



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

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

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

September 19, 2007

RE: COMP-CORP INDUSTRIES
SMALL QUANTITY GENERATOR
OHR 000 019 232
CUYAHOGA COUNTY
NOV

Mr. Mike Austin
Comp-Corp Industries
7601 Bittern Avenue
Cleveland, OH 44103

Dear Mr. Austin:

On September 11, 2007, Frank Zingales and I, representing the Ohio Environmental Protection Agency (Ohio EPA), Division of Hazardous Waste Management, conducted a compliance evaluation inspection (CEI) at Comp-Corp Industries' (CCI) facility in Cleveland, Ohio. CCI was inspected to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC), and the rules promulgated thereunder in Chapter 3745 of the Ohio Administrative Code (OAC).

The inspection included a review of the facility's operations, as well as the management of wastes. CCI was inspected for the requirements of a small quantity generator (SQG) of hazardous waste. The facility was represented by you and Bill Beckwith.

Ohio EPA identified the following violations of Ohio's hazardous waste rules. In order to correct these violations, Summit must do the following and send me the required information **within 30 days** of the date of this letter:

1. Waste Evaluation, OAC rule 3745-52-11:
Any person, who generates a waste, as defined in OAC rule 3745-51-02, must determine if that waste is a hazardous waste.

The facility failed to evaluate the contents of 16, 55-gallon drums at the hazardous waste accumulation area. These drums along with 4, 55-gallon drums that were identified as hazardous waste were labeled by Ohio EPA as CC01 through CC20.

In order to abate this violation, the facility must evaluate and verify the contents of the 20, 55-gallon drums identified by Ohio EPA during the inspection. CCI must submit waste evaluation results for each container, indicate the date when the contents were generated, and indicate how the waste stream will be managed.

2. Waste Evaluation, OAC rule 3745-52-11:

Any person, who generates a waste, as defined in OAC rule 3745-51-02, must determine if that waste is a hazardous waste.

The facility failed to evaluate the contents of several 5-gallon and other miscellaneous containers located at the hazardous waste accumulation area.

In order to abate this violation, the facility must evaluate the contents of all containers. CCI must submit waste evaluation results for each container, indicate the date when the contents were generated, and indicate how the waste stream will be managed.

3. Employee Training, OAC rule 3745-52-34(D)(5)(c):

The generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.

The facility failed to ensure employees are familiar with proper hazardous waste management and emergency procedures, such as:

- properly evaluating waste to determine whether it is hazardous;
- proper handling of hazardous waste, used oil, and universal waste;
- responding to facility hazardous waste emergencies;
- labeling, dating, and closing containers used to store hazardous waste, used oil, and universal waste;
- filling out the uniform hazardous waste manifest;
- conducting inspections of areas where containers of hazardous waste are stored;
- conducting inspections of required emergency equipment;
- using, repairing and replacing emergency equipment; and
- using, repairing and replacing communication or alarm systems.

In order to abate this violation, the facility must submit documentation (e.g. training description and sign-in sheet) demonstrating those employees who handle hazardous waste are familiar with proper waste handling and emergency procedures.

4. Emergency Equipment Inspections, OAC rule 3745-65-33:

All facility communication or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment must be tested and maintained as necessary to assure its proper operation in time of emergency. The owner/operator must record the inspections in a log or summary.

The facility failed to conduct and record emergency equipment inspections.

In order to abate this violation, the facility must submit a written inspection schedule (i.e. that outlines the frequency for inspecting and testing emergency equipment) and a copy of a completed inspection log for review. An example inspection log was provided to you during the inspection.

5. Required Aisle Space, OAC rule 3745-65-35:

The owner/operator shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operation in an emergency.

The facility failed to maintain adequate aisle spacing at the hazardous waste accumulation area.

In order to abate this violation, the facility must submit photographs demonstrating aisle spacing is provided at the hazardous waste accumulation area.

6. Dating, OAC rule 3745-52-34(D)(4):

The date upon which each period of accumulation begins must be clearly marked and visible for inspection on each container.

The facility failed to date at least two 55-gallon drums (CC02 and CC03) that were identified as hazardous waste at the accumulation area. In addition, a two additional 55-gallon drums identified as hazardous waste were dated 1-07 and 6-07 (CC01 and CC06).

In order to abate this violation, the facility must submit photographs demonstrating all containers of hazardous waste are appropriately dated, identify the date when drums were generated, and complete the training referenced in Violation 3.

7. Inspections, OAC rule 3745-66-74:

The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and deterioration caused by corrosion or other factors. The owner or operator must record inspections in an inspection log or summary.

The facility failed to conduct and record container accumulation area inspections on a weekly basis since May 24, 2007.

In order to abate this violation, the facility must submit a written procedure that outlines how the facility will comply with this rule and submit two consecutive weeks of completed inspection logs. An example inspection log was provided to you during the inspection.

8. Universal Waste Labeling, OAC rule 3745-273-14(E):
Each lamp or a container or package in which universal waste lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste Lamps," or "Waste Lamps," or "Used Lamps."

CCI failed to label or mark 12 boxes of 8 foot lamps and one box of 4 foot lamps with one of the following phrases: "Universal Waste Lamps," or "Waste Lamps," or "Used Lamps."

In order to abate this violation, the facility must submit a photograph demonstrating the packages are appropriately labeled.

9. Universal Waste Dating, OAC rule 3745-273-15(C):
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. The handler may make this demonstration by: marking or labeling each container with the earliest date that any universal waste in the container became a waste or was received; marking or labeling each individual item of universal waste; maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste containers/items became a waste or was received; or placing the universal waste in a specific area and identifying the earliest date that any universal waste in the area became a waste or was received.

CCI failed to demonstrate the length of time that 13 boxes of universal waste lamps had been accumulating.

In order to abate this violation, the facility must submit a photograph(s) that demonstrates the facility is tracking the length of time universal waste lamps are accumulating on-site.

10. Universal Waste Accumulation, OAC rule 3725-237-15(A):
A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, unless the requirements of paragraph (B) of this rule are met.

CCI accumulated universal waste lamps on-site for longer than one year. During the inspection a facility employee indicated the lamps had been accumulating on-site for up to 2 years.

In order to abate this violation, the facility must immediately arrange for the spent lamps to be sent to universal waste handler or destination facility and submit a copy of the shipping documentation.

Concerns:

11. **Please submit the waste evaluation results for the oil skimming waste removed from the on-site waste water treatment system and indicate how this waste stream is being managed.**
12. The facility utilizes a small shot/bead blast unit to clean tools and fixtures. Once sufficient quantities of the spent shot media is produced and collected, CCI must evaluate the spent shot prior to disposal. **Please submit a photograph demonstrating the spent shot is being collected for waste evaluation.**
13. The facility generates a small quantity of aerosol cans. Generators are required to evaluate both the contents of the can and the can itself prior to disposal. The best way to manage aerosol cans is to recycle both the can (scrap metal) and the contents. If you intend to throw away non-empty aerosol cans, you must evaluate the contents to determine if they are a hazardous waste and properly manage them.

In order to determine if an aerosol can is empty: (1) it must be emptied of all waste using practices commonly employed to remove materials from that type of container, that is, pouring, pumping and aspirating (the easiest way to do this is to use a puncturing device); and (2) contain less than or equal to 2.5 centimeters of liquid residue or no more than three percent by weight of the total capacity of the container remains. **Please indicate how the facility will manage its spent aerosol cans.**

14. CCI was inspected for the requirements of a small quantity generator of hazardous waste. Should the facility generate >2,200 pounds of hazardous waste in any month, the facility is required to comply with the large quantity generator requirements. Ohio EPA's guidance document "Hazardous Waste Generator Categories and Episodic Generation" may be found at: <http://www.epa.state.oh.us/dhwm/guidancedocuments.html>

Generator requirements and generator recordkeeping requirements summary tables were provided to you during the inspection.

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides free compliance and pollution prevention assistance on environmental issues related to air, land and water. Should your facility be interested in receiving a free pollution prevention assessment in the future, please feel free to contact me or OCAPP. OCAPP may be contacted at: 800-329-7518 or <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.

COMP-CORP INDUSTRIES
SEPTEMBER 19, 2007
PAGE – 6 –

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.

Enclosed you will find a copy of the checklists that we completed during the inspection. Should you have any question, please feel free to call me at (330) 963-1278. You can find copies of the rules and other information on the DHWM's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,



Wade Balsler
District Representative
Division of Hazardous Waste Management

WB:ddw

Enclosure

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

NOTICE:

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

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

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

GENERAL REQUIREMENTS

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

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

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

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

- | | | | | | | |
|--|-----|--------------------------|----|-------------------------------------|-----|--------------------------|
| 7. Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
|--|-----|--------------------------|----|-------------------------------------|-----|--------------------------|

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

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

NOTE: Complete appropriate checklist for each unit.

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

MANIFEST REQUIREMENTS

- | | | | | | | |
|---|-----|-------------------------------------|----|-------------------------------------|-----|-------------------------------------|
| 9. Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 10. Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| a. Does the contractual agreement specify the type of waste and frequency of shipment? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |

[Facility Name/Inspection Date]
 [ID number]
 SQG/February 2007
 Page 1 of 4

- b. Is the transport vehicle owned and operated by the reclaimer? Yes No N/A
- c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? Yes No N/A

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

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

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

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

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

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

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

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

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

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

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

PREPAREDNESS AND PREVENTION

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

18. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]

- a. Name and telephone number of emergency coordinator? Yes No N/A
- b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes No N/A
- c. Telephone number of local fire department? Yes No N/A

19. Are employees familiar with waste handling and emergency procedures [3745-52-34(D)(5)(c)] Yes No N/A

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

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

22. Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:
- a. Internal Alarm system? [3745-65-32(A)] Yes No N/A
 - b. Emergency communication device? [3745-65-32(B)] Yes No N/A
 - c. Portable fire control, spill control and decon equipment? [3745-65-32(C)]? Yes No N/A
 - d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes No N/A
23. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]
- a. Are inspections recorded in a log or summary? [3745-65-33]? Yes No N/A
24. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)] Yes No N/A
25. 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
26. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
27. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes No N/A
28. 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

29. 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 the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A *note: DM Labeled Acids, But was Solvent*
30. 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 the 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

31. Has the generator marked containers with the words "Hazardous Waste"[3745-52-34(D)(4)] Yes No N/A **TBD - see Nov 1 & 2**
32. Is the accumulation date on each container? [3745-52-34(D)(4)] **NOV 6** Yes No N/A **2 DMS; Also see Nov 1 & 2**
33. 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.

34. Is the container accumulation area(s) inspected at least 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
35. 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
36. 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
37. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B) ? [3745-66-77(B)] Yes No N/A

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

PRE-TRANSPORT REQUIREMENTS

38. Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes No N/A
39. Does each container ≤ 100 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A
40. 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

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#
See NOV LTR
- 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#

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*

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#

NOTE: *Wastes with EPA hazardous waste numbers K174 and K175 (chlorinated aliphatic wastes) have specific requirements in rule 3745-270-33. Waste with EPA hazardous waste numbers K176, K177 and K178 (inorganic chemical wastes) have specific requirements in rule 3745-270-36.*

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__NoN/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__NoN/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/ARMK# ____

a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05] Yes__NoN/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/ARMK# ____

a. The facility can land dispose of the waste. [3745-270-06] Yes__NoN/A__RMK# ____

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? If so: Yes__No__N/ARMK# ____

a. Has the facility complied with 3745-270-04? Yes__NoN/A__RMK# ____

REMARKS

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#
-

USED OIL INSPECTION CHECKLIST

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

PROHIBITIONS

*No Used Oil Containers Identified during CEI,
Note NOV # 1 - some were unlabeled/may be oil*

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)] *Potential Violation* Yes ___ No N/A ___ RMK# ___
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
 - a. Stopped the release? Yes ___ No N/A ___ RMK# ___

- b. Contained the release? Yes ___ No N/A ___ RMK# ___
- c. Cleaned up and properly managed the used oil and other materials? Yes ___ No N/A ___ RMK# ___
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A ___ RMK# ___
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes ___ No ___ N/A ___ RMK# ___
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes ___ No N/A ___ RMK# ___
- b. Is the heater designed to have a maximum capacity of not more than 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# ___

Nov # 1 and 2

L:\Inspection Checklist\MegaSet Rule Updates\USED OIL.SHORT.11.2004.fin.megaset.wpd

REMARKS

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

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

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

PROHIBITIONS

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

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

No Batteries On-Site

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes No N/A RMK#
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes No N/A RMK#
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes No N/A RMK#
 - b. Mix battery types in one container? Yes No N/A RMK#
 - c. Discharge batteries to remove the electric charge? Yes No N/A RMK#
 - d. Regenerated used batteries? Yes No N/A RMK#
 - e. Disassemble them into individual batteries or cells? Yes No N/A RMK#
 - f. Remove batteries from consumer products? Yes No N/A RMK#
 - g. Remove the electrolyte from the battery? Yes No N/A RMK#

If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)]

Yes ___ No N/A ___ RMK# ___

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# ___

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# ___
- 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# ___
TBD

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#
- If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] 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

E-mail this completed form to tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office	Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM		For Ohio EPA use only							
2. Site EPA ID No.	EPA ID Number: OHR 000 019 232									
3. Site Name	Name: Com-Corp Industries		Website (optional):							
4. Site Location Information	Street Address: 7601 Bittern Avenue									
	City, Town, or Village: Cleveland		State: OH							
	County Name: Cuyahoga		Zip Code: 44103							
5. Site Land Type (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other		
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A.		B.							
	C.		D.							
	First Name: Mike		MI:		Last Name: Austin					
	Phone Number:		Phone Number Extension:							
7. Facility Representative Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	E-Mail Address:									
	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):					
		Owner Type: Mark with an X		Private	County	District	Federal	Indian	Municipal	State
Street or P.O. Box:										
City, Town, or Village:				Owner Phone #:						
State:				Country:			Zip Code:			
B. Name of Site's Operator:			Date Became Operator (mm/dd/yyyy):							
Operator Type: Mark with an X		Private	County	District	Federal	Indian	Municipal	State	Other	
Street or P.O. Box:										
City, Town, or Village:				Operator Phone #:						
State:				Country:			Zip Code:			
9. Violations Cited?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No							
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)										
<input type="checkbox"/> Not Regulated										

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

A. Hazardous Waste Activities			3. Treater, Storer or Disposer of Hazardous Waste
(choose only one of the following categories)		<input type="checkbox"/>	4. Recycler of Hazardous Waste
<input type="checkbox"/>	UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/>	5. Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/>	a. Large Quantity Generator (LQG):	<input type="checkbox"/>	a. Small Quantity On-site Burner Exemption
<input checked="" type="checkbox"/>	b. Small Quantity Generator (SQG)	<input type="checkbox"/>	b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/>	c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/>	6. Underground Injection Control Facility
<input type="checkbox"/>	d. United States Importer of Hazardous Waste	<input type="checkbox"/>	7. Hazardous Waste Transporter
<input type="checkbox"/>	e. Mixed Waste (hazardous and radioactive) Generator		
B. Universal Waste Activities		C. Used Oil Activities	
<input checked="" type="checkbox"/>	1. Small Quantity Handler of Universal Waste	<input checked="" type="checkbox"/>	1. Used Oil Generator
(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):		2. Used Oil Transporter Indicate Type(s) of Activity(ies)	
<input type="checkbox"/>	2. Large Quantity Handler of Universal Waste	<input type="checkbox"/>	Transporter
(accumulates 5,000 kg or more).		<input type="checkbox"/>	Transfer Facility
<input type="checkbox"/>	3. Destination Facility for Universal Waste	3. Used Oil Processor and/or Re-refiner	
(Check all boxes below that apply for each of the three types of facilities above.)		Indicate Type(s) of Activity(ies)	
	<u>Generated</u> <u>Accumulated</u>	<input type="checkbox"/>	Processor
A. Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Re-refiner
B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>	
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>	
D. Lamps	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
		<input type="checkbox"/>	4. Off-Specification Used Oil Burner
		5. Used Oil Fuel Marketer -	
		Indicate Type(s) of Activity(ies)	
		<input type="checkbox"/>	a. Marketer Who Directs Shipment of Off- Specification Oil
		<input type="checkbox"/>	b. Used Oil to Off-Specification Used Oil Burner

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

--	--	--	--	--	--

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

No	Announced ?	Additional Facility Representatives: Bill Beckwith
No	Tanks?	Other comments:
YES	Containers?	

13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
Wade Balsler	Frank Zingales	9-10-07 1000-1325

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)