

**Environmental  
Protection Agency**

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

May 17, 2011

**RE: AKRON BRASS CO. PLANT 3  
OHD 981 090 376  
NOTICE OF VIOLATION/PRTC**

Alora Miller  
Akron Brass Company  
343 Venture Blvd.  
Wooster, OH 44691

Dear Ms. Miller:

On April 11, 2011, Ohio EPA met with you at Akron Brass Plant 3 located at 1415 E. Bowman St. in Wooster, Ohio. The purpose of this was to determine if Akron Brass was in compliance with Ohio's hazardous waste and used oil laws and rules as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). Please see the attached Process and Waste Summary chart for my understanding of this facility's operations and wastes.

This letter will document any violations and concerns found and outline what you need to do to correct them. A written response to these issues is required within 30 days.

The following violations were found: (These follow the order of the enclosed checklists starting with the checklist titled Large Quantity Generator Requirements.)

1. **OAC Rule 3745-52-34(A)(1) –Uncontainerized waste.**

This rule states that a generator may, for 90 days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit provided that the waste is placed in containers.

- a. Akron Brass violated this rule by having hazardous waste that was not in a container. This occurred at the two discharge pipes of the first shot blast machine. In this area the hazardous waste was on the floor and on the motors. I previously sent you a photo of this area taken during our inspection. You must set up a system so that all of the waste that comes out of these two discharge pipes gets into a container. You also need to ensure that the container(s) are kept closed. (See violation # 10 below.) Perhaps a sleeve that connects the discharge pipe to the bucket would work well. Also, since I understand these buckets are normally emptied into a hopper, perhaps the higher discharge pipe could be routed directly into that hopper to avoid double handling of the waste.
- b. Akron Brass also violated this rule by having hazardous waste on the floor by the two drums used to collect the waste that is dumped out of the buckets mentioned above.

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c. Akron Brass also violated this rule by having hazardous waste on the floor in the room containing the west bag house and the west dust collector.

Please submit photographs showing that each of these areas has been cleaned up (no uncontainerized waste) and describe any operating procedures that have been instituted to ensure wastes are properly containerized.

2. **OAC Rule 3745-65-16(A)(2) – Training program.**

This rule requires the training program include instructions which teach facility personnel hazardous waste management procedures, including contingency plan implementation, relevant to the positions in which they are employed.

Akron Brass violated this rule by not including in its training a discussion of the required hazardous waste labeling (both hazardous waste labels and accumulation start dates). The training also did not include a discussion of all the hazardous waste accumulation areas. Please revise your training program to include these and also to discuss the other violations cited in this letter. This training should be specific to the operations at this facility and cover what each employee is actually asked to do. **Once the training has been revised please make sure all required employees receive the training and send documentation of that to me.** If you wish, you may send me the revised training program to review before it is given to the employees.

3. **OAC Rule 3745-65-16(D)(1) – Job titles and names.**

This rule requires that the job title for each position at the facility related to hazardous waste management and the name of the employee filling each job be maintained at the facility.

Akron Brass violated this rule by not maintaining these job titles and the corresponding employee names. **These records must now be created and a copy sent to me.**

4. **OAC Rule 3745-65-16(D)(2) – Job descriptions.**

This rule requires that a written job description for each position listed under paragraph (D)(1) of this rule (see above) be maintained at the facility. 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.

Akron Brass violated this rule by not maintaining these job descriptions. For example, you told me that many of the employees could cleanup used sand from the floor below the mold line. Their job descriptions should explain things such as what containers this material is put in, how it is decided whether it will be reused, how the containers

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are labeled, and what personal protective equipment is needed (such as respirators). **These records must now be created and a copy sent to me.**

5. **OAC Rule 3745-65-16(D)(4) – Training records.**

This rule requires that the training or job experience required by OAC 3745-65-16(A), (B), and (C) has been given to, and completed by, facility personnel.

Akron Brass violated this rule by not maintaining records that document John Uhl, Bill Lambert, Benjamin Barr received the last annual review of the initial training. **These records must now be created and a copy sent to me.**

The next set of violations deal with your contingency plan. This paragraph is offered as information that may be helpful to you when you address the violations cited below. You mentioned that along with a Contingency Plan you have an Emergency Action Plan for this facility but that it doesn't address any hazardous waste issues. You can combine these plans if you like as described in the following wording from OAC 3745-65-52(B):

"If the owner or operator has already prepared a "Spill Prevention, Control, and Countermeasures Plan" in accordance with 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency or contingency plan, he need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of Chapters 3745-65 to 3745-69 and 3745-256 of the Administrative Code. The owner or operator may develop one contingency plan which meets all the regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)."

6. **OAC Rule 3745-65-52(D) - Emergency coordinators**

This rule requires the contingency plan to list the names, addresses, and phone numbers (office and home) of all persons qualified to act as an emergency coordinator.

Akron Brass violated this rule by not having a current list of emergency coordinators. **Please update this information in the contingency plan and send me a copy of the revised plan or revised page(s) and the cover page showing a revision date.**

7. **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.

Akron Brass violated this rule by not including the vacuum you stated would be used to clean up spills of the hazardous waste dust. **Please add this information to the**

**contingency plan and send me a copy of the revised plan or revised page(s) and the cover page showing a revision date.**

8. **OAC Rule 3745-65-53(A) – Copies of contingency plan.**

This rule requires a copy of the contingency plan and all revisions to be maintained at the facility and submitted to all local police departments, fire departments, hospitals, and Ohio EPA and local emergency response teams that may be requested to provide emergency services.

Akron Brass violated this rule by not maintaining at the facility the most recent revision of the contingency plan. During the inspection I provided you with a copy of the contingency plan taken from our file that was a newer revision than the one that was being maintained at the facility. The most recent revision must be maintained at the facility and be available for any possible future inspections.

**Once the revisions required in response to violations 6 and 7 are completed, please submit a copy to all of the above-listed emergency organizations that may be requested to provide emergency services. Please submit documentation such as cover letters that show the updates have been distributed.**

9. **OAC Rule 3745-65-35 – Required aisle space.**

This rule requires aisle space to be maintained to allow the unobstructed movement of personnel, fire protection equipment, and spill control equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of the above-mentioned purposes.

Akron Brass violated this rule by not having adequate aisle space around its full drums of hazardous waste accumulated in the warehouse area. **Please submit a photograph documenting that you have provided adequate aisle space around these drums so that, at least, a person can walk around them and inspect the containers and labels as required.**

The next set of violations deal with what is called satellite accumulation. This is a conditional exemption to certain hazardous waste rules. This allows certain containers of hazardous waste to not have to meet all rules while being filled. This exemption was designed with the 55-gallon drum in mind and, therefore, only applies up to the time 55 gallons of hazardous waste has been accumulated. The two buckets used to collect waste from the shot blast machine qualify for this partial exemption. Also, the two drums we saw being used to collect waste in this area qualify for this partial exemption because they had not been there longer than three days. The following document gives more information about this:

Satellite Accumulation Under Ohio Hazardous Waste Rules 2004  
[http://epa.ohio.gov/portals/32/pdf/Satellite\\_Accumulation\\_Guidance.pdf](http://epa.ohio.gov/portals/32/pdf/Satellite_Accumulation_Guidance.pdf)

10. **OAC Rule 3745-52-34(C)(1)(a) – Open satellite containers.**

This rule requires that containers in satellite accumulation areas follow certain rules including being kept closed except when necessary to add or remove waste.

Akron Brass violated this rule by having two open buckets used to collect the waste from the shot blast machine. Perhaps sleeves that connect each discharge pipe to its bucket would work well. **Please submit photographs showing how the containers are closed and describe any operating procedures that have been instituted to ensure wastes are kept in closed containers.**

More information regarding closed containers can be found at:  
[http://epa.ohio.gov/portals/32/pdf/Closed\\_Container\\_Guidance.pdf](http://epa.ohio.gov/portals/32/pdf/Closed_Container_Guidance.pdf)

11. **OAC Rule 3745-52-34(C)(1)(b) – Satellite container labeling.**

This rule requires that containers in satellite accumulation areas be marked with the words "Hazardous Waste" or with other words identifying the contents.

Two undated, unlabeled full drums of shot blast hazardous waste were accumulating by the shot blast machine in addition to the two open labeled buckets mentioned in the previous violation. **Please describe operating procedures that have been instituted to ensure wastes in excess of 55 gallons in this area are accumulated in labeled containers.**

12. **OAC Rule 3745-52-34(C)(2) – Dating of satellite containers.**

This rule requires that when over 55 gallons of waste has accumulated in a satellite area the container holding the excess accumulation must be marked with the date the excess amount began accumulating.

Akron Brass violated this rule by not dating the two drums holding excess hazardous waste at the satellite accumulation area at the shot blast machine. **Please describe operating procedures that have been instituted to ensure wastes in excess of 55 gallons in this area are accumulated in dated containers.**

The next set of violations deal with hazardous waste containers in areas that are not satellite areas. These are often called less than 90 day areas.

13. **OAC Rule 3745-52-34(A)(3) – Container labeling.**

This rule requires that, while being accumulated and/or treated on site, each hazardous waste container and tank must be labeled clearly with the words "Hazardous Waste."

Akron Brass violated this rule by having four open, unlabeled, undated drums of hazardous waste accumulated at the loading dock. **Please describe operating procedures that have been instituted to ensure all containers of hazardous waste at the dock are properly labeled.**

14. **OAC Rule 3745-52-34(A)(2) – Accumulation start date.**

This rule requires that, while being accumulated and/or treated on site, each container of hazardous waste must be labeled with the date each period of accumulation and/or treatment began.

- a. Akron Brass violated this rule by having four open, unlabeled, undated drums of hazardous waste at the loading dock.
- b. There was also a hopper full of hazardous waste at this loading dock that had an incorrect accumulation start date on it. The hopper was dated "4/30/10" but you indicated the waste was just placed in it the day of the inspection.
- c. The accumulation start dates marked on your drums of hazardous waste stored in the warehouse area all lacked the year.

**Please describe operating procedures that have been instituted and/or additional training that has been provided to ensure all containers of hazardous waste are properly dated.**

15. **OAC Rule 3745-66-73(A) – Closed containers**

This rule requires that a container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

Akron Brass violated this rule by storing four open, unlabeled, undated drums of hazardous waste on the loading dock. **Please describe operating procedures that have been instituted to ensure all containers of hazardous waste are properly closed.**

16. **OAC Rule 3745-66-74 – Inspections of container storage areas.**

This rule requires that the owner or operator inspect areas where containers of hazardous waste are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The owner or operator must also record inspections in an inspection log or summary.

Akron Brass violated this rule by not including the drums accumulated in the warehouse area in your inspection logs. **Please submit a completed log showing you are also inspecting and documenting the inspections of the warehouse area.**

17. **OAC rule 3745-270-07(A)(2) – Land disposal restriction notice.**

If the waste does not meet the treatment standards, or if the generator chooses not to make the determination of whether his waste must be treated, with the initial shipment of waste to each treatment or storage facility, the generator must send a one-time written notice to each treatment or storage facility receiving the waste. This notice must include the EPA hazardous waste numbers and manifest number of first shipment.

Akron Brass violated this rule by not having the correct EPA hazardous waste numbers and manifest number on the Land Disposal Restriction & Certification Form sent with the September 27, 2010 shipment of west bag house dust and west dust collector waste. These are two separate wastes and have different waste codes based on the 1999 waste analysis data you provided. For this reason, they should not be listed on the same line on a manifest or on the same line on a land disposal restriction notice (notice).

Your April 21, 2011 email said you took samples of these two wastes. Please send me a copy of this analysis when available. Your email also included a manifest and notice from 2008 for a shipment of these two wastes to the same facility as the September 27, 2010 shipment mentioned above. You stated that this 2008 shipment was closer to the initial date of shipment and since that notice was correct, then the incorrect notice sent with the September 27, 2010 was not a violation. This rule states that no further notification is necessary until such time as the waste changes or the treatment or storage facility changes, in which case a new notification must be sent to the new treatment or storage facility and a copy must be placed in the generator's files. As I understand this, it requires any further notices that are required or chosen to be done to also be correct.

Your email also included a manifest and notice for an April 20, 2011 shipment of these two wastes to a facility different from the shipments mentioned above. **This notice contained both the D006 and the D008 waste codes and, therefore, documents your correction of this violation.**

I would suggest that you list these two wastes on separate lines so that you have a clear record of how much waste is generated from each process. This may help you in future waste minimization or recycling options that you explore. This may also help in the proper completion of the annual hazardous waste generation reports.

18. **OAC Rule 3745-273-13 (D)(2) - Universal waste lamp containers.**

This rule requires a handler of universal waste to immediately clean up and place in a container any lamp that is broken.

Akron Brass violated this rule by having a broken waste lamp that was not in a container. **Please confirm in writing that the broken lamp has been properly cleaned up and containerized.**

19. **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."

Akron Brass violated this rule by having three boxes of waste lamps that were not labeled as required. **Please confirm in writing that all boxes of spent lamps have been properly labeled and submit a picture documenting such.**

20. **OAC Rule 3745-273-16 –Universal waste training.**

This rule requires that employees who manage universal waste be informed of proper handling and emergency procedures for that universal waste.

Because of the violations cited above it appears Akron Brass has not adequately informed its employees of proper universal waste handling. **Please confirm in writing that employees have been informed as required.**

The following suggestions are given:

Your 2010 annual report of hazardous waste generated only listed one waste description which was actually a combination of several different wastes. For the 2011 report I suggest you list each waste separately. You may want to discuss this with the contacts listed on the report form when filling out this 2011 report.

Your wastes are currently disposed of in a landfill. It may be possible to have some of these wastes recycled. This would conserve valuable resources such as lead. If certain wastes are recycled, it may reduce the amount of hazardous waste generated. If this reduction is great enough, this facility could become a small quantity generator and then not be subject to some of the rules cited as violations above. Some of the organizations you may want to talk to about recycling are listed below.

Recycling Coordinators in Akron, OH

Ph. 330-434-4500

<http://www.recyclingcoordinators.com/recyclingcoordinators/index.htm>

Agmet in Oakwood Village, OH

Ph. 440-439-7400

<http://www.agmet1.com/home.htm>

Inmetco in Ellwood City, PA

Ph. 724-758-2800

<http://www.inmetco.com/>

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Envirite in Canton, OH  
Ph. 330-456-6238  
[http://www.envirite.com/html/recycling\\_services.html](http://www.envirite.com/html/recycling_services.html)  
Ohio By-Product Synergy Network  
<http://www.ohiobps.org/>  
Ohio Materials Exchange  
<http://www.myomex.com/ViewPosting.aspx?cat=3>  
g2 Revolution  
<http://www.g2rev.com/>

The following documents regarding metal casting may be of use to you:

[Guide to Energy Efficiency Opportunities in Canadian Foundries, 2003 \(143 pages\)](http://oee.nrcan.gc.ca/cipec/ieep/newscentre/foundry/Foundry_eng.pdf)  
[http://oee.nrcan.gc.ca/cipec/ieep/newscentre/foundry/Foundry\\_eng.pdf](http://oee.nrcan.gc.ca/cipec/ieep/newscentre/foundry/Foundry_eng.pdf)  
[Ceramic Composite Die for Metalcasting, 2000](http://www1.eere.energy.gov/industry/metalcasting/pdfs/merc.pdf)  
<http://www1.eere.energy.gov/industry/metalcasting/pdfs/merc.pdf>  
[US Department of Energy – Metal Casting, 2010](http://www1.eere.energy.gov/industry/metalcasting/)  
<http://www1.eere.energy.gov/industry/metalcasting/>  
[Air Pollution Requirements for Foundries, 2007](http://www.epa.ohio.gov/portals/41/sb/publications/foundries.pdf)  
<http://www.epa.ohio.gov/portals/41/sb/publications/foundries.pdf>

The following additional documents may be useful:

[Identifying Your Hazardous Waste, 2010](http://www.epa.ohio.gov/portals/41/sb/publications/identifvingwaste.pdf)  
<http://www.epa.ohio.gov/portals/41/sb/publications/identifvingwaste.pdf>  
[Use of Generator Knowledge in Complying with OAC 3745-52-11, 2005](http://epa.ohio.gov/portals/32/pdf/GeneratorKnowledge6.pdf)  
<http://epa.ohio.gov/portals/32/pdf/GeneratorKnowledge6.pdf>  
[OAC3745-52-11 Hazardous waste determination](http://www.epa.ohio.gov/dhwm/laws_regs.aspx)  
[OAC 3745-51-21 to 24 characteristic hazardous waste](http://www.epa.ohio.gov/dhwm/laws_regs.aspx)  
[http://www.epa.ohio.gov/dhwm/laws\\_regs.aspx](http://www.epa.ohio.gov/dhwm/laws_regs.aspx)  
[Hazardous Waste Generator Categories and Episodic Generation 2007](http://epa.ohio.gov/portals/32/pdf/Episodic_Generation.pdf)  
[http://epa.ohio.gov/portals/32/pdf/Episodic\\_Generation.pdf](http://epa.ohio.gov/portals/32/pdf/Episodic_Generation.pdf)  
[Are You Properly Managing Your Hazardous Waste Containers? 2010](http://www.epa.ohio.gov/portals/41/sb/publications/hazwastecontainers.pdf)  
<http://www.epa.ohio.gov/portals/41/sb/publications/hazwastecontainers.pdf>  
[Ohio's Universal Waste Rules: Are You Handling Used Lamps Correctly? 2008](http://www.epa.ohio.gov/portals/41/sb/publications/Lampcompliancechecklist.pdf)  
<http://www.epa.ohio.gov/portals/41/sb/publications/Lampcompliancechecklist.pdf>  
[The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil, 2006](http://epa.ohio.gov/portals/32/pdf/Used_Oil_Generators_Guidance.pdf)  
[http://epa.ohio.gov/portals/32/pdf/Used\\_Oil\\_Generators\\_Guidance.pdf](http://epa.ohio.gov/portals/32/pdf/Used_Oil_Generators_Guidance.pdf)  
[Onsite Pollution Prevention Assistance](http://epa.ohio.gov/portals/41/p2/P2OnsiteBrochure.pdf)  
<http://epa.ohio.gov/portals/41/p2/P2OnsiteBrochure.pdf>  
[Pollution Prevention Opportunities, 2003](http://epa.ohio.gov/portals/32/pdf/P2OppsGeneral.pdf)  
<http://epa.ohio.gov/portals/32/pdf/P2OppsGeneral.pdf>

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Pollution Prevention (P2) Opportunities: Easy to Implement P2, 2009

<http://epaintra.epa.state.oh.us/dhwm/p2/EasytoImplementP28242006.pdf>

Water Use Reduction for Businesses, 2008

<http://www.epa.ohio.gov/LinkClick.aspx?fileticket=VBi3sVneuuQ%3d&tabid=2659>

Sustainable/Green Business Toolkit, October 2010

<http://epa.ohio.gov/LinkClick.aspx?fileticket=6PhtW3gaSyk%3d&tabid=2668>

E4S Sustainable Business to Business Directory

[http://www.e4s.org/content/resource\\_energy\\_efficiency.asp](http://www.e4s.org/content/resource_energy_efficiency.asp)

Midwest Combined Heat and Power Application Center

<http://www.chpcentermw.org/home.html>

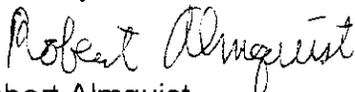
Other information and suggestions:

- Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides compliance and pollution prevention assistance on environmental issues (including sources of funding) related to air, land, and water. They can be contacted at (800) 329-7518, or <http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/ocapp>.
- Entrepreneurs for Sustainability is a group that seeks to "build a sustainable regional economy in Northeast Ohio that will create prosperity and total community health." They offer workshops, conferences, a business to business directory and more. Their website is at: <http://www.e4s.org/content/index.asp>.
- 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/>.
- The Clean Air Resource Center offers help in understanding EPA air quality requirements. In addition, if your business is required to purchase new equipment, they can offer better-cost financing with special tax incentives. Their phone number is (800) 225-5051 and website is <http://www.ohioairquality.org/>.
- Ohio Bureau of Workers' Compensation has an OSHA On-Site Consultation service which includes free on-site safety inspections and consultation, safety program assistance, and safety and hygiene training or seminars. More information can be found at: <http://www.ohiobwc.com/employer/programs/safety/SandHOSHAOnSite.asp>.

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If you have any questions, please contact me at (330) 963-1217, or [robert.almquist@epa.state.oh.us](mailto:robert.almquist@epa.state.oh.us). I look forward to your prompt response addressing all of the cited violations.

Sincerely,



Robert Almquist  
Division of Materials and Waste Management

RA:cl  
Enclosures

ec: Frank Popotnik, DMWM, NEDO  
Natalie Oryshkewych, DMWM, NEDO  
Jeff Mayhugh, DMWM, CO  
Sherry Slone, DMWM, NEDO

cc: Marlene Kinney, DMWM, 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.

Send to Central Office



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

For Ohio EPA use only

Completed verification forms required to be submitted to CO should be e-mailed to [brad.hauser@epa.state.oh.us](mailto:brad.hauser@epa.state.oh.us).

<b>Site EPA ID No.</b>	EPA ID Number: <b>OHD 981 090 376</b>		Website: (Optional)					
	<b>Site Name</b>		Name: <b>Akron Brass Co Plant 3</b>					
<b>Site Location Information</b>	Street Address: <b>1415 E Bowman St.</b>							
	City, Town, or Village: <b>Wooster</b>		State: <b>OH</b>					
	County Name: <b>Wayne</b>		Zip Code:					
<b>Site Land Type</b> (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**NAICS code(s)**  
[www.census.gov/epcd/www/naics.html](http://www.census.gov/epcd/www/naics.html)

**332919**

<b>Facility Representative</b>  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: <b>Alora</b>		MI: <b>J</b>	Last Name: <b>Miller</b>	
	Title: <b>EHS Manager</b>				
	Phone Number: <b>330-287-7017</b>		Phone Number Extension:		
	E-Mail Address: <b>amiller@akronbrass.com</b>				
	Fax Number: <b>330-287-7106</b>		Fax Number Extension:		
	Street or P.O. Box: <b>PO Box 86</b>				
	City, Town or Village: <b>Wooster</b>		State: <b>Ohio</b>		

<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner:		Date Became Owner						
	<b>Premier Farnell Corp</b>		(mm/dd/yyyy): <b>04/10/1996</b>						
	Owner Type:	Private	County	District	Federal	Indian	Municipal	State	Other
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Street or P.O. Box: <b>7061 E Pleasant Valley Rd.</b>					City, Town or Village: <b>Independence</b>			Owner Phone #: <b>216-525-4300</b>
	State: <b>Ohio</b>		Country:		Zip Code: <b>44131</b>				
	Name of Site's Operator:		Date Became Operator						
	<b>Akron Brass Co</b>		(mm/dd/yyyy): <b>4/10/1996</b>						
	Operator Type:	Private	County	District	Federal	Indian	Municipal	State	Other
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Street or P.O. Box: <b>PO Box 86</b>					City, Town or Village: <b>Wooster</b>		Operator Phone #: <b>330-264-5678</b>		
State: <b>Ohio</b>		Country:		Zip Code: <b>44691</b>					

**VIOLATIONS CITED?**     Yes     No

**TYPE OF HANDLER - MARK "X" AS APPROPRIATE**

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input checked="" type="checkbox"/> Large Quantity Generator (LQG)
<input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.	<input type="checkbox"/> Small Quantity Generator (SQG)	<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
	<input type="checkbox"/> U.S. Importer of Hazardous Waste	<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

**TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)**

- |   |  |
|---|--|
| <input type="checkbox"/> Hazardous Waste Transporter                    | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace       |
| <input type="checkbox"/> Hazardous Waste Transfer Facility              | <input type="checkbox"/> Small Quantity On-Site Burner Exemption       |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Recycler of Hazardous Waste                    | <input type="checkbox"/> Underground Injection Control Facility        |
| <input type="checkbox"/> 72-Hour Recycler                               | <input type="checkbox"/> Receives Hazardous Waste from Off-site        |

**UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED**

**(CHECK ALL BOXES THAT APPLY)**

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste                         | <input type="checkbox"/> Destination Facility for Universal Waste |
| <input type="checkbox"/> Large Quantity Handler of Universal Waste<br>(accumulates 5,000 kg. or more) |   |

**CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES**

- Batteries  
 Pesticides  
 Mercury containing equipment  
 Lamps

**USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))**

- Used Oil Generator  
 Used Oil Transporter  
 Used Oil Transfer Facility  
 Used Oil Processor  
 Used Oil Re-refiner  
 Off-Specification Used Oil Burner  
 Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil  
 Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

**Eligible Academic Entities with Laboratories:** Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

- College or University  
 Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university  
 Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

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

**D006                      D008**

**COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.**

Announced       Yes       No      Additional Facility Representatives:      **John Uhl, Foundry Manager**  
Tanks               Yes       No  
Containers         Yes       No

Name of Inspector(s)  
**Robert Almquist**

Name of Inspector(s)  
**Sherry Slone**

Date of Inspection/Time  
(mm/dd/yyyy) (hh:mm)  
**04/11/2011**

**Comments:**

Process and Waste Summary for:

Akron Brass, OHD 981 090 376, LQG, 4-11-11 inspection

#	Process generating the waste	Waste description and haz. codes	Profile #	Date of last analysis	Date of last LDR	Amount generated	On-site management	Off-site management
1	Melting scrap and ingots	Slag/skims			NA		Collected in drums at furnace, full drums stored in SE corner of building	Sent for recycling to Imet. Not a waste because it is used as an effective substitute for a commercial product (OAC 3745-51-02(E)(1))
2	Melting scrap and ingots	West dust collector waste, D006 (cadmium), D008 (lead)	D097295DET	4/27/99 (TCLP: cadmium 11 mg/l, lead 529 mg/l)	9-27-10	Last shipped 10 drums on 4-20-11	Collected in 6 satellite drums under the dust collector. When full, drums are moved to warehouse area.	Sent to EQ Detroit, Detroit, MI for stabilization or chemical fixation prior to disposal at another site (H111)
3	Sand cast operations	West baghouse waste, D008 (lead)	Included in profile for waste number 2	5/26/99 (TCLP lead 28 mg/l)	Treated as same waste as number 2	Included in waste 2 above	Collected in 8 satellite drums under the bag house. When full, drums are moved to warehouse area.	Shipped on manifest as same waste as number 2
4	Casting	Used mold sand that cannot be	13153	1-21-10 (TCLP cadmium)			Collected in hoppers and then dumped into 20	Sent to EnviroSAFE Services of Ohio, Oregon, OH for

		reused, D008		0.25 mg/l, lead 145 mg/l)			yard roll off box that is stored in southeast corner of building	landfill or surface impoundment that will be closed as landfill (to include on-site treatment and/or stabilization) (H132)
5	1 <sup>st</sup> shot blasting of castings	Shot blasting waste				Included in waste 4 above	Collected in two buckets under discharge pipes at shot blaster. These buckets are emptied into a hopper. The hopper is emptied into the roll-off box mentioned in waste 4 above.	Shipped on manifest as same waste as number 4
6	Casting	Inner part of casting, D008					Same roll-off box	Shipped on manifest as same waste as number 4
7	West bag house and/or dust collector	filters				Have not been generated in the last couple of years	Same roll-off box	Shipped on manifest as same waste as number 4
8	Cutoff saw, grinders, west shot	Waste collected in inside dust			NA		Collected in drums, full drums stored in SE	Sent for recycling to Imet. Not a waste because it is

	blaster	collector					corner of building	a sludge exhibiting a characteristic of hazardous waste that is reclaimed (OAC 3745-51-02 table)
9	Parts cleaning	Waste solvent with a flash point of 106 degrees F				26 gallons shipped on 4-21-11	Taken directly out of parts washer	Shipped to Heritage-Crystal Clean, Broadview Heights, OH for a continued use
10	Lighting	Waste fluorescent lamps			NA	Last shipment was 20 pounds shipped on 9-27-11		Shipped to Environmental Recycling, Bowling Green, OH for recycling.
11	Foundry machinery	Hydraulic oil drained from machinery (Used oil)			NA	One drum generated about every about 6 months. and that this is shipped to Plant 2 and then shipped out from there.	Stored in drum on loading dock in southeast corner of facility	Shipped to Plant 2 and then shipped to Clean Water Limited, Mansfield, OH (OHR 000 139 972)
12	Machining	chips					Collected in drums, full drums stored in SE	Sent for recycling to Imet. Not a waste because it is

							corner of building	an excluded scrap metal being recycled (OAC 3745-51-04(A)(13))
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**SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS**

<b>Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more</b>		
<b>Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less</b>		
<b>PROHIBITIONS</b>		
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<b>WASTE MANAGEMENT AND LABELING/MARKING</b>		
<b>UNIVERSAL WASTE BATTERIES no waste batteries seen</b>		
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>UNIVERSAL WASTE PESTICIDES no waste pesticides seen</b>		
8.	Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97, of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
11.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(B)(4)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides"? [3745-273-14(B)(1)&(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste-Pesticides" or "Waste Pesticides"? [3745-273-	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	14(C)(1)&(2)]	
<b>UNIVERSAL WASTE MERCURY-CONTAINING EQUIPMENT none seen</b>		
14.	Has mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage or damage that could cause leaks been placed in a container that is closed, structurally sound, compatible with contents of the device and lacks evidence of leakage, spillage or damage that could cause leakage and is designed to prevent escape of mercury into the environment by volatilization or any other means? [3745-273-13(C)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]	
a.	Remove and manage the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-13(C)(2)(a)&(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)&(d)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-13(C)(2)(h)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
16.	If the open original housing holding mercury is removed from a mercury-containing equipment that does not contain an ampule, does the SQUWH: [3745-273-13(C)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Immediately seal the original housing holding the mercury with an air-tight seal to prevent the release of any mercury to the environment? [3745-273-13(C)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Follow all requirements for removing ampules and managing removed ampules in accordance with 3745-273-13(C)(2)? [3745-273-13(C)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
17.	When removing mercury containing ampules from mercury-containing equipment or sealing mercury from its original housing if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining mercury-containing device), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-13(C)(4)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-13(C)(4)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Is mercury-containing equipment or containers of mercury-containing equipment labelled either "Universal Waste-Mercury-Containing Equipment" or "Waste Mercury-Containing Equipment" or "Used Mercury-Containing Equipment"? [3745-237-14(D)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

19.	Are mercury-containing thermostats or containers containing ONLY thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)" [3745-273-14(D)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>UNIVERSAL WASTE LAMPS</b>		
20.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
21.	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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<p><b>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 rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.</b></p>		
22.	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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<b>ACCUMULATION TIME</b>		
23.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If not, is 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><b>NOTE: Accumulation is defined as date generated or date received from another handler.</b></p>		
24.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)]  If yes, describe below: Bill of Lading dated 9-27-10 showing shipment of 20 pounds of waste lamps to Environmental Recycling, Bowling Green, OH	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>EMPLOYEE TRAINING</b>		
25.	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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<b>RESPONSE TO RELEASES no releases seen</b>		
26.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
27.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
28.	If the material released is a hazardous waste, was it managed as required	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	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 OAC Chapter 3745-52) [3745-273-17(B)]				
<b>OFF-SITE SHIPMENTS</b>					
<i>NOTE: If a SQUWH self-transportes waste, then the handler must comply with the Universal Waste transporter requirements.</i>					
29.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/> N/A <input type="checkbox"/>
30.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/> N/A <input type="checkbox"/>
31.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/> N/A <input type="checkbox"/>
32.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/> N/A <input type="checkbox"/>
33.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u> :	Yes	<input type="checkbox"/>	No	<input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	a. Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/> N/A <input type="checkbox"/>
34.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>EXPORTS</b>					
35.	Is waste being sent to a foreign destination? If so:	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/> N/A <input type="checkbox"/>
	b. Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/> N/A <input type="checkbox"/>
	c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/> N/A <input type="checkbox"/>

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

CESQG: ≤100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.  
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.  
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.  
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used: Safety shoes and glasses

**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)]	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 checked="" 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 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"/>
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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 3745-66-100 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"/>
<b>MANIFEST REQUIREMENTS</b>		
12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	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)(1)]&[3745-52-27(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>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)(1)]</i>		
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"/>
<i>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)]</i>		
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"/>
<i>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.</i>		
17.	If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
18.	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
19.	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>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.</i>		
<b>PERSONNEL TRAINING</b>		
21.	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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
22.	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)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]</i>		
23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
25.	Does the generator provide annual refresher training to employees? [3745-	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	65-16(C)]	
26.	Does the generator keep records and documentation of:	
	a. Job titles? [3745-65-16(D)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	b. Job descriptions? [3745-65-16(D)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	c. Type and amount of training given to each person? [3745-65-16(D)(3)] <b>They stated all employees receive the same training because all may clean up waste sand from the mold line.</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. Completed training or job experience required? [3745-65-16(D)(4)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
27.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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

Job Performed	Name of Employee	Date Trained

#### CONTINGENCY PLAN

28.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 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. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]

30.	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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
31.	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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> See 29c
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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**

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

*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**

34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
35.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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

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

**SATELLITE ACCUMULATION AREA REQUIREMENTS**

43.	Does the generator ensure that satellite accumulation area(s):	
a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Are under the control of the operator of the process generating the	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	waste? [3745-52-34(C)(1)]				
c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/> N/A <input type="checkbox"/>
d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/> N/A <input checked="" type="checkbox"/>
e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/> N/A <input type="checkbox"/>
f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes		No	<input checked="" type="checkbox"/> N/A <input type="checkbox"/>
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/> N/A <input type="checkbox"/>
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	<input checked="" type="checkbox"/>	No	<input type="checkbox"/> N/A <input type="checkbox"/>
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	<input type="checkbox"/>	No	<input checked="" type="checkbox"/> N/A <input type="checkbox"/>

*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**

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

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

48.	Is the container accumulation areas(s) inspected weekly? [3745-66-74]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/> N/A <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: "Week" means 7 consecutive days per ORC§1.44(A).*

49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/> N/A <input checked="" type="checkbox"/>
50.	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	<input type="checkbox"/>	No	<input type="checkbox"/> N/A <input checked="" type="checkbox"/>
51.	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	<input type="checkbox"/>	No	<input type="checkbox"/> N/A <input checked="" type="checkbox"/>
52.	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	<input type="checkbox"/>	No	<input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*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.*

53.	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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*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**

54.	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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*NOTE: Continue with the generator LDR requirements on the next page.*

**GENERATOR LDR REQUIREMENTS**

*NOTE: This LDR checklist does not include the requirements for generators that treat to meet LDR standards. If the generator treats, the inspector should use the stand-alone Generator LDR checklist instead of this checklist.*

**GENERAL REQUIREMENTS**

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

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

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

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

6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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*NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.*

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

7.	Did the generator treat his HW /soil on-site <u>to meet</u> the LDR treatment standard?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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*NOTE: If "Yes" see question #16.*

8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
i.	Applicable HW codes?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
ii.	Manifest number of the first shipment to the TSD?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
iii.	A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination.?"	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

10.	Does the generator have a copy of the LDR notification form/notice on file? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<b>NOTIFICATION FORM</b>				
11.	Does the LDR Notification form contain the following information:			
a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<i>NOTE: A wastewater contains &lt;1% by wt. total suspended solids (TSS) and &lt;1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.</i>				
e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<i>NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories</i>				
f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<i>NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.</i>				
g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<i>NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.</i>				
<b>PROHIBITED DILUTION</b>				
12.	Is the HW treated by burning? If "No" go to #15.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
13.	Is the HW a metal-bearing HW?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<i>NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs is given in the Appendix to 3745-270-03.</i>				
14.	a. Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless <b>one</b> of the following conditions apply. [3745-270-03(c)]			
i.	Contains > 1% TOC?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
ii.	Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
v.	Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

	improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	
15.	Was the HW treated by wastewater treatment?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: If "Yes", HW is improperly being treated by dilution.</i>		
b.	Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: If the answers to b &amp; c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].</i>		
<i>NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.</i>		

**USED OIL INSPECTION CHECKLIST  
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

*NOTE: 1. A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.*

*2. Inspectors can check BUSTR's web-site at [https://www.comapps.ohio.gov/sfm/fire\\_apps/bust/bustr/PublicInquiry.asp](https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp) to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at: [https://www.comapps.ohio.gov/sfm/fire\\_apps/bust/bustr/SearchByCounty.asp](https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp).*

**PROHIBITIONS**

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: For example, used oil contaminated scrap metal stored in a pile.*

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).*

**GENERATOR STANDARDS**

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.*

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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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*NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.*

6.	Does the generator store used oil in tanks, or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

<b>ON-SITE BURNING IN SPACE HEATER</b>		
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).*

<b>GENERATOR TRANSPORTATION</b>		
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).*

<b>COLLECTION CENTERS AND AGGREGATION POINTS</b>		
13.	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.*