



State of Ohio Environmental Protection Agency

004
003
BM
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, Lt. Governor
Chris Korleski, Director

April 24, 2007

Patrick Taylor
Transcontinental Miami Valley
678 Yellow Springs-Fairfield Road
Fairborn, Ohio 45324

**Re: Transcontinental Miami Valley; Hazardous Waste; Green County;
OHD981536220**

Dear Mr. Taylor:

On April 11, 2007, Ohio Environmental Protection Agency (Ohio EPA) conducted a compliance evaluation of Transcontinental Miami Valley (TMV) to determine your compliance with Ohio's hazardous waste laws and regulations as found under the Ohio Revised Code (ORC) and the Ohio Administrative Code (OAC). Ohio EPA's inspection included an inspection of facility operations and a review of written documentation and records. During the inspection we also discussed pollution prevention and waste reduction. This letter will explain the violations we found and what you need to do to correct the violations.

During the opening interview you had stated that TMV was a conditionally exempt small quantity generator of hazardous waste (CESQG). A CESQG checklist was completed and is attached. However, through the course of the inspection it was determined that since TMV now treats the caustic waste developer onsite prior to discharge and sends out the waste mineral spirits to Krystal Kleen for use as a product that TMV no longer generates hazardous waste.

We found the following violations of Ohio's hazardous waste laws. In order to correct these violations you must do the following:

Used Oil

Used Oil must be stored in containers that are in good condition, not leaking, and are labeled with the words "Used Oil". This includes all tanks and drums, as per OAC 3745-279-22. TMV is in violation of OAC 3745-279-22 (B). Used Oil containers we observed were labeled with the words "waste oil" instead of "used oil". **This violation was corrected at the time of the inspection. No further action is required.**

Patrick Taylor
Transcontinental Miami Valley
April 24, 2007
Page 2

Universal Waste

TMV is in violation of OAC 3745-273-13(D)(1) which requires a small quantity handler manage universal waste lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. TMV was storing universal waste lamps in boxes that were not closed. Some of the lamps were not completely contained by the boxes and were observed to be sticking out of the containers creating a risk of breakage.

TMV is also in violation of OAC 3745-273-14(E) which requires the containers or packages of universal waste lamps be labeled with the words "universal waste - lamp(s)" or "waste lamp(s)" or "used lamp(s)". The packages containing universal waste lamps observed at TMV were not properly labeled.

Please place universal waste lamps in properly labeled containers that adequately contain the lamps within 14 days of receipt of this letter. I have enclosed guidance on fluorescent lamps to assist you with compliance.

Pollution Prevention

You may be able to reduce the waste TMV generates. If you find ways to recycle, reduce, or altogether eliminate the amount of waste that you generate you may be able to reduce treatment and disposal costs, and you may possibly reduce your regulatory requirements. We discussed pollution prevention during the inspection, however, we did not identify any pollution prevention opportunities within your operations. For other possible pollution prevention opportunities please visit our Office of Compliance Assistance and Pollution Prevention's (OCAPP) website at <http://www.epa.state.oh.us/ocapp>. I will inform OCAPP if you desire an on-site pollution prevention assessment.

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information at the following web address: www.epa.state.oh.us/dhwm/listserv.html. Please feel free to share this information with your colleagues. You can find copies of the rules, compliance checklists, and other information on the division's web page at www.epa.state.oh.us/dhwm.

Patrick Taylor
Transcontinental Miami Valley
April 24, 2007
Page 3

A re-inspection will be conducted to document your return to compliance. Copies of the checklists completed for this inspection are attached. Should you have any questions, please contact me at (937) 285-6083.

Sincerely,



Brian Marlatt
Environmental Specialist
Division of Hazardous Waste Management

cc: ~~Dinah Crawford, DHWM/SWDO, File~~

BM/plh

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.



E-mail this completed form to tammy.mcconnell@pa.state.oh.us or mail it to Tammy McConnell, Central Office	Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM		For Ohio EPA use only																
2. Site EPA ID No.	EPA ID Number: OH D 981536220																		
3. Site Name	Name: TRANSCONTINENTAL MIAMI VALLEY Website (optional):																		
4. Site Location Information	Street Address: 678 YELLOW SPRINGS - FAIRFIELD ROAD																		
	City, Town, or Village: FAIRBORN	State: OH																	
	County Name:	Zip Code:																	
5. Site Land Type (check only one)	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Private	County	District	Federal	Indian	Municipal	State	Other												
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>												
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A. 32311		B.																
	C.		D.																
	7. Facility Representative: First Name: PATRICK MI: Last Name: TAYLOR		Phone Number: 937-879-5678 Phone Number Extension:																
	Additional names can be recorded in number 12. E-Mail Address: PATRICK.TAYLOR@TRANSCONTINENTAL.CA		Fax Number: 937-879-2683 Fax Number Extension:																
7. Facility Representative: Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	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: TRANSCONTINENTAL Date Became Owner (mm/dd/yyyy): 01/01/1987																
	Owner Type: Mark with an X	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>					
Private	County	District	Federal	Indian	Municipal	State	Other												
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>												
Street or P.O. Box: ONE PL VILLE MARIE																			
City, Town, or Village: MONTREAL		Owner Phone #:																	
State: QUEBEC		Country: CANADA	Zip Code: 99999																
B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):																	
Operator Type: Mark with an X	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input type="checkbox"/></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Private	County	District	Federal	Indian	Municipal	State	Other												
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>												
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																		
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)																			
<input type="checkbox"/> Not Regulated																			

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)

UNKNOWN: Cited for violation of 3745-52-11

a. Large Quantity Generator (LQG):

b. Small Quantity Generator (SQG)

c. Conditionally Exempt Small Quantity Generator

d. United States Importer of Hazardous Waste

e. Mixed Waste (hazardous and radioactive) Generator

3. Treater, Storer or Disposer of Hazardous Waste

4. Recycler of Hazardous Waste

5. Exempt Boiler and/or Industrial Furnace

a. Small Quantity On-site Burner Exemption

b. Smelting, Melting, Refining Furnace Exemption

6. Underground Injection Control Facility

FACILITY NO LONGER GENERATES HAZ WASTE

B. Universal Waste Activities

1. Small Quantity Handler of Universal Waste

(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):)

2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more).

3. Destination Facility for Universal Waste (Check all boxes below that apply for each of the three types of facilities above.)

	Generated	Accumulated
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"/>

C. Used Oil Activities

1. Used Oil Generator

2. Used Oil Transporter Indicate Type(s) of Activity(ies)

Transporter

Transfer Facility

3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)

Processor

Re-refiner

4. Off-Specification Used Oil Burner

5. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)

a. Marketer Who Directs Shipment of Off-Specification Oil

b. Used Oil to Off-Specification Used Oil Burner

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. 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.

--	--	--	--	--	--	--

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: OTHER SITE NAME: MIAMI VALLEY PUBLISHING
Y/N	Containers?	

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

BRIAN MARLATT 04/11/2007

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)

TRUNGCONTRAVENIMZ

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: MUMU UTILITY PUBUSINDA Facility Type: LQG/SQGG/QESQGG/TSD Date of Inspection: 4/11/07 EPA ID#: 0140981536220

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 PRINTER PRESS CLEANING	DWI WASTE MACHINERY SPARE PARTS	35 gal / month	N/A	KANSAS CITY MISSOURI	SENT OUT AS TRASH	
2 WASTE INK	NON HAZ	100 gal / month		KANSAS CITY MISSOURI	PAPER BURNING	
3 PRE PRESS ATMOSPHERE	HIGH PH	~ 40 gal / month	WWT	N/A		
4						
5						
6						
7						
8						
9						

REMARKS-GENERAL INFORMATION

General Process Information:

Regulatory/Enforcement History (if applicable):

N/A

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:

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:
 - 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)]
- 2. Is used oil being used as a dust suppressant? [3745-279-12(B)]
- 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# ___

Yes ___ No N/A RMK# ___

Yes No N/A ___ RMK# ___

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)]
- 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)]
- 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)]
- 7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]
- 8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]
- 9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
 - a. Stopped the release?
 - b. Contained the release?

Yes ___ No N/A RMK# ___

NO MIXING W/ HAZ WASTE

Yes No N/A ___ RMK# ___

Yes No N/A ___ RMK# ___

Yes No N/A ___ RMK# ___

Yes ___ No N/A ___ RMK# 1

Yes No N/A ___ RMK# ___

Yes No N/A ___ RMK# ___

c. Cleaned up and properly managed the used oil and other materials?

Yes No N/A RMK#

d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary?

Yes No N/A RMK#

10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so:

Yes No N/A RMK#

a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?

Yes No N/A RMK#

b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?

Yes No N/A RMK#

c. Are the combustion gases from heater vented to the ambient air?

Yes No N/A RMK#

11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24]

Yes No N/A RMK#

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]

Yes No N/A RMK#

13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]

Yes No N/A RMK#

14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]

Yes No N/A RMK#

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11]

Yes No N/A RMK#

L:\Inspection Checklist\MegaSet Rule Updates\USED OIL.SHORT.11.2004.fin.megaset.wpd

REMARKS

4) CONTAINERS LABELED "WASTE OIL" WHICH WERE CHANGED TO READ "USED OIL" DURING THE INSPECTION

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 BATTERIES

- 3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes No N/A RMK#
- 4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes No N/A RMK#
- 5. Does the SQUWH conduct any of the following activities:
 - a. Sort batteries by type? Yes No N/A RMK#
 - b. Mix battery types in one container? Yes No N/A RMK#
 - c. Discharge batteries to remove the electric charge? Yes No N/A RMK#
 - d. Regenerated used batteries? Yes No N/A RMK#
 - e. Disassemble them into individual batteries or cells? Yes No N/A RMK#
 - f. Remove batteries from consumer products? Yes No N/A RMK#
 - g. Remove the electrolyte from the battery? Yes No N/A RMK#
- If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] Yes No N/A RMK#

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)]
 Yes ___ No N/A RMK# ___
- a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]
 Yes ___ No N/A RMK# ___
- b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]
 Yes ___ No N/A RMK# ___
7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]
 Yes ___ No N/A ___ RMK# ___
UNLABELED DURING INSPECTION

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# ___
LEAKS SPILLAGE OUT OF BOXES
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# ___
NEW UNLABELED

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#
LAST SHIPMENT 9/06 TO VEGAS

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#
KRUSM 1423
SINCE JAN. '07

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 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:
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes No N/A 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 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 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 RMK#

EXPORTS

24. Is waste being sent to a foreign destination? If so: Yes No 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 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 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 RMK#

REMARKS

~ 200 lbs
RCM# 1060



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

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

Safety Equipment Used:

WASTE EVALUATION

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

GENERATOR CLASSIFICATION

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

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

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

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

TREATMENT OF HAZARDOUS WASTE

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

NOTE: Complete appropriate checklist for each unit.
 NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.
 NOTE: If waste is treated to meet LDRs, use LDR checklist.

*KODAK SYSTEM ROL
TREATMENT UNIT*

REMARKS

YES TO CAPD - P²

- 1) *PRE-PRESS CHEMISTRY (POTASSIUM HYDROXIDE) NOW TREATED ON-SITE TO LOWER PH (WASTE DEVELOPER)*
- 2) *WASTE MINERAL SPIRITS BEING PICKED UP AND USED BY KRYSTAL KREN AS A PRODUCT*

