



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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www.epa.state.oh.us

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

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

August 8, 2007

John Tatusko  
Plant Engineer  
Canfield Metal Coating Corporation  
460 W. Main St.  
Canfield, OH 44406

**RE: CANFIELD METAL COATING CORPORATION, OHD000810283, MAHONING COUNTY, RCRA/LQG, COMPLIANCE EVALUATION INSPECTION, NOTICE OF VIOLATION**

Dear Mr. Tatusko:

On June 12, 2007 and June 13, 2007 Ohio EPA Division of Hazardous Waste Management (DHWM) conducted a compliance evaluation inspection at the Canfield Metal Coating (CMC) facility located at 460 W. Main Street in Canfield, Ohio. CMC is an electro-galvanizing operation and qualifies as a Large Quantity Generator (LQG) of hazardous waste. Hazardous waste generated at the facility includes an calcium carbonate filter cake (D003, F007, F008), waste chromic acid (D002, D007) and spent paint thinner (D001, D035, F003, F005).

The purpose of this inspection was to determine CMC's compliance with Ohio's hazardous waste laws and regulations as found under the Ohio Revised Code and Ohio Administrative Code ("ORC" and "OAC" respectively). CMC was represented by you while Ohio EPA was represented by Karen Nesbit and me. Ohio EPA's inspection included an inspection of the CMC facility and a review of written documentation. Ohio EPA also documented portions of the inspections using digital photography.

Based on this inspection, Ohio EPA has determined that CMC has violated the following state hazardous waste regulations:

1. **Ohio Revised Code (ORC) § 3734.02(E) and (F) storage of hazardous waste without a facility installation and operation permit:**

By letter dated March 15, 2007, Ohio EPA received a request from CMC for a thirty day extension to the ninety day accumulation time limit for LQG's. The letter states "CMC has one drum of waste chromic liquid, approximately 563 pounds, which has exceeded the ninety day time limit for storage on March 14, 2007".

Ohio EPA did not act on said request since it was requested after the time limit had expired. Hazardous waste manifests reviewed at the time of the inspection indicate that the drum of waste chromic acid (D002, D007) was not shipped off site to Envirite until March 27, 2007 (hazardous waste manifest number 001400418 FLE).

Based upon this information, Ohio EPA has determined that CMC has stored hazardous waste on site in excess of ninety days with a hazardous waste permit.

CMC has shipped the container of hazardous waste off site; therefore no further action is required at this time regarding this violation.

**Since CMC violated ORC §3734.02(E) and (F), CMC is subject to all applicable general facility standards found in OAC chapters 3745-54 and 55. Additionally, at any time Ohio EPA may assert its right to have CMC begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.**

2. **OAC Rule 3745-55-92 Design and installation of new tank systems and components:**

*(A) Owners or operators of new tank systems or components must ensure that the foundation, structural support, seams, connections, and pressure controls (if applicable) are adequately designed and that the tank system has sufficient structural strength, compatibility with the waste(s) to be stored or treated, and corrosion protection so that it will not collapse, rupture, or fail. The owner or operator must obtain a written assessment reviewed and certified by an independent, qualified, registered professional engineer in accordance with paragraph (D) of rule 3745-50-42 of the Administrative Code attesting that the system has sufficient structural integrity and is acceptable for the storing and treating of hazardous waste.*

*(B) The owner or operator of a new tank system must ensure that proper handling procedures are adhered to in order to prevent damage to the system during installation. Prior to covering, enclosing, or placing a new tank system or component in use, an independent, qualified installation inspector or an independent, qualified, registered professional engineer, either of whom is trained and experienced in the proper installation of tank systems, must inspect the system or component for the presence of any of the following items, and all discrepancies must be remedied before the tank system is covered, enclosed, or placed in use:*

- (1) Weld breaks;*
- (2) Punctures;*
- (3) Scrapes of protective coatings;*
- (4) Cracks;*
- (5) Corrosion; and*
- (6) Other structural damage or inadequate construction or installation.*

*(C) New tank systems or components and piping that are placed underground and that are backfilled must be provided with a backfill material that is a noncorrosive, porous, homogeneous substance and that is carefully installed so that the backfill is placed completely around the tank and compacted to ensure that the tank and piping are fully and uniformly supported.*

*(D) All new tanks and ancillary equipment must be tested for tightness prior to being covered, enclosed or placed in use. If a tank system is found not to be tight, all repairs necessary to remedy the leak(s) in the system must be performed prior to the tank system being covered, enclosed, or placed in use.*

*(E) Ancillary equipment must be supported and protected against physical damage and excessive stress due to settlement, vibration, expansion or contraction.*

*(F) The owner or operator must provide the type and degree of corrosion protection necessary, based on the information provided under paragraph (A)(3) of this rule, to ensure the integrity of the tank system. The installation of a corrosion protection system that is field-fabricated must be supervised by an independent corrosion expert to ensure proper installation.*

At the time of this inspection, Ohio EPA observed that CMC was managing its waste chromic acid (D002, D007) in three 330 gallon totes being used as tanks inside the secondary containment to replace the steel hazardous waste tank that was taken out of service years earlier. CMC is therefore operating a hazardous waste tank system and could not produce documentation in the form of assessments or other relevant documentation pertaining to the integrity and installation of the hazardous waste tanks per OAC Rule 3745-55-92.

To demonstrate abatement of this violation, please see Violation #4.

3. **OAC Rule 3745-55-93 Containment and detection of releases:**

*(A) In order to prevent the release of hazardous wastes or hazardous constituents to the environment, secondary containment that meets the requirements of this rule must be provided...*

At the time of this inspection, Ohio EPA observed that CMC was operating a hazardous waste tank system that did not meet the requirements of OAC Rule 3745-55-93 for the accumulation of the waste chromic acid liquid.

To demonstrate abatement of this violation, please see Violation #4.

4. **OAC 3745-55-95 Tank Inspections:**

*(A) The owner or operator must inspect, where present, at least once each operating day:*

*(1) Overfill/spill control equipment (e.g., waste-feed cut-off systems, bypass systems, and drainage systems) to ensure that it is in good working order;*

*(2) The aboveground portions of the tank system, if any, to detect corrosion or releases of waste;*

*(3) Data gathered from monitoring equipment and leak-detection equipment (e.g., pressure and temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design; and*

*(4) The construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures (e.g., dikes) to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation).*

*(B) The owner or operator must inspect cathodic protection systems, if present, according to, at a minimum, the following schedule, to ensure that they are functioning properly:*

*(C) The owner or operator must document in the operating record of the facility an inspection of those items in paragraphs (A) and (B) of this rule.*

At the time of this inspection, CMC could not produce documentation demonstrating that daily inspections of the hazardous waste tank system used for the accumulation of the waste chromic acid liquid, were being performed per OAC Rule 3745-55-95.

By e-mail dated June 28, 2007 Ohio EPA received a statement from CMC stating that the facility will no longer be using a hazardous waste tank system. The facility submitted photographs demonstrating that the secondary containment and totes which comprised the hazardous waste tank system have been modified and moved to a new accumulation area to enable the totes to be used as containers instead of tanks. Therefore Ohio EPA considers Violations #2, #3 and #4 abated.

5. **OAC 3745-52-34(C)(1) Satellite Accumulation:** *A generator may accumulate as much as fifty-five gallons of hazardous waste or one quart of acutely hazardous waste listed in paragraph (E) of rule 3745-51-33 of the Administrative Code in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit and without complying with paragraph (A) of this rule provided he:*

*(a) Complies with rules 3745-66-71, 3745-66-72, and paragraph (A) of rule 3745-66-73 of the Administrative Code; and*

*(b) Marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.*

- A. At the time of the June 12, 2007 inspection, Ohio EPA observed two (2) satellite accumulation containers of paint waste that were not labeled with words "Hazardous Waste" or with other words that identify the contents.

Upon being informed of the regulations, CMC immediately labeled the containers with the words "Hazardous Waste". Ohio EPA therefore considers this violation abated and no further action is required regarding this violation.

- B. At the time of this inspection, Ohio EPA observed one satellite accumulation container of spent rags which the facility manages as a hazardous waste that were not labeled with words "Hazardous Waste" or with other words that identify the contents.

Upon being informed of the regulations, CMC immediately labeled the container with the words "Hazardous Waste". Ohio EPA therefore considers this violation abated and no further action is required regarding this violation.

- C. At the time of this inspection, Ohio EPA observed an open hopper of calcium carbonate waste (F008) generated from the filter press was not labeled with the words "Hazardous Waste" or with other words that identified the contents.

Upon being informed of the regulations, CMC immediately labeled the hopper with the words "Hazardous Waste". Ohio EPA therefore considers this violation abated and no further action is required regarding this violation.

6. **OAC 3745-66-73(A) Management of containers:** *A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.*

At the time of this inspection, Ohio EPA observed the hopper of calcium carbonate waste (F008) generated from the filter press was not closed and the facility was neither adding, nor removing hazardous waste at the time.

Upon being informed of the regulations, CMC immediately emptied the hopper into the roll-off box and stated that it is their standard practice to empty the hopper into the roll-off box as soon as the operator is done pressing. Ohio EPA therefore considers this violation abated and no further action is required regarding this violation.

7. **OAC 3745-65-52 Content of contingency plan:**

*(A) The contingency plan must describe the actions facility personnel must take to comply with rules 3745-65-51 and 3745-65-56 of the Administrative Code in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.*

*(B) If the owner or operator has already prepared a "Spill Prevention, Control, and Countermeasures Plan" in accordance with 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency or contingency plan, he need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of Chapters 3745-65 to 3745-69 and 3745-256 of the Administrative Code.*

*(C) The contingency plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and Ohio EPA and local emergency response teams to coordinate emergency services, pursuant to rule 3745-65-37 of the Administrative Code.*

*(D) The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see rule 3745-65-55 of the Administrative Code), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates.*

*(E) The contingency plan must include a list of all emergency equipment at the facility [such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment] where this equipment is required. This list must be kept up to date. In addition, the contingency plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.*

*(F) The contingency plan must include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).*

CMC has a Spill Prevention, Control and Countermeasures (SPCC) plan dated August 2004, however the plan does not incorporate hazardous waste management provisions that are sufficient to comply with OAC 3745-65-52.

By e-mail dated July 27, 2007 Ohio EPA received a draft copy of the facility SPCC plan updated to incorporate hazardous waste management provisions. Ohio EPA's review of the draft updated plan still finds the document deficient with respect to being in compliance with OAC 3745-65-52.

To demonstrate compliance, CMC will revise the SPCC plan to include;

- The home addresses of all persons listed to act as emergency coordinators,
- A list of all emergency equipment at the facility [such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment] where this equipment is required. While the updated plan does list the location of fire extinguishers and spill control, it does not list the communication devices or alarm systems. It must also include a physical description of each item on the list, and a brief outline of its capabilities.
- Special emergency response, clean up and management procedures required with respect to emergencies involving the cyanide bearing hazardous wastes generated at the facility. Ohio EPA's review of the SPCC plan found very little, if any, reference to responding to an incident involving a reactive hazardous waste (D003, F007, F008).

CMC will submit a copy of the revised plan to this office for review. Upon approval by Ohio EPA, CMC will send a copy of the contingency plan to all local police departments, fire departments, hospitals, and local emergency response teams that may be requested to provide emergency services. CMC must document that this has been done and submit said documentation to this office.

An example contingency plan was given to you at the time of this inspection and subsequently emailed to you in Word format.

8. **OAC 3745-65-16 (A) Personnel training:**

*(A) (1) Facility personnel /must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Chapters 3745-65 to 3745-69 and 3745-2483745-256 of the Administrative Code. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (D)(3) of this rule.*

*(2) This program /must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures, (including, but not limited to, contingency plan implementation), relevant to the positions in which they are employed.*

*(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) Communications or alarm systems;*
- (d) Response to fires or explosions;*
- (e) Response to ground water contamination incidents; and*
- (f) Shutdown of operations.*

At the time of this inspection, CMC did not have a hazardous waste training program that included training employees in a facility hazardous waste contingency plan.

To demonstrate compliance, CMC will submit to this office documentation that all employees involved with hazardous waste management have been trained in the revised and approved hazardous waste management portion of the facility SPCC plan.

9. **OAC 3745-65-16 (A) Personnel training:**

*(D) The owner or operator shall/must maintain the following documents and records at the facility:*

*(1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;*

*(2) A written job description for each position listed under paragraph (D)(1) of this rule. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but shall/must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;*

*(3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (D)(1) of this rule; and*

*(4) Records that document that the training or job experience required under paragraph (A), (B), and (C) of this rule has been given to, and completed by, facility personnel.*

At the time of this inspection, CMC did not have job titles and descriptions for all positions involved in hazardous waste management at the facility. By e-mail dated June 22, 2007, Ohio EPA received a document titled "Supplemental Job Requirements". Ohio EPA's review of this document finds it to be deficient with regard to meeting the requirements of OAC 3745-65-16(D).

To demonstrate compliance, CMC must develop job titles and descriptions for all positions involved in hazardous waste management. An example of job titles and descriptions was given to you at the time of this inspection and subsequently emailed to you in Word format. The facility will submit to this office:

- A list of positions that manage hazardous waste.
- A **list of employees which fill each position** that manages hazardous waste.
- A list of job titles and descriptions for **each position** involved in hazardous waste management.
- The job descriptions should make clear who has the duty to inspect hazardous waste accumulation areas and emergency equipment, to label, date and close hazardous waste containers, to sign manifests, to create annual reports and any other duties regarding the management of hazardous waste.

10. **OAC 3745-270-07(A) Testing, Tracking, and Record keeping Requirements for Generators, Treaters, and Disposal Facilities:** *Generators shall retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to this rule for at least three years from the date that the waste that is the subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal.*

At the time of this inspection, CMC did not have on site Land Disposal Restriction (LDR) forms for the following hazardous waste sent off site:

- Hazardous waste solid, sent to Hukill Chemical under profile #15876.
- F007 hazardous waste, sent to Envirite under profile # C 7671.
- F008 hazardous waste, sent to Envirite under profile #CS 4361.
- F008 hazardous waste, sent to Envirite under profile #CS 5197.

Upon Ohio EPA's request, CMC contacted Hukill Chemical and Envirite and had copies of the LDRs faxed to the facility while Ohio EPA was on site. Therefore, Ohio EPA considers this violation abated and no further action is required.

11. **OAC 3745-273-13(D)(1) Universal Waste Lamp Management:** *A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages **must remain closed** and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.*

At the time of this inspection, Ohio EPA observed open containers of universal waste lamps in addition to universal waste lamps that had not been containerized and were stacked against a post in the maintenance area. .

By e-mail dated June 15, 2007, CMC submitted photographs to this office demonstrating that the universal waste lamps are being managed in closed containers. Ohio EPA therefore considers this violation abated.

12. **OAC 3745-273-14(E) Labeling/marketing of Universal Waste:** *Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste- Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)."*

At the time of this inspection, the universal waste lamps observed by Ohio EPA were not labeled with one of the following phrases: "Universal Waste- Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)."

By e-mail dated June 15, 2007, CMC submitted photographs to this office demonstrating that the universal waste lamps are being managed in containers that are appropriately labeled in compliance with universal waste regulations. Ohio EPA therefore considers this violation abated.

13. **OAC 3745-273-15(C) Accumulation time limits for Universal Waste:** *A small quantity handler of universal waste who accumulates universal waste shall be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.*

At the time of this inspection, CMC did not have a system for demonstrating how long the universal waste has been onsite.

By e-mail dated June 15, 2007, CMC submitted photographs to this office demonstrating that the accumulated universal waste is being managed in containers that have been labeled with a date demonstrating how long the universal waste has been on site. Ohio EPA therefore considers this violation abated.

14. **OAC 3745-273-16 Employee Training for Small Quantity handlers of Universal Waste:** *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.*

During Ohio EPA's June 12, 2007 inspection of the CMC facility, Ohio EPA observed multiple universal waste violations indicating that the facility was not operating in compliance with regulations regarding the management of universal waste. The facility had not trained employees responsible for the management of universal waste in the proper handling and emergency procedures appropriate to the type of universal waste handled at the facility.

By e-mail dated July 12, 2007, Ohio EPA received a universal waste training procedure drafted by CMC. Ohio EPA responded via e-mail and provided comments on the draft training document.

To demonstrate abatement of this violation, CMC must finalize the written protocol for the management of universal waste and train employees which manage universal waste in this protocol. After receiving said training, employees must sign the written protocol acknowledging the receipt of training on this topic and a copy must be submitted to this office.

Ohio EPA has the following concerns which must be addressed.

1. At the time of this inspection, CMC did not have a protocol for managing spent aerosol cans. By e-mail dated July 12, 2007 CMC stated that the facility was in the process of developing a procedure for the management of this waste stream. To facilitate this process, please find enclosed a copy of the winter 2006 edition of the *Notifier*, which contains an article on aerosol cans. Please submit to this office a copy of the facility's aerosol can protocol once it has been finalized.
2. By fax dated June 14, 2007, Ohio EPA received analytical data from Chemtron for "Zinc & Iron Phosphate sludge", described as a colorless liquid that did not require extraction for the TCLP analysis. The data sheet states the sample was received on June 11, 2007 and analyzed on June 12, 2007. Please submit to this office a discussion regarding the generation of this waste stream, if it is a new waste stream and how it was previously managed if it is not a new waste stream.

Enclosed you will find copies of the checklists completed at the time of the inspection. Please submit all of the requested documentation to my attention within thirty (30) days of receipt of this letter demonstrating that all issues have been addressed.

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. If you haven't already, we encourage you to sign-up for this free service. You can find more information at the following Web link: <http://www.epa.state.oh.us/dhwm/listserv.html>. Please feel free to share this information with your colleagues.

Failure to list specific deficiencies in this communication does not relieve CMC from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve CMC from liability for any past or present violations of the state's hazardous waste laws.

Should you have any questions, please feel free to call me at (330) 963-1181.

Sincerely,



Suzanne Prusnek  
Environmental Specialist  
Division of Hazardous Waste Management

SP:ddw

Enclosures

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

PHASE 0 AD-HOC BARCODE SHEET  
11/3/2011 11:04 AM

Department:



DMWM

Locked to DMWM

Subdepartment:



DMWM-Hazardous Waste

Office Location:



NEDO

Locked to NEDO

Media:



LAND

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Doc Type:



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Doc Subtype:



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Program:



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County:



50 - MAHONING

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Facility ID:



OHD000810283

Facility Name:



CANFIELD METAL COATING CORP

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5/19/2008

Record ID:





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

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

May 19, 2008

John Tatusko  
Plant Engineer  
Canfield Metal Coating Corporation  
460 W. Main St.  
Canfield, OH 44406

**RE: CANFIELD METAL COATING CORPORATION, OHD000810283, MAHONING COUNTY, RCRA/LQG, COMPLIANCE EVALUATION INSPECTION, CORRECTION**

Dear Mr. Tatusko:

On August 8, 2007 and on May 1, 2008, Ohio EPA sent Canfield Metal Coatings (CMC) a Notice of Violation letter and a Partial Return to Compliance letter respectively. Ohio EPA has identified a typo in the above correspondences and wishes to make the following correction. Old language is struck out and correct language is in bold.

1. **Ohio Revised Code (ORC) § 3734.02(E) and (F) storage of hazardous waste without a facility installation and operation permit:**

By letter dated March 15, 2007, Ohio EPA received a request from CMC for a thirty day extension to the ninety day accumulation time limit for LQG's. The letter states "CMC has one drum of waste chromic liquid, approximately 563 pounds, which has exceeded the ninety day time limit for storage on March 14, 2007".

Ohio EPA did not act on said request since it was requested after the time limit had expired. Hazardous waste manifests reviewed at the time of the inspection indicate that the drum of waste chromic acid (D002, D007) was not shipped off site to Envirote until March 27, 2007 (hazardous waste manifest number 001400418 FLE).

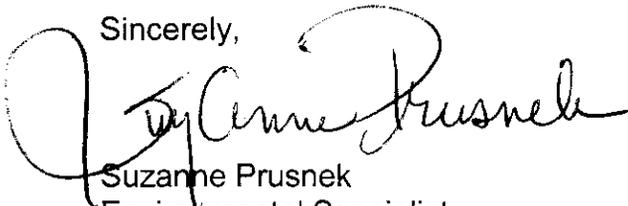
Based upon this information, Ohio EPA has determined that CMC has stored hazardous waste on site in excess of ninety days ~~with~~ **without** a hazardous waste permit.

CANFIELD METAL COATING CORPORATION  
MAY 19, 2008  
PAGE – 2 –

Failure to list specific deficiencies in this communication does not relieve CMC from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve CMC from liability for any past or present violations of the state's hazardous waste laws.

Should you have any questions, please feel free to call me at (330) 963-1181.

Sincerely,

A handwritten signature in black ink, appearing to read "Suzanne Prusnek". The signature is written in a cursive style with a large initial "S".

Suzanne Prusnek  
Environmental Specialist  
Division of Hazardous Waste Management

SP:ddw

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

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	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM</b>		For Ohio EPA use only																		
2. Site EPA ID No.	EPA ID Number: OHD000810283																				
3. Site Name	Name: Canfield Metal Coating Corp		Website (optional):																		
4. Site Location Information	Street Address: 460 W. Main St.																				
	City, Town, or Village: Canfield	State: OH																			
	County Name: Mahoning	Zip Code: 444406																			
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. 331112		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: John		MI: G	Last Name: Tatusko																	
	Phone Number: 330-702-3877		Phone Number Extension:																		
	E-Mail Address: tatuskoj@coilcoat.com																				
	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:  WHX Corp		Date Became Owner (mm/dd/yyyy):  07/01/2001																		
	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: New York		Owner Phone #:																		
	State: NY		Country: USA	Zip Code: 10022																	
	B. Name of Site's Operator:  Canfield Metal Coating Corp		Date Became Operator (mm/dd/yyyy):  06/29/2001																		
	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							
	Private	County	District	Federal	Indian	Municipal	State	Other													
X																					
Street or P.O. Box: 460 W Main St.																					
City, Town, or Village: Canfield		Operator Phone #:																			
State: OH		Country: Mahoning	Zip Code: 44406																		
9. Violations Cited?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No																			
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)																					
<input type="checkbox"/> Not Regulated																					

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

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

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

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 RCRA Info source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

Same as 10/31/2006	D035	D039				
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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:
Y	Tanks?	Other comments:
Y	Containers?	

13.	Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
	Suzanne Prusnek OEPA/DHWM/NEDO	Karen Nesbit OEPA/DHWM/NEDO	06/12/2007 09:20

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)

LA:  $\Xi$  QUANTITY GENERATOR REQUIREMENTS

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

CESQG:  $\leq$  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:  $\geq$  1,000 Kg. (~300 gallons) of waste in a calendar month or  $\geq$  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  No  N/A
  2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] Yes  No  N/A
  3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes  No  N/A
  4. Were annual reports filed with Ohio EPA on or before March 1<sup>st</sup>? [3745-52-41(A)] Yes  No  N/A
  5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] Yes  No  N/A
  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  No  N/A
  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  No  N/A
  8. Does the generator accumulate hazardous waste? Yes  No  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.
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  No  N/A
- 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: 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**

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

16. 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 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.*

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date Trained</u>

**CONTINGENCY PLAN**

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

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

29. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes  No  N/A
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 communications or alarm system? [3745-65-32(A)] Yes  No  N/A
- b. Emergency communication device? [3745-65-32(B)] Yes  No  N/A

- c. Portable fire control, spill control & 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 a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes  No  N/A
- d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes  No  N/A

- e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes  No  N/A
- f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes  No  N/A
43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes  No  N/A
- a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes  No  N/A
- b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes  No  N/A

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

**USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS**

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

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

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) Yes  No  N/A
- "Week" means 7 consecutive days.
- 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 waste 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