



State of Ohio Environmental Protection Agency

Southwest District

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Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

March 28, 2007

Ryan Philburn
D&D Classic Bright Works Inc
1311 B South Street
Piqua, Ohio 45356

**Re: Notice of Violation
D & D Classic Bright Works Inc, SQG, Miami county, non-notifier**

Dear Mr. Philburn,

On March 20, 2007 Tom Koch and I inspected the D&D Classic Bright Works Inc. facility in Piqua, Ohio to determine 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). You represented D&D Classic Bright Works Inc. (D&D)

This letter describes the violations and general concerns found during the inspection and describes the actions which D&D should take to correct these.

Ohio EPA found the following violations of Ohio's hazardous waste laws and regulations. D&D should follow Ohio EPA's recommendations to abate each violation. **Within 30 days** of receipt of this letter, D&D must submit a written response describing how each violation has been abated.

VIOLATION 1-

Generator identification numbers OAC 3745-52-12 (C)

This regulation prohibits a generator from offering hazardous waste for transportation unless the generator has received an identification number from Ohio EPA.

Although D&D is a generator of hazardous waste and has offered hazardous waste for transportation, D&D has not applied for nor obtained a generator identification number. Therefore on March 20, 2007 D&D was in violation of OAC 3745-52-12 (C) for offering hazardous waste for transportation without having received a generator identification number.

To abate this violation D&D must obtain a generator identification number by submitting Ohio EPA form 9029 prior to offering hazardous for off site transportation. The following is a link to that application.

<http://www.epa.state.oh.us/dhwm/notiform.html>

VIOLATION 2

✓ **Waste Determination OAC 3745-52-11**

This regulation requires that when a facility generates a waste, the facility must determine if the waste is regulated as a "hazardous" waste.

At the time of inspection March 20, 2007 D&D was storing approximately nine (9) drums of liquid waste on site. The waste resulted from clean out of either a plating tank, cleaning tank, or strip tank. D&D was not certain from which clean out the waste was generated, and had not determined if the waste was a hazardous waste. Therefore, at the time of inspection March 20, 2007 D&D was in violation of OAC 3745-52-11 for failing to determine if the waste in the nine (9) drums is hazardous waste.

To abate this violation D&D must determine the source(s) of the waste which is stored in each of the nine (9) drums. D&D must also determine if the waste in each drum is hazardous waste. Also determine if the spent alkali waste stream is hazardous waste. Provide any analytical results which support the conclusions.

VIOLATION 3-

✓ **Emergency Numbers OAC 3745-52-34 (D)(5)(b)**

This regulation requires that a generator post the following information next to the phone to assist with an emergency involving hazardous waste: name and telephone number of emergency coordinator; location of fire extinguishers and spill control material, and if present, fire alarm; and the telephone number of the fire department, unless the facility has a direct alarm.

D&D does not have these items posted next to the phone. Therefore on March 20, 2007 D&D was in violation of OAC 3745-52-34 (D)(5)(b) for failing to post emergency numbers and failing to provide the location of response equipment next to the phone.

To abate this violation post emergency numbers near the phone and provide the location of response equipment next to the phone in order to assist employees with emergency response actions related to the accumulation of hazardous waste.

VIOLATION 4-

Emergency Equipment OAC 3745-65-33

This regulation requires that a facility inspect all emergency equipment relative to the hazardous waste accumulation area to ensure its proper operation. These

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inspections must be recorded in a log or summary.

D&D classic has a spill kit on site, but does not inspect the spill kit or record inspections of the spill kit in a log or summary. Therefore, at the time of inspection March 20, 2007 D&D was in violation of OAC 3745-65-33 for failing to inspect the spill kit and failing to record inspections in a log or summary.

To correct this violation initiate inspections of the emergency equipment associated with the container storage area. These inspections should determine if the emergency equipment is ready for use. Record these inspections in a log or summary. Attached is a example emergency equipment inspection log.

VIOLATION 5-
Inspections OAC 3745-66-74

This regulation requires that a facility inspect areas where containers are accumulated, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. Inspections must be recorded in a log or summary.

Although D&D has stored hazardous waste on site, D&D has not conducted regular inspections of the container storage area and there is no record that inspections have been conducted. Therefore at the time of inspection March 20, 2007 D&D was in violation of OAC 3745-66-74 for failing to conduct inspections of the container storage area and failing to record these inspections in a log.

To correct this violation initiate weekly inspections of the container storage area. Record these inspections in a log or summary. Attached is a example container storage inspection log.

In addition to violations, Ohio EPA found the following general concerns. D&D should follow Ohio EPA's recommendations to address these general concerns. **Within 30 days** of receipt of this letter, D&D must submit a written response describing how each general concern has been addressed.

GENERAL CONCERN 1-
Labeling of hazardous waste OAC 3745-52-34 (D)(4)

This regulation requires that all containers or tanks used to accumulate or treat hazardous waste must be labeled with the words "hazardous waste" and marked with the accumulation date when the accumulation or treatment began.

D&D was not aware of this requirement.

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To address this concern, D&D must label any containers or tanks used to accumulate or treat hazardous waste with the words "hazardous waste" and with the accumulation date when the accumulation or treatment began.

GENERAL CONCERN 2-
Incompatible Wastes OAC 3745-66-77 (C)

This rule requires that incompatible hazardous waste must be separated during storage to avoid adverse reactions, etc.

During our inspection I noted that D&D may have both acid and alkali waste or material stored near each other. This waste or material may be incompatible and may require special considerations such as separate storage areas. Appendix to 3745-66-99 suggests Group 1-a alkaline cleaner, alkaline corrosive, and alkaline caustic are incompatible with Group 1-b acid sludge, spent acid, and sulfuric acid. This regulation also requires special consideration when hazardous waste is placed in containers which previously held an incompatible chemical.

To address this concern review the requirements of OAC 3745-66-77, OAC 3745-66-99 and Appendix to 3745-66-99, and MSDS's for the chemicals used on site to determine if D&D generates and accumulates incompatible hazardous wastes. If so D&D must follow the special requirements for incompatible wastes in OAC 3745-66-77 and 3745-66-99. These and other rules can be found at the following link.
<http://www.epa.state.oh.us/dhwm/rules.htm>

GENERAL CONCERN 3-
Evaporator use

During our inspection you stated that D&D had recently purchased an evaporator which may be used to treat hazardous waste. Prior to operating the evaporator D&D must determine if the facility is required to obtain a permit to install or permit to operate for the evaporator. Also, if D&D evaporates hazardous waste this activity is considered "generator treatment" of hazardous waste and further regulations apply.

To address this concern, determine if there is a requirement to obtain a permit to install or a permit to operate the evaporator. Prior to treating hazardous waste at the facility determine the regulatory requirements which apply to this activity.

A guidance document explaining these requirements can be found at
http://www.epa.state.oh.us/dhwm/pdf/Generator_Treatment_Guidance.pdf

Feel free to contact me for further guidance.

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GENERAL CONCERN 4-
Hazardous Waste Tank

During the inspection Ohio EPA noted that D&D had two waste storage tanks at the facility. If these tanks will be used to store hazardous waste, additional regulations may apply. Prior to using tanks to store hazardous waste at the facility D&D should determine the applicable requirements.

This concludes Ohio EPA's findings. If you have any questions about this letter or how to comply with hazardous waste regulations, please call me at (937) 285-6082. Enclosed you will find a copy of the checklists that I completed as a result of the inspection. 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.

Sincerely,



Brian Gitzinger
District Representative
Division of Hazardous Waste Management

cc: Dinah Crawford, DHWM, SWDO

Enclosure

BG/plh



Example SQG Hazardous Waste Inspection Log

Name _____ Date: _____ Time: _____

Storage Area Inspection Item

Y/N Observation #

- | | | |
|--|-------|-------|
| 1. Are all containers closed? | _____ | _____ |
| 2. Are containers in good condition? | _____ | _____ |
| 3. Are any containers leaking or is there evidence of a spill? | _____ | _____ |
| 4. Are containers stored/handled in a way that would prevent a spill or leak? | _____ | _____ |
| 5. Are containers compatible with the wastes stored in them? | _____ | _____ |
| 6. Are containers labeled with the words "hazardous waste" and the accumulation date? | _____ | _____ |
| 7. Have any containers been stored for more than 180 days? | _____ | _____ |
| 8. Is aisle space adequate for passage of emergency equipment and for inspection purposes? | _____ | _____ |
| 9. Are more than 13,200 lbs (roughly 30 drums) of hazardous waste stored in the storage area(s)? | _____ | _____ |

Emergency Equipment Inspection Item

Y/N Observation #

- | | | |
|--|-------|-------|
| 1. Is the internal alarm system/intercom working? | _____ | _____ |
| 2. Is the telephone, radio or other device for summoning emergency assistance present and working? | _____ | _____ |
| 3. Are all fire extinguishers fully charged and in good condition? | _____ | _____ |
| 4. Is spill control and decontamination equipment fully stocked? | _____ | _____ |
| 5. Is water of adequate volume and pressure available? | _____ | _____ |

Observations _____

Date and nature of any remedial actions _____



LDR CHECKLIST

GENERAL LDR REQUIREMENTS

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

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

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

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

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

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

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

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

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

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

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

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

- a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05] Yes No N/A RMK#

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

- a. The facility can land dispose of the waste. [3745-270-06] Yes No N/A RMK#

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment?
If so:

Yes__ No N/A__ RMK#__

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

Yes__ No N/A RMK#__

REMARKS

NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)] Yes No N/A RMK#
14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)] Yes No N/A RMK#
15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)] Yes No N/A RMK#
16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)] Yes No N/A RMK#
17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so: Yes No N/A RMK#
- a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes No N/A RMK#
18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)] Yes No N/A RMK#

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

REMARKS

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

CESQG: ≤ 100 Kg. (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. Has the generator obtained a U.S. EPA I.D. number? [3745-52-12] Yes No N/A
- 3. 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
- 4. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)] Yes No N/A
- 5. Does the generator accumulate hazardous waste? Yes No N/A

NOTE: If the SQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements might still apply, e.g. manifest, marking, LDR, etc.

- 6. Has the generator accumulated hazardous wastes in excess of (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)] Yes No N/A

NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 180/270 days. [3745-52-34 (E)]

- 7. Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)] Yes No N/A

NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.

- 8. Does the generator treat hazardous waste in a:
 - 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.

MANIFEST REQUIREMENTS

- 9. Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)] Yes No N/A
- 10. Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)]
 - a. Does the contractual agreement specify the type of waste and frequency of shipment? Yes No N/A

- b. Is the transport vehicle owned and operated by the reclaimer? Yes No N/A
- c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? Yes No N/A

NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.

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 complete. [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 alternative 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 alternative 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) and (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 made a good faith effort to minimize their waste generation.

15. If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? 3745-52-42(B)) Yes No N/A

16. Are signed copies of all manifests 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.

PREPAREDNESS AND PREVENTION

17. Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)] Yes No N/A

18. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]

- a. Name and telephone number of emergency coordinator? Yes No N/A
- b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes No N/A
- c. Telephone number of local fire department? Yes No N/A

19. Are employees familiar with waste handling and emergency procedures [3745-52-34(D)(5)(c)] Yes No N/A

20. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)] Yes No N/A

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

22. 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 per documentation or facility rep? [3745-65-32(D)] Yes No N/A
23. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]
- a. Are inspections recorded in a log or summary? [3745-65-33]? Yes No N/A
24. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)] Yes No N/A
25. 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
26. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
27. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes No N/A
28. 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

29. 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
 - d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes No N/A
 - e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. Yes No N/A
 - f. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
30. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:
- 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 the 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

- 31. Has the generator marked containers with the words "Hazardous Waste"[3745-52-34(D)(4)] Yes No N/A
- 32. Is the accumulation date on each container? [3745-52-34(D)(4)] Yes No N/A
- 33. 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.

- 34. Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§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
- 35. 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
- 36. 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
- 37. 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.

PRE-TRANSPORT REQUIREMENTS

- 38. Does each 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
- 39. Does each container ≤100 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A
- 40. 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

E-mail this completed form to tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office	Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM		For Ohio EPA use only																		
2. Site EPA ID No.	EPA ID Number: not issued one yet																				
3. Site Name	Name: D & D Classic bright works Inc		Website (optional):																		
4. Site Location Information	Street Address: 1311 B South St																				
	City, Town, or Village: Piqua	State: OH																			
	County Name: Miami	Zip Code: 45356																			
5. Site Land Type (check only one)	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td>x</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	x									
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6. NAICS code(s) www.census.gov/epcd/www/naics.html	A.		B.																		
	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: Ryan		MI:																		
	Phone Number: 937-773-5127		Phone Number Extension:																		
	E-Mail Address:																				
	Fax Number: 937-381-0048		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: David Myers		Date Became Owner (mm/dd/yyyy): 03/01/2004																		
	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Owner Type: Mark with an X</td> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td></td> <td>x</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other		x							
	Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other												
		x																			
	Street or P.O. Box: PO Box 37																				
	City, Town, or Village: Covington		Owner Phone #: 937-473-2802																		
	State: Ohio		Country:	Zip Code: 45318																	
	B. Name of Site's Operator: D & D classic bright works inc		Date Became Operator (mm/dd/yyyy): 03/01/2004																		
	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Operator Type: Mark with an X</td> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td></td> <td>x</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other		x							
	Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other												
	x																				
Street or P.O. Box:																					
City, Town, or Village:		Operator Phone #:																			
State:		Country:	Zip Code:																		
9. Violations Cited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																					
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.) <input type="checkbox"/> Not Regulated																					





PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: *D&D Classic Bright Works Inc.* Facility Type: LQG(SQG)CESQG/TSD Date of Inspection: EPA ID#:

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	<i>Nickel Strip</i>	<i>D002 sludge/liquid</i>	<i>1-400 gal tank 3-4 yrs drums</i>	<i>none</i>	<i>EEI</i>	
2	<i>Chrome Strip</i>	<i>D002, D007 sludge / liquid</i>	<i>1-400 gal tank yr drums</i>	<i>none</i>	<i>EEI</i>	
3	<i>Copper plating bath cleanout</i>	<i>D002</i>	<i>150 gallons 1-1.5 yr</i>	<i>none</i>	<i>EEI</i>	
4	<i>Nickel plating bath cleanout</i>	<i>non-haz</i>	<i>150 gallons 3 yr</i>	<i>none</i>	<i>EEI</i>	

5	Chrome bath cleaner						
6	Alkali pre cleaning bath cleaner	?	450 gal once/yr	none	EEI	trying to reuse this as a Chrome strip bath	
7	Acid etch rinse tank cleaner	?	450 gal once/2yrs		EEI		
8							
9							

REMARKS-GENERAL INFORMATION

General Process Information: This facility reconditions antique auto parts. Part of this reconditioning involves plating. The facility does Chrome and Nickel stripping and copper, nickel, and Chrome plating.

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes*

No

*If yes, refer promptly to your district P2 coordinator.

Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other: