



File

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

CERTIFIED MAIL

May 24, 2007

Ron Bunofsky
Astro Shapes
65 Main St.
Struthers, OH 44471

**RE: ASTRO SHAPES, CEI – LQG, OHD 154 165 591, MAHONING COUNTY
NOTICE OF VIOLATION/PARTIAL RETURN TO COMPLAINEE**

Dear Mr. Bunofsky:

On May 9, 2007, Robert Almquist and I of the DHWM-NEDO inspected Astro Shapes for compliance with Ohio hazardous waste laws and regulations found in Chapters 3734 of the Ohio Revised Code (ORC) and 3745 of the Ohio Administrative Code (OAC)

You represented Astro Shapes during the inspection.

Astro Shapes is an aluminum extruder. Astro Coatings is operated at the same location, but it is a different company with a different ID number. Astro Coatings was not inspected.

This letter will explain the violations we found, other general concerns we have, and what you need to do to respond to them. We found the following violations of Ohio's hazardous waste regulations found in Chapter 3745 of the Ohio Administrative Code (OAC). In order to correct them you must do the following and send me all required information **within 30 days** of the date of this letter:

**1. Land Disposal Restrictions
OAC 3745-270-07 (A)(3)(a)**

With the initial shipment of waste to each treatment, storage, or disposal facility, the generator shall send a one-time written notice to each treatment, storage or disposal facility receiving the waste and place a copy in the generator's files.

Astro Shapes did not have a land disposal restriction (LDR) form on file for its two caustic waste streams. This violation was abated on May 16 when you e-mailed copies of the forms to this office.

**2. Content Contingency Plan (Emergency Coordinators)
3745-65-52 (D)**

The contingency plan shall list names, addresses, and phone numbers of all persons qualified to act as emergency coordinator

Astro Shapes's list of emergency coordinators did not include your current address and telephone number. This violation was abated during the inspection when you updated the list.

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

Containers and above ground tanks used to store used oil at generator facilities shall be labeled or marked clearly with the words "Used Oil"

The red tank used to accumulate used oil from the extrusion presses was not labeled per this rule. To abate this violation, you must label the tank with the words "Used Oil". You must photograph the tank and send the photograph to this office.

The following violation from Ohio EPA's December 7, 2001 Partial Return to Compliance Letter (copy enclosed) also remains outstanding:

**3. Evaluation of Wastes
OAC 3745-52-11**

Ohio EPA has determined that the tank accumulating spent caustic from Astro Shapes die-etch process is a hazardous waste tank. Although most of the spent caustic is recycled through a company that uses it to make sodium aluminate, Astro Shapes occasionally has to dispose of the material as hazardous waste. Because the tank is occasionally used to store hazardous waste, it must meet the tank rules in OAC Chapter 3745.

On January 17, 2002, Astro Shapes submitted to Ohio EPA an assessment for the tank. Ohio EPA has reviewed the assessment and determined that more information is needed, specifically the following:

1. The use of an accepted tank standard.
2. Design calculations and drawings of the tank,
3. Design calculations and drawings of the tank ancillaries, and;
4. All associated documents used by the certifying engineer to determine the structural integrity of the tank.

To abate this violation, you must submit the required information so Ohio EPA can complete its review of the assessment. In addition, you must begin inspecting the tank, piping, and ancillary equipment once each operating day. You must submit a copy of an inspection form showing that two actual inspections have been completed.

ASTRO SHAPES
MAY 24, 2007
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You may be able to reduce operating costs with waste minimization/pollution prevention practices. The Ohio EPA offers pollution prevention assessments to help you decide which practices would benefit your operations. If you would like to have a pollution prevention assessment or would like more information please contact me. The following Office of Compliance Assistance and Pollution Prevention website is also a good source of information: <http://www.epa.state.oh.us/ocapp/ocappmain.html>.

Enclosed are copies of the checklists used for the inspection.

Failure to list specific deficiencies in this communication does not relieve Astro Shapes from the responsibility of complying with all applicable Ohio EPA laws and regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Please feel free to contact me at (330) 963-1170 if you have any questions.

Sincerely,



Edward J. D'Amato
Environmental Specialist
Division of Hazardous Waste Management

EJD:ddw

Enclosures

cc: Natalie Oryshkewych, DHWM, NEDO
ec: Frank Popotnik, DHWM, NEDO
Robert Almquist, DHWM, NEDO
Harry Sarvis, DHWM, CO

USED OIL INSPECTION CHECKLIST (Short Version)

Company: Astro Ship EPA I.D.: CHD 154125591

Street: 65 Main St City: Hudson

County: Multnomah State: Ohio Zip: _____

Mailing Address: _____
(IF DIFFERENT FROM ABOVE)

Telephone: _____ Fax: _____

Owner/Operator: _____
(IF DIFFERENT FROM ABOVE)

Street: _____

City: _____ State: _____ Zip: _____

Inspection Date(s): _____ Time(s): _____

Inspection announced? Yes No If so, how much advance notice given? _____

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	Ed D'Amato	OEPA	(330) 963-1200
	<u>Robert G. ...</u>		

Facility Rep(s): Ron Bronofsky

USED OIL MANAGEMENT ACTIVITY

<input checked="" type="checkbox"/> Generator/Collection Center/Aggregation	<input type="checkbox"/> Marketer
<input type="checkbox"/> Transporter/Transfer Facility	<input type="checkbox"/> Off-Spec Burner
<input type="checkbox"/> Processor/Re-Refiner	<input type="checkbox"/> Other (specify)
<input type="checkbox"/> No Generation	

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 or 3745-65 to 3745-69? [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 or 3745-65 to 3745-69? [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 an 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# ___
- used oil recycled on-site*

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# ___

C:\Documents and Settings\EDamato\My Documents\Folder\Forms\inspection forms\USED OIL.SHORT.2001.wpd

REMARKS

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

As to shape

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

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

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

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

Safety Equipment Used:

GENERAL REQUIREMENTS

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

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

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

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

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

NOTE: Complete appropriate checklist for each unit.

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

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

MANIFEST REQUIREMENTS

12. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes No N/A
13. 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 completed. [3745-52-20(A)]

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

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

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

[Facility Name/Inspection Date]

[ID number]

LQG/February 2007

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

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

17. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes No N/A

18. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes No N/A

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

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

PERSONNEL TRAINING

20. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes No N/A

21. Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes No N/A

22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A

23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes No N/A

24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A

25. Does the generator keep records and documentation of:
- a. Job titles [3745-65-16D(1)]? Yes No N/A
 - b. Job descriptions [3745-65-16D(2)]? Yes No N/A
 - c. Type and amount of training given to each person [3745-65-16D(3)]? Yes No N/A
 - d. Completed training or job experience required [3745-65-16D(4)]? Yes No N/A
26. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes No N/A

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

CONTINGENCY PLAN

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

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

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

31. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes No N/A

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

EMERGENCY PROCEDURES

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

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

PREPAREDNESS AND PREVENTION

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

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

35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes No N/A
36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A

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

SATELLITE ACCUMULATION AREA REQUIREMENTS

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

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

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

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

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

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

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

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

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

PRE-TRANSPORT REQUIREMENTS

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

TANK SYSTEM REQUIREMENTS (OAC 3745-66-91 TO 3745-66-101)

Facility: Astro Shapes, Inc. /Struthers

Reviewer: J. Nyers, DHWM/CO

Review Summary: Review requested 8/2/07 by Ed Damato, DHWM/NEDO. Request included written assessment from facility. One tank (6,000 gallons), carbon steel above-ground tank within concrete containment. Tank stores corrosive (D002) liquid waste and was installed in 1994 and therefore considered "New" tank.

NOTE: New Tank System - Installation commencing after July 14, 1986.

Existing Tank System - Installation or operation commencing on/before July 14, 1986.

1. **For an existing or new tank system(s)** has secondary containment been provided? [3745-66-93(A)(1) to (A)(5)] Yes No ___ N/A ___ RMK# ___

- NOTES:**
- A. Secondary containment must be provided for all new tank systems or components, prior to their being put into service. [3745-66-93(A)(1)]
 - B. For an existing tank system(s) of **known and documentable age** secondary containment is required to be provided within two years after January 12, 1987, or when the tank system has reached 15 years of age, whichever came later. [3745-66-93(A)(3)]
 - C. Secondary containment is required for all existing tanks for which the **age cannot be documented**. The tanks were required to have secondary containment within eight years of January 12, 1987 or when the facility turned 15 years of age, whichever came later. [3745-66-93(A)(4)]
 - D. Tank systems that store/treat materials that become hazardous waste after January 12, 1987, must have secondary containment required within the time intervals in OAC 3745-66-93(A)(1) to (A)(4). The date the material became a hazardous waste must be used in place of January 12, 1987. [3745-66-93(A)(5)]
 - E. If the tank system has no secondary containment, or a variance from secondary containment requirements has been granted, skip to the middle of page 5 of this Tank Systems Checklist; (Tank Systems without secondary containment).

2. Is the secondary containment one of the following:

- a. An **External Liner** [3745-66-93(E)(1)(a) - (1)(f)] If so, Yes No ___ N/A ___ RMK# ___
 - i. Is liner designed or operated to contain 100% of the capacity of the largest tank? Yes No ___ N/A ___ RMK# ___
Secondary containment volume is not calculated in assessment. A 4,000 gallon Sodium Hydroxide tank is located within the secondary containment of the hazardous waste tank. The displacement of this tank will need to be considered in calculations of secondary containment volume.
 - ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? Yes No ___ N/A ___ RMK# ___
Tank inside building
 - iii. Is liner free of cracks and gaps? Yes No ___ N/A ___ RMK# ___
The concrete is lined with carbon steel sheet with welded seams.
 - iv. Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release? Yes No ___ N/A ___ RMK# ___

- v. Are chemically resistant water stops in place at all joints? (concrete liners only) Yes ___ No N/A ___ RMK# ___
PE has no info on water stops & compatibility. Recommended that this be evaluated during future inspections.
- vi. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? (concrete liners only) Yes No ___ N/A ___ RMK# ___
Concrete is lined with 1/8 inch thick carbon steel with welded seams.
- b. **Vault System?** [3745-66-93(E)(2)(a) - (2)(f)] If so, Yes ___ No ___ N/A RMK# ___
- c. **Double-Walled Tank?** [3745-66-93(E)(3)(a) - (3)(c)] If so, Yes ___ No ___ N/A RMK# ___
3. Is the secondary containment system for the tank(s) an equivalent device as described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D)(E)] Yes ___ No ___ N/A RMK# ___

SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION (OAC 3745-66-93(B)(C))

4. Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids? [3745-66-93(B)] Yes No ___ N/A ___ RMK# ___
The tank and associated piping are inspected on a daily basis.
5. Does the secondary containment system meet the following minimum requirements of 3745-66-93(C):
- a. Constructed or lined with compatible materials of sufficient strength to prevent failure? Yes No ___ N/A ___ RMK# ___
PE makes a reasonable determination of structure strength based on typical compressive strength of concrete and visual inspection of structure.
- b. Placed on a foundation or base capable of providing support? Yes No ___ N/A ___ RMK# ___
PE refers to 1994 soil report prepared by John Cernica and Associates of Youngstown, Ohio used in analysis.
- c. Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time? Yes No ___ N/A ___ RMK# ___
The tank and associated piping are inspected on a daily basis.
- d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? Yes ___ No ___ N/A ___ RMK# ___
Not clear if system is sloped. Side view drawing needed.
- e. Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner? Yes No ___ N/A ___ RMK# ___
Not explicitly stated. This is the implication from Section 3.0. The tank and associated piping are inspected on a daily basis.

ANCILLARY EQUIPMENT REQUIREMENTS (OAC 3745-66-93(F))

6. Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)? **If not**, is the ancillary equipment:
- Yes No ___ N/A ___ RMK# ___
Piping and pumps all within secondary containment. All piping is inside plant buildings w/concrete floor and, as such, is considered in assessment to have secondary containment. The tank and associated piping are inspected on a daily basis. Pumps are located within secondary containment.
- a. Inspected daily? **AND**;
- Yes ___ No ___ N/A RMK# ___
- b. Is ancillary equipment one of the following:
- i. Above ground piping (exclusive of flanges, joints, valves and connections)?
- Yes ___ No ___ N/A RMK# ___
- ii. Welded flanges, welded joints and/or welded connections?
- Yes ___ No ___ N/A RMK# ___
- iii. Sealless or magnetic coupling pumps and/or sealless valves?
- Yes ___ No ___ N/A RMK# ___
- iv. Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown, and/or loss of pressure-actuated shut-off devices)?
- Yes ___ No ___ N/A RMK# ___

NEW TANK SYSTEM REQUIREMENTS (OAC 3745-66-92)

1. Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)]
- Yes No ___ N/A ___ RMK# ___
2. Does the written assessment include the following: [OAC 3745-66-92(A)]
- a. Certification by an independent, registered, professional engineer?
- Yes No ___ N/A ___ RMK# ___
PE registered in Ohio
- b. Consideration of the design standards of the system?
- Yes No ___ N/A ___ RMK# ___
Constructed to design standard Underwriters Laboratories Standard UL 142. This is not based on the report by the tank provider, but on the opinion of the tank inspector (DJA Inspection Services, Inc.) Based on information obtained from an inspection on July 18, 2007.
- c. Consideration of the hazardous characteristics of the waste(s)?
- Yes No ___ N/A ___ RMK# ___
Waste is D002 corrosive - spent caustic acid. Tank and most of piping constructed of carbon steel which is compatible with waste. Some of the piping in the immediate area around the pumps is PVC, which is also an acceptable material for the spent caustic. Pumps are made of stainless steel.

- d. An evaluation by a corrosion expert (if the external system/components are metal)? Yes ___ No___ N/A RMK#___
- e. A determination of design and operational measures that will be needed to protect the tank system from potential damage (for underground tank components)? Yes ___ No___ N/A RMK#___
- f. Design considerations to ensure that the tank foundations will maintain the load of a full tank? Yes No___ N/A ___ RMK#___
1994 soil report prepared by John Cernica and Associates of Youngstown, Ohio used in analysis.
- g. Design considerations for anchoring the unit to prevent floatation (for tanks situated in a seismic fault zone or saturated zone)? Yes ___ No___ N/A RMK#___
- h. Design considerations to ensure that the tank system will withstand the effects of frost heave (for underground tank systems)? Yes ___ No___ N/A RMK#___
Above ground, inside building - no evidence of heave issues during operational life (1994)
3. Are there written statements by those person who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)] Yes ___ No N/A ___ RMK#___
Tanks installed in 1994 - installation information is not available. PE inspection/certification attest to adequacy of installed tank (refer to Section 4.7).

Do the written statements address all of the following:

- a. Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)] Yes No___ N/A ___ RMK#___
In July 2007, the tanks were inspected by DJA Inspection Services, who found the tank and nozzles to be in good condition, with no leaks or indications of significant corrosion. In 2005 City Machine Technologies of Youngstown, Ohio conducted magnetic particle testing of the welds on the tank and no problems were found.
- b. Statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)] Yes ___ No___ N/A RMK#___
- c. Proper backfilling? [3745-66-92(C)] Yes ___ No___ N/A RMK#___
- d. Tightness test; if the tank was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)] Yes ___ No___ N/A RMK#___
- e. Proper support and protection of ancillary equipment? [3745-66-92(E)] Yes No___ N/A ___ RMK#___
PE assessment addresses this in section 4.6
- f. Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)] Yes ___ No___ N/A RMK#___

TANK SYSTEM - GENERAL OPERATING REQUIREMENTS (OAC 3745-66-94)

1. Does the o/o follow the general operating requirements below:

- a. Does the o/o prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail? [3745-66-94(A)] Yes No ___ N/A ___ RMK# ___
- b. Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)? [3745-66-94(B)] Yes No ___ N/A ___ RMK# ___
Ultrasonic monitor w/visual alarm and readouts.
- c. If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96? [3745-66-94(C)] Yes ___ No ___ N/A RMK# ___

TANK SYSTEM - INSPECTION REQUIREMENTS (OAC 3745-66-95)

1. Has the o/o documented the inspections required in 3745-66-95, in the operating record, including inspection of the following:
- a. Spill control equipment (daily)? [3745-66-95(A)(1)] Yes ___ No ___ N/A ___ RMK# ___
- b. Above ground portion of tank (daily)? [3745-66-95(A)(2)] Yes ___ No ___ N/A ___ RMK# ___
- c. Data from leak detection equipment (daily)? [3745-66-95(A)(3)] Yes ___ No ___ N/A ___ RMK# ___
- d. Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste (daily)? [3745-66-95(A)(4)] Yes ___ No ___ N/A ___ RMK# ___
- e. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(B)(1)] Yes ___ No ___ N/A ___ RMK# ___
- f. Where applicable, all sources of impressed current at least bi-monthly? [3745-66-95(B)(2)] Yes ___ No ___ N/A ___ RMK# ___

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES (OAC 3745-66-98 AND 3745-66-99)

1. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with **one of the following**: [3745-66-98(A)]
- a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-65-17(B)? [3745-66-98(A)(1)]; **OR** Yes ___ No ___ N/A RMK# ___
- b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A)(2)]; **OR** Yes ___ No ___ N/A RMK# ___
- c. The tank is used solely for emergencies? [3745-66-98(A)(3)] Yes ___ No ___ N/A RMK# ___
2. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (1996)? [3745-66-98(B)] Yes ___ No ___ N/A RMK# ___

3. Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material? [3745-66-99]

Yes__ No__ N/A X RMK#__

a. **If so**, have the requirements of 3745-65-17(B) been met?

Yes __ No__ N/A X RMK#__

REMARKS

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

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

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

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

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

Safety Equipment Used: _____

GENERAL REQUIREMENTS

- | | | | | | | |
|---|-----|-------------------------------------|---|-------------------------------------|-----|---|
| 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] | Yes | <input checked="" type="checkbox"/> | N | <input type="checkbox"/> | N/A | — |
| 2. Has the generator obtained a U.S. EPA identification number? [3745-52-12] | Yes | <input checked="" type="checkbox"/> | N | <input type="checkbox"/> | N/A | — |
| 3. Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)] | Yes | <input checked="" type="checkbox"/> | N | <input type="checkbox"/> | N/A | — |
| 4. Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] | Yes | <input type="checkbox"/> | N | <input checked="" type="checkbox"/> | N/A | — |
| 5. Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] | Yes | <input type="checkbox"/> | N | <input checked="" type="checkbox"/> | N/A | — |
| 6. Does the generator accumulate hazardous waste? | Yes | <input checked="" type="checkbox"/> | N | <input type="checkbox"/> | N/A | — |

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.

- | | | | | | | |
|--|-----|--------------------------|---|-------------------------------------|-----|---|
| Has the generator accumulated hazardous waste on-site <u>in excess</u> of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)? | Yes | <input type="checkbox"/> | N | <input checked="" type="checkbox"/> | N/A | — |
|--|-----|--------------------------|---|-------------------------------------|-----|---|

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

- | | | | | | | |
|--|-----|--------------------------|---|--------------------------|-----|-------------------------------------|
| 8. 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"/> | N | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C) and | Yes | <input type="checkbox"/> | N | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| c. Drip pads that meet 3745-69-40 to 3745-69-45? | Yes | <input type="checkbox"/> | N | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| d. Containment building that meets 3745-256-100 to 3745-256-102? | Yes | <input type="checkbox"/> | N | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |

NOTE: Complete appropriate checklist for each unit.

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

- | | | | | | | |
|--|-----|--------------------------|---|--------------------------|-----|---|
| 9. Does the generator export hazardous waste? If so: | Yes | <input type="checkbox"/> | N | <input type="checkbox"/> | N/A | — |
|--|-----|--------------------------|---|--------------------------|-----|---|

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

MANIFEST REQUIREMENTS

- 10 Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes No N/A
- 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 completed. [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 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)].

- 13 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 No N/A

- 14 Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (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 a program in place to reduce the volume and toxicity of the waste they generate.

- 15 If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes No N/A

- 16 If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes No N/A

- 17 Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes No N/A

NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated

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

PERSONNEL TRAINING

- 18 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 N N/A -
- 19 Does the personnel training program include instructions to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes N N/A -
- 20 Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes N N/A -
- 21 Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes N N/A -
- 22 Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes N N/A -

- 23 Does the generator keep records including: job titles [D(1)], job descriptions [D(2)], type and amount of training given to each person [D(3)] and documentation of completed training or job experience required [D(4)]? [3745-65-16(D)] Yes N N/A -
- 24 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 N N/A -

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

Job Performed	Name of Employee	Date Trained
---------------	------------------	--------------

CONTINGENCY PLAN

- 25 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 N N/A -
- 26 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 N N/A -

- b Arrangements with emergency authorities [3745-65-52(C)]. Yes N N/A
- c A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes N N/A
- d A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes N N/A
- e An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes N N/A

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

- 27 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 N N/A
- 28 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 N N/A
- 29 Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes N N/A

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

EMERGENCY PROCEDURES

- 30 Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes N N/A
- a Was the contingency plan implemented? [3745-65-51(B)] Yes N N/A
- b Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes N N/A
- c Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes N N/A

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

PREPAREDNESS AND PREVENTION

- 31 Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes N N/A
- 32 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 N N/A -
- b Emergency communication device? [3745-65-32(B)] Yes N N/A -
- c Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes N N/A -
- d Water of adequate volume/pressure? [3745-65-32(D)] Yes N N/A -

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

- 33 Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes N N/A -
- 34 Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes N N/A -
- 35 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 N N/A -
- 36 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 N N/A -
- Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes N N/A -
- 38 Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes N N/A -
- 39 Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes N N/A -

SATELLITE ACCUMULATION AREA REQUIREMENTS

- 40 Does the generator ensure that satellite accumulation area(s):
 - a Are at or near a point of generation? [3745-52-34(C)(1)] Yes N N/A -
 - b Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes N N/A -
 - c Do not exceed one quart of acutely hazardous waste at anyone time? [3745-52-34(C)(1)] Yes N N/A -
 - d Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes N N/A -

- e Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
- 41 Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes No N/A
- a Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes No N/A
- b Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes No N/A
- c Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A

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

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

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

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

- 45 Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven 7 consecutive days. Yes No N/A
- a Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
- 46 Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes No N/A

47 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

48 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

49 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.

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

NOTE: Please provide a description of the unit and documentation provided by the generator 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

51 Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes No N/A

52 Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A

53 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