



State of Ohio Environmental Protection Agency

Northeast District Office

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

June 22, 2007

RE: ACME INDUSTRIAL GROUP  
STARK COUNTY  
OHD 004 173 027  
LQG, CEI NOTICE OF VIOLATION

Mr. Rich Burton, President  
ACME Industrial Group  
555 N. Freedom Avenue  
Alliance, OH 44601

Dear Mr. Burton:

On June 5, 2007, the Ohio EPA conducted a compliance evaluation inspection (CEI) of the ACME Industrial Group (ACME) facility to determine ACME's compliance with Ohio's hazardous waste laws and regulations as found in the Ohio Revised Code and the Ohio Administrative Code ("ORC" and "OAC" respectively). ACME was represented by you. Ed D'Amato and I represented the Ohio EPA. ACME was inspected as a Large Quantity Generator (LQG) of hazardous waste. Enclosed are copies of the checklists completed for this inspection.

Ohio EPA understands that ACME has eliminated its waste water treatment system (WWTS) and no longer discharges to the local POTW. Hazardous waste waters are collected in tanks without treatment, commingled and transported to Vickery Environmental, Inc. for disposal. With elimination of your WWTS, your ancillary piping, sumps and containments are no longer exempt from the hazardous waste rules. These items may be subject to daily inspection, logging and closure. As such, keep these issues in mind with the design and construction of your new system that is understood to be operational by September 30, 2007. Hazardous waste areas and equipment that will no longer be used may be subject to generator closure requirements. This, and details regarding a required tank assessment and secondary containment certification for your new hazardous waste tank system are further discussed below.

During the inspection, the following violation regarding used oil labeling was abated at the time of the inspection on June 5, 2007:

8) Used Oil Storage Requirements for Generators (Labels) OAC 3745-279-22(C).

## VIOLATIONS

Based on the CEI, Ohio EPA has determined that the ACME facility remains in violation of the following state hazardous waste regulations:

- 1) **Waste Evaluation, OAC 3745-52-11:** Any person who generates a waste must evaluate the waste to determine if the waste is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51. ACME failed to evaluate the following waste streams:

- a) **Fluorescent Lamps:** Facility fluorescent lamps were reported being green end and disposed to solid waste. Observation indicated that as many as half the existing lamps were non-green ended. In addition, high intensity discharge lamps were replaced and taken by an outside contractor.

**To abate this violation,** you must evaluate all lamps and demonstrate proper disposal or manage lamps as a universal waste. Respond in writing as to how you will manage your fluorescent lamps. In regard to high intensity discharge lamps you should verify with your service contractor that your generated wastes are properly managed and disposed. Please inquire as to how these lamps are disposed and provide a written statement, receipt or agreement as to how lamps are disposed.

Spent lamps that are recycled are not subject to the hazardous waste rules. You may wish to refer to the Ohio EPA Fact Sheet "Universal Waste Rules for Handlers of Lamps"

[http://www.epa.state.oh.us/dhwm/pdf/Universal\\_Waste\\_Rules\\_for\\_Handlers\\_of\\_Lamps.pdf](http://www.epa.state.oh.us/dhwm/pdf/Universal_Waste_Rules_for_Handlers_of_Lamps.pdf) and (<http://www.epa.state.oh.us/dhwm/pdf/LampGuidance.pdf>)

and a list of lamp recyclers at:

[http://www.cuyahogasd.com/business/guide\\_lamps.shtml](http://www.cuyahogasd.com/business/guide_lamps.shtml) and at:

<http://www.epa.state.oh.us/dhwm/pdf/comp.lamp.ballast.list.pdf>. These links were also provided via email.

- b) **Used oil from the OD grinder:** Used oil sludges are profiled and disposed as a hazardous waste. However, recovered used oil fluids are sent as nonhazardous waste to a local oil collection center.

**To abate this violation,** please provide generator knowledge and/or analytical data by either the used oil specification level requirements or RCRA TCLP metals analysis to characterize proper disposal or recycling of this oil.

- 2) **Personnel Training, OAC 3745-65-16 (D):** All facilities must have a personnel training program of classroom instruction or on-the-job training that teaches the employees to perform their job duties in a way that ensures the facility is in compliance with the hazardous waste rules. The program shall include:

- a) Records including:
- i) Job titles, as they relate to hazardous waste management, and the name of each employee filling each job.
  - ii) Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each person filling a position.

At the time of the inspection ACME failed to have a training program that met these requirements.

**To abate this violation**, ACME shall submit records of a training program that demonstrate ACME meets the above requirements, specifically job titles, job descriptions, and a list of corresponding trained personnel.

- 3) **Labeling of Satellite Accumulation Containers, OAC 3745-52-34 (C)(1)**: “A generator may accumulate...hazardous wastes...at or near any point of generation where wastes initially accumulate, which is under control of the operator of the process generating the wastes...provided he...marks his containers either with the words ‘Hazardous Waste’ or with other words that identify the contents of the containers.”

ACME thermally treats sludge cleanout from tanks. A drum labeled “chrome debris” was being treated to remove excess water. The drum was labeled per the rule but was not located in a manner such that it was perceived to be under the control of the operator. During the inspection the condition of this drum was suspect and the drum was located such that the condition of this drum could not be readily assessed.

**To abate this violation**, ACME must locate this container such that the condition of the container may be readily assessed per OAC 3745-66-71 and thus maintained under the control of the operator. Provide a statement or photo that demonstrates the drum is now managed under the control of an operator.

- 4) **Hazardous Waste Container Labels, OAC 3745-52-34 (A)(3)**: ACME failed to label three poly tanks used to contain D002 and D007 plating waste.

To abate this violation, ACME must clearly label each container with the words “hazardous waste”. ACME must document by photograph that these tanks are properly labeled.

- 5) **Tank Inspections, OAC 3745-66-95 (A)(1) to (A)(4)**: ACME failed to inspect, at least once each operating day, spill control equipment, the above ground portion of tanks, leak detection equipment/data, construction materials and signs of erosion or release from the hazardous waste tanks.

**To abate this violation**, ACME must immediately begin daily inspection of the hazardous waste storage tanks per the rule. Provide a copy of your inspection log showing at least two weeks of completed inspections.

- 6) **Containment and detection of releases, OAC 3745-66-93(E)(1)**: ACME failed to provide a tank and secondary containment assessment.

To abate this violation, ACME must provide documentation that the existing temporary tank and secondary containment system liner is designed and operated to contain 100% of the capacity tank system to meet the requirements of this rule. A "Tank System Requirement" checklist was provided during the inspection as guidance to these rules.

- 7) **Ancillary Equipment Requirements, OAC 3745-66-93 (F):** ACME failed to provide full secondary containment or visually inspect, on a daily basis, tank ancillary equipment.

**To abate this violation,** ACME must immediately begin daily inspection of the ancillary piping, connections, pumps and sumps etc. per the rule. Provide a copy of your inspection log showing at least two weeks of completed inspections.

- 8) **Used Oil Storage Requirements for Generators (Labels), OAC 3745-279-22(C):** ACME failed to properly label one drum of spent grinding coolant that is sent off as a used oil.

This violation was abated during the inspection when this drum was labeled as "used oil".

## CONCERNS and COMMENTS

- In regard to closure of existing tanks and ancillary equipment and piping systems there is a closure performance standard that must be met. This generator closure performance standard is cited in the Closure Plan Review Guidance (CPRG) revised 2007 and found at:  
<http://www.epa.state.oh.us/dhwm/cprg/Correctionsto2006CPRG.pdf>.
- It appears that much of the existing hazardous waste system infrastructure will be used in your new tank system. For closure of pits, sumps or concrete, and areas below existing tanks and ancillary equipment and piping systems that will no longer be used, you may use your daily inspection records (if available) to establish that no release has occurred and avoid further closure effort. Otherwise, you may need to employ a decontamination method and have an independent engineer certify that:
  - a) The decontamination method employed was adequate to remove contamination to the extent practicable, and that
  - b) The integrity of floor and sump areas are such that hazardous waste has not penetrated or been released below the containment area.

Otherwise you may need to:

- c) Provide analysis of samples from below any floor areas that may be suspect for a release.

Appurtenances destined for recycling in a manner that will destroy residual contamination (e.g. scrap metal recycling) need not be as thoroughly decontaminated.

However, the appurtenances, pipes, tanks, etc. must be rendered useless (cut into small sections) when recycled or disposed. Also, maintain a record of disposal, recycling and sale or transfer of site equipment, wastes and wash/rinse water.

- The proposed new hazardous waste tank system will require a written assessment and secondary containment certification for construction, installation and design per the tank system requirements of OAC 3745-52-34(A) and 3745-66-100. During the inspection you were provided a copy of our tank inspection checklist. A link to this checklist is found at: [http://www.epa.state.oh.us/dhwm/pdf/LQG\\_Tank02.20.07.pdf](http://www.epa.state.oh.us/dhwm/pdf/LQG_Tank02.20.07.pdf).
- With elimination of your wastewater treatment system, your ancillary piping, sumps and containments are no longer exempt from the hazardous waste rules. These items may be subject to daily inspection, logging and closure. As such, keep these issues in mind with the design and construction of your new system. For assistance, you may contact Adrienne Lafavre with the Office of Compliance Assistance and Pollution Prevention (OCAPP) at (330)963-1250 or by email at [Adrienne.Lafavre@epa.state.oh.us](mailto:Adrienne.Lafavre@epa.state.oh.us).
- **Used oil** – According to OAC 4745-279-11 “on specification” oil may be taken and burned for energy recovery. However, you must ensure that your oil meets the “on specification” requirements at all times. You must maintain analytical documentation or other information that documents that each used oil fuel shipment meets the specification. The person that first claims the used oil, to be burned for energy recovery, is on specification, is considered to be the fuel marketer. This person must comply with OAC 3745-279-72 to 74. This includes analysis or other documentation that proves the fuel is on specification, obtaining an EPA ID number and maintaining records of analysis and shipments. The used oil rules are found at the following link: [http://www.epa.state.oh.us/dhwm/l\\_ruom.html](http://www.epa.state.oh.us/dhwm/l_ruom.html).
- **Empty drums** – It is understood that empty drums are crushed and disposed in the regular trash as a solid waste. Empty drums and metal containers may be sent for scrap metal recycling or returned to a drum recycler. A list of drum recyclers is found at: <http://epawebapps/Recyclers/jsp/results.jsp?category=9>.
- The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image by implementing pollution prevention programs. More information about pollution prevention, including fact sheets and U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92/088) may be obtained by contacting the Ohio EPA Pollution Prevention Section at (614) 644-3469 or online at: <http://www.epa.state.oh.us/ocapp/ocapp.html>.

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information at the following Web link:  
<http://www.epa.state.oh.us/dhwm/listserv.html>.

You can find copies of the rules and other information on the DHWM's web page at:  
<http://www.epa.state.oh.us/dhwm>.

During the inspection you were provided a "*Process, Waste, P2 Summary Sheet*". Please complete this summary sheet and return it with your response above within 30 days of the date of this letter. Should you have any questions, you may contact me at (330) 963-1146 or at: [ron.shadrach@epa.state.oh.us](mailto:ron.shadrach@epa.state.oh.us).

Sincerely,



Ronald J. Shadrach  
Environmental Specialist II  
Division of Hazardous Waste Management

Enclosures

RJS:ddw

ec: Frank Popotnik, DHWM, NEDO  
Harry Sarvis, DHWM, CO  
Natalie Oryshkewych, DHWM, NEDO  
Ed D'Amato, DHWM, NEDO

NOTICE: Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.
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**LAF QUANTITY GENERATOR REQUIREMENTS**  
**COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

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

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

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

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

Safety Equipment Used:

**GENERAL REQUIREMENTS**

- |   |   |  |   |
|---|---|--|---|
| 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11]  | Yes <input type="checkbox"/>            | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/>            |
| 2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)]   | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/>            | N/A <input type="checkbox"/>            |
| 3. Has the generator obtained a U.S. EPA identification number? [3745-52-12]  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/>            | N/A <input type="checkbox"/>            |
| 4. Were annual reports filed with Ohio EPA on or before March 1 <sup>st</sup> ? [3745-52-41(A)]   | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/>            | N/A <input type="checkbox"/>            |
| 5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)]   | Yes <input type="checkbox"/>            | No <input type="checkbox"/>            | N/A <input type="checkbox"/>            |
| 6. Has the generator transported or caused to be transported hazardous waste to <b>other</b> than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]                                   | Yes <input type="checkbox"/>            | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/>            |
| 7. Has the generator disposed of hazardous waste <b>on-site without a permit</b> or at another facility <b>other</b> than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] | Yes <input type="checkbox"/>            | No <input type="checkbox"/>            | N/A <input checked="" type="checkbox"/> |
| 8. Does the generator accumulate hazardous waste?   | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/>            | N/A <input type="checkbox"/>            |

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

- |   |                              |  |                              |
|---|------------------------------|--|------------------------------|
| 9. Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & ( F)? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
|---|------------------------------|--|------------------------------|

NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G) & (H).

- |   |                              |                             |                              |
|---|------------------------------|-----------------------------|------------------------------|
| 10. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)] |                              |                             |                              |
| a. Container that meets 3745-66-70 to 3745-66-77?                       | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)?     | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| c. Drip pads that meet 3745-69-40 to 3745-69-45?                        | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| d. Containment building that meets 3745-256-100 to 3745-256-102?        | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

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

**MANIFEST REQUIREMENTS**

- |  |   |                             |                              |
|--|---|-----------------------------|------------------------------|
| 12. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)]                                       | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]

- |  |   |                             |                              |
|--|---|-----------------------------|------------------------------|
| 14. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
|--|---|-----------------------------|------------------------------|

NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].

- |   |   |                             |   |
|---|---|-----------------------------|---|
| 15. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] | Yes <input type="checkbox"/>            | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| 16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)]   | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/>            |

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.

17. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes  No  N/A
18. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes  No  N/A
19. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes  No  N/A

NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.

**PERSONNEL TRAINING**

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

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

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

**CONTINGENCY PLAN**

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

- 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
43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes  No  N/A
- a. Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes  No  N/A
- b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded?[3745-52-34(C)(2)] Yes  No  N/A
- 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**

44. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes  No  N/A
45. Is the accumulation date on each container? [3745-52-34(A)(2)] **Haz waste tanks not labeled or dated.** Yes  No  N/A
46. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes  No  N/A
- b. In good condition? [3745-66-71] Yes  No  N/A
- c. Compatible with wastes stored in them? [3745-66-72] Yes  No  N/A
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes  No  N/A

**NOTE:** Record location on process summary sheets, photograph the area, and record on facility map.

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. Yes  No  N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes  No  N/A
48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes  No  N/A
49. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes  No  N/A
50. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] Yes  No  N/A
51. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] Yes  No  N/A

**NOTE:** OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

52. If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] Yes  No  N/A

**NOTE:** Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

**PRE-TRANSPORT REQUIREMENTS**

53. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes  No  N/A
54. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes  No  N/A
55. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes  No  N/A

**COMMENTS:**

1. Used oil needs further evaluation to insure proper management.
- 42.b. Need to insure management of chromium debris drum as satellite or follow generator area inspection and management requirements.
47. Area or location of inspected area not identified on the log (should identify). Inspection reported not to include tank area.

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

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

29. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes  No  N/A
30. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] Yes  No  N/A
31. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes  No  N/A

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

#### EMERGENCY PROCEDURES

32. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes  No  N/A
- a. Was the contingency plan implemented? [3745-65-51(B)] Yes  No  N/A
- b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes  No  N/A
- c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes  No  N/A

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

#### PREPAREDNESS AND PREVENTION

33. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes  No  N/A
34. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:
- a. Internal alarm system? [3745-65-32(A)] Yes  No  N/A
- b. Emergency communication device? [3745-65-32(B)] Yes  No  N/A
- c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes  No  N/A
- d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes  No  N/A

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

35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes  No  N/A
36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes  No  N/A
37. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] Yes  No  N/A
38. If there is only one employee on the premises, is there immediate access to a device (ex.phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] Yes  No  N/A
39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes  No  N/A
40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes  No  N/A
41. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes  No  N/A

#### SATELLITE ACCUMULATION AREA REQUIREMENTS

42. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes  No  N/A
- b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes  No  N/A
- c. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes  No  N/A

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

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

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

**TANK SYSTEM – GENERAL OPERATING REQUIREMENTS**

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

**TANK SYSTEM – INSPECTION REQUIREMENTS**

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

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

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

**TANK SYSTEM CLOSURE REQUIREMENTS**

6. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). Yes  **No**  N/A

**TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES**

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

**TANK SYSTEM – WASTE ANALYSIS REQUIREMENTS**

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

**TANK SYSTEMS REQUIREMENTS**

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

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

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

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

13. Are there written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed?[3745-66-92(G)]
- |     |                          |    |                          |     |                                     |
|-----|--------------------------|----|--------------------------|-----|-------------------------------------|
| Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
|-----|--------------------------|----|--------------------------|-----|-------------------------------------|

Do the written statements address all of the following:

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

**SECONDARY CONTAINMENT**

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

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

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

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

#### SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION

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

#### ANCILLARY EQUIPMENT REQUIREMENTS

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

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

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

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

- a. Immediately cease flow of material into tank and investigate the cause of the release?[3745-66-96(A)] Yes  No  N/A
- b. Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time?[3745-66-96(B)(1)] Yes  No  N/A
- c. Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment?[3745-66-96(B)(2)] Yes  No  N/A
- d. Immediately conduct a visual inspection of the release?[3745-66-96(C)] Yes  No  N/A
- e. Prevent further migration of the leak or spill to soils or surface waters?[3745-66-96(C)] Yes  No  N/A
- f. Properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)] Yes  No  N/A
- g. Report the release to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)] Yes  No  N/A
- h. Submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)] Yes  No  N/A
- i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)(2)] Yes  No  N/A

- j. For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)] Yes  No  N/A

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

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

#### COMMENTS:

The existing tank and secondary containment system remains from an approved WWTS. Although this equipment and the current configuration may minimally meet the rules, a tank assessment and the design and installation and secondary containment certification of this system has not been verified. As a new tank system design and containment is planned for operation beginning 10/1/2007, Ohio EPA requires that the O/O minimally provide the following for the current tank system:

- 1) Label all hazardous waste tanks.
- 2) meet tank, ancillary piping, spill control and secondary containment daily inspection requirements.
- 3) Document the existing secondary containment system will be adequate to provide failsafe containment in the event of a release at any point in the system.

Any less than 90 day tank closures must be completed in accordance with OAC 3745-66-97.

### USED OIL INSPECTION CHECKLIST (Short Version)

**NOTE: This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.**

#### PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes  No  N/A  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  RMK#
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes  No  N/A  RMK#
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes  No  N/A  RMK#

#### USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes  No  N/A  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  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  No  N/A  RMK#
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes  No  N/A  RMK#
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes  No  N/A  RMK#  1
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes  No  N/A  RMK#
- b. Contained the release? Yes  No  N/A  RMK#
- c. Cleaned up and properly managed the used oil and other materials? Yes  No  N/A  RMK#

- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- c. Are the combustion gases from heater vented to the ambient air? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes \_\_\_ No  N/A  RMK# 2

**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# 3

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**REMARKS**

1. The spent grinding coolant in drum marked Astro grind was not labeled as "used oil". This violation was abated during the inspection when the drum was properly labeled.
2. Generator transports single drum when full to collection center that takes used oil.
3. Concern exists that used oil could be hazardous for metals from grinding. Existing profile may be inadequate. DHWM requesting analysis per onspec requirements or RCRA metals by TCLP.