



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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www.epa.state.oh.us

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

June 14, 2007

**RE: Aircraft Plating Corp.
OHD 004 176 681
Large Quantity Generator of
Hazardous Waste
Notice of Violation**

Gerald Ott
Aircraft Plating Corp.
1106 Clark Ave.
Cleveland, OH 44109-1824

Dear Mr. Ott:

This letter will report on the recent hazardous waste inspection of Aircraft Plating Corp. It will document any violations and concerns found and outline what you need to do to correct them.

Sherry Slone and I of the Ohio EPA Division of Hazardous Waste Management conducted an inspection of Aircraft Plating Corp. located at 1106 Clark Ave., Cleveland, Ohio on May 24, 2007. The purpose was to determine if Aircraft Plating had violations of Ohio's hazardous waste and used oil laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC).

Another purpose of the inspection was to look for ways Aircraft Plating may be able to reduce its waste generation, conserve energy, and save money. An attachment to this letter covers these issues.

Below are listed the violations and concerns found during the inspection and what you need to do to correct or otherwise address them. Please also see the enclosed Process, Waste, and Pollution Prevention Summary and the enclosed inspection checklists.

The following violations were found: (These follow the order of the enclosed checklists.)

1. OAC rule 3745-65-16(C) – Annual review of initial training.
This rule requires that facility personnel take part in an annual review of the initial required training.

Aircraft Plating violated this rule by not having annual reviews of its hazardous waste training that was last done in 2001. **Please submit a plan for the annual review of hazardous waste training. The next annual review should include a discussion of the items in this letter.**

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2. OAC rule 3745-65-52(E) – Contingency plan emergency equipment.
This rule requires the contingency plan to include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications, and alarm systems), where this equipment is required. Included must be the location, physical description, and capabilities of each item on the list.

Aircraft Plating violated this rule by not including its drum of liquid spill control equipment in its contingency plan emergency equipment list. **This information must be added and a copy of the revised page(s) sent to me.**

OAC rule 3745-65-53(B) requires a copy of the contingency plan and all revisions to be submitted to all emergency authorities that may be requested to provide emergency services. In particular, Aircraft Plating may request the local fire department to provide emergency services. **Once the addition mentioned above is added to the contingency plan, you must submit copies as required and send documentation of this to me.** A record of this submittal should also be kept with the contingency plan so that it can be easily determined in the future whether you are in compliance with this rule.

3. OAC rule 3745-65-31 – Maintenance and operation of facility.
This rule requires facilities be maintained and operated to minimize the possibility of a fire, explosion, or release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Aircraft Plating violated this rule by having F006 hazardous waste on the floor below the filter press. **You must sweep this up and place it in a container. Please contact me when this has been done.**

Aircraft Plating also violated this rule in the area at the end of the manual line. When parts are taken out of the last rinse on the manual line, they drip onto the floor on the way to the dryer. This causes this floor area to be contaminated. This contamination is spread by people walking through this area. In order to comply with this rule, you must minimize this release. Ideas for this that we talked about were putting down adsorbent pads/booms or installing a curb to control and direct this dripped waste. A curb made of a rubber material may work well for this. Examples of this can be found at:

http://www.newpig.com/en_US/main.jhtml?catId=2LHBSEMIPERMANENTSPILLBERMS&page=browse/capture.jhtml

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Please send me documentation (such as a photograph) showing how you have minimized this release.

4. OAC rule 3745-65-33 – Testing and maintenance of equipment.
This rule requires that all facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency. This rule also requires the owner or operator to record the emergency equipment inspections in a log or summary.

Aircraft Plating violated this rule by not having this required log or summary. An example log is enclosed and can be found at: <http://www.epa.state.oh.us/dhwm/pdf/equiplog.PDF>.

You could also just add emergency equipment to the container area inspection log you currently use. **Submit documentation including a completed log to show that you have corrected this violation.**

5. OAC rule 3745-273-13 (D) - Universal waste lamp containers.
This rule requires universal waste lamps to be in closed containers or packages that are structurally sound and adequate to prevent breakage.

Aircraft Plating violated this rule by having waste fluorescent lamps and other lamps in a box that was not closed. **Please send me a description of how you will ensure that boxes of waste lamps will be kept closed.**

6. OAC rule 3745-273-14 (E) - Universal waste lamp labeling.
This rule requires that containers of universal waste lamps be labeled as Universal Waste - Lamps, Waste Lamps, or Used Lamps.

Aircraft Plating violated this rule by not having all of its waste lamps labeled as required. **Please correct this violation and provide documentation of that to me.**

7. OAC rule 3745-273-15(C) – Demonstrate length of time universal waste has been accumulated.
This rule requires that a company must be able to demonstrate the length of time that a universal waste has been accumulated.

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Aircraft Plating violated this rule by not being able to demonstrate the length of time that its waste lamps have been accumulated. **Please send me a description of how you will demonstrate this.**

8. OAC rule 3745-273-16 – Employee training for handlers of universal waste. This rule requires that employees who manage universal waste be informed of proper handling and emergency procedures for that universal waste.

Aircraft Plating violated this rule by not informing its employees as required as shown by violations 5, 6, and 7 above. Please send me documentation that employees have been informed as required.

The following concerns were found:

1. When reviewing your Cyano Corp. of Michigan, Land Disposal Notification and Certification I saw that Carol Gergen signed this. I did not notice this during the inspection. **Please either send me documentation showing that she has been trained as per the personnel training rules cited above or documentation that only hazardous waste trained personnel will sign these forms in the future.**
2. OAC rule 3745-65-16(D)(2) requires a job description for each position related to hazardous waste management. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position. You had a job description for Dennis Brown which listed one duty as a general duty to properly manage hazardous waste. This job description should be more specific and list required actions. For example, something similar to the following could be added: Responsible for filling, labeling, and closing F006 waste containers; Sweep up any spilled filter cake hazardous waste; Be familiar with emergency procedures detailed in the contingency plan. **Please send me an updated job description.**
3. You told me that you are working with Heritage Environmental to dispose of the plating tank cleanout waste which is a F008 hazardous waste. **Please send me a copy of the manifest used to ship this waste.**

Please send a written response to this letter within 30 days of the date of this letter including the documentation required above.

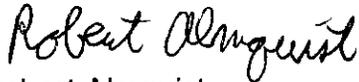
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The Division of Hazardous Waste Management has created an electronic news service to provide you with updates on events and news related to hazardous waste activities in Ohio. If you have not already, we encourage you to sign-up for this free service. 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 regulations and other information on the Division of Hazardous Waste Management web page at <http://www.epa.state.oh.us/dhwm/>.

If you have any questions, please contact me at (330) 963-1217, or robert.almquist@epa.state.oh.us.

Sincerely,



Robert Almquist
Division of Hazardous Waste Management

RA:cl
Enclosures

cc: Natalie Oryshkewych, DHWM, NEDO

ec: Frank Popotnik, DHWM, NEDO
Harry Sarvis, DHWM, CO
Sherry Slone, DHWM, NEDO

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your facility from its obligation to comply with all applicable regulations.

Pollution Prevention Attachment
to June 2007 letter
Aircraft Plating (OHD 004 176 681)

The following is offered as information and suggestions that you may want to investigate further. If you have any questions or want additional information, please contact me at 330-963-1217, or robert.almquist@epa.state.oh.us.

Process Summary:

Aircraft Plating does electroplating of nickel, copper (using copper cyanide), brass, and zinc primarily on carbon steel. The zinc plating has recently been started and it is a small % of what they run. They do passivation on stainless steel parts which is to remove any iron oxide from the cutting tools that would cause surface rust. They have about 15 employees and run one shift: Mon-thurs, 6:30am to 5:00pm. They have 2 automatic lines – one for zinc and one for copper. They have one manual line in which they do brass, copper, and nickel. When the parts come out of the last rinse (hot water rinse) of the manual line they go right away into a dryer because if left to air dry there would be marks on the parts which are of a decorative nature (awards, etc.).

At a minimum all rinses are two stage counterflow. There is a dead rinse before the counterflow rinses. They have flow restrictors on all rinse water lines. Most also have valves that can be adjusted. They have found that ½ gallon per minute works well. They installed spray rinses but removed them because of problems with overspray (the lines are fairly narrow and adjacent tanks were getting the overspray) and problems with parts being knocked off. They have continuous filtration of the plating baths. They have looked into electrowinning and reverse osmosis (I think) and these would not benefit their operations in light of their processes and the limits of available capital.

General Metal Finishing:

Process and/or equipment changes may be able to save your company money and reduce the amount of waste generated. Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) has prepared a fact sheet regarding this which is enclosed and can be found at:

<http://www.epa.state.oh.us/opp/fact24.pdf>.

Some of the items in this fact are already being done by your company (counter-current rinsing, static rinses, restricting rinse water flow) and some have been tried (spray rinses). I was not certain whether the static rinses are being used to replenish the process baths. Other things you may want to consider are:

1. Conductivity controlled rinse water feed (see more information below).
2. Slower withdraw rate of parts from process tanks.
3. Increased hang time over process baths and rinse tanks, possibly including hang bars on the manual line.

For example, changes such as removing calcium and magnesium from the water used in metal finishing can yield big savings. A case study regarding this is enclosed and can be found at:

<http://www.pca.state.mn.us/programs/p2-s/pubs/cs-merit.pdf>.

Significant pollution prevention opportunities can be realized when the cost of managing each waste is tied back to the production process where it originated. If all the true costs are assessed, then the true potential savings of a pollution prevention project can be seen. More information, including worksheets, can be found at:

<http://www.ecy.wa.gov/pubs/95400.pdf>.

Information regarding grants, loans, and tax incentives for environmental projects in Ohio is enclosed and can be found at:

<http://www.epa.state.oh.us/ocapp/funding.html>.

Conductivity Controlled Rinse Water Feed:

Rinse water quality degrades as contaminants are dragged in by work pieces. The conductivity of the rinse water goes up as the level of these contaminants goes up. Conductivity sensors and solenoid valves can be used to allow fresh water to enter a rinse tank only when a set conductivity valve is reached. More information regarding this is enclosed and can be found at:

http://www.wmrc.uiuc.edu/main_sections/info_services/library_docs/TN/00-72.pdf

<http://www.pprc.org/pubs/pubslst.cfm#technologies>

<http://www.p2pays.org/ref/02/01142.pdf>.

Examples vendors of such equipment can be found at:

<http://www.ckmindustrialsales.com/products.htm>

<http://www.foxboro.com/us/eng/Homepage>

Noncyanide Plating Solutions:

Your copper plating is done using copper cyanide solution. There may be a noncyanide copper plating solution that would work better for you. One company that sells noncyanide copper plating solutions is:

<http://shorinternational.com/PlatingAccessory.htm>

Recycling of Cardboard and Plastic:

Aircraft Plating is currently disposing of cardboard boxes and clear plastic bags. You may be able to find a company that can recycle these. A good place to investigate this is:

<http://www.cuyahogaswd.org/business/recdirectory.asp>

Some of the companies in Cuyahoga County that pick up cardboard for recycling are:

BFI Waste Systems of Ohio, Garfield Heights, 216-441-6300
Caraustar Cleveland Recycling, Cleveland, Ohio, 216-961-5060
Cordell Hauling, Cleveland, Ohio, 216-651-4285
Gateway Recycling, Cleveland, Ohio, 216-341-8777
Global Lake Enterprises, Cleveland, Ohio, 216-671-1935
Peltz Group, Cleveland, Ohio, 216-481-3200
Ponz Industries, Cleveland, Ohio, 216-661-8999
Recycle Midwest, Cleveland, Ohio, 216-481-9490
Republic Waste, Cleveland, Ohio, 216-741-4013
Weingold Rubbish, Cleveland, Ohio, 216-641-1071

The following site might be useful in regards to plastics recycling:
<http://www.epa.state.oh.us/opp/recyc/pete-rc.html>.

Assistance and/or Site Assessment:

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides compliance and pollution prevention assistance on environmental issues related to air, land, and water. If desired, this can include an onsite assessment of your operations with a resulting report containing waste minimization and energy conservation suggestions. They can be contacted at 800-329-7518 or <http://www.epa.state.oh.us/ocapp/ocapp.html>.

In June 2006 they published a 56 page Small Business Environmental Compliance Self-Assessment Guide which can be found at:
<http://www.epa.state.oh.us/ocapp/sb/publications/selfgde.pdf>

Energy Use Reduction:

ENERGY STAR is a government-backed program helping businesses and individuals protect the environment through superior energy efficiency. Their website is at:<http://www.energystar.gov/>.

This link leads to the part of the site that deals with improving the energy performance of buildings and plants:
http://www.energystar.gov/index.cfm?c=business.bus_index.

As an example, this site says that the exit signs in your facility may offer a way to reduce electricity costs and reduce maintenance costs. Exit signs that are labeled as ENERGY STAR operate on 5 watts or less per face, compared to standard signs, which use as much as 40 watts per face. The more efficient exit signs use light emitting diodes (LED) which can last up to 10 years without a lamp replacement, compared to less than one year for an exit sign using

Pollution Prevention Attachment
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incandescent bulbs. More information, including a list of products and a savings calculator can be found at:

http://www.energystar.gov/index.cfm?c=exit_signs.pr_exit_signs

Ohio businesses that spend less than \$150,000 on their annual energy bill now have a tool to help them reduce energy waste and hold costs down. The Ohio Department of Development has developed a free online tool that is confidential and easy to use. If you are looking for ways to save on energy expenses at your business, visit the Small Business Energy Saver at:

<http://www.energyguide.com/EnergySmartSBE/welcomeba.asp?referrerid=227&sid=436>.

Grant funding is available for business owners who are ready to implement measures suggested by the Ohio Small Business Energy Saver. For more information, visit:

http://www.odod.state.oh.us/cdd/oeel/ELFGrant.htm#NOFA_07-05.

The Ohio Department of Development's Office of Energy Efficiency may also be able to help with energy efficiency issues. Their web site is at: <http://www.odod.state.oh.us/cdd/oeel/>.

E-mail this completed form to tammy.mcconnell@pa.state.oh.us or mail it to Tammy McConnell, Central Office	U.S. Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM		For Ohio EPA use only							
2. Site EPA ID No.	EPA ID Number: OHD 004 176 681									
3. Site Name	Name: Aircraft Plating Corp.		Website (optional):							
4. Site Location Information	Street Address 1106 Clark Ave.									
	City, Town, or Village: Cleveland		State: OH							
	County Name: Cuyahoga		Zip Code: 44109							
5. Site Land Type (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other		
	<input checked="" type="checkbox"/>									
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A.		B.							
	C.		D.							
	First Name: Gerald Ott		MI: C	Last Name: Ott						
	Phone Number: 216-781-5845			Phone Number Extension:						
7. Facility Representative Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	E-Mail Address: gott@aircraftplating.com									
	Fax Number: 216-781-1409			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: Aircraft Plating Corp.		Date Became Owner (mm/dd/yyyy): 4-1-1941					
			Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State
Street or P.O. Box: same										
City, Town, or Village:				Owner Phone #:						
State:				Country:		Zip Code:				
B. Name of Site's Operator: same			Date Became Operator (mm/dd/yyyy):							
Operator Type: Mark with an X			Private	County	District	Federal	Indian	Municipal	State	Other
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 checked="" type="checkbox"/> Not Regulated										

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

A. Hazardous Waste Activities		3. Treater, Storer or Disposer of Hazardous Waste	
(choose only one of the following categories)		<input type="checkbox"/>	4. Recycler of Hazardous Waste
<input type="checkbox"/>	UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/>	5. Exempt Boiler and/or Industrial Furnace
<input checked="" type="checkbox"/>	a. Large Quantity Generator (LQG):	<input type="checkbox"/>	a. Small Quantity On-site Burner Exemption
<input type="checkbox"/>	b. Small Quantity Generator (SQG)	<input type="checkbox"/>	b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/>	c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/>	6. Underground Injection Control Facility
<input type="checkbox"/>	d. United States Importer of Hazardous Waste	<input type="checkbox"/>	7. Hazardous Waste Transporter
<input type="checkbox"/>	e. Mixed Waste (hazardous and radioactive) Generator		
B. Universal Waste Activities		C. Used Oil Activities	
<input checked="" type="checkbox"/>	1. Small Quantity Handler of Universal Waste	<input type="checkbox"/>	1. Used Oil Generator
(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):		<input type="checkbox"/>	2. Used Oil Transporter Indicate Type(s) of Activity(ies)
<input type="checkbox"/>	2. Large Quantity Handler of Universal Waste	<input type="checkbox"/>	Transporter
(accumulates 5,000 kg or more).		<input type="checkbox"/>	Transfer Facility
<input type="checkbox"/>	3. Destination Facility for Universal Waste	<input type="checkbox"/>	3. Used Oil Processor and/or Re-refiner
(Check all boxes below that apply for each of the three types of facilities above.)		<input type="checkbox"/>	Indicate Type(s) of Activity(ies)
	<u>Generated</u> <u>Accumulated</u>	<input type="checkbox"/>	Processor
A. Batteries	<input type="checkbox"/>	<input type="checkbox"/>	Re-refiner
B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>	
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>	
D. Lamps	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
		<input type="checkbox"/>	4. Off-Specification Used Oil Burner
		<input type="checkbox"/>	5. Used Oil Fuel Marketer -
			Indicate Type(s) of Activity(ies)
		<input type="checkbox"/>	a. Marketer Who Directs Shipment of Off- Specification Oil
		<input type="checkbox"/>	b. Used Oil to Off-Specification Used Oil Burner

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

F006	F007	D002	F008			
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12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

yes	Announced ?	Additional Facility Representatives:	George Cutro
no	Tanks?	Other comments:	
yes	Containers?		

13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
Robert Almquist	Sherry Stone	5-24-07 9:30am

14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of owner, operator, or an authorized representative	Name and Title (Print)	Date (mm-dd-yyyy)

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

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

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

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

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

Safety Equipment Used:

GENERAL REQUIREMENTS

- | | | | | | | |
|---|-----|-------------------------------------|----|-------------------------------------|-----|--------------------------|
| 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] unknown | Yes | <input 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 st ? [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)] unknown | 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 other 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 on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" type="checkbox"/> | N/A | <input 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 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 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 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 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 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] **unknown** 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: **see concerns listed in letter**
- a. Job titles [3745-65-16D(1)]? Yes No N/A
 - b. Job descriptions [3745-65-16D(2)]? Yes No N/A
 - c. Type and amount of training given to each person [3745-65-16D(3)]? Yes No N/A
 - d. Completed training or job experience required [3745-65-16D(4)]? Yes No N/A
26. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes No N/A

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

Job Performed	Name of Employee	Date Trained
President, Gerald Ott, Nov. 2001		
Wastewater treatment operation and hazardous waste management, Dennis Brown, Nov. 2001		

CONTINGENCY PLAN

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

e. An evacuation plan for facility personnel where there is possibility that evacuation 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
unknown – see letter for more info

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] **see 28d** 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: **unknown** Yes No N/A

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

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

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

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

PREPAREDNESS AND PREVENTION

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

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

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

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

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

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

Does not generate ignitable hazardous waste

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): **no satellite areas seen**

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 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

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

44. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes No N/A
45. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No N/A
46. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A
- b. In good condition? [3745-66-71] Yes No N/A
- c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A

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

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1 44(A) "Week" means 7 consecutive days. Yes No N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes No N/A
49. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] **no incompatible wastes stored at time of inspection** 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)] **see 49** 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)] **see 49** 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)] **no areas closed** 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)] **unknown** 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] **unknown** Yes No N/A

UNIVERSAL WASTE HANDLER REQUIREMENTS - SMALL QUANTITY - BATTERIES AND LAMPS

Facility Name: aircraft Plating ID #: ohd004176681 Inspection Date: 5-24-07

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more

Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No N/A ___RMK#
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes No N/A ___RMK#

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

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

If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)]

Yes ___ No ___ N/A ___ RMK#

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)]

Yes ___ No N/A ___ RMK#

a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]

Yes ___ No N/A ___ RMK#

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]

Yes ___ No N/A ___ RMK#

7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)]

Yes ___ No N/A ___ RMK#

UNIVERSAL WASTE LAMPS

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]

Yes ___ No X N/A ___ RMK#

9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]

Yes ___ No N/A ___ RMK#
No broken bulbs seen

10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)]

Yes ___ No X N/A ___ RMK#
Was labeled "spent fluorescent lamps"

NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

11. Is the waste accumulated for less than one year? Yes__ No__ N/A __RMK#
[3745-273-15(A)] If not: unknown

a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes __ No N/A __RMK#

NOTE: Accumulation is defined as date generated or date received from another handler.

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes ___ No X N/A ___ RMK#
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes ___ No ___ N/A ___ RMK#
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes ___ No ___ N/A ___ RMK#
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes ___ No ___ N/A ___ RMK#
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes ___ No ___ N/A ___ RMK#
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes ___ No ___ N/A ___ RMK#
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes ___ No ___ N/A ___ RMK#

EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] Yes ___ No X N/A ___ RMK#

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes ___ No N/A ___RMK#
No releases seen
15. Is the material released characterized? [3745-273-17(B)] Yes ___ No N/A ___RMK#
16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes ___ No N/A ___RMK#

OFF-SITE SHIPMENTS

NOTE: If a SQUWH self-transport waste, then they must comply with the Universal Waste transporter requirements.

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes ___ No N/A ___RMK#
Shipped to AERC in Allentown, PA.

NOTE: SQUWHs are prohibited to send waste to any other facility.

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes ___ No N/A ___RMK#
Uncertain if it meets that definition
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes ___ No N/A ___RMK#
Shipped in prepaid shipping boxes supplied by AERC.
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes___ No___ N/A X RMK#

- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes ___ No ___ N/A ___ X ___ RMK#
21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes ___ No ___ N/A ___ X ___ RMK#
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes ___ No ___ N/A ___ X ___ RMK#
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes ___ No ___ N/A ___ X ___ RMK#
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes ___ No ___ N/A ___ X ___ RMK#

EXPORTS

24. Is waste being sent to a foreign destination? If so: Yes ___ No ___ X ___ N/A ___ RMK#
- a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes ___ No ___ N/A ___ RMK#
- b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)] Yes ___ No ___ N/A ___ RMK#
- c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes ___ No ___ N/A ___ RMK#

REMARKS

Land Disposal Restriction Requirements

Facility Name: Aircraft Plating

ID #: ohd004176681

Inspection Date: 5-24-07

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)(a)] Yes No N/A RMK#
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)(b)] 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)] **Do not know if the waste will be treated and monitored for all constituents.** 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: **unknown** 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)] **Did not certify that any of its wastes meet treatment standards.** 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] **generator does no diluting of waste** 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# ___

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

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)]
unknown

Yes ___ No N/A ___ RMK# ___

REMARKS

Aircraft Plating, OHD 004 176 681, 5-24-07 inspection (see also Process, Waste and P2 Summary sheet)

Aircraft Plating does electroplating of nickel, copper (using copper cyanide), brass, and zinc primarily on carbon steel. The zinc plating has recently been started and it is a small % of what they run. They do passivation on stainless steel parts which is to remove any iron oxide from the cutting tools that would cause surface rust. They have about 15 employees and run one shift: Mon-thurs, 6:30am to 5:00pm. They have 2 automatic lines – one for zinc and one for copper. They have one manual line in which they do brass, copper, and nickel. When the parts come out of the last rinse (hot water rinse) of the manual line they go right away into a dryer because if left to air dry there would be marks on the parts which are of a decorative nature (awards, etc.).

At a minimum all rinses are two stage counterflow. There is a dead rinse before the counterflow rinses. They have flow restrictors on all rinse water lines. Most also have valves that can be adjusted. They have found that ½ gallon per minute works well. They installed spray rinses but removed them because of problems with overspray (the lines are fairly narrow and adjacent tanks were getting the overspray) and problems with parts being knocked off. They have continuous filtration of the plating baths. They have looked into electrowinning and reverse osmosis (I think) and these would not benefit their operations in light of their processes and the limits of available capital.

Process, Waste, and Pollution Prevention Summary for:

Aircraft Plating, OHD 004 176 681, LQG, 5-24-07 inspection

#	Process generating the waste	Waste details	On-site management	Off-site management	Current pollution prevention	Possible pollution prevention
1	Copper, brass, zinc, and nickel electroplating and passivation on stainless steel	Wastewater from rinses, alkaline cleaners, and acid baths. About 5000 gallons per day.	Wastewater treatment system including a filter press	Discharge to sanitary sewer	Dead rinses, countercurrent rinses, flow restrictors	1. Conductivity controlled rinse water feed. 2. Slower withdraw rate of parts from process tanks. 3. Increased hang time over process baths, possibly including hang bars on manual line.
2	Filtration of plating baths	Clean off of filter plates into the wastewater treatment system	Wastewater treatment system including a filter press	Discharge to sanitary sewer		
3	Vibratory cleaner or polisher	Wastewater poured into drain going to wastewater treatment system.	Wastewater treatment system including a filter press	Discharge to sanitary sewer		
4	Wastewater treatment	F006 sludge 26851 P in 2006, as of 5-16-07 13,923 P have been shipped in 2007	Stored near the filter press in cubic yard cardboard boxes	Agmet Metals, Oakwood Village, OH	Being recycled by Agmet	

5	Copper electroplating using copper cyanide – from time to time (less than once a year) have to remove solution, then add water to make solution back up.	Waste cyanide solution, 3350 G in 2006 (shipped on Aug. 31, 2006 using F007 waste code)		Cyanocorp, Detroit, MI	Being recycled by Cyanocorp	
6	Stripping of copper off the contact hooks on the racks (200 gallon tank)	spent nitric acid Shipped 4728 pounds on 3-8-07	Stored in drums near filter press	Agmet Metals, Oakwood Village, OH	Agmet sends it to Inmetco who uses it to pelletize material [OAC 3745-51-02 (E)(1)(a)]	
7	Cleanout of plating tanks (may not be done for another 15 years)	Plating tank bottoms with waste code of F008, 4 cubic yard boxes seen on 5-24-07		Working with Heritage Environmental to create a waste profile and for shipment		
8	lighting	Waste lamps	Stored in prepaid shipping box	AERC, Allentown, PA		
9		Plastic bags		Disposed of as solid waste		Investigate recycling at: http://www.cuyahogaswd.org/business/recdIRECTORY.asp
10		Cardboard		Disposed of as solid waste		Investigate recycling at: http://www.cuyahogaswd.org/business/recdIRECTORY.asp