



State of Ohio Environmental Protection Agency

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TK  
File

Southwest District

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

May 30, 2008

Nease Corporation  
Mr. Carl Deskins  
Environmental Health and Safety Manager  
10740 Paddys Run Road  
Harrison, Ohio 45030

**Re: Compliance Evaluation Inspection  
Notice of Violation and Return to Compliance  
Large Quantity Generator - US EPA ID# OHD004264784**

Dear Mr. Deskins:

On May 28, 2008, Larry Dickerson and I inspected the Nease Corporation Facility located at 10740 Paddys Run Road located in Harrison, Ohio to determine Nease Corporation's 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). Nease Corporation is a chemical manufacturing plant that specializes in the production of hydrotropes and related products.

This letter will explain the violations. Both violations were Returned to Compliance at the time of the inspection.

**Violations**

**1. Satellite Accumulation Drum (OAC Rule 3745-52-34(C)) – Labeling Requirement**

Satellite Accumulation containers must be marked with the words "Hazardous Waste" or with other words that identify the contents of the containers.

During the inspection, we observed the satellite accumulation drum in the lab. This drum was not labeled with the words "Hazardous Waste" or with other words that identify the contents of the containers. This violation was corrected at the time of the inspection and is therefore Returned to Compliance.

*Guidance Enclosed: Satellite Accumulation Under Ohio Hazardous Waste Rules, July 2004*

**2. Management of Containers (OAC Rule 3745-66-73) – Open Containers**

A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

Mr. Carl Deskins

May 30, 2008

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During the inspection, we observed the same satellite accumulation drum in the lab. This drum had no lid on it. This violation was corrected at the time of the inspection and is therefore Returned to Compliance.

As discussed, you may be able to use a latching lid that is kept latched, except when filling. We suggest a sign on the door to the closet that holds this satellite accumulation drum as a reminder to lab personnel to place a label on the drum and ensure the container is kept closed as needed.

*Guidance Enclosed: Closed Containers, June 2004*

**Additional  
Pollution Prevention**

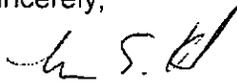
ChemAlliance® at ChemAlliance.org has valuable information and resources regarding Pollution Prevention for the chemical manufacturing industry. Some of the suggestions on their website include the reduction of hazardous material inventories, increasing checks for leaks, and process intensification which is a strategy for achieving dramatic reductions in the size of the manufacturing plant while maintaining current production volume.

The Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP) is a one-stop location for answers and information about environmental regulations, compliance concerns, and pollution prevention for all businesses. For additional information their office can be reached at (614) 644-3469 or <http://www.epa.state.oh.us/ocapp/ocapp.html>.

**Summary**

Enclosed you will find a copy of the checklist(s) that I completed for the inspection. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. If you have any questions, please call me at (937) 285-6594.

Sincerely,



Thomas E. Koch,  
Division of Hazardous Waste Management

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

Guidance Enclosed:

Satellite Accumulation Under Ohio Hazardous Waste Rules, July 2004  
Closed Containers, June 2004

Enclosures:

Large Quantity Generator Checklist  
Land Disposal Restriction Checklist  
Tank Checklist  
Universal Waste Checklist

TEK/rif

**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.

**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 <sup>recycle</sup> 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  
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#

N/A

RM  
K#  
\_6.

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#

### 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-

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

13(D)(2)]

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? [3745-273-15(A)] If not:

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

- 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

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  RMK#

N/A

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21.

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

NA



**LQG TANK SYSTEM REQUIREMENTS (OAC rule 3745-52-34(A) and OAC rules 3745-66-90 through 3745-66-100)**

(Please refer to the rules before or while completing this checklist.)

1. Is each tank clearly labeled/marked with the words "Hazardous Waste" [3745-52-34(A)(3)]? Yes  No  N/A

**TANK SYSTEM – GENERAL OPERATING REQUIREMENTS**

2. Does the o/o follow the general operating requirements below:
- a. Does the o/o prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail?[3745-66-94(A)] Yes  No  N/A
  - b. Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)?[3745-66-94(B)] Yes  No  N/A
  - c. If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96?[3745-66-94(C)] Yes  No  N/A

**TANK SYSTEM – INSPECTION REQUIREMENTS**

3. Has the o/o documented the inspections required in 3745-66-95, in the operating record, including inspection of the following:
- a. Spill control equipment each operating day? [3745-66-95(A)(1)] Yes  No  N/A
  - b. Above ground portion of tank each operating day?[3745-66-95(A)(2)] Yes  No  N/A
  - c. Data from leak detection equipment each operating day?[3745-66-95(A)(3)] Yes  No  N/A
  - d. Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste each operating day?[3745-66-95(A)(4)] Yes  No  N/A

**NOTE:** "Each operating day" is each day that the tank system is being used to manage (store or treat) hazardous waste.

- 4. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter?[3745-66-95(B)(1)] Yes  No  N/A
- 5. Where applicable, all sources of impressed current at least bi-monthly?[3745-66-95(B)(2)] Yes  No  N/A

**TANK SYSTEM CLOSURE REQUIREMENTS**

- 6. If the generator has closed a <90 day tank, was closure completed in accordance with OAC 3745-66-97 (except for paragraph C)? Yes  No  N/A

**TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES**

- 7. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with **one of the following**: [3745-66-98(A)] Yes  No  N/A 
  - a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-66-17(B)?[3745-66-98(A)]; **OR** Yes  No  N/A
  - b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction?[3745-66-98(A)]; **OR** Yes  No  N/A
  - c. The tank is used solely for emergencies?[3745-66-98(A)] Yes  No  N/A
- 8. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (1996)? [3745-66-98(B)] Yes  No  N/A
- 9. Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material?[3745-66-99(A) and/or (B)] Yes  No  N/A 
  - a. If so, have the requirements of 3745-65-17(B) been met?[3745-66-99(A) and/or (B)] Yes  No  N/A

**TANK SYSTEM – WASTE ANALYSIS REQUIREMENTS**

- 10. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following:[3745-66-100]
  - a. Conducted waste analysis and trial treatment or storage tests?[3745-66-100(A)]; **OR** Yes  No  N/A
  - b. Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-100(B)] Yes  No  N/A

**TANK SYSTEMS REQUIREMENTS**

- 11. Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)?[3745-66-92(A)] Yes  No  N/A

**NOTE:** You should review the file to see if the written assessment has been previously reviewed and what the results were.

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12. Does the written assessment include the following:[3745-66-92(A)]

- |   |     |                                     |    |                          |     |                          |
|---|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| a. Certification by an independent registered, professional engineer?[3745-66-92(A)]  | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| b. Consideration of the design standards of the system?[3745-66-92(A)]  | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| c. Consideration of the hazardous characteristics of the waste(s)?[3745-66-92(A)]   | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| d. An evaluation by a corrosion expert (only if the external system/components are metal and in contact with soil or water)?[3745-66-92(A)]                                       | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| e. A determination of design and operational measures that will be needed to protect the tank system from potential damage (only for underground tank components)?[3745-66-92(A)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| f. Design considerations to ensure that the tank foundations will maintain the load of a full tank?[3745-66-92(A)]  | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| g. Design considerations for anchoring the unit to prevent floatation (only for tanks situated in a seismic fault zone or saturated zone)?[3745-66-92(A)]                         | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| h. Design considerations to ensure that the tank system will withstand the effects of frost heave(only for underground tank systems)?[3745-66-92(A)]                              | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

NOTE: CO-DHWM Engineering staff are available to assist you with evaluation of the written assessment.

13. Are there written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed?[3745-66-92(G)]

Do the written statements address all of the following:

- |  |     |                                     |    |                          |     |                          |
|--|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| a. Inspection for damage and/or inadequate construction and installation was conducted?[3745-66-92(B)]                                     | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| b. Statement that deficiencies were corrected before the tank system was covered or put into use?[3745-66-92(B)]                           | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| c. Proper backfilling?[3745-66-92(C)]  | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| d. Tightness test; if the tank system was found not to be tight, does the statement indicate that proper repairs were made?[3745-66-92(D)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| e. Proper support and protection of ancillary equipment?[3745-66-92(E)]  | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| f. Supervision of the installation of field fabricated corrosion protection?[3745-66-92(F)]  | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

## SECONDARY CONTAINMENT

14. Has secondary containment been provided? Yes  No  N/A

NOTE: All tank systems must have secondary containment at this point, except for tank systems that store/treat materials that become hazardous waste after January 12, 1987, must have secondary containment required within the time intervals in [3745-66-92(A)(1)] to (A)(4). The date the material became a hazardous waste must be used in place of January 12, 1987.[3745-66-92(A)(5)]

15. Is secondary containment one of the following:

- |  |     |                                     |    |                          |     |                                     |
|--|-----|-------------------------------------|----|--------------------------|-----|-------------------------------------|
| a. An <b>External Liner</b> ? [3745-66-93(E)(1)] If so,  | Yes | <input type="checkbox"/>            | No | <input type="checkbox"/> | N/A | <input type="checkbox"/>            |
| i. Is liner designed or operated to contain 100% of the capacity of the largest tank?  | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/>            |
| ii. Is liner designed and operated to prevent run-on and infiltration <u>or</u> the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm? | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/>            |
| iii. Is liner free of cracks and gaps?   | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/>            |
| iv. Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release?  | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/>            |
| v. Are chemically resistant water stops in place at all points? (concrete liners only)   | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/>            |
| vi. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? (concrete liners only)   | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/>            |
| b. <b>Vault System</b> ? [3745-66-93(E)(2)] If so,   | Yes | <input type="checkbox"/>            | No | <input type="checkbox"/> | N/A | <input type="checkbox"/>            |
| i. Is vault system designed to contain 100% of the capacity in the largest tank?   | Yes | <input type="checkbox"/>            | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| ii. Is liner designed and operated to prevent run-on and infiltration <u>or</u> the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm? | Yes | <input type="checkbox"/>            | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| iii. Are chemically resistant water stops in place at all points?  | Yes | <input type="checkbox"/>            | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| iv. Is there a compatible interior coating to prevent migration into the concrete?   | Yes | <input type="checkbox"/>            | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |

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- v. For **ignitable or reactive waste**: Is the vault system provided with means to prevent (or alternatively "protect against") the formation or ignition of vapors? Yes  No  N/A
- vi. Is vault system provided with an exterior moisture barrier? Yes  No  N/A
- c. **Double-Walled Tank?** [3745-66-93(E)(3)] If so, ~~Yes  No  N/A~~
- i. Is double-walled tank designed as an integral structure to contain any release from the inner tank? Yes  No  N/A
- ii. If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion? Yes  No  N/A
- iii. Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time? Yes  No  N/A
- d. **An Equivalent Device?** As described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D&E)] Yes  No  N/A

### SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION

16. Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, groundwater, or surface water and is it capable of detecting and collecting releases and accumulated liquids?[3745-66-93(B)(1) and (2)] Yes  No  N/A
17. Does the secondary containment system meet the following minimum requirements of [3745-66-93(C)]:
- a. Constructed or lined with compatible materials of sufficient strength to prevent failure?[3745-66-93(C)(2)] Yes  No  N/A
- b. Placed on a foundation or base capable of providing support?[3745-66-93(C)(2)] Yes  No  N/A
- c. Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time?[3745-66-93(C)(3)] Yes  No  N/A
- d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation?[3745-66-93(C)(4)] Yes  No  N/A
- e. Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner?[3745-66-93(C)(4)] Yes  No  N/A

### ANCILLARY EQUIPMENT REQUIREMENTS

18. Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)? Yes  No  N/A
- If not, is the ancillary equipment one of the following: [3745-66-93(F)]
- a. Above ground piping (exclusive of flanges, joints, valves and connections) that is inspected daily? Yes  No  N/A
- b. Welded flanges, welded joints and/or welded connections that is inspected daily? Yes  No  N/A
- c. Sealless or magnetic coupling pumps and/or sealless valves? Yes  No  N/A
- d. Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown and/or loss of pressure-actuated shut-off devices) that is inspected daily? Yes  No  N/A

### TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE

19. Has there been a leak or spill from any tank system or has any tank system been found unfit for use? If so, did the o/o: Yes  No  N/A

NOTE: If the tank is found to be unfit for use, inspector should explain why.

- a. Immediately cease flow of material into tank and investigate the cause of the release?[3745-66-96(A)] Yes  No  N/A
- b. Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time?[3745-66-96(B)(1)] Yes  No  N/A
- c. Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment?[3745-66-96(B)(2)] Yes  No  N/A
- d. For a visible release to the environment, immediately conduct a visual inspection of the release?[3745-66-96(C)] Yes  No  N/A
- e. For a visible release to the environment, prevent further migration of the leak or spill to soils or surface waters?[3745-66-96(C)] Yes  No  N/A
- f. For a visible release to the environment, properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)] Yes  No  N/A
- g. Report any release to the environment to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)] Yes  No  N/A

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- h. For a release to the environment, submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)] Yes  No  N/A
- i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)(2)] Yes  No  N/A
- j. For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)] Yes  No  N/A

*NOTE: The requirements noted in 20.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.*

20. In the event that the repairs to the tank system were major (e.g., replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from an independent, registered P.E. attesting that the repaired unit is capable of handling hazardous waste? [3745-66-96(F)] Yes  No  N/A
21. Was a copy of the certification submitted to the director within seven days after returning the system to use? [3745-66-96(F)] Yes  No  N/A
22. If the o/o was unable to repair and return the unit to service as described in 20.a through 20.e, was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)] Yes  No  N/A
23. Does the o/o have a tank system **with a variance from secondary containment** from which a release has occurred but has not migrated beyond the zone of engineering control?  
**If so,**
- a. Has the o/o complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G)(3)] Yes  No  N/A
- b. If soils cannot be decontaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)] Yes  No  N/A
24. Does the o/o have a tank system **with a variance from secondary containment** from which a release occurred and has migrated from the zone of engineering control? **If so,**
- a. Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)] Yes  No  N/A
- b. If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(4)] Yes  No  N/A

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**GENERATOR LDR CHECKLIST  
DOES NOT APPLY TO CESQGS**

**GENERAL REQUIREMENTS**

- |    |  |  |
|----|--|--|
| 1. | If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07 (A)(7)]                  | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 2. | Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

*NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07 (A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).*

- |    |  |  |
|----|--|--|
| 3. | Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]           | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 4. | Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 5. | Does the generator generate a listed HW that exhibits a characteristic? If yes,  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

*FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.*

- |    |   |  |
|----|---|--|
| 6. | Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|--|

*NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.*

*NOTE: Written documentation of this determination is not required.*

- |    |   |  |
|----|---|--|
| 7. | Did the generator treat his HW /soil on-site <u>to meet</u> the LDR treatment standard? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|--|

*NOTE If "Yes" see question #16.*

- |     |  |  |
|-----|--|--|
| 8.  | Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility?[3745-270-07(A)(2)]          | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 9.  | Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 10. | Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)]  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a.  | Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)]  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

**NOTIFICATION FORM**

- |     |   |  |
|-----|---|--|
| 11. | Does the LDR Notification form contain the following information:   |  |
| a.  | Manifest number of the first waste shipment to the TSD?[3745-270-07(A)(2)]  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b.  | Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]                           | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c.  | A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d.  | A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)].  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.

e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
----	--	--

NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories

f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
----	--	--

NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.

g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
----	---	--

NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.

**PROHIBITED DILUTION**

12.	Is the HW treated by burning? If "No," go to #15.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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13.	Is the HW a metal-bearing HW?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
-----	-------------------------------	--

NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.

14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless <u>one</u> of the following conditions apply. [3745-270-03(c)]	
-----	----	---	--

	i.	Contains > 1% TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	----	--------------------	--

	ii.	Contains organic constituents or cyanide at levels greater than the UST levels?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	-----	---	--

	iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	------	--	--

	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	-----	--	--

	v.	Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	----	--	--

	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	----	---	--

15.	Was the HW treated by wastewater treatment?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
-----	---	--

	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	----	---	--

NOTE: If Yes, HW is improperly being treated by dilution.

	b.	Does the waste carry the D001 code and contain ≥10% TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	----	--	--

	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	----	---	--

NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B) and 3745-270-40(A)(3)].

NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.

GENERATOR TREATMENT		
16.	Does the generator treat to meet LDRs on-site [3745-270-40(A)]?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	If "Yes"...complete the rest of the checklist. If "No"...stop...you are done.	
a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: This is a laboratory analysis but it does not have to be kept by the generator.</i>		
c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTIFICATION FORM		
17.	a.	Contains all information in #11 a-g above and <del>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></del>
	b.	If the treated HW/soil is listed.....notification contains the following certification statement:  " I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or trough knowledge of the waste, to support this certification that the waste complies with the treatment stands specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:
	i.	Send a one-time notification to the director?[3745-270- 09 (D)]
	ii.	Maintain a copy of the notice onsite?[3745-270-09(D)]
	iii.	Include in the notification: [3745-270-09(D)(1)(a)]
	1.	Name & address of receiving landfill?
	2.	Description of HW when generated?
	3.	HW code when generated?
	4.	Treatability group when generated?
	5.	Underlying hazardous constituents present when generated?
	iv.	Contain the right certification statement as required by 3745-70-07(b)(4)?



**LARGE QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

CESQG: ≤ 100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

**GENERAL REQUIREMENTS**

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes  No  N/A
2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] Yes  No  N/A
3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes  No  N/A
4. Were annual reports filed with Ohio EPA on or before March 1<sup>st</sup>? [3745-52-41(A)] Feb 22, 2009 Yes  No  N/A
5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] Yes  No  N/A
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  No  N/A
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  No  N/A
8. Does the generator accumulate hazardous waste? Yes  No  N/A

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  No  N/A

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  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 waste is treated to meet LDRs, use LDR checklist.

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

**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  No  N/A
13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Yes  No  N/A

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  No  N/A

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  No  N/A
16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] Yes  No  N/A

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

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

Job Performed	Name of Employee	Date Trained

**CONTINGENCY PLAN**

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

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

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

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

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

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

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

### EMERGENCY PROCEDURES

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

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

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

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

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

### PREPAREDNESS AND PREVENTION

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

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

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

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

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

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

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

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

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

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

38. If there is only one employee on the premises, is there immediate access to a device (ex. phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] Yes  No  N/A

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

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

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

### SATELLITE ACCUMULATION AREA REQUIREMENTS

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

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

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

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

[Facility Name/Inspection Date]

[ID number]

LQG/February 2007

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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)] Lab satellite drum not closed - ① Yes  No  N/A
- f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Lab satellite drum not labelled - ① 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

① RTC'd at inspection. The other satellite drum was properly labelled and closed.  
 ↳ Returned to Compliance.

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

For Ohio EPA use only

E-mail this completed form to [kristina.durnell@epa.state.oh.us](mailto:kristina.durnell@epa.state.oh.us)  
or mail it to Kristina Durnell, Central Office

Site EPA ID No.	EPA ID Number: OHD0042647848								
Site Name	Name: Nease Corporation					Website: (Optional)			
Site Location Information	Street Address: 10740 Paddys Run Road								
	City, Town, or Village: Harrison					State: OH			
	County Name: Hamilton					Zip Code: 45030			
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"/>	
NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	325613								
Facility Representative  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: Carl			MI:	Last Name: Deskins				
	Phone Number: 513-738-1255				Phone Number Extension: 114				
	E-Mail Address:								
	Fax Number:				Fax Number Extension:				
	Street or P.O. Box: SAA								
	City, Town or Village:								
	State:			Country:		Zip Code:			
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: International Chemical Investors Group				Date Became Owner (mm/dd/yyyy): September 29, 2005				
	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: An der Hauptwache 5								
	City, Town or Village: Frankfurt				Owner Phone #:				
	State:				Country: Germany		Zip Code: 60313		
	Name of Site's Operator: Nease Corporation				Date Became Operator (mm/dd/yyyy): 1979				
	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: SAA								
	City, Town or Village:				Operator Phone #:				
	State:			Country:		Zip Code:			
Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
Type of Generator									
<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)									
Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Underground Injection Control Facility				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste									



Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply))						
<input checked="" type="checkbox"/> <b>Small Quantity Handler of Universal Waste</b>			<input type="checkbox"/> <b>Large Quantity Handler of Universal Waste</b> (accumulates 5,000 kg. or more)			
<input type="checkbox"/> <b>Destination Facility for Universal Waste</b>						
(Check all boxes below that apply for each of the three types of facilities above)			Used Oil Activities (Indicate Type(s) of Activity(ies))			
<b>Managed</b>			<input type="checkbox"/> <b>Used Oil Generator</b>	<input type="checkbox"/> <b>Off-Specification Used Oil Burner</b>		
<b>Batteries</b>	<input checked="" type="checkbox"/>		<input type="checkbox"/> <b>Used Oil Transporter</b>	<input type="checkbox"/> <b>Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil</b>		
<b>Pesticides</b>	<input type="checkbox"/>		<input type="checkbox"/> <b>Used Oil Transfer Facility</b>	<input type="checkbox"/> <b>Used Oil Fuel Marketer to Off-Specification Used Oil Burner</b>		
<b>Mercury containing equipment</b>	<input type="checkbox"/>		<input type="checkbox"/> <b>Used Oil Processor</b>			
<b>Lamps</b>	<input checked="" type="checkbox"/>		<input type="checkbox"/> <b>Used Oil Re-refiner</b>			
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.						
<b>D001</b>	<b>D002</b>	<b>D007</b>	<b>F003</b>	<b>F005</b>	<b>U055</b>	<b>U220</b>
Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.						
<b>Announced</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Additional Facility Representatives:</b>		Frank P. Canepa	
<b>Tanks</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<b>Other Comments:</b>			
<b>Containers</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No				
<b>Name of Inspector(s)</b>			<b>Name of Inspector(s)</b>		<b>Date of Inspection/Time (mm/dd/yyyy) (hh:mm)</b>	
Thomas Koch			Larry Dickerson		5/28/2008 10:00 am	
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.						
<b>Signature of Owner, Operator, or an Authorized Representative</b>			<b>Name and Title (Print)</b>		<b>Date (mm/dd/yyyy)</b>	



PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Nease Corp.

Facility Type: LCQ/SQG/CESQG/TSD

EPA ID#: OHB004264784

Description of Waste				On-Site Management			Off-Site Management	P2 Activities
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	Waste Generated (e.g. sludge, spent solvent, ash, etc)	EPA Waste Code	QTY Generated per Month	Type of Accumulation/Storage (e.g. container, tank, etc)	Type of On-Site Treatment (recycle, wwt, etc)	Waste Location (include map if possible)	Name, state, and type of activity occurring at the facility.	
1 Maintenance	Fluorescent Bulbs	UW	~ 6 bulbs	Boxes	NA	Maintenance	AERC Allentown, Pa.	
2 Maintenance	RBC 2way Radio Batteries	UW	~ 6 batteries	Boxes	NA	Maintenance	RBE National Batteries Franklin, Ill.	
3 Various Lab Chemicals	Lab waste	D001 D002 U055 U220 U239	175 lb/mo	Lab pack (55-gal drum) (satellite)	NA	Lab	Ross, Grafton, Oh	
4 Spent Process Liquid	Spent sulfuric acid	D002	50,000 $\frac{lb}{mo}$	Tank 305	NA	Tank Farm	Vickery Env., Vickery, Oh	
5 Process liquid	Waste sulfuric acid	D002 D007	10,000 $\frac{lb}{yr}$	Tank 305	NA	Tank Farm	EET, Cincinnati, Ohio	



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

For Ohio EPA use only

E-mail this completed form to [kristina.durnell@epa.state.oh.us](mailto:kristina.durnell@epa.state.oh.us)  
or mail it to Kristina Durnell, Central Office

Site EPA ID No.	EPA ID Number: OHD0042647848									
Site Name	Name: Nease Corporation					Website: (Optional)				
Site Location Information	Street Address: 10740 Paddys Run Road									
	City, Town, or Village: Harrison					State: OH				
	County Name: Hamilton					Zip Code: 45030				
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"/>		
NAICS code(s) <a href="http://www.census.gov/eprd/www/naics.html">www.census.gov/eprd/www/naics.html</a>	325613									
Facility Representative  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: Carl			MI:	Last Name: Deskins					
	Phone Number: 513-738-1255				Phone Number Extension: 114					
	E-Mail Address:									
	Fax Number:				Fax Number Extension:					
	Street or P.O. Box: SAA									
	City, Town or Village:			State:			Country:		Zip Code:	
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: International Chemical Investors Group				Date Became Owner (mm/dd/yyyy): September 29, 2005					
	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: An der Hauptwache 5									
	City, Town or Village: Frankfurt				Owner Phone #:					
	State:				Country: Germany		Zip Code: 60313			
	Name of Site's Operator: Nease Corporation				Date Became Operator (mm/dd/yyyy): 1979					
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	Street or P.O. Box: SAA									
	City, Town or Village:				Operator Phone #:					
	State:				Country:		Zip Code:			
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Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)										
<input type="checkbox"/> Recycler of Hazardous Waste					<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Underground Injection Control Facility					<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
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<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste										

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<input type="checkbox"/> <b>Destination Facility for Universal Waste</b>						
(Check all boxes below that apply for each of the three types of facilities above)			Used Oil Activities (Indicate Type(s) of Activity(ies))			
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<b>Batteries</b>	<input checked="" type="checkbox"/>		<input type="checkbox"/> <b>Used Oil Transporter</b>	<input type="checkbox"/> <b>Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil</b>		
<b>Pesticides</b>	<input type="checkbox"/>		<input type="checkbox"/> <b>Used Oil Transfer Facility</b>	<input type="checkbox"/> <b>Used Oil Fuel Marketer to Off-Specification Used Oil Burner</b>		
<b>Mercury containing equipment</b>	<input type="checkbox"/>		<input type="checkbox"/> <b>Used Oil Processor</b>			
<b>Lamps</b>	<input checked="" type="checkbox"/>		<input type="checkbox"/> <b>Used Oil Re-refiner</b>			
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.						
<b>D001</b>	<b>D002</b>	<b>D007</b>	<b>F003</b>	<b>F005</b>	<b>U055</b>	<b>U220</b>
Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.						
<b>Announced</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Additional Facility Representatives:</b>		Frank P. Canepa	
<b>Tanks</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<b>Other Comments:</b>			
<b>Containers</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No				
Name of Inspector(s)		Name of Inspector(s)		Date of Inspection/Time (mm/dd/yyyy) (hh:mm)		
Thomas Koch		Larry Dickerson		5/28/2008 10:00 am		
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)	