L Carriers
Mr. Gerald A. Krisa
600 Gillam Road
Wilmington, Ohio 45177

RE: Compliance Evaluation Inspection – OHR000024018

Dear Mr. Krisa:

On June 10, and 23, 2008, Ohio EPA conducted compliance evaluation inspections of R&L Carriers' Wilmington, Ohio facility. The purpose of the inspections was to determine R&L Carriers' 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). Toni Scott, Daniel Brake, and Jerry Johns represented R&L Carriers on June 10, 2008. Tina Breezley, Toni Scott, and you represented R&L Carriers on June 23, 2008. I represented Ohio EPA during both inspections. Based on the inspections, Ohio EPA has determined that R&L Carriers has violated the following hazardous waste regulations:

1. **Accumulation time of hazardous waste, OAC 3745-52-34(A)(2) and (3):**
 - (2) The date upon which each period of accumulation and/or treatment begins is clearly marked and visible for inspection on each container; and
 - (3) While being accumulated and/or treated on-site, each container and tank is labeled or marked clearly with the words "Hazardous Waste."

R&L Carriers failed to comply with this regulation by not have hazardous waste containers properly labeled and dated. During the inspection, R&L Carriers properly labeled and dated the hazardous waste containers. **Therefore, R&L Carriers is no longer in violation of OAC 3745-52-34(A)(2) and (3).**

2. **Content of contingency plan, OAC 3745-65-52(C), (D), (E), and (F):**
 - (C) The contingency plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and Ohio EPA and local emergency response teams to coordinate emergency services, pursuant to rule 3745-52-37 of the Administrative Code.
 - (D) The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see rule 3745-65-55 of the Administrative Code), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and

others must be listed in order in which they will assume responsibility as alternates.

(E) The contingency plan must include a list of all emergency equipment at the facility [such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment], where this equipment is required. This list must be kept up to date. In addition, the contingency plan must include the location and physical description of each item on the list, and a brief outline of its capabilities.

(F) The contingency plan must include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).

R&L Carriers failed to comply with these regulations by not describing arrangements with local agencies, by not specifically listing the emergency coordinator information, by not providing locations and descriptions for emergency equipment, and for not providing an evacuation plan. To return to compliance, submit an update contingency plan including the above information.

Per OAC 3745-65-53, please submit the updated contingency plan to all local police departments, fire departments, hospitals, and Ohio EPA and local emergency response teams that may be requested to provide emergency services.

During the inspection, we discussed whether R&L Carriers was required to use F codes (e.g., F003, F005) when disposing of hazardous waste. Solvent hazardous waste will only carry the F waste code if the solvent is listed (e.g., toluene) and is spent (any material that has been used and as a result of contamination can no longer serve the purpose for which it was produced without processing). Because R&L Carriers generates the hazardous waste from damaged packaging, and not from a used solvent, the waste would not carry the F codes.

I have enclosed a copy of the contingency plan regulations and universal waste lamp guidance. Also enclosed are the checklists completed during the inspection. If you have any questions please call me at (937) 285-6093.

Sincerely,



Cathy L. Altman
Division of Hazardous Waste Management

cc: Dinah Crawford, DHWM-SWDO/SWDO 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.

3745-65-34 Access to communications or alarm system.

(A) Whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation shall have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, unless such a device is not required under rule 3745-65-32 of the Administrative Code.

(B) If there is only one employee on the premises while the facility is operating, such employee shall have immediate access to a device, such as a telephone, which is immediately available at the scene of operation, or a hand-held two-way radio, capable of summoning external emergency assistance, unless such a device is not required under rule 3745-65-32 of the Administrative Code.

Effective: 1/7/1983
119.032 review dates: Exempt
Prior effective dates: 4/15/1981

3745-65-35 Required aisle space.

The owner or operator shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of the above-mentioned purposes.

Effective: 1/7/1983
119.032 review dates: Exempt
Prior effective dates: 4/15/1981

3745-65-37 Arrangements with local authorities.

(A) The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at the facility and the potential need for the services of these organizations:

(1) Arrangements to familiarize police, fire departments, and local and Ohio EPA emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;

(2) Where more than one police and fire department may respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;

(3) Agreements with the Ohio EPA emergency response team, emergency response contractors, and equipment suppliers; and

(4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases of hazardous waste or hazard waste constituents at the facility.

(B) Where local authorities decline to enter into such agreements or arrangements, the owner or operator must document such refusal in the operating record.

Effective: 12/7/2004
119.032 review dates: Exempt
Prior effective dates: 4/15/1981, 1/7/1983

3745-65-50 Applicability- contingency plan and emergency procedures.

~~Rules 3745-65-50 to 3745-65-56~~ of the Administrative Code apply to owners and operators of all hazardous waste facilities, except as rule 3745-65-01 of the Administrative Code provides otherwise.

Effective: 12/7/2004
119.032 review dates: Exempt
Prior effective dates: 4/15/1981, 1/7/1983

3745-65-51 Purpose and implementation of contingency plan.

(A) Each owner or operator shall have a contingency plan for the facility. The contingency plan shall be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

(B) The provisions of the contingency plan shall be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

Effective: 1/7/1983
119.032 review dates: Exempt
Prior effective dates: 4/15/1981

3745-65-52 Content of contingency plan.

(A) The contingency plan must describe the actions facility personnel must take to comply with rules 3745-65-51 and 3745-65-56 of the Administrative Code in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

(B) If the owner or operator has already prepared a "Spill Prevention, Control, and Countermeasures Plan" in accordance with 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency or contingency plan, he need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of Chapters 3745-65 to 3745-69 and ~~3745-256~~ of the Administrative Code.

(C) The contingency plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and Ohio EPA and local emergency response teams to coordinate emergency services, pursuant to rule 3745-65-37 of the Administrative Code.

(D) The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (~~see rule 3756-65-55 of the Administrative Code~~), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates.

(E) The contingency plan must include a list of all emergency equipment at the facility ~~such as~~ fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment], where this equipment is required. This list must be kept up to date. In addition, the contingency plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

(F) The contingency plan must include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes ~~(in cases where the primary routes could be blocked by releases of hazardous waste or fires).~~

[Comment: For dates of non-regulatory government publications, publications of recognized organizations and associations, federal rules, and federal statutory provisions referenced in this rule, see rule 3745-50-11 of the Administrative Code titled "Incorporated by reference".]

Effective: 12/7/2004
 119.032 review dates: Exempt
 Prior effective dates: 4/15/1981, 1/7/1983, 5/29/1985 (Emer.), 8/29/1985, 12/7/2000

3745-65-53 Copies of contingency plan.

A copy of the contingency plan and all revisions to the plan shall be:

- (A) Maintained at the facility; and
- (B) Submitted to all local police departments, fire departments, hospitals, and Ohio EPA and local emergency response teams, that may be requested to provide emergency services.

Effective: 1/7/1983
 119.032 review dates: Exempt
 Prior effective date: 4/15/1981

3745-65-54 Amendment of contingency plan.

The contingency plan must be reviewed, and immediately amended, if necessary, whenever:

- (A) Applicable rules are revised;
- (B) The contingency plan fails in an emergency;
- (C) The facility changes- in its design, construction, operation, maintenance, or other circumstances- in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
- (D) The list of emergency coordinators changes; or
- (E) The list of emergency equipment changes.

Effective: 3/13/2002
 119.032 review dates: 9/28/2001, Exempt
 Prior effective dates: 4/15/1981, 1/7/1983

3745-65-55 Emergency coordinator.

At all times, there shall be at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for assuming coordination of all internal emergency response measures. This emergency coordinator shall be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, this person shall have the authority to commit the resources needed to implement the provisions of the contingency plan.

Effective: 1/7/1983
 119.032 review dates: Exempt
 Prior effective dates: 4/15/1981

3745-65-56 Emergency procedures.

(A) Whenever there is an emergency situation consisting of imminent or actual harm or hazard to human health or the environment, the emergency coordinator (or his designee when the emergency coordinator is on call) must immediately:

(1) Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and

(2) Notify the Ohio EPA emergency response team by use of its twenty-four hour toll free telephone number- 1-800-282-9378.

(B) Whenever there is a release, fire, or explosion, the emergency coordinator must immediately identify the character, exact source, amount, and areal extent of any released materials. The emergency coordinator may do this by observation or review of facility records or manifests and, if necessary, by chemical analysis.

(C) In addition to the requirements set forth in paragraphs (A) and (B) of this rule, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion, and must include, but not be limited to, the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions.

(D) If the emergency coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, he must report his findings as follows:

(1) If his assessment indicates that evacuation of local areas may be advisable, he must immediately notify appropriate local authorities. The emergency coordinator must be available to help appropriate officials decide whether local areas should be evacuated; and

(2) The emergency coordinator must immediately notify the Ohio EPA emergency response team by use of its twenty-four hour toll free telephone number- 1-800-282-9378 and provide the following information:

- (a) Name and telephone number of reporter;
- (b) Name and address of facility;
- (c) Time and type of incident (e.g., release, fire);
- (d) Name and quantity of material(s) involved, to the extent known;

(e) The extent of injuries, if any; and

(f) The possible hazards to human health, or the environment, outside the facility.

(E) During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

(F) If the facility stops operations in response to a fire, explosion, or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

(G) Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

[Comment: Unless the owner or operator can demonstrate, in accordance with paragraph (C) or (D) of rule 3745-51-03 of the Administrative Code, that the recovered material is not a hazardous waste, the owner or operator becomes a generator of hazardous waste and must manage such waste in accordance with all applicable requirements of Chapters 3745-52, 3745-53, 3745-65 to 3745-69, and ~~3745-256~~ of the Administrative Code.]

(H) The emergency coordinator must ensure that, in the affected area(s) of the facility:

(1) No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and

(2) All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

(I) The owner or operator must notify the director and appropriate local authorities that the facility is in compliance with paragraph (H) of this rule before operations are resumed in the affected area(s) of the facility.

(J) The owner or operator must note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within fifteen days after the incident, the owner or operator must submit a written report on the incident to the director. The report must include:

(1) Name, address, and telephone number of the owner or operator;

(2) Name, address, and telephone number of the facility;

(3) Date, time, and type of incident (e.g., fire, explosion);

(4) Name and quantity of material(s) involved;

(5) The extent of injuries, if any;

(6) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and

(7) Estimated quantity and disposition of recovered material that resulted from the incident.

Effective: 12/7/2004

119.032 review dates: 9/28/2001, 12/2/2003, 8/25/2009

Prior effective dates: 4/15/1981, 1/7/1983, 12/7/2000, 3/13/2002



Universal Waste Rules for Handlers of Lamps

DHWM Guidance Document

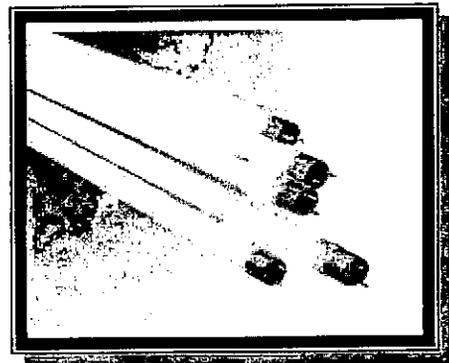
Date: June 2005

Purpose:

This guidance document is intended to provide handlers with an overview of the universal waste rules (UWR) as they pertain to hazardous waste lamps. Ohio's UWR are found in Ohio Administrative Code (OAC) Chapter 3745-273. This document is not intended to be a substitute for reading the universal waste rules.

Introduction:

Ohio EPA's use of the term "lamp" [see OAC rule 3745-50-10(A)] applies generically to hazardous waste lamps including: incandescent, fluorescent, metal halide, neon, high-intensity discharge, high-pressure sodium and mercury-vapor lamps. Fluorescent lamps may contain up to 40 milligrams (mg) of elemental mercury, depending on the brand and manufacturer date. Lamps may also contain lead and cadmium. Because most lamps exhibit the characteristic of toxicity for heavy metals when disposed, they could be a hazardous waste.



A waste must be a hazardous waste before it is defined as a universal waste. If a hazardous waste stream is not managed under the universal waste rules, then it must be managed as a hazardous waste under the applicable regulations if the waste exhibits any hazardous waste characteristic. Non-hazardous lamps also can be managed as universal wastes, although the universal waste compliance standards are not required.

Background:

Lamps have been added to Ohio's list of universal wastes (UW). The list of UW includes certain suspended and recalled pesticides, mercury-containing thermostats, and discarded batteries. When lamps were added to the list of universal wastes, Ohio revised the classification of hazardous lamps in the hazardous waste program.

Universal Waste Rules for Handlers of Lamps

Previously, used lamps that were being recycled were considered characteristic byproducts. This removed them from regulation as wastes and therefore hazardous wastes. Used lamps that were being discarded were to be evaluated to determine whether they were hazardous. Now hazardous lamps are considered "spent materials" and remain hazardous waste even when recycled, unless they are managed as universal wastes (see OAC rule [3745-51-02](#)). Hazardous waste lamp generators have the option of handling their lamps as hazardous waste or as UW. Managing hazardous waste lamps under the UWR eases certain regulations imposed on generators of spent lamps.



Non-hazardous Lamps: Ohio EPA recommends recycling lamps that do not exhibit hazardous waste characteristics. While these lamps are not hazardous waste, Ohio EPA encourages recycling rather than disposal. Non-hazardous lamps still contain low amounts of heavy metals such as mercury that could potentially harm the environment.

Who are UW handlers?

UW handlers include persons who generate, receive and store, but do not treat, dispose of or recycle UW generated elsewhere. Ohio's hazardous waste rules state that a person who receives and stores hazardous waste is required to have a storage permit. Generators of universal waste who want to take advantage of the UWR instead of the hazardous waste generator requirements, must comply with all UW handler requirements. The UWR allows these persons to accept and store UW from off-site without having to obtain a storage permit. However, UW handlers cannot treat, dispose of or recycle UW.

What are the UW handler categories?

UW handlers are classified into two categories based on the quantity of UW waste they accumulate at any time:

- small quantity handlers [accumulate less than 5,000 kilograms (11,023 pounds) of UW (not by type) at any time], or
- large quantity handlers [accumulate more than 5,000 kilograms (11,023 pounds) of UW (not by type) at any time].

If a small quantity UW handler accumulates more than 5,000 kilograms of UW on-site at any time, they must comply with the large quantity UW handler requirements for the remainder of the calendar year. All generators have the option of handling their UW under the UWR or under Ohio's hazardous waste generator requirements found in OAC Chapter [3745-52](#).

Universal Waste Rules for Handlers of Lamps

Note: UW should not be counted when making quantity determinations for hazardous waste generator categories (i.e., conditionally exempt small quantity generators (CESQGs), small quantity generators (SQGs) and large quantity generators (LQGs)). Universal waste handlers' status levels should not be confused with hazardous waste generator status levels.

May I use a lamp crusher to crush the lamps I generate?

The UWR prohibits handlers from crushing lamps. If you are the lamp generator and you want to continue crushing them, you have the option of managing those lamps under the hazardous waste generator requirements in OAC Chapter [3745-52](#). You cannot send crushed hazardous lamps to an unpermitted handler. They must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility accompanied by a hazardous waste manifest. While some commercially available lamp crushers are designed to control mercury emissions when properly maintained, please beware that due to the unique properties of mercury, there is a high potential for exposure to harmful mercury vapors when lamps are crushed.

What are the packaging requirements for UW lamps?

Lamps must be packaged to minimize breakage and must be designed to contain potential releases due to breakage. Some examples of acceptable packaging include double- or triple-ply cardboard containers with closed lids or packaging in which new lamps are shipped from the manufacturer. Broken, damaged or leaking lamps can be sent to permitted recycling facilities. Acceptable storage for broken lamps includes a closed 55-gallon steel drum or a closed wax fiberboard drum.

Warning: Because of its unique properties, mercury from broken or crushed lamps can become airborne at room temperature and can seep into cracks and porous materials such as cloth, carpet or wood, slowly emitting vapors over a long period. Immediate and proper containment of a mercury release is very important. For information on mercury containment and clean up, contact your local fire department or call Ohio EPA's spill hotline at (800) 282-9378.

What are the labeling requirements for UW lamps?

Universal waste lamps or their containers must be clearly marked "Universal Waste Lamp(s)," "Waste Lamp(s)" or "Used Lamp(s)." The containers should never be labeled "Hazardous Waste" unless being managed as such.

UW handlers must be able to demonstrate the accumulation time for all universal wastes. Accumulation begins with the date the lamps became a waste or were received. The handler may make this determination by:



- placing the lamps in a container and marking or labeling the container with the earliest date that any UW in the container became a waste or was received;
- marking or labeling the individual item of UW (i.e., each lamp) with the date it became a waste or was received;
- maintaining an inventory system on-site that identifies the date the lamp(s) being accumulated became a waste or was received;
- maintaining an inventory system on-site that identifies the earliest date that any UW in a group of UW items or a group of containers of UW became a waste or was received;
- placing the UW in a specific accumulation area and identifying the earliest date that any UW in the area became a waste or was received; or
- any other method which clearly demonstrates the length of time that the UW has been accumulated from the date it became a waste or was received.

Am I required to notify Ohio EPA of my UW activities?

Small quantity UW handlers and transporters are not required to notify Ohio EPA of their activities and are not required to obtain an EPA hazardous waste ID number. Large quantity UW handlers must notify Ohio EPA in writing and must obtain an EPA hazardous waste ID number prior to exceeding the 5,000 kg storage limit. Large quantity UW handlers that have previously notified Ohio EPA of their hazardous waste activities and who have received an EPA identification number are not required to renotify. For specifics on the notification requirements, see OAC rule 3745-273-32.

How long may I accumulate UW lamps?

If you are a UW handler, you may accumulate UW fluorescent lamps on-site for up to one year regardless of your status. If greater than a year accumulation is required, you must be able to prove that the accumulation is necessary in order to facilitate proper recovery, treatment or disposal.

Who can I send or take my UW lamps to?

As a universal waste handler, you can send or take lamps only to another UW handler or to a permitted (if in Ohio) destination facility. If you are sending your UW lamps to a facility outside Ohio, the out-of-state destination facility must be authorized by that state to accept lamps.

Am I required to manifest my UW lamps?

No. UW handlers are not required to manifest their off-site shipments. However, all UW handlers must ensure delivery of their universal waste to another UW handler or to a permitted destination facility as defined in OAC rule [3745-273-09\(B\)](#).

Do I need to use a special transporter like I do for my other hazardous waste?

No. UW handlers are not required to use a certain transporter. Universal waste transporters, however, must comply with DOT [packaging/labeling](#) requirements, transfer facility [storage](#) requirements and must immediately contain all [releases](#) of universal waste in the event of a spill.

May I transport my own universal waste lamps?

Yes. Both small and large quantity universal waste handlers can transport their universal waste lamps to either another universal waste handler or to a universal waste destination facility if they comply with the universal waste [transporter requirements](#) in OAC rules [3745-273-50](#) through [3745-273-56](#).

What are my record-keeping requirements?

If you are a small quantity UW handler, you are not required to keep off-site shipment records of UW. If you are a large quantity UW handler, you are required to retain shipment records received on-site and shipments sent off-site for at least three years. For specifics, see OAC rule [3745-273-39](#).

For more information on Ohio's UWR, please see our guidance document entitled, "[Universal Waste Rule](#)" and our [universal waste handler requirements summary table](#) available on our [Web page](#). If you have questions regarding information contained in this guidance document, please contact Ohio EPA's Division of Hazardous Waste Management's [Regulatory Services Unit](#) at 614-644-2917 or visit our [Web site](#).



Ohio Environmental Protection Agency
**RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to
tammy.mcconnell@epa.state.oh.us or mail it to Tammy
McCConnell, Central Office

| | | | | | | | | | |
|--|--|--|--------------------------------------|--|-------------------------------------|---------------------------------------|---------------------------------------|-----------------------------------|-----------------------------------|
| 2. Site EPA ID No. | EPA ID Number: OHR00024018 | | | | | | | | |
| 3. Site Name | Name: R&L Carriers | | | | | Website: (Optional) | | | |
| 4. Site Location Information | Street Address: 600 Gillam Road | | | | | | | | |
| | City, Town, or Village: Wilmington | | | | | State: OH | | | |
| | County Name: Clinton | | | | | Zip Code: 45177 | | | |
| 5. Site Land Type (check only one) | Private <input checked="" type="checkbox"/> | County <input type="checkbox"/> | District <input type="checkbox"/> | Federal <input type="checkbox"/> | Indian <input type="checkbox"/> | Municipal <input type="checkbox"/> | State <input type="checkbox"/> | Other <input type="checkbox"/> | |
| 6. NAICS code(s) www.census.gov/epcd/www/naics.html | | | | | | | | | |
| 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: Gerald | | | MI: | | Last Name: Krisa | | | |
| | Phone Number: (937) 382-1494 | | | | | Phone Number Extension: | | | |
| | E-Mail Address: gkrisa@rlcarriers.com | | | | | | | | |
| | Fax Number: (937) 382-2677 | | | | | 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 | Name of Site's Legal Owner: RLR Investments LLC | | | | | Date Became Owner (mm/dd/yyyy): | | | |
| | Owner Type: | Private <input checked="" type="checkbox"/> | County <input type="checkbox"/> | District <input type="checkbox"/> | Federal <input type="checkbox"/> | Indian <input type="checkbox"/> | Municipal <input type="checkbox"/> | State <input type="checkbox"/> | Other <input type="checkbox"/> |
| | Street or P.O. Box: P.O. Box 271 | | | | | | | | |
| | City, Town or Village: Wilmington | | | | | Owner Phone #: | | | |
| | State: Ohio | | | | | Country: USA | | Zip Code: 45177 | |
| | Name of Site's Operator: | | | | | Date Became Operator (mm/dd/yyyy): | | | |
| | Owner Type: | Private <input type="checkbox"/> | County <input type="checkbox"/> | District <input type="checkbox"/> | Federal <input type="checkbox"/> | Indian <input type="checkbox"/> | Municipal <input type="checkbox"/> | State <input type="checkbox"/> | Other <input type="checkbox"/> |
| | Street or P.O. Box: | | | | | | | | |
| City, Town or Village: | | | | | Operator Phone #: | | | | |
| State: | | | | | Country: | | Zip Code: | | |
| 9. Violations Cited? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | | | | | | | |
| 10A. Type of Regulated Waste Activity: (Mark "X" in all of the appropriate boxes) | | | | | | | | | |
| <input type="checkbox"/> Not Regulated | | | | <input type="checkbox"/> Conditionally Exempt Small Quantity Generator | | | | | |
| <input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 | | | | <input type="checkbox"/> United States Importer of Hazardous Waste | | | | | |
| <input checked="" type="checkbox"/> Large Quantity Generator (LQG) | | | | <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator | | | | | |
| <input type="checkbox"/> Small Quantity Generator (SQG) | | | | | | | | | |
| <input type="checkbox"/> Hazardous Waste Transporter | | | | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace | | | | | |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | | | | <input type="checkbox"/> Small Quantity On-Site Burner Exemption | | | | | |
| <input type="checkbox"/> Recycler of Hazardous Waste | | | | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption | | | | | |
| <input type="checkbox"/> Underground Injection Control Facility | | | | | | | | | |

| | | | | | | |
|---|---|--|--|---|--|------|
| 10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply)) | | | | | | |
| <input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste | | | <input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more) | | | |
| <input type="checkbox"/> Destination Facility for Universal Waste | | | | | | |
| Check all boxes below that apply for each of the three types of facilities above | | | 10C. Used Oil Activities (Indicate Type(s) of Activity(ies)) | | | |
| Managed | | | <input checked="" type="checkbox"/> Used Oil Generator | <input type="checkbox"/> Off-Specification Used Oil Burner | | |
| Batteries | <input type="checkbox"/> | | <input type="checkbox"/> Used Oil Transporter | <input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil | | |
| Pesticides | <input type="checkbox"/> | | <input type="checkbox"/> Used Oil Transfer Facility | <input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner | | |
| Mercury containing equipment | <input type="checkbox"/> | | <input type="checkbox"/> Used Oil Processor | | | |
| Lamps | <input checked="" type="checkbox"/> | | <input type="checkbox"/> Used Oil Re-refiner | | | |
| 11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the 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. | | | | | | |
| D001 | D002 | D007 | D008 | D018 | D035 | D039 |
| 12. Comments: Use this area to describe whether the inspection was announced; whether the waste is stored in tanks or containers, etc. | | | | | | |
| Announced | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Additional Facility Representatives: | | | |
| Tanks | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Other Comments: waste codes vary depending on transportation loads | | | |
| Containers | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | | | | |
| 13. Name of Inspector(s) | | | Name of Inspector(s) | | Date of Inspection/Time (mm/dd/yyyy) (hh:mm) | |
| Cathy Altman | | | | | 6/23/2008 1:00 | |
| 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) | |
| | | | | | | |

LAI QUANTITY GENERATOR REQUIREMENTS 3
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 st ? [3745-52-41(A)] | Yes | <input checked="" type="checkbox"/> | No | <input 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 checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 6. Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 7. Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <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 type="checkbox"/> | No | <input checked="" 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 checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] | Yes | <input checked="" type="checkbox"/> | No | <input 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 type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
|---|-----|--------------------------|----|--------------------------|-----|-------------------------------------|

- | | | | | | | |
|---|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| 16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
|---|-----|-------------------------------------|----|--------------------------|-----|--------------------------|

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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

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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

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- d. Do not exceed one quart of acute 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

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. Does the generator manage used oil in a surface impoundment or waste pile? If yes: Yes No N/A RMK#
- Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] Yes No N/A RMK#
2. Is used oil 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 in devices specified in 3745-279-12(C)? Yes No N/A RMK#

Note: Multiple sections of used oil checklist may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklist at a minimum).

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil? [3745-279-21(A)] If yes: Yes No N/A RMK#
- Note:** Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.
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#
- NOTE:** If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.
6. Does the generator only store used oil in tanks; or, containers, or a unit(s) subject to regulation as a hazardous waste management unit? [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#
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes No N/A RMK#
- b. Contained the release? Yes No N/A RMK#
- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A RMK#
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A RMK#

ON-SITE BURNING IN SPACE HEATER

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 that 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#

GENERATOR TRANSPORTATION

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#

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#
- NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, ect.) for used oil collection centers and aggregation points.

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REMARKS



PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: R&L Carriers

Facility Type: LQG

Date of Inspection: June 10, & 23, 2008 EPA ID#: OHR000024018

| Waste Generated | | | On- or Off-Site Management | | P2 Activities | | |
|---|--|---|---|---|-----------------------|--|--|
| Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc) | Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic. | QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area | Type of On-Site Treatment (recycle, wwt, etc) | Name, state, and type of activity occurring at the off-site facility. | Current P2 Activities | P2 Opportunities | |
| 1 | Transportation activities | Varies, depending on packages being transported – examples: D001, D002, D007, D008, D018, D035, D039, U028, U080, U122, U210, U220 | Varies due to production - containers | None | Chemtron Avon, OH | Attempt to return damaged packages or send for salvage | |
| 2 | | | | | | | |
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| 9 | | | | | | | |

REMARKS-GENERAL INFORMATION

General Process Information:

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.
 Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other:

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#
- 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#
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes No N/A RMK#
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? If so: Yes ___ No N/A ___ RMK# ___

a. Has the facility complied with 3745-270-04?

Yes ___ No N/A RMK# ___

REMARKS

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)]

Yes No N/A ___ RMK# ___



SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS BATTERIES AND LAMPS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more

Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No N/A ___RMK#
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)] Yes No N/A ___RMK#

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE LAMPS

8. 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 No N/A ___RMK#
9. 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)] Yes ___ No N/A RMK#
10. 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 No N/A ___RMK#

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

11. Is the waste accumulated for less than one year? Yes No N/A RMK#
[3745-273-15(A)] If not:
- 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)] Yes No N/A RMK#

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

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes No N/A RMK#
- 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)] Yes No N/A RMK#
- 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)] Yes No N/A RMK#
- 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)] Yes No N/A RMK#
- 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)] Yes No N/A RMK#
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes No N/A RMK#
- 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 No N/A RMK#

EMPLOYEE TRAINING

13. 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 No N/A RMK#

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes No N/A RMK#
15. Is the material released characterized? [3745-273-17(B)] Yes No N/A RMK#
16. 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 No N/A RMK#

OFF-SITE SHIPMENTS

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

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes No N/A RMK#

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

18. 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 No N/A RMK#
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No N/A RMK#
20. 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)] Yes No N/A RMK#

- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes ___ No ___ N/A X RMK#
21. 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: Yes ___ No N/A X RMK#
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes ___ No ___ N/A X RMK#
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes ___ No ___ N/A X RMK#
22. 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)] Yes ___ No N/A X RMK#
23. 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 ___ No N/A X RMK#

EXPORTS

24. Is waste being sent to a foreign destination? If so: Yes ___ No X N/A ___ RMK#
- 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)] Yes ___ No N/A X RMK#
- 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)] Yes ___ No N/A X RMK#
- c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes ___ No N/A X RMK#

REMARKS