



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

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

May 22, 2007

RE: **BESCAST, INC.**  
**LAKE COUNTY**  
**OHD 004 198 958**  
**LQG CEI NOTICE OF VIOLATION**

Mr. Norm Hirter  
Bescast, Inc.  
4600 E 355<sup>th</sup> Street  
Willoughby, Ohio 44094

Dear Mr. Hirter:

On May 1, 2007, the Ohio EPA conducted a compliance evaluation inspection (CEI) of the Bescast, Inc. facility in Willoughby, Ohio, to determine Bescast's compliance with Ohio's hazardous waste laws and rules as found under the Ohio Revised Code and the Ohio Administrative Code ("ORC" and "OAC" respectively). Bescast was represented by Scott Sutch, Lee Watson and you. Suzanne Prusnek and I represented the Ohio EPA.

Bescast is an investment casting facility that manufactures parts for airplanes, helicopters and solar turbines.

The first item that needs to be addressed is the actual waste characterization of the spent potassium hydroxide (KOH) since there is some question as to whether or not it actually exhibits the characteristics of hazardous waste. If it does, Bescast may have been in significant non-compliance, therefore, this issue must be addressed.

Bescast should take a representative sample of each of the KOH waste streams. It is Ohio EPA's understanding that this includes the etching done in the caustic area. It also includes the descaling of the castings. In addition, Bescast stated that they add the hydrogen peroxide to the KOH waste. This should be tested separately also.

Once the results of these samples are sent to Ohio EPA, the determination of whether additional violations exist will be determined.

The Ohio EPA's compliance inspection included an inspection of the facility operations and a review of written documentation. Based on this inspection, Ohio EPA has determined that Bescast is in violation of at least the following state hazardous waste regulations:

**Violations:**

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

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Bescast currently uses isopropyl alcohol (IPA) in a cleaning operation in the dipping area. When the IPA is too "clumpy" for continued use, the waste is mixed with the slurries, allowed to solidify and disposed as a non-hazardous waste in with the ceramic waste.

Bescast could not demonstrate that the IPA is non-hazardous at the point it is mixed with the slurry.

Bescast needs to determine if the IPA exhibits the characteristic of ignitability prior to mixing with the slurry. If the waste does exhibit this characteristic, then Bescast should determine if the waste contains less than twenty-four percent alcohol by volume. If the waste contains less than twenty-four percent alcohol by volume, it cannot be an ignitable waste. If necessary, Ohio EPA can advise Bescast in various testing methods which would be acceptable in determining the amount of IPA in the waste.

As discussed during the inspection, since the current IPA is in process, Bescast does not want to test the waste until it is actually spent and no longer usable. Bescast should submit a schedule as to when it is estimated the IPA will be spent and tested. When this container of IPA is no longer usable, the IPA should be containerized in a separate container until the results indicate if it is a hazardous waste or can be managed as historically has been.

2. **Testing and Maintenance of Equipment, OAC rule 3745-65-33:** All facility communication or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment shall be tested and maintained to assure proper operation in time of emergency. These tests shall be documented in a log or summary.

Bescast was not testing the communication device as required. This should be added to the current log.

Bescast should submit two weeks of completed logs to document the communication device is being tested.

3. **Required Aisle Space, OAC rule 3745-65-35:** The facility shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in the hazardous waste accumulation areas.

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The area where the totes and drums of hazardous waste are being accumulated had no area between the containers to allow for inspections or response to emergency. Ohio EPA had to have a drum moved to determine if a hazardous waste drum was properly labeled and dated. Part of the problem is that Bescast stored product in this area.

Bescast should rearrange the containers so that there is adequate aisle space. While not required, Ohio EPA suggested that the hazardous waste drums be given a designated space within the area to minimize the possibility that a drum gets 'lost' and potentially is accumulated beyond the 90-day accumulation period.

Please submit a photograph demonstrating aisle space has been established thereby abating the violation.

4. ***Labeling Requirements for Hazardous Waste Containers, OAC rule 3745-52-34(A)(2)***: Containers accumulating hazardous waste must be clearly marked with the date accumulation began.

The hazardous waste drum noted in violation 3 above was found not to have an accumulation date. Bescast investigated this situation and the appropriate accumulation date was placed on the container abating the violation.

No further action is required.

5. ***Personnel Training, OAC rule 3745-65-16***: All facilities must have a personnel training program that included:

- (A)(1) A program of classroom instruction or on-the-job training that teaches the employees to perform their job duties in a way that ensures the facility is in compliance with the hazardous waste rules.

- (A)(2) The program must be directed by a person trained in hazardous waste management procedures. The training program must teach facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions.

- (A)(3) At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including, where applicable:

- (a) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment.
  - (b) Key parameters for automatic waste feed cut-off systems.
  - (c) Communication or alarm systems.
  - (d) Response to fire or explosions.
  - (e) Shutdown operations.
- (B) New employees shall receive training within six (6) months after the date of hire (or assignment to a new position) and must not work unsupervised until the training is complete.
- (C) Facility personnel must take part in annual review of the initial training requirements.
- (D) The following records and documentation must be maintained at the facility:
- (1) Job titles for each position at the facility related to hazardous waste management, and the name of each employee filling each job.
  - (2) Job descriptions for each position, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each person filling a position.
  - (3) A written description of the type and amount of both introductory and continuing training to be given to each person filling a position.
  - (4) Records that document that the training or job experience described above has been given to, and completed by, facility personnel.
- (E) Training records for current personnel must be kept until closure of the facility. Training records for former personnel shall be kept for at least three (3) years from the date the employee last worked for the facility.

At the time of the inspection, it appeared that Bescast did not have a training program which met the above requirements. Bescast must submit a training program which meets all of the above requirements. During the inspection I gave you an example to assist in complying with a portion of this requirement.

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6. **Content of the Contingency Plan, OAC rule 3745-65-52:** A hazardous waste contingency plan must include the following elements:
- (A) Description of the actions facility personnel must take in response to fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil or surface water.
  - (B) The contingency plan must describe the arrangements agreed to by local police departments, fire departments, hospitals, contractors, and Ohio EPA and local emergency services.
  - (C) The plan must list the names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator.
  - (D) The contingency plan shall include a list of all emergency equipment including: location, physical description and brief outline of capabilities.

The contingency plan Bescast had on site did not include these elements. On May 2, 2007, I sent you a link to a sample contingency plan Ohio EPA maintains on its internet site.

Please submit a copy of Bescast's revised contingency plan to document compliance with this rule.

7. **Packaging of Universal Waste Lamps, OAC rule 3745-273-13(D)(1):** Universal waste lamps must be contained in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with the contents of the lamps. In addition, the containers or packages must be closed, lack evidence of leakage, spillage or damage that could cause leakage.

During the inspection Ohio EPA noted at least eight (8) loose fluorescent bulbs on the mezzanine of the former tunnel dryer area. In addition, there were three boxes of 8 foot spent fluorescent bulbs in the universal waste accumulation area. These boxes were open and the bottom of one of the boxes was in poor condition and needs to be replaced.

Bescast must containerize all spent bulbs in containers that are closed and in good condition. Bescast must submit a photograph demonstrating this action to abate the violation.

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8. **Labeling/markings- standards for small quantity handlers of universal waste, OAC rule 3745-273-14(E):** Universal waste [fluorescent] lamps shall be labeled as "Universal Waste - Lamps," "Waste Lamp(s)," or "Used Lamp(s)."

The three boxes of fluorescent bulbs noted in violation number 7 were not labeled. Bescast must label the boxes and submit a photograph demonstrating this violation has been abated.

9. **Accumulation time limits – standards for small quantity handlers of universal waste, OAC rule 3745-273-15(C):** A facility must be able to demonstrate the length of time that a universal waste has been accumulated.

Bescast could not make this demonstration.

During the inspection, you stated that Bescast would label the boxes with an accumulation date to demonstrate the length of time the bulbs have been accumulated. Please submit a photograph documenting this action has occurred to demonstrate this violation has been abated.

10. **Management of Broken or Damaged Universal Waste Lamps, OAC rule 3745-273-13(D)(2):** A small quantity handler of universal waste must immediately clean up and place in a container any lamp that is broken and place in a container any lamp that shows evidence of breakage, leakage or damage that could cause a release of mercury or other hazardous constituents to the environment. The containers must be closed, structurally sound, compatible with the contents of the lamps, and must lack evidence of leakage, spillage or damage that could cause releases of mercury or other hazardous constituents to the environment under reasonably foreseeable conditions.

Ohio EPA noted at least two (2) broken bulbs on the mezzanine of the former tunnel dryer area.

Bescast must containerize these bulbs immediately in an appropriate container. Bescast should also investigate as to whether or not these bulbs can be managed by the company currently taking the universal waste bulbs. If so, the broken bulbs can be managed as a universal waste; if not, the bulbs will need to be characterized to determine if the broken bulbs are hazardous waste.

Bescast must submit a photograph to demonstrate the broken bulbs have been containerized. In addition, Bescast must submit documentation as to how the waste will be managed (e.g. as a universal waste, hazardous waste, etc.)

11. ***Employee Training for Small Quantity Handlers of Universal Waste, OAC rule 3745-273-16:*** A small quantity handler of universal waste shall inform all employees who handle or have responsibility for managing universal waste. The information shall describe proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility.

Bescast stated during the inspection that the employees had not been trained.

While the rules do not specifically require written documentation of employee training in universal waste management, Bescast should submit a training sign-in sheet of all employees who manage universal waste to document compliance with this rule. The training should include how to package, label, date the containers of universal waste as well as how to respond to releases. Be sure to include the management of universal waste batteries if it is determined Bescast generates them.

12. ***Used Oil Storage Requirements for Generators, OAC 3745-279-22(D):*** Upon detection of a visible leak/release, the facility shall stop the release, contain the used oil release, clean up and manage properly the released used oil and other materials.

During the inspection, Ohio EPA noted one drum of used oil that appeared to be leaking and had used oil on the ground around it.

Bescast should immediately clean up the release. Bescast should submit photographs of the cleaned area and submit documentation as to whether or not the release was caused by a damaged drum or poor handling of used oil.

Ohio EPA also had the following concerns:

13. The transporter has not been able to remove all of the hazardous waste from the totes with the equipment currently being used. At the time of the inspection, some of the totes had several inches of waste remaining in them. Bescast should note that a container that held hazardous waste is empty if it meets the requirements of OAC rule 3745-51-07. Per this rule, a container is empty if all wastes have been removed from the container that can be removed using the practices commonly employees or remove materials from that type of container, e.g. pouring, pumping, and aspirating, **AND** no more than 0.3 percent by weight of the total capacity of the container remains in the container that is greater than 110 gallons in size. I spoke with you on May 16, 2007 and you indicated that the totes were supposed to have been removed on Monday, May 14, 2007. Please verify this has occurred by submitting the shipping manifest and indicate what steps Bescast will take to prevent this from occurring in the future.

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14. At the time of the inspection, Bescast had accumulated several containers that had been found in the plant of material that is no longer usable at Bescast. Bescast had contacted Clean Harbors to have the material evaluated and were going to have it placed in a lab pack for shipment off site. Please submit the shipping paper/manifest documenting the material has been removed from the site.
15. Ohio EPA noted a blue valve in the ground near the accumulation area. It was unclear as to whether or not this was a functioning part of the secondary containment of the hazardous waste container accumulation area. Bescast should investigate the source of the pipe leading to the valve and determine if it is necessary.
16. During the inspection, Ohio EPA noted debris (leaves, etc) in the secondary containment of the hazardous waste accumulation area. Ohio EPA stated that Bescast would want to keep this to a minimum, since if there was a release of the listed hazardous waste, all of the debris that became contaminated would need to be managed as a hazardous waste. Also, Bescast may want to determine if a coating was placed on the containment. If there was, Bescast may want to maintain this coating to minimize any release to the environment should there ever be a release in the hazardous waste accumulation area. All maintenance of the containment area should be noted on the inspection logs since these may be used to document generator closure at some time in the future when Bescast ceases to use the area.
17. During the inspection, Ohio EPA noted several blasting units. Bescast stated that they have not disposed of any waste from these units and that they are looking for a vendor to take the waste. Bescast should characterize the waste first, since Ohio EPA would consider the waste a spent material and as such, needs to be characterized. If the waste does not exhibit any characteristics of a hazardous waste, it will no longer be regulated under the hazardous waste rules. If it exhibits a characteristic, and the vendor can use the waste without ANY reclamation, it may fall out of the regulations. If the vendor does any reclamation, the waste would be regulated as a hazardous waste. If any of the blasting waste is determined to be hazardous and Bescast finds a vendor to take the waste, Ohio EPA can help you determine if the waste needs to be managed as a hazardous waste.
18. At the time of the inspection, you were unsure if Bescast generated any waste batteries that should be managed as universal waste and recycled. As discussed during the inspection, it may be easier to recycle all batteries rather than trying to determine which specific batteries would be hazardous waste if disposed rather than recycled. If you manage such batteries as universal waste, you must:
  - a. Package any batteries that show signs of leakage, spillage or damage in closed containers;

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- b. Mark the universal waste batteries or their containers with the words "Universal Waste Battery(ies)," "Waste Battery(ies)" or "Used Battery(ies);" (note, in lieu of marking each battery, Ohio EPA allows the batteries to be placed in a container that is marked in either of the forms noted.
- c. Develop a method that clearly demonstrates the length of time the batteries have been accumulated from the date they became a waste or are received; and
- d. Ensure delivery of the batteries to another universal waste handler or a permitted destination facility.

For information on how to manage your batteries as universal waste, see our Universal Waste Rule guidance document and our universal waste handler requirements summary table available on our Web page.

19. Several years ago, Bescast was managing the waste from the vapor degreaser as an F001 listed hazardous waste. In recent years, the characterization has changed to F002. Bescast stated that none of the chemicals or processes have changed. Please indicate why this change occurred. As stated during the inspection, it appears the correct characterization should be F001, since the waste is spent trichloroethylene from a vapor degreaser.
20. During the inspection, I told you that I would have the data personnel at the Ohio EPA's Central Office research our records to determine if Bescast was a large quantity generator of hazardous waste prior to 1998. If Bescast was a large quantity generator, the former accumulation area would need to meet the closure performance standard found in OAC rule 2745-66-11. A preliminary review of the documentation is inconclusive and we are requesting additional information be retrieved from our archive system.

What was discovered was that a significant amount of waste was shipped from the facility in 1987, 8.1 tons. While this is an average of approximately 600 kilograms per month, if generated all at once, it may trigger the closure obligation. Therefore, Ohio EPA requests you try and determine if the rate of waste generation was a regular amount on consistent basis, batch generations, annual clean out, etc. Please let me know if this can be determined. If additional information is discovered in the Ohio EPA archived files that will indicate generator closure is required, I will notify you.

21. During the inspection you stated that the dross and slag are sold to a vendor. You were unable to name the vendor at the time of the inspection. Please supply the names of the vendor(s) used by Bescast for the dross and slag.

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The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (i.e. source reduction). For those wastes and pollutants that are generated, the second is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image by implementing pollution prevention programs. The Office of Compliance Assistance and Pollution Prevention provides compliance and pollution prevention assistance on environmental issues related to air, land and water. Their web site is: <http://www.epa.state.oh.us/opp/ocapp.html>.

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. You can find more information at the following Web link <http://www.epa.state.oh.us/dhwm/listserv.html>.

Failure to list specific deficiencies and/or violations in this communication does not relieve Bescast from the responsibility of complying with all applicable laws, rules and regulations.

Enclosed you will find a copy of the checklists completed during the inspection. You can find copies of the rules and other information on the Division of Hazardous Waste's web page at <http://www.epa.state.oh.us/dhwm>.

Please submit the requested documentation by June 29, 2007. Should you have any questions, please feel free to call me or my supervisor, Frank Popotnik at this office.

Sincerely,



Karen L. Nesbit  
Division of Hazardous Waste Management

KLN:cl

Enclosure

cc: Natalie Oryshkewych, DHWM, NEDO

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

E-mail this completed form to <a href="mailto:tammy.mcconnell@epa.state.oh.us">tammy.mcconnell@epa.state.oh.us</a> or mail it to Tammy McConnell, Central Office	Ohio Environmental Protection Agency <b>RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM</b>		For Ohio EPA use only																			
2. Site EPA ID No.	EPA ID Number: OHD 004 198 958																					
3. Site Name	Name: BESCOAST INC		Website (optional): <a href="http://www.bescast.com">www.bescast.com</a>																			
4. Site Location Information	Street Address: 4600 E 355 <sup>TH</sup> STREET																					
	City, Town, or Village: WILLOUGHBY		State: OH																			
	County Name: LAKE		Zip Code: 44094																			
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>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>				Private	County	District	Federal	Indian	Municipal	State	Other	X									
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6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	A. 336412		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: NORM		MI:	Last Name: HIRTER																		
	Phone Number: 440 946 5300			Phone Number Extension: x270																		
	E-Mail Address:				Fax Number Extension:																	
	Fax Number:			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:		Date Became Owner (mm/dd/yyyy):																			
	BROWN FAMILY ENTERPRISES CO		02/01/1978																			
	Owner Type: Mark with an X	<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>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>					Private	County	District	Federal	Indian	Municipal	State	Other	X							
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	City, Town, or Village: WILLOUGHBY		Owner Phone #:																			
	State: OHIO		Country: USA	Zip Code: 44094																		
	B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):																			
	BESCOAST INC		07/01/1961																			
Operator Type: Mark with an X	<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>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>					Private	County	District	Federal	Indian	Municipal	State	Other	X								
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Street or P.O. Box: 4600 E 355 <sup>TH</sup> ST																						
City, Town, or Village: WILLOUGHBY		Operator Phone #:																				
State: OH		Country: USA	Zip Code: 44094																			
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  in all of the appropriate boxes.)

**A. Hazardous Waste Activities**

(choose only one of the following categories)

UNKNOWN: Cited for violation of 3745-52-11

a. Large Quantity Generator (LQG):

b. Small Quantity Generator (SQG)

c. Conditionally Exempt Small Quantity Generator

d. United States Importer of Hazardous Waste

e. Mixed Waste (hazardous and radioactive) Generator

3. Treater, Storer or Disposer of Hazardous Waste

4. Recycler of Hazardous Waste

5. Exempt Boiler and/or Industrial Furnace

a. Small Quantity On-site Burner Exemption

b. Smelting, Melting, Refining Furnace Exemption

6. Underground Injection Control Facility

7. Hazardous Waste Transporter

**B. Universal Waste Activities**

1. Small Quantity Handler of Universal Waste

(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):

2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more).

3. Destination Facility for Universal Waste

(Check all boxes below that apply for each of the three types of facilities above.)

	Generated	Accumulated
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"/>

**C. Used Oil Activities**

1. Used Oil Generator

2. Used Oil Transporter Indicate Type(s) of Activity(ies)

Transporter

Transfer Facility

3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)

Processor

Re-refiner

4. Off-Specification Used Oil Burner

5. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)

a. Marketer Who Directs Shipment of Off-Specification Oil

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.

D002	D007	D040	F001	F002		
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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.

N	Announced ?	Additional Facility Representatives:	Lee Watson and Scott Sutch
N	Tanks?	Other comments:	
Y	Containers?		

13.	Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm-dd-yyyy) (HH:MM)
	KAREN L NESBIT	SUZANNE PRUSNEK	05-01-2007 9:00 to ~4:20

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

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

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

Facility Name: **BESCAST INC**

Facility Hazardous Waste ID#: **OHD 004 198 958**

Date of CEI: ~~04/25/07~~ <sup>1/10</sup> 05/01/07

CESQG: <100Kg. (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: *Steel toed shoes, safety glasses - certain areas require hearing protection.*

**GENERAL REQUIREMENTS**

- 1 Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes  No  N/A   
*- see for updates*
- 2 Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes  No  N/A
- 3 Were annual reports filed with Ohio EPA on or before March 1<sup>st</sup>? [3745-52-41(A)] Yes  No  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  No  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  No  N/A
- 6 Does the generator accumulate hazardous waste? Yes  No  N/A
- 7 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  No  N/A   
*→ residue in totes ?-see if! How first!*
- 8 Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)] 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

- 9 Does the generator export hazardous waste? If so: Yes  No  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

**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  No  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  No  N/A

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

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

23 Does the generator keep records including: [3745-65-16(D)]  
 a. Job titles? [3745-65-16(D)(1)] Yes  No  N/A

b. Job descriptions? [3745-65-16(D)(2)], Yes  No  N/A

c. Type and amount of training given to each person? [3745-65-16(D)(3)], Yes  No  N/A

d. Documentation of completed training or job experience required? [3745-65-16(D)(4)], Yes  No  N/A

<u>Name</u> <u>Job Performed</u>	<u>Job</u> <u>Name of Employee</u>	<u>Date Trained</u>
Ray Rhodes	Weekly Inspections	
Ron Gorka	Sign manifests	
Frank Maglins	"	
Maglins	"	
Scott		

**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  No  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)]? *- fires - separate doc.* Yes  No  N/A

b. Arrangements with emergency authorities [3745-65-52(C)]. Yes  No  N/A

c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes  No  N/A

d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] *- need comm device* 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)]

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  No  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] *- change of chemicals* Yes  No  N/A

29 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

- 30 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

- 31 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
- 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)] *fire + security* 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? [3745-65-32(D)] (per facility rep) Yes  No  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] *- need to add comm. device* Yes  No  N/A
- 34 Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes  No  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  No  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  No  N/A

- 37 Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes  No  N/A
- 38 Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes  No  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  No  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  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 anyone 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
- 41 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

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   
*abated*

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   
*Current area built ~1998 - see if CQ6*

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

## 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)]  
*— one drum w/ oil on top + stain below*
- 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# \_\_\_

#### 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

## PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: BESCASST INC

Facility Type: LQG

Date of Inspection: 05/01/07

EPA ID#: OHD 004 198 958

Waste Generated			On- or Off-Site Management		
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	
1	mold making	Slurries	varies - roll-off box	Emptied into lined trash hoppers, hardened with Portland cement	Sent to Landfill
2	Degreasing	TCA - F001 (or F002?)	65 gallons every quarter - 55 gallon drum	none	sent to Clean Harbors
3	Part cleaning	spent KOH - D002 and D006 - having test	totes	none	sent to Clean Harbors
4	Parts cleaning	spent Hydrogen peroxide	add to KOH tote	none	sent to Clean Harbors
5	wax pattern etching	alcohol	<5 gallons when generated	solidify with slurries	landfill
6	Foundry	Used Oil	Drums to totes	none	GEM
7	Emptying and recharging Diversey boilers	Diversey 299 boiler solution - added to KOH waste as D002/D006	Cleaned every 3 months		Sent to Clean Harbors
8	wax pattern assembly	scrap wax	varies - hopper		returned to Kindt
9	metal furnaces	dross	drums		not known - asked in NOV

10	Metal finishing	turnings, sawings and grindings	roll-off and drums		Saved on case by case basis and sent off as scrap metal - some goes to Miles Alloy
11	product chemicals	Empty metal drums	varies		return to vendor for deposit, otherwise crush and disposed with scrap metal
12	product chemicals	Empty plastic drums	varies		return for deposit or rinse and destroy
13	removing ceramic from parts w/hi Pressure water	water and ceramic	varies	ceramics screened from water waste	ceramics disposed with slurry waste - water down drain
14	wax washing	citric acid sol'n and water	varies		check pH and down the drain
15	cleaning	spent rags	varies		Coyne Laundry

### REMARKS-GENERAL INFORMATION

#### General Process Information:

Ceramic cores are made to create intricate passages within the cast part. Bescast can make small detailed cores to large precision cores. The ceramic is either injected or pored into metallic dies. All ceramic cores are fired in a kiln for strength. Often the ceramic dies are combined with wax patterns in the 6000 square foot wax pattern area (across street, not contiguous). The liquid wax is injected under pressure into metallic dies to produce a replica of the desired geometry. Dies are generated on or off-site. Core wax assemblies can be specialized. After the wax has been inspected, trimmed and assembled, it will provide a pathway for the molten metal during casting. A ceramic shell is generated in the wax assembly area by dipping the wax in successive coats of liquid ceramic slurry and granular ceramic stucco. The coats are dried between each of 6 to 16 coat applied to generate the mold of ceramic shell. The shell is fired to remove the wax pattern and to generate strength to receive molten metal. Metals such as aluminum, stainless steel, nickel and cobalt based alloy metals are heated to prescribed temperatures. The preheated ceramic molds are cast in air, vacuum or a vacuum assisted techniques. The ceramic shell are removed to reveal rough castings. The casting surfaces are improved by chemical and mechanical treatments in preparation for visual inspection. Finishing inclu. the use of CNC lathes, mills and EDM machines.

#### Regulatory/Enforcement History (if applicable): None

#### 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](mailto:p2mail@epa.state.oh.us) or [www.epa.state.oh.us/ocapp/ocapp.html](http://www.epa.state.oh.us/ocapp/ocapp.html)

#### Other:

**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** — *send info - none on-site but Besto-Bescont unsure if generate*

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

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# \_\_\_\_\_  
*- one needs repackaged*

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? [3745-273-15(A)] If not: Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- 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# \_\_\_  
*- This is what Preacost stated would do in future*
- 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)] 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: Yes \_\_\_ No  N/A  RMK# \_\_\_
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes \_\_\_ No  N/A  RMK# \_\_\_
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes \_\_\_ No  N/A  RMK# \_\_\_

**EXPORTS**

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

**REMARKS**

## LDR CHECKLIST

### GENERAL LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] If so: Yes  No  N/A \_\_\_ RMK# \_\_\_
- a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)] Yes  No  N/A \_\_\_ RMK# \_\_\_
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes  No  N/A \_\_\_ RMK# \_\_\_
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] Yes  No  N/A \_\_\_ RMK# \_\_\_
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes  No  N/A \_\_\_ RMK# \_\_\_
4. Does the generator generate a characteristic hazardous waste? If so: Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes  No  N/A \_\_\_ RMK# \_\_\_
- NOTE: If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.**
5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so: Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes  No  N/A \_\_\_ RMK# \_\_\_
6. Has the generator correctly determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)] Yes  No  N/A \_\_\_ RMK# \_\_\_

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] Yes  No  N/A  RMK#

**NOTE:** *A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (§402 of CWA), that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater.*[3745-270-03(B)]

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] Yes  No  N/A  RMK#

**NOTE:** *In other words, is combustion a legitimate treatment method.*

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes  No  N/A  RMK#

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] If so: Yes  No  N/A  RMK#

- a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05] Yes  No  N/A  RMK#

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] If so: Yes  No  N/A  RMK#

- a. The facility can land dispose of the waste. [3745-270-06] Yes  No  N/A  RMK#

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? If so: Yes  No  N/A  RMK#

a. Has the facility complied with 3745-270-04?

Yes\_\_ No N/A  RMK# \_\_\_\_

**NOTIFICATION AND CERTIFICATION REQUIREMENTS**

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)]

Yes  No  N/A \_\_\_\_ RMK# \_\_\_\_

14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)]

Yes\_\_ No  N/A  RMK# \_\_\_\_

15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)]

Yes\_\_ No  N/A  RMK# \_\_\_\_

16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)]

Yes\_\_ No  N/A  RMK# \_\_\_\_

17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so:

Yes\_\_ No  N/A \_\_\_\_ RMK# \_\_\_\_

a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)]

Yes\_\_ No  N/A  RMK# \_\_\_\_

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

18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)]

Yes  No  N/A \_\_\_\_ RMK# \_\_\_\_

**REMARKS**