



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

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www.epa.state.oh.us

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

April 4, 2008

RE: **CUBBISON  
SMALL QUANTITY GENERATOR  
OHD 058 388 570  
MAHONING COUNTY  
NOTICE OF VIOLATION**

Mr. Shawn Danks  
Cubbison Co.  
380 Victoria Road  
Youngstown, OH 44515

Dear Mr. Danks:

On March 11, 2008, I conducted a routine Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at the Cubbison facility located in Youngstown, Ohio. I represented the Division of Hazardous Waste Management (DHWM) of the Ohio Environmental Protection Agency (Ohio EPA) and you represented Cubbison. At the time of the inspection Cubbison was a small quantity generator (SQG) and inspected to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC), and Chapter 3745 of the Ohio Administrative Code (OAC).

An SQG may accumulate up to 6,000 kilograms of hazardous waste on site for up to 180 days before transport to a licensed treatment storage and disposal (TSD) facility. In addition, an SQG's monthly generation must not exceed 1,000 kilograms (Kg) or 2,200 pounds per month.

Cubbison is a label and nameplate manufacturer for product identification purposes. Cubbison prints on paper, foils, vinyl, aluminum, stainless steel and brass. Processes include screen printing, digital printing, UV printing, etching, coating, adhesive application, stamping, machining, cutting and sanding.

## VIOLATIONS

During the inspection, the following violations of Ohio's hazardous waste laws were identified:

1. **Emergency Coordinator, OAC 3745-52-34(D)(5)(a):** At all times there must be at least one employee either on the premises or on call with the responsibility for coordinating all emergency response measures. Cubbison did not have an emergency coordinator available for afternoon shifts or in the event of absence or leave time for Mr. Danks.

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This violation was abated on April 2, 2008, when an emergency contact list was provided.

- 2. Posted emergency contact information, OAC 3745-52-34(D)(5)(b):** The name and number of the emergency coordinator(s), the location of fire extinguishers and spill control material, fire alarm(s) and emergency phone numbers must be posted. Cubbison did not have the emergency contact information posted as required.

This violation was abated on April 2, 2008, when an emergency contact list was posted and provided. An example of emergency contact information is also enclosed.

- 3. Emergency Preparedness, OAC 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. Cubbison did not appear to have familiarized all employees with waste handling and emergency procedures due to the lack of availability of emergency equipment, inspections and emergency contact information.

Please provide documentation that employees have been trained or informed as to their relevant responsibility regarding hazardous waste management and emergency procedures.

- 4. Required Equipment, OAC 3745-65-32(C):** facilities shall be equipped with portable fire control equipment, spill control equipment, and decontamination equipment. Cubbison did not have spill control and decontamination response equipment available for the hazardous waste storage area.

Please document to the Ohio EPA that you have provided the needed spill control response and decontamination equipment for the type and quantity of wastes managed in your hazardous waste storage area.

- 5. Testing and Maintenance of Equipment, OAC 3745-65-33:** All facility communications 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 inspections must be recorded in a log or summary. Cubbison failed to inspect and test facility equipment or keep a log or summary of these inspections.

Please implement testing, maintenance and inspections of emergency equipment and provide copy of a completed log or summary indicating compliance with this rule. An example equipment inspection log is enclosed and found at the following link: <http://www.epa.state.oh.us/dhwm/pdf/equiplog.PDF>.

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- 6. Satellite Accumulation Area Requirements, OAC 3745-52-34(c)(1):** Satellite accumulation containers must be marked with the words "Hazardous Waste" or other words identifying their contents. Cubbison failed to adequately label two, 55-gallon containers of D001 and F003 waste solvent, paint residue and filters.

This violation was abated on April 2, 2008, when a photograph was provided showing these containers have been properly labeled. Enclosed is a copy of our satellite container guidance. This is also found at:

[http://www.epa.state.oh.us/dhwm/pdf/Satellite\\_Accumulation\\_Guidance.pdf](http://www.epa.state.oh.us/dhwm/pdf/Satellite_Accumulation_Guidance.pdf).

- 7. Dating of Hazardous Waste Container Labels, OAC 3745-52-34 (A)(2):** an SQG may, for 180 days or less, accumulate and/or conduct treatment of hazardous waste, provided...the date upon which each period of accumulation ... begins is clearly marked and visible for inspection on each container. Cubbison failed to date two, 55-gallon drums labeled "D001, F003 hazardous waste" located in the shipping dock storage area.

This violation was abated at the time of the inspection when you provided a date to the hazardous waste containers.

- 8. Inspections, OAC 3745-66-74:** The owner or operator shall inspect areas where containers are stored at least weekly, looking for leaks and deterioration caused by corrosion or other factors. The owner or operator shall record inspections in an inspection log or summary. Cubbison was not making or recording weekly inspections in a log or summary.

Please provide inspection records for at least three weeks to demonstrate inspections are now being performed. An example of an inspection checklist is enclosed and found at the following link: <http://www.epa.state.oh.us/dhwm/pdf/sqglog.PDF>.

- 9. Used Oil Storage Requirements for Generators (Labels), OAC 3745-279-22(C):** Cubbison failed to properly label one five gallon container of compressor oil.

This violation was abated when the container was labeled as "used oil".

- 10. Universal Waste Lamps, OAC 3745-273-14(E):** You failed to label two boxes containing spent lamps with the words "Universal Waste Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)".

This violation was abated on April 2, 2008 when a photo was provided showing the spent lamps were labeled per the rule.

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11. **OAC 3745-273-15(A) Accumulation time limits:** You failed to date or otherwise track the accumulation time of universal waste lamps.

This violation was abated on April 2, 2008 when a photo was provided showing the spent lamps were dated per the rule.

## **CONCERNS and RECOMMENDATIONS**

1. In regard to determining whether Cubbison may need to file an annual report or meet the large quantity generator (LQG) requirements, it is recommended that Cubbison keep a log of hazardous waste quantities by the date generated to ensure proper management of waste according to the applicable regulation. This record keeping may be used as a tracking tool to avoid inadvertent large quantity hazardous waste generation.
2. It is recommended that you update your LQG contingency plan so that in the event you become an episodic LQG or in the instance that you may lose the market for your ferric chloride and must accumulate this material as a waste again, then you are better prepared to meet the LQG requirements.
3. Review of waste streams: 1) the citrosolve based paint waste MSDS indicates that this material may not be a hazardous waste. The material does not appear to either a D001 or F003 waste, 2) the screen wash appears to have at one time failed the toxicity characteristic leaching procedure (TCLP) for lead. You should consider evaluation of your inks to determine where/if lead enters the process and either seek alternates or have the TCLP analysis re-run to update characterization of this waste stream.
4. You may be able to reduce the amount of waste your company generates. If you find ways to recycle, reduce or eliminate waste that your company generates, you may be able to reduce regulatory requirements, treatment and disposal costs. Ohio EPA also has helpful information about Pollution Prevention (P2) at the following web address: <http://www.epa.state.oh.us/opp>.
5. 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. 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.

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6. Spent fluorescent and high intensity discharge lamps may be considered hazardous waste due to their mercury and other RCRA metal content. These lamps must be disposed or recycled accordingly. You may manage lamps as a universal waste, sending them to be recycled. Universal wastes that are recycled are not subject to the hazardous waste rules. Refer to the following enclosed Ohio EPA guidance: "Universal Waste Rules for Handlers of Lamps":  
[http://www.epa.state.oh.us/dhwm/pdf/Universal Waste Rules for Handlers of Lamps.pdf](http://www.epa.state.oh.us/dhwm/pdf/Universal_Waste_Rules_for_Handlers_of_Lamps.pdf), "Fluorescent Lamps: What You Should Know":  
<http://www.epa.state.oh.us/dhwm/pdf/LampGuidance.pdf>, and "Universal Waste":  
[http://www.epa.state.oh.us/dhwm/pdf/New Universal Waste Guidance.pdf](http://www.epa.state.oh.us/dhwm/pdf/New_Universal_Waste_Guidance.pdf).

The following documents were provided to you during the inspection: *A list of Disposal and Recycling Companies in Northeast Ohio and a Large Quantity Generators Checklist.*

In response to this Notice of Violation, please provide the required information **within 30 days** of the date of this letter. Enclosed you will find a copy of the checklists that were completed for the inspection. Should you have any questions, please feel free to call me at (330) 963-1146. 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,



Ron Shadrach  
District Representative  
Division of Hazardous Waste Management

RS:cl  
Enclosures

cc: Tim Merrifield, President

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

**NOTICE:**

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

Process, Waste, and Pollution Prevention Summary for:						
Cubbison, Youngstown, OHD 058 388 570, SQG, 3-11-2008 inspection						
#	Process generating the waste	Waste Qty - details	On-site management	Off-site management	Current pollution prevention	Possible pollution prevention
1	Waycoate - SS (metal) resist etch <i>developed</i>	D001, F003 Isopropanol, xylene~ 110 gal/mos.	Drum storage, load dock area	Chemical Solvents (CSI) # 6093		
2	Screen and SC ink wash	D008 ~ 1/2 drum/mos.	Drum storage dock area	CSI #8441		Suggest re-evaluate for D008 character
3	Paint/ink residue, filter bags, citrosolve and xylene/ F-waste <i>paint radders</i>	D001, F003 varies <dm/mos	Drum storage dock area	CSI #323		Segregate citrosolve waste from D & F listed waste
4	NaOH etching	D002 about #1200 lbs. /qtr.	Drum storage dock area	CSI <i>28936</i>		May not always be D002. Consider elem. Neutralization
5	FeCl3 from SS & Al etch process  FeCl3 rags	D001, D002, D006, D007, D008, F003 ~ 2,600#/ qtr.  Same ~ 2 dm/yr	Drum storage in former generator area  Dock area	Envirite # 17967  CSI	Substitute for commercial chemical prdct.	
6	Indigo wipes & waste Indigo printing  mineral oil filters	Non haz, 1 dm/ 2 mos.  Non RCRA	Dm store along Indigo press  Solid waste	CSI		Recycle filter after draining
7	Misc. housekeeping paints & inks	D001, varies ~ 1dm/mos.	HW or SW	CSI		
8	Misc. aerosol and paint cans	Non RCRA when empty or characterize	Solid waste			May recycle as steel scrap w/arrangements. Must ensure empty.

	Continued...					
9	Rags	D, F listed and non haz generation	Step cans	Laundered by D&D Industrial	Washed & returned	
10	Cardboard/scrap metal			recycled	recycled	
11	Lamps	Universal waste	Dock storage area	CSI	Recycled	
12	Used oil	nonhaz		CSI or other	recycle	

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

CESQG:  $\leq 100$  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:  $\geq 1,000$  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. Has the generator obtained a U.S. EPA I.D. number? [3745-52-12] Yes  No  N/A
3. Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)] Yes  No  N/A
4. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)] Yes  No  N/A
5. Does the generator accumulate hazardous waste? Yes  No  N/A

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

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

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

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

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

8. Does the generator treat hazardous waste in a:
- 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.

**MANIFEST REQUIREMENTS**

9. Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)] Yes  No  N/A
10. Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)] Yes  No  N/A

[Facility Name/Inspection Date]  
[ID number]  
SQG/February 2007  
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- a. Does the contractual agreement specify the type of waste and frequency of shipment? Yes  No  N/A
- b. Is the transport vehicle owned and operated by the reclaimer? Yes  No  N/A
- c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? Yes  No  N/A

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

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

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

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

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

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

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

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

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

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
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
32. Is the accumulation date on each container? [3745-52-34(D)(4)] Yes  No  N/A
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

Ohio Environmental Protection Agency  
**RCRA SUBTITLE C SITE  
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to  
[tammy.mcconnell@epa.state.oh.us](mailto:tammy.mcconnell@epa.state.oh.us) or mail it to Tammy  
McCConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OHD 058 388 570								
3. Site Name	Name: Cubbison						Website: (Optional)		
4. Site Location Information	Street Address: 380 Victoria Road								
	City, Town, or Village: Youngstown						State: OH		
	County Name: Mahoning						Zip Code: 44515		
5. Site Land Type (check only one)	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>									
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: Shawn			MI:	Last Name: Danks				
	Phone Number: 330-793-2481				Phone Number Extension:				
	E-Mail Address: sdank@cubbison.com								
	Fax Number: 330-793-8471				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	Name of Site's Legal Owner:						Date Became Owner (mm/dd/yyyy):		
	Owner Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box:								
	City, Town or Village:				Owner Phone #:				
	State:				Country:			Zip Code:	
	Name of Site's Operator:						Date Became Operator (mm/dd/yyyy):		
	Owner Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	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								
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Not Regulated					<input type="checkbox"/> Conditionally Exempt Small Quantity Generator				
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11					<input type="checkbox"/> United States Importer of Hazardous Waste				
<input type="checkbox"/> Large Quantity Generator (LQG)					<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator				
<input checked="" type="checkbox"/> Small Quantity Generator (SQG)									
<input type="checkbox"/> Hazardous Waste Transporter					<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace				
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste					<input type="checkbox"/> Small Quantity On-Site Burner Exemption				
<input checked="" type="checkbox"/> Recycler of Hazardous Waste					<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption				
<input type="checkbox"/> Underground Injection Control Facility									

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))			
<input checked="" type="checkbox"/> <b>Small Quantity Handler of Universal Waste</b>		<input type="checkbox"/> <b>Large Quantity Handler of Universal Waste</b> (accumulates 5,000 kg. or more)	
<input type="checkbox"/> <b>Destination Facility for Universal Waste</b>			
Check all boxes below that apply for each of the three types of facilities above		10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
	<b>Managed</b>	<input checked="" type="checkbox"/> <b>Used Oil Generator</b>	<input type="checkbox"/> <b>Off-Specification Used Oil Burner</b>
Batteries	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Transporter</b>	<input type="checkbox"/> <b>Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil</b>
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Transfer Facility</b>	<input type="checkbox"/> <b>Used Oil Fuel Marketer to Off-Specification Used Oil Burner</b>
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Processor</b>	
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Re-refiner</b>	
11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the 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.			
D001	D008	F003	
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.			
<b>Announced</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Additional Facility Representatives:</b>
<b>Tanks</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Other Comments: Sends Ferric chloride generated as substitute for a commercial chemical product.</b>
<b>Containers</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Ron Shadrach, DHWM, NEDO			3/11/2008 10:00
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)