

File
002



State of Ohio Environmental Protection Agency

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
Laura Powell, Acting Director

January 23, 2007

**Re: Daido Metal Bellefontaine L.L.C.
Large Quantity Generator
OHR000131433
Logan County
Compliance Evaluation Inspection
Notice Of Violation**

Mr. Adam Bates
Daido Metal Bellefontaine L.L.C.
1215 S. Greenwood St.
Bellefontaine, OH 43311

Dear Mr. Bates:

Thank you for accompanying me during Ohio EPA's December 19, 2006 inspection of Daido Metal Bellefontaine LLC's facility in Bellefontaine, Ohio. You represented Daido Metal Bellefontaine LLC (DMB). The Ohio EPA was represented by me. I inspected DMB to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). This letter will explain the violations I found, what you need to do to correct the violations, concerns I have identified and what you need to do to respond to my concerns.

I found the following violations of Ohio's hazardous waste laws. In order to correct these violations, please send the required information to me by February 2, 2007:

**1. Accumulation Time of Hazardous Waste
OAC 3745-52-34(C)(1)(b)**

A generator must label satellite accumulation drums with the words "Hazardous Waste" or words to identify the contents.

During the December 19, 2006 inspection, DMB failed to label its F006 hazardous waste roll off box located in the wastewater treatment plant with the words "Hazardous Waste" or any others identifying its contents.

DMB must immediately label this roll off box and submit proof to this office for review.

Identified Concerns

- 1) During the inspection, it was unclear what, if any, universal waste DMB generates. I won't be filling out *Section 10.B.* of the RCRA Subtitle C Site

Mr. Adam Bates
November 23, 2007
Page 2

Identification/Verification Form (copy enclosed) until DMB identifies what boxes should be checked to indicate what types of universal waste DMB is generating and/or accumulating. I am enclosing a universal waste fact sheet and a June 30, 2005 regulatory interpretation issued by DHWM to assist you in classifying non lead acid batteries (i.e., batteries collected from home, nickel-cadmium, alkaline). DMB should submit this information to this office for our review.

- 2) Per your January 2, 2007 e-mail, DMB is still in the process of finding 2004, 2005 and 2006 (partial) hazardous waste storage and emergency equipment inspection records. Also, on January 2, 2007 you faxed me 2006 employee training records. Ohio EPA still needs 2004 and 2005 employee training records. Therefore, Questions 24, 34 and 45 of the LARGE QUANTITY REQUIREMENTS checklist won't be filled out until this information is received.
- 3) Finally, DMB did not have the original signature copy of manifest # 06003 (dated 5/31/06 for a shipment to Onyx). This is not a violation. However, the original signature is DMB's complete assurance that "cradle to grave" hazardous waste disposal is occurring.

Please submit the information requested regarding the violations and concerns identified above to this office by February 2, 2007. Enclosed you will find a copy of the checklists completed during the inspection. Should you have any questions, please feel free to call me at this office. You can find copies of the rules and other information (such as regulatory interpretations) on the division's web page at <http://www.epa.state.oh.us/dhwm>.

If you have any questions, please call me at (937) 285-6091.

Sincerely,



Pamela Hull
Environmental Specialist 2
Division of Hazardous Waste Management

Enclosures

cc: Dinah\Crawford\SWDO-DHWM\SWDO file
SWDO-file: Daido Metal Bellefontaine L.L.C., LQG, OHR000131433, Logan County

PH/plh

LDR REQUIREMENTS - Evaluated DMB's LDR associated with F006 Electroplating Wastewater Treatment sludge

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

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

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

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

6. Has the generator **correctly** determined if restricted wastes meet or exceed treatment standards? [3745-270-07(A)(1)] Yes No N/A ___ RMK# ___

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

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

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

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes No N/A ___RMK#___

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] If so: Yes ___ No N/A ___ RMK#___

a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05]

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] If so: Yes ___ No N/A ___RMK#___

a. The facility can land dispose of the waste. [3745-270-06]

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

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

REMARKS

- 1 UHCs are not identified for D002 waste.

NOTIFICATION AND CERTIFICATION REQUIREMENTS

12. If a generators' waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1? [3745-270-07(A)(2)] Yes No N/A RMK#
13. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1? [3745-270-07(A)(3)] Yes No N/A RMK#
14. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1? [3745-270-07(A)(4)] Yes No N/A RMK#
15. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1? [3745-270-07(A)(9)] Yes No N/A RMK#
16. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] **If so:** Yes No N/A RMK#
- a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes No N/A RMK#

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

17. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)] Yes No N/A RMK#

REMARKS

GENERATORS TREATING HAZARDOUS WASTE

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

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

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

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

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

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

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

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

REMARKS

HAZARDOUS DEBRIS

- 1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)? Yes___ No___ N/A X RMK#___
- 2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.) Yes___ No___ N/A X RMK#___
- 3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so: Yes___ No___ N/A X RMK#___
 - a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)] Yes___ No N/A X RMK#___

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

- 4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so: Yes___ No___ N/A X RMK#___
 - a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] Yes___ No N/A X RMK#___
- 5. Is the waste a PCB waste under 40 CFR Part 761? If so: Yes___ No___ N/A X RMK#___
 - a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 270? [3745-270-45(A)(5)] Yes___ No N/A X RMK#___
- 6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)] Yes___ No N/A X RMK#___
- 7. Does the owner/operator of a treatment facility that claims the debris is excluded under 3745-51-03(F)(1) maintain the following information? Yes___ No___ N/A X RMK#___
 - a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)] Yes___ No___ N/A X RMK#___

- b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)] Yes ___ No N/A RMK# ___
- c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)] Yes ___ No N/A RMK# ___
8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F) have the following information? [3745-270-07(D)(3)] Yes ___ No N/A RMK# ___
- a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)] Yes ___ No ___ N/A RMK# ___
- b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)] Yes ___ No N/A RMK# ___
- c. Technology used from Table 1? [3745-270-07(D)(1)(c)] Yes ___ No N/A RMK# ___
9. Has the above notification been sent to the director? [3745-270-07(D)(1)] Yes ___ No N/A RMK# ___

REMARKS

TREATING FACILITIES

- 1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-14?[3745-270-07(B)] Yes ___ No N/A RMK# ___

- 2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)] Yes ___ No N/A RMK# ___

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

- 3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07?[3745-270-07(B)(3)] Yes ___ No N/A RMK# ___

- 4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so:** Yes ___ No ___ N/A RMK# ___
 - a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)] Yes ___ No N/A RMK# ___

- 5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-58-30? **If so:** Yes ___ No ___ N/A RMK# ___
 - a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)), excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)] Yes ___ No N/A RMK# ___
 - b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4)[3745-270-07(B)(6)] Yes ___ No N/A RMK# ___
 - c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B))(6)] Yes ___ No N/A RMK# ___

- 6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)] Yes ___ No N/A RMK# ___

- 7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have: Yes ___ No ___ N/A RMK# ___

- a. Copies of all notices and certifications required in 3745-270? Yes ___ No N/A RMK#___
- b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49? Yes ___ No N/A RMK#___
- c. Followed the testing frequency specified in the facilities WAP? Yes ___ No N/A RMK#___

C:\DMBLDR.wpd

REMARKS



11

E-mail this completed form to tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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2. Site EPA ID No.	EPA ID Number: OHR000131433
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3. Site Name	Name: DAIDO METAL BELLEFONTAINE LLC	Website (optional!)
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4. Site Location Information	Street Address: 1215 GREENWOOD ST	
	City, Town, or Village: BELLEFONTAINE	State: OH
	County Name: LOGAN	Zip Code: 43311

5. Site Land Type (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other
	<input checked="" type="checkbox"/>							

6. NAICS code(s) www.census.gov/epcd/www/naics.html	A. 336312	B. 332999
	C.	D.

7. Facility Representative Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	First Name: ADAM	MI: L	Last Name: BATES
	Phone Number: 937-592-5010		Phone Number Extension: 689
	E-Mail Address: adam.bates@daidometal.com		
	Fax Number: 937-592-4836		Fax Number Extension:
	Street or P.O. Box:		
	City, Town or Village:		
	State:	Country:	Zip Code:

8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	A. Name of Site's Legal Owner: DAIDO METAL BELLEFONTAINE LLC		Date Became Owner (mm/dd/yyyy): 09/01/2005						
	Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
		<input checked="" type="checkbox"/>							
	Street or P.O. Box: 1215 GREENWOOD ST								
	City, Town, or Village: BELLEFONTAINE			Owner Phone #:					
	State: OH			Country: USA		Zip Code: 43311			
	B. Name of Site's Operator: DAIDO METAL BELLEFONTAINE LLC		Date Became Operator (mm/dd/yyyy): 09/01/2005						
	Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
		<input checked="" type="checkbox"/>							
	Street or P.O. Box: 1215 GREENWOOD ST								
City, Town, or Village: BELLEFONTAINE			Operator Phone #:						
State: OH			Country: USA		Zip Code: 43311				

9. Violations Cited?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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10. Type of Regulated Waste Activity. (Mark "X" in all of the appropriate boxes.)	<input type="checkbox"/> Not Regulated
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10. Type of Regulated Waste Activity ("X" in all of the appropriate boxes.)

A. Hazardous Waste Activities

(choose only one of the following categories)

- 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

- 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

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 type="checkbox"/>	<input type="checkbox"/>
B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
D. Lamps	<input 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 RCRA Info source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

SEE	2005	Annual	Report	Information	for	Codes
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12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

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

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

Pam Hull 12-19-2006 / 9:15

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)
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REMARKS-GENERAL INFORMATION

General Process Information: Daido Metal Bellefontaine manufactures bimetal strip and engine bearings for the automotive industry. Bimetal strips are formed by rolling sintered copper, lead and metal powder. These strips are pressed, machined and plated to produce engine bearings for various types of automobiles. This location also has an aluminum powder and clad process.

Regulatory/Enforcement History (if applicable):

Other:

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

CESQG: <100Kg. (Approximately 25-30 gallons) of waste in a calendar month.
 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. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes No N/A

3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] Yes No N/A

Annual reports were filed under two ID #s in 2006 for 2005. After working with DHWM to correct this discrepancy. Daido Metal Bellefontaine decided to choose OHR000131433. The OHD004287371 is being used by Dana to dispose of clean-up wastes associated with their F's and O's with DERR.

4. 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

5. 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

6. 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.

7. 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).

8. 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) and 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.

9. Does the generator export hazardous waste? If so: Yes No N/A

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

10. 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

11. 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)]

12. 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)].

13. 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

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

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 of the waste they generate.

15. 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

16. 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

17. 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

18. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes No N/A

19. Does the personnel training program include instructions to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes No N/A
20. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A
21. 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
22. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A
23. Does the generator keep records including: job titles [D(1)], job descriptions [D(2)], type and amount of training given to each person [D(3)] and documentation of completed training or job experience required [D(4)]? [3745-65-16(D)] Yes No N/A
24. 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.

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date Trained</u>

CONTINGENCY PLAN

25. 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
26. Does the plan describe the following:
- a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes No N/A
- b. Arrangements with emergency authorities [3745-65-52(C)]. Yes No N/A
- c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes No N/A
- d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes No N/A
- e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes No N/A

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

27. 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

28. 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

29. 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

30. 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 release of hazardous waste occurred at DMB on 6/23/05.

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

31. 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

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

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

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

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

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

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

36. 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
37. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
38. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes No N/A
39. 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

40. 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 one quart of acutely hazardous waste at anyone time? [3745-52-34(C)(1)] Yes No N/A
 - d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes No N/A
 - e. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
The WWT sludge roll off box did not have a hazardous waste label during the 12/19/06 CEI.
41. 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
 - c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] 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

42. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes No N/A
43. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No N/A
44. 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 and photograph the area.

45. Is the container accumulation areas(s) inspected weekly? [3745-66-74]. Per ORCS 1.44(A) "Week" means seven 7 consecutive days. Yes No N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
46. 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
47. 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
48. 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
49. 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.

50. 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 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

51. 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
52. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A
53. 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

DMB did not have hazardous waste ready to ship during the 12/19/06 CEI.

USED OIL INSPECTION CHECKLIST (Long Version)

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes ___ No ___ N/A X RMK# ___
Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes ___ No N/A X RMK# ___
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No X N/A ___ RMK# ___
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes ___ No N/A X RMK# ___

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes ___ No N/A X RMK# ___
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes ___ No N/A X RMK# ___
6. Does the generator only store used oil in tanks, containers; or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes X No N/A ___ RMK# ___
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes X No N/A ___ RMK# ___
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes X No N/A ___ RMK# ___
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes ___ No N/A X RMK# ___
- b. Contained the release? Yes ___ No N/A X RMK# ___
- c. Cleaned up and properly managed the used oil and other materials? Yes ___ No N/A X RMK# ___
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A X RMK# ___
10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: Yes ___ No X 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 a 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# ___

REMARKS

USED OIL TRANSPORTER AND TRANSFER FACILITIES-SEE REMARK 1

16. Does the used oil transporter process used oil? [3745-279-41(A)] If so: Yes ___ No ___ N/A ___ RMK# ___
- Is the used oil transporter in compliance with the requirements for processors/re-refiners in 3745-279-50 to 3745-279-59 (except as provided in 3745-279-41(B) and (C))? [3745-279-41(A)] Yes ___ No N/A ___ RMK# ___
17. Has the used oil transporter notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-42(A)] Yes ___ No N/A ___ RMK# ___
18. Has the used oil transporter delivered all used oil to:
- a. Another used oil transporter that has a U.S. EPA ID#? [3745-279-43(A)(1)] Yes ___ No N/A ___ RMK# ___
 - b. A used oil processing/re-refining facility that has a U.S. EPA ID#? [3745-279-43(A)(2)] Yes ___ No N/A ___ RMK# ___
 - c. An off-spec used oil burning facility that has a U.S. EPA ID#? [3745-279-43(A)(3)] Yes ___ No N/A ___ RMK# ___
 - d. An on-spec used oil burning facility? [3745-279-43(A)(4)] Yes ___ No N/A ___ RMK# ___
19. Has the used oil transporter complied with all applicable USDOT regulations (49 CFR 171 to 180)? [3745-279-43(B)] Yes ___ No N/A ___ RMK# ___
20. Has the used oil transporter had a discharge of used oil? If so: Yes ___ No ___ N/A ___ RMK# ___
- Did they take the appropriate action as outlined in 3745-279-43(C)? Yes ___ No N/A ___ RMK# ___
21. Has the used oil transporter determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? [3745-279-44(A)] Yes ___ No N/A ___ RMK# ___
22. Does the transporter retain all records of analyses and information used to comply with 3745-279-44 for at least three years? [3745-279-44(D)] Yes ___ No N/A ___ RMK# ___
23. Does the owner/operator of a used oil transfer facility:
- a. Stored used oil in tanks, containers, or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-45(B)] Yes ___ No N/A ___ RMK# ___

- b. Stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-45(C)] Yes ___ No N/A ___ RMK# ___
- c. Provide secondary containment for containers used to store used oil as required by 3745-279-45(D)? [3745-279-45(D)] Yes ___ No N/A ___ RMK# ___
- d. Provide secondary containment for existing aboveground tanks required by 3745-279-45(E)? [3745-279-45(E)] Yes ___ No N/A ___ RMK# ___
- e. Provide secondary containment for new aboveground tanks as required by 3745-279-45(F)? [3745-279-45(F)] Yes ___ No N/A ___ RMK# ___
- f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-45(G)] Yes ___ No N/A ___ RMK# ___
- g. Upon detection of a release of used oil: [3745-279-45(H)]
 - i. Stopped the release? Yes ___ No N/A ___ RMK# ___
 - ii. Contained the release? Yes ___ No N/A ___ RMK# ___
 - iii. Cleaned up and managed the used oil and other materials? Yes ___ No N/A ___ RMK# ___
 - iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A ___ RMK# ___

24. Does the used oil transporter keep a record of each shipment of used oil? [3745-279-46(A)] Yes ___ No N/A ___ RMK# ___
- a. Does each record include the name and address of the generator, transporter or processor/re-refiner who provides the used oil for transport? [3745-279-46(A)(1)] Yes ___ No N/A ___ RMK# ___
 - b. Does each record include the U.S. EPA ID# of the generator, transporter or processor/re-refiner (if applicable) that provides the used oil for transport? [3745-279-46(A)(2)] Yes ___ No N/A ___ RMK# ___
 - c. Does each record include the quantity of used oil accepted? [3745-2679-46(A)(3)] Yes ___ No N/A ___ RMK# ___

- d. Does each record include the date of acceptance? [3745-279-46(A)(4)] Yes ___ No N/A ___ RMK# ___
- e. Does each record include the signature of a representative of the generator, transporter, processor/re-refiner that provided the used oil for transport? [3745-279-46(A)(5)] Yes ___ No N/A ___ RMK# ___
25. Does the used oil transporter keep a record of each shipment of used oil that is delivered to another used oil transporter, burner, processor/re-refiner, or disposal facility? [3745-279-46(B)] Yes ___ No N/A ___ RMK# ___
- a. Does each record include the name and address of the receiving facility or transporter? [3745-279-46(B)(1)] Yes ___ No N/A ___ RMK# ___
- b. Does each record include the U.S. EPA ID# of the receiving facility or transporter? [3745-279-46(B)(2)] Yes ___ No N/A ___ RMK# ___
- c. Does each record include the quantity of used oil delivered? [3745-279-46(B)(3)] Yes ___ No N/A ___ RMK# ___
- d. Does each record include the date delivered? [3745-279-46] Yes ___ No N/A ___ RMK# ___
- e. Does each record include the signature of a representative of the receiving facility or transporter (intermediate rail transporters are not required to sign a record of delivery)? [3745-279-46(B)(5)] Yes ___ No N/A ___ RMK# ___
26. Does the used oil transporter who exports used oil to a foreign country comply with 3745-279-46(B)(1) to (B)(4)? [3745-279-46(C)] Yes ___ No N/A ___ RMK# ___
27. Does the used oil transporter retain all records required under 3745-279-46 for at least three years? [3745-279-46(D)] Yes ___ No N/A ___ RMK# ___
28. Does the used oil transporter generate residues from the storage or transportation of used oil? Yes ___ No ___ N/A ___ RMK# ___
- If so, are they managed as specified in 3745-279-10(E)? [3745-279-47] Yes ___ No N/A ___ RMK# ___

REMARKS

- 1 Questions 16 through 28 don't apply given DMB is not a used oil transporter. Safety Kleen (TXR000050930) transports their used oil.

USED OIL STANDARDS FOR PROCESSORS AND RE-REFINERS-SEE REMARK 1

29. Has the used oil processor and/or re-refiner notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-51(A)] Yes No N/A ___RMK#___
30. Does the owner/operator of a used oil processing or re-refining facility comply with the following:
- a. Is the facility maintained and operated to minimize the possibility of fire, explosion, or release of used oil? [3745-279-52(A)(1)] Yes No N/A ___RMK#___
 - b. Is the facility equipped with the equipment in 3745-279-52(A)(2), if necessary? Yes No N/A ___RMK#___
 - c. Are all communication systems, alarm systems, fire protection equipment, spill control equipment, and decontamination equipment tested and maintained as required? [3745-279-52(A)(3)] Yes No N/A ___RMK#___
 - d. Is there access to communication or alarm system(s)? [3745-279-52(A)(4)] Yes No N/A ___RMK#___
 - e. Is the required aisle space being maintained? [3745-279-52(A)(5)] Yes No N/A ___RMK#___
 - f. Are arrangements maintained with local authorities? [3745-279-52(A)(6)] Yes No N/A ___RMK#___
31. Has the owner/operator of a used oil processing and re-refining facility complied with the following requirements:
- a. Has a contingency plan been developed? [3745-279-52(B)(1)] Yes No N/A ___RMK#___
 - b. Does the contingency plan contain the requirements of 3745-279-52(B)(2)? Yes No N/A ___RMK#___
 - c. Have copies and revisions been maintained and submitted to all local authorities? [3745-279-52(B)(3)] Yes No N/A ___RMK#___
 - d. Is the contingency plan reviewed and amended whenever one of the events in 3745-279-52(B)(4) occurs? Yes No N/A ___RMK#___

- e. Is an emergency coordinator on the premises or on call at all times to meet the requirements of 3745-279-52(B)(5) and (6)? Yes No N/A RMK#
32. Does the used oil processor/re-refiner determine whether the total halogen content of the used oil being managed at the facility is above or below 1000 ppm? [3745-279-53(A)] Yes No N/A RMK#
33. Does/has the used oil processor/re-refiner:
- a. Only store used oil in tanks, containers or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-54(A)] Yes No N/A RMK#
- b. Only store used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-54(B)] Yes No N/A RMK#
- c. Provide secondary containment for containers as required by 3745-279-54(C)? Yes No N/A RMK#
- d. Provide secondary containment for existing aboveground tanks as required by 3745-279-54(D)? Yes No N/A RMK#
- e. Provide secondary containment for new aboveground tanks as required by 3745-279-54(E)? Yes No N/A RMK#
- f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil" [3745-279-54(F)] Yes No N/A RMK#
- g. Upon detection of a release of used oil, done the following in accordance with 3745-279-54(G):
- i. Stopped the release? Yes No N/A RMK#
- ii. Contained the release? Yes No N/A RMK#
- iii. Cleaned up and managed the used oil and other materials? Yes No N/A RMK#
- iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A RMK#
- h. Performed closure of aboveground tanks and containers in accordance with 3745-279-54(H)? Yes No N/A RMK#

34. Has the owner/operator of the used oil processing/re-refining facility developed, kept on-site, and followed a written waste analysis plan which meets the requirements in 3745-279-53 and, if applicable 3745-279-72? [3745-279-55] Yes No N/A ___ RMK# ___
35. Does the used oil processor/re-refiner keep a record of each shipment of used oil accepted for processing/re-refining? [3745-279-56(A)] Yes No N/A ___ RMK# ___
- a. Does each record include the name and address of the transporter who delivered the used oil to the processor? [3745-279-56(A)(1)] Yes No N/A ___ RMK# ___
- b. Does each record include the name and address of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(2)] Yes No N/A ___ RMK# ___
- c. Does each record include the U.S. EPA ID # of the transporter who delivered the used oil to the processor/re-refiner? [3745-279-56(A)(3)] Yes No N/A ___ RMK# ___
- d. Does each record include the U.S. EPA ID # (if applicable) of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(4)] Yes No N/A ___ RMK# ___
- e. Does each record include the quantity of used oil accepted? [3745-279-56(A)(5)] Yes No N/A ___ RMK# ___
- f. Does each record include the date of acceptance? [3745-279-56(A)(6)] Yes No N/A ___ RMK# ___
36. Does the used oil processor/re-refiner keep a record of each shipment of used oil that is shipped to a used oil burner, processor/re-refiner, or disposal facility? [3745-279-56(B)] Yes No N/A ___ RMK# ___
- a. Does each record include the name and address of the transporter who delivers the used oil to the burner, processor/re-refiner or disposal facility [3745-279-56(B)(1)] Yes No N/A ___ RMK# ___
- b. Does each record include the name and address of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(2)] Yes No N/A ___ RMK# ___

- c. Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner, processor/re-refiner or disposal facility? [3745-279-56(B)(3)] Yes No N/A RMK# _____
- d. Does each record include the U.S. EPA ID# of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(4)] Yes No N/A RMK# _____
- e. Does each record include the quantity of used oil shipped? [3745-279-56-(B)(5)] Yes No N/A RMK# _____
- f. Does each record include the date of shipment? [3745-279-56(B)(6)] Yes No N/A RMK# _____
37. Does the used oil processor/re-refiner retain all records required under 3745-279-56 for at least three years? [3745-279-56(C)] Yes No N/A RMK# _____
38. Does the owner/operator keep an operating record at the facility? [3745-279-57(A)(1)] Yes No N/A RMK# _____
- a. Does the operating record include records and results of used oil analysis performed as described in the analysis plan required under 3745-279-55? [3745-279-57(A)(2)(a)] Yes No N/A RMK# _____
- b. Are summary reports and details of all incidents that require implementation of the contingency plan as specified in 3745-279-52(B) maintained in the operating record? [3745-279-57(A)(2)(b)] Yes No N/A RMK# _____
39. Does the used oil processor/re-refiner report to the director in the form of a letter, on a biennial basis by March 1, the following information:
- a. The U.S. EPA ID#, name and address of the processor/re-refiner? [3745-279-57(B)(1)] Yes No N/A RMK# _____
- b. The calendar year covered by the report? [3745-279-57(B)] Yes No N/A RMK# _____
- c. The quantities of used oil accepted for processing/re-refining and the manner in which the used oil is processed/re-refined, including the specific processes employed? [3745-279-57(B)] Yes No N/A RMK# _____
40. Does the used oil processor/re-refiner, who initiates a shipment of used oil off-site, use a used oil transporter that has a U.S. EPA ID#? [3745-279-58] Yes No N/A RMK# _____

41. Does the used oil processor/re-refiner generate residues from the storage, processing or re-refining of used oil? [3745-279-59] Yes No N/A RMK#

If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-59] Yes No N/A RMK#

REMARKS

1 Questions 29 through 41 don't apply given DMB is not a used oil processor or re-refiner.

STANDARDS FOR USED OIL BURNERS WHO BURN OFF-SPEC USED OIL FOR ENERGY RECOVERY- SEE REMARK 1

42. Is off-spec used oil fuel burned for energy recovery only in industrial furnaces identified in 3745-50-10, or boilers as defined in 3745-50-10 and identified in 3745-279-61(A)(2), or hazardous waste incinerators? [3745-279-61(A)] Yes No N/A RMK#

43. Does the used oil burner process used oil? [3745-279-61(B)] Yes No N/A RMK#

If so, have they complied with the requirements for processors in 3745-279-50 to 3745-279-59? [3745-279-61(B)] Yes No N/A RMK#

44. Has the used oil burner notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-62(A)] Yes No N/A RMK#

45. Does the used oil burner determine whether the total halogen content of the used oil being managed at the facility is above or below 1000 ppm? [3745-279-63(A)] Yes No N/A RMK#

46. Does the used oil burner retain records of all analyses conducted or information used to comply with 3745-279-63 for at least three years? [3745-279-63(D)] Yes No N/A RMK#

47. Does the used oil burner:

a. Only store used oil in tanks, containers; or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-64(A)] Yes No N/A RMK#

b. Only stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-64(B)] Yes No N/A RMK#

- c. Provided secondary containment for containers as required by 3745-279-64(C)? Yes ___ No N/A ___ RMK# ___
- d. Provided secondary containment for existing aboveground tanks as required by 3745-279-64(D)? Yes ___ No N/A ___ RMK# ___
- e. Provided secondary containment for new aboveground tanks as required by 3745-279-64(E)? Yes ___ No N/A ___ RMK# ___
- f. Labeled all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-64(F)] Yes ___ No N/A ___ RMK# ___
- g. Upon detection of a release of used oil, done the following in accordance with 3745-279-64(G):
- i. Stopped the release? Yes ___ No N/A ___ RMK# ___
 - ii. Contained the release? Yes ___ No N/A ___ RMK# ___
 - iii. Cleaned up and managed the used oil and other materials? Yes ___ No N/A ___ RMK# ___
 - iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A ___ RMK# ___
48. Does the used oil burner keep a record of each used oil shipment accepted for burning? [3745-279-65(A)] Yes ___ No N/A ___ RMK# ___
- a. Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-65(A)(1)] Yes ___ No N/A ___ RMK# ___
 - b. Does each record include the name and address of the generator or processor/re-refiner who sent the used oil to the burner? [3745-279-65(A)(2)] Yes ___ No N/A ___ RMK# ___
 - c. Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-65(A)(3)] Yes ___ No N/A ___ RMK# ___
 - d. Does each record include the U.S. EPA ID# (if applicable) of the generator or processor/re-refiner who sent the used oil to the burner? [3745-279-65(A)(4)] Yes ___ No N/A ___ RMK# ___
 - e. Does each record include the quantity of the used oil accepted? [3745-279-65(A)(5)] Yes ___ No N/A ___ RMK# ___

f. Does each record include the date of acceptance?
[3745-279-65(A)(6)]

Yes ___ No N/A ___ RMK# ___

49. Are the records described in 3745-279-65(A) maintained for at least three years? [3745-279-65(B)]

Yes ___ No N/A ___ RMK# ___

50. Prior to accepting the first shipment of off-spec used oil fuel from a generator, transporter, or processor/re-refiner, does the used oil fuel burner provide to the generator, transporter, or processor/re-refiner a one-time written and signed notice certifying that:

a. The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-279-66(A)(1)]

Yes ___ No N/A ___ RMK# ___

b. The burner will burn the used oil only in an industrial furnace or boiler identified in 3745-279-61?

Yes ___ No N/A ___ RMK# ___

51. Is the certification maintained for at least three years from the date the burner last received a shipment of off-spec used oil from the generator, transporter, or processor/re-refiner? [3745-279-66(B)]

Yes ___ No N/A ___ RMK# ___

52. Does the used oil burner generate residues from the storage or burning of used oil? [3745-279-67]

Yes ___ No ___ N/A ___ RMK# ___

If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-67]

Yes ___ No N/A ___ RMK# ___

REMARKS

1 Questions 42 through 52 don't apply given DMB does not burn off-spec used oil for energy recovery.

STANDARDS FOR USED OIL MARKETERS-SEE REMARK 1

53. Does the used oil fuel marketer initiate shipments of **off-spec** used oil only to a used oil burner that has an a U.S. EPA ID# and burns the used oil in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-71]

Yes ___ No N/A ___ RMK# ___

54. Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil meets the specification for used oil fuel under 3745-279-11 keep copies of analyses of the used oil (or other information used to make the determination) for at least three years? [3745-279-72(B)] Yes ___ No N/A ___ RMK# ___
55. Has the used oil marketer notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-73(A)] Yes ___ No N/A ___ RMK# ___
56. Does the used oil marketer keep a record of each shipment of **off-spec** used oil directed to a used oil burner? [3745-279-74(A)] Yes ___ No N/A ___ RMK# ___
- a. Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-74(A)(1)] Yes ___ No N/A ___ RMK# ___
- b. Does each record include the name and address of the burner who receives the oil? [3745-279-74(A)(2)] Yes ___ No N/A ___ RMK# ___
- c. Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-74(A)(3)] Yes ___ No N/A ___ RMK# ___
- d. Does each record include the U.S. EPA ID# of the burner? [3745-279-74(A)(4)] Yes ___ No N/A ___ RMK# ___
- e. Does each record include the quantity of the used oil shipped? [3745-279-74(A)(5)] Yes ___ No N/A ___ RMK# ___
- f. Does each record include the date of shipment? [3745-279-74(A)(6)] Yes ___ No N/A ___ RMK# ___
57. Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil **meets the fuel specifications** under 3745-279-11 keep a record of each shipment of used oil to an on-spec used oil burner? [3745-279-74(B)] Yes ___ No N/A ___ RMK# ___
- a. Does each record include the name and address of the facility receiving the shipment? [3745-279-74(B)(1)] Yes ___ No N/A ___ RMK# ___
- b. Does each record include quantity of used oil fuel delivered? [3745-279-74(B)(2)] Yes ___ No N/A ___ RMK# ___
- c. Does each record include date of shipment or delivery? [3745-279-74(B)(3)] Yes ___ No N/A ___ RMK# ___

d. Does each record include a cross-reference to the record of used oil analysis or other information used to make the determination that the used oil meets the specification as required in 3745-279-72(A)? [3745-279-74(B)(4)]

Yes ___ No N/A ___ RMK# ___

58. Are the records described in 3745-279-74(A) and (B) maintained for at least three years? [3745-279-74(C)]

Yes ___ No N/A ___ RMK# ___

59. Before the used oil generator, transporter or processor/re-refiner directs the first shipment of **off-spec** used oil to a burner, does he obtain a one time written and signed notice from the burner certifying that:

a. The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-279-75(A)(1)].

Yes ___ No N/A ___ RMK# ___

b. The burner will burn the off-spec used oil only in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-75(A)(2)]

Yes ___ No N/A ___ RMK# ___

60. Is the certification maintained for at least three years from the date the last shipment of off-spec used oil was shipped to the burner? [3745-279-75(B)]

Yes ___ No N/A ___ RMK# ___

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REMARKS

1 Questions 53 through 60 don't apply given DMB is not a used oil marketer.