



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

February 16, 2007

RE: STAVELY SERVICES FLUIDS ANALYSIS
OHD987009974
CUYAHOGA COUNTY
SQG - NOV

Margo Collins, Chemist
Stavely Services Fluids Analysis
18419 Euclid Ave.
Cleveland, OH 44112-1016

Dear Ms. Collins:

On January 31, 2007, I conducted an audit of your facility. The purpose of the audit was to determine Stavely's compliance with Ohio's hazardous waste laws and rules as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). The audit included a review of your available records, and an inspection of your laboratory and your waste storage area outside. You represented the facility during the audit.

Your records indicate that your facility currently is classified as a small quantity generator (SQG) of hazardous waste and so you were audited as an SQG. However, please be aware that your annual reports and manifests indicate that for the majority of 2006 you were operating as a large quantity generator (LQG) of hazardous waste. During any month that you generate over 1000 Kg of hazardous waste you would be required to comply with all of the rules pertaining to an LQG. I gave you a copy of the inspection checklist for an LQG and suggested that you review it and make certain your facility will be in compliance with all applicable rules in the event that your generation amount increases. You should note that as an LQG any containers of ignitable waste must be located at least 50 feet from your property line. Your container storage area appears to be only about 15-20 feet from your property boundary.

The following violations of the SQG rules were noted:

1. Manifests - OAC 3745-52-42(B)

You indicated 17 drums of hazardous waste were manifested to Chemtron on October 5, 2006, but no return to generator copy of the manifest was found in your file and no notification was made to Ohio EPA that confirmation of delivery was not received within 60 days as required. Please contact Chemtron to request a copy of the manifest with their signature accepting this load, or if not available, try to determine the whereabouts of these 17 drums. Submit to us a copy of the final manifest or any documentation describing your efforts to locate the waste.

2. Information Posted by Telephone - OAC 3745-52-34(D)(5)(b)

Stavely has not posted the required information by the telephone. The required information includes:

- * the name and telephone number of the emergency coordinator
- * locations of fire extinguishers and spill control material and fire alarms
- * the telephone number of the fire department unless you have a direct alarm

Please post the above information immediately by the telephone and submit a photograph to us documenting the posting.

3. Location of Satellite Accumulation Area - OAC 3745-52-34(C)(1)

Two 5 gallon containers of a waste heptane and oil mixture were stored on the floor near the heptane still in the oil room. The open containers were not located at the point of generation and were not under the control of the operator of the process that generated the waste. These wastes must stay at the point of generation and be under the control of the operator of the process that generated them, or placed directly into the still, or this area must be managed as a storage area. Please describe in writing how the used heptane will be managed appropriately in the future.

4. Open Satellite Containers - OAC 3745-52-34(C)(1)(a)

Two 5 gallon containers of waste toluene under the toluene still were open and two 5 gallon containers of waste heptane in the oil room were open. Containers of hazardous waste must remain closed except while actively adding or removing waste. These containers must be closed immediately. Please submit a photograph showing these containers are closed. Also describe what protocols have been instituted to make certain these containers are appropriately closed in the future.

5. Unlabeled Satellite Containers - OAC 3745-52-34(C)(1)(b)

Three satellite safety cans containing hazardous waste at work stations in the lab area were not labeled. Also the two 5 gallon containers of waste toluene under the still were not labeled. Please submit a photograph showing these containers are properly labeled and describe what protocols have been instituted to make certain these containers are properly labeled in the future.

6. Labeling and Dating of Storage Area Containers - OAC 3745-52-34(D)(4)

One grounded drum of waste solvent was not labeled with the words "hazardous waste" and was not dated. Four partially filled drums of hazardous waste were not dated. One 5 gallon safety can of waste solvent on a cart was not labeled "hazardous waste" and was not dated. All containers of hazardous waste in the storage area must be labeled with the words "hazardous waste" and must be dated with the date the first drop of waste is placed in them. Please properly label and date all storage containers and submit a photo demonstrating these actions. Also describe what protocols have been instituted to make certain these containers are properly labeled and dated in the future.

7. Personnel Training - OAC 3745-52-34(D)(5)(C)

Because of the above violations it is apparent that not all of the employees are thoroughly familiar with proper waste handling. Please describe in writing what training has been provided or what other measures have been taken to correct this problem.

8. Emergency Communication Device - OAC 3745-65-32(B) and OAC 3745-65-34(A)

Stavely is not equipped with a device such as a telephone immediately available at the container storage area or a hand-held two-way radio, capable of summoning emergency assistance as required. An intercom device was mounted on a wall in the container storage area but it was not functional. Please provide immediate access to an emergency communication device as required and submit a written description to me of what has been provided and how this violation has been addressed.

9. Testing (Inspection) of Emergency Equipment - OAC 3745-65-33

All emergency equipment must be tested (inspected) to assure its proper operation in time of an emergency. These tests (inspections) must be recorded in a log. Only fire extinguishers were inspected. The other emergency equipment has not been inspected. When we tried to use the intercom in the container storage area it stuck on and did not work. Please submit two weeks of completed logs, documenting that you are inspecting/testing all emergency equipment as required.

Go to this link for a blank example inspection log that could be used for this purpose: <http://www.epa.state.oh.us/dhwm/pdf/equiplog.PDF>.

10. Container Inspection Log - OAC 3745-66-74

Weekly inspections of the hazardous waste storage area have not been documented in a log or summary. Please submit two weeks of completed logs, documenting that you are inspecting the container storage area weekly as required.

Go to this link for a blank example inspection log that could be used for this purpose: <http://www.epa.state.oh.us/dhwm/pdf/sqglog.PDF>.

Submit the documentation requested for each violation to my attention within 30 days of the date of this letter. Enclosed is a copy of the inspection checklists. A copy of the hazardous waste rules can be found on our web site @ www.epa.state.oh.us/dhwm. Information about Pollution Prevention can be found @ www.epa.state.oh.us/opp.

If you should have any questions related to this letter please call me at (330) 963-1226.

Sincerely,



Sheryl K. Slone, P.E.
Environmental Engineer
Division of Hazardous Waste Management

SKS:ddw

Enclosure

cc: Natalie Oryshkewych, DHWM, NEDO
Harry Sarvis, DHWM, CO

NOTICE:

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

E-mail this completed form to tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM		For Ohio EPA use only																		
2. Site EPA ID No.	EPA ID Number: <u>OH D 987 009 974</u>																				
3. Site Name	Name: <u>STAVELY SERVICES FLUIDS ANALYSIS</u> <small>Website (optional): <u>SSS</u></small>																				
4. Site Location Information	Street Address: <u>18419 EUCLID AVE.</u>																				
	City, Town, or Village: <u>CLEVELAND</u>	State: <u>OH</u>																			
	County Name: <u>CUYAHOGA</u>	Zip Code: <u>44112</u>																			
5. Site Land Type (check only one)	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input type="checkbox"/></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	<input type="checkbox"/>									
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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>														
6. NAICS code(s) www.census.gov/epcd/www/naics.html	<table border="1" style="width: 100%;"> <tr> <td>A.</td> <td>B.</td> </tr> <tr> <td>C.</td> <td>D.</td> </tr> </table>			A.	B.	C.	D.														
A.	B.																				
C.	D.																				
7. Facility Representative: Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	First Name: <u>MARGO</u> MI: Last Name: <u>COLLINS</u>																				
	Phone Number: <u>216 383 8200</u>		Phone Number Extension: <u>258</u>																		
	E-Mail Address: <u>margo.collins@stavelyna.com</u>																				
	Fax Number: <u>216 383 9633</u>		Fax Number Extension:																		
	Street or P.O. Box:																				
	City, Town or Village:																				
State: Country: Zip Code:																					
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	A. Name of Site's Legal Owner: <u>STAVELY SERVICES</u>		Date Became Owner (mm/dd/yyyy): <u>01/02/1989</u>																		
	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Owner Type:</td> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td>Mark with an X</td> <td><input type="checkbox"/></td> </tr> </table>			Owner Type:	Private	County	District	Federal	Indian	Municipal	State	Other	Mark with an X	<input type="checkbox"/>							
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	Street or P.O. Box:																				
	City, Town, or Village:		Owner Phone #:																		
	State:		Country: Zip Code:																		
	B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):																		
	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Operator Type:</td> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td>Mark with an X</td> <td><input type="checkbox"/></td> </tr> </table>			Operator Type:	Private	County	District	Federal	Indian	Municipal	State	Other	Mark with an X	<input type="checkbox"/>							
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Street or P.O. Box:																					
City, Town, or Village:		Operator Phone #:																			
State:		Country: Zip Code:																			
9. Violations Cited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																					
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.) <input type="checkbox"/> Not Regulated																					

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

A. Hazardous Waste Activities	
(choose only one of the following categories)	
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> 3. Treater, Storer or Disposer of Hazardous Waste
<input type="checkbox"/> a. Large Quantity Generator (LQG):	<input type="checkbox"/> 4. Recycler of Hazardous Waste
<input checked="" type="checkbox"/> b. Small Quantity Generator (SQG)	<input type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/> a. Small Quantity On-site Burner Exemption
<input type="checkbox"/> d. United States Importer of Hazardous Waste	<input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/> 6. Underground Injection Control Facility
	<input type="checkbox"/> 7. Hazardous Waste Transporter

B. Universal Waste Activities	C. Used Oil Activities															
<input checked="" type="checkbox"/> 1. Small Quantity Handler of Universal Waste (Indicate types of universal waste generated and/or accumulated (check all boxes that apply):	<input checked="" type="checkbox"/> 1. Used Oil Generator															
<input type="checkbox"/> 2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more).	<input type="checkbox"/> 2. Used Oil Transporter Indicate Type(s) of Activity(ies)															
<input type="checkbox"/> 3. Destination Facility for Universal Waste (Check all boxes below that apply for each of the three types of facilities above.)	<input type="checkbox"/> Transporter															
	<input type="checkbox"/> Transfer Facility															
	<input type="checkbox"/> 3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)															
	<input type="checkbox"/> Processor															
	<input type="checkbox"/> Re-refiner															
<table border="0"> <tr> <td></td> <td><u>Generated</u></td> <td><u>Accumulated</u></td> </tr> <tr> <td>A. Batteries</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>B. Pesticides</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>C. Thermostats</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>D. Lamps</td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>		<u>Generated</u>	<u>Accumulated</u>	A. Batteries	<input type="checkbox"/>	<input type="checkbox"/>	B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>	C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>	D. Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> 4. Off-Specification Used Oil Burner
	<u>Generated</u>	<u>Accumulated</u>														
A. Batteries	<input type="checkbox"/>	<input type="checkbox"/>														
B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>														
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>														
D. Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/>														
	<input type="checkbox"/> 5. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)															
	<input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Oil															
	<input type="checkbox"/> b. Used Oil to Off-Specification Used Oil Burner															

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

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

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

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

SHERRY SLONE _____ *1/31/07 10:10 AM*

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

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

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name:

Facility Type: LQG/SQG/CESQG/TSD Date of Inspection:

EPA ID#:

Waste Generated

On- or Off-Site Management

P2 Activities

Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	wiping hands, outside of bottles rags	containers	—	commercial laundry - clean & reuse		
2	lighting fluorescent lamps	card boxes	—	Chemtron for recycling		
3	oil testing oil	varies - tank outside above ground	—	Homan - recycling		
4	oil testing solvents - heptane, toluene	varies - containers	heptane still and toluene still	Chemtron		

FO05 - toluene
 D001 - heptane, alcohol
 D022 - chloroform

5							
6							
7							
8							
9							

REMARKS-GENERAL INFORMATION

General Process Information: *This is a fluid analysis laboratory, services are provided to truck fleets, railroads, utilities, construction companies. Oils and fluids from engines, gearboxes, and transmissions are analyzed, water, suds, oxidation, aging, metals, diesel fuel, particle count, etc.*

Regulatory/Enforcement History (if applicable): *DFP # 05, 4/17/02, (training, inspections, cont. plan, communication device, containers open, unlabeled, undated, bad condition, 50 foot isolation, used oil label & release)*

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.
 Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other:

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

CESQG: < 100 Kg. (approximately 25-30 gallons) of waste in a calendar month

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 glasses, safety shoes*

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A
2. Has the generator obtained a U.S. EPA I.D. number? [3745-52-12] Yes No N/A
3. Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)] Yes No N/A
4. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)] Yes No N/A
5. Does the generator accumulate hazardous waste? Yes No N/A

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

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

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

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

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

8. Does the generator treat hazardous waste in a: No
- a. Container that meets 3745-66-70 to 3745-66-77? Yes No N/A
- b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C) and Yes No N/A
- c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A
- d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: *Complete appropriate checklist for each unit.*

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

MANIFEST REQUIREMENTS

9. Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)] Yes No N/A
10. Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)] Yes No N/A
- a. Does the contractual agreement specify the type of waste and frequency of shipment? Yes No N/A
- b. Is the transport vehicle owned and operated by the reclaimer? Yes No N/A
- c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? Yes No N/A

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

11. Have items 1 through 20 of each manifest been completed? [3745-52-20(A)] Yes No N/A

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

12. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] Yes No N/A

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

13. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes No N/A

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

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.

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

MC indicated 17 drums were manifested out on 10/5/06 but no RTA copy was found.

16. Are signed copies of all manifests being retained for at least three years? [3745-52-40] Yes No N/A

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

PREPAREDNESS AND PREVENTION

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

- 18. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)] No
 - a. Name and telephone number of emergency coordinator? Yes No N/A
 - b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes No N/A
 - c. Telephone number of local fire department? Yes No N/A

- 19. Are employees familiar with waste handling and emergency procedures [3745-52-34(D)(5)(c)] Yes No N/A
satellite accum & haz waste drums not labeled properly

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

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

- 22. Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:
 - a Internal Alarm system? [3745-65-32(A)] Yes No N/A
 - b Emergency communication device? [3745-65-32(B)] Yes No N/A
intercom not working
 - c Portable fire control, spill control and decon equipment? [3745-65-32(C)]? Yes No N/A
 - d Water of adequate volume/pressure? [3745-65-32(D)] Yes No N/A
per MC

- 23. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency [3745-65-33] Yes No N/A
intercom not working

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

- 25. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)] Yes No N/A
intercom not working

- 26. If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32?) [3745-65-34(B)] Yes No N/A

27. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
28. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes No N/A
29. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes No N/A

SATELLITE ACCUMULATION AREA REQUIREMENTS

30. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? {3745-52-34(C)(1)} *heptane no* Yes No N/A
 - b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] *heptane no* Yes No N/A
 - c. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes No N/A
 - d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. *unlabeled open containers of waste toluene under still open heptane containers in back oil room* Yes No N/A
 - e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] *3 satellite safety cans unlabeled* Yes No N/A
31. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes No N/A
- a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes No N/A
 - b. Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes No N/A
 - c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A

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

USE AND MANAGEMENT OF CONTAINERS *< 90 day area / 180 day area*

32. Has the generator marked containers with the words "Hazardous Waste" [3745-52-34(D)(4)] Yes No N/A
*1 drum of waste solvent (grounded) not labeled, not dated
 5 gal safety can on cart not labeled, not dated*
33. Is the accumulation date on each container? [3745-52-34(D)(4)] Yes No N/A
4 partially filled drums had "HW" label but no dates
34. Are hazardous wastes stored in containers which are: Yes No N/A

- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A
- b. In good condition? [3745-66-71] Yes No N/A
- c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A

NOTE: Record location on process summary sheets and photograph the area.

- 35. Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days. *PER MC* Yes No N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
- 36. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes No N/A
- 37. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B) 3745-66-77(A)] Yes No N/A
- 38. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B) ? [3745-66-77(B)] Yes No N/A

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

PRE-TRANSPORT REQUIREMENTS

- 39. Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes No N/A
- 40. Does each container ≤100 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A
- 41. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes No N/A

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

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

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

PROHIBITIONS

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

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES *no waste batteries on site*

- 3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes No N/A RMK#
- 4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes No N/A RMK#
- 5. Does the SQUWH conduct any of the following activities:
 - a. Sort batteries by type? Yes No N/A RMK#
 - b. Mix battery types in one container? Yes No N/A RMK#
 - c. Discharge batteries to remove the electric charge? Yes No N/A RMK#
 - d. Regenerated used batteries? Yes No N/A RMK#
 - e. Disassemble them into individual batteries or cells? Yes No N/A RMK#
 - f. Remove batteries from consumer products? Yes No N/A RMK#
 - g. Remove the electrolyte from the battery? Yes No N/A RMK#
- If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] Yes No N/A RMK#

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] Yes No N/A RMK# _____
- a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] Yes No N/A RMK# _____
- b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] Yes No N/A RMK# _____
7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)" [3745-273-14(A)] Yes No N/A RMK# _____

UNIVERSAL WASTE LAMPS

*- none in storage at time of inspection
- load shipped out recently*

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] Yes No N/A RMK# _____
9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes No N/A RMK# _____
10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)" [3745-273-14(E)] Yes No N/A RMK# _____

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

generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

11. Is the waste accumulated for less than one year? Yes___ No___ N/A___ RMK#___
[3745-273-15(A)] If not:
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes ___ No N/A ___ RMK#___

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

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

EMPLOYEE TRAINING

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

RESPONSE TO RELEASES

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

OFF-SITE SHIPMENTS

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

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] *sent to Chemtron as UW* Yes ___ No N/A ___ RMK# ___

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

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes ___ No N/A ___ RMK# ___
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes ___ No N/A ___ RMK# ___
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes ___ No ___ N/A ___ RMK# ___
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes ___ No ___ N/A ___ RMK# ___

21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
 a. Sending the waste back to the originating handler? [3745-273-18(F)(1)]
 b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)]
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)]

Yes ___ No N/A ___ RMK# ___

Yes ___ No ___ N/A ___ RMK# ___

Yes ___ No ___ N/A ___ RMK# ___

Yes ___ No N/A ___ RMK# ___

Yes ___ No N/A ___ RMK# ___

EXPORTS

24. Is waste being sent to a foreign destination? If so:
 a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]
 b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)]
 c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]

Yes ___ No N/A ___ RMK# ___

REMARKS

USED OIL INSPECTION CHECKLIST (Short Version)

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

PROHIBITIONS

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

USED OIL GENERATOR STANDARDS

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

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

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes ___ No N/A ___ RMK# ___
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes ___ No N/A ___ RMK# ___
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes ___ No N/A RMK# ___

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes No N/A ___ RMK# ___

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REMARKS