



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

April 16, 2007

RE: DAYGLO COLOR CORP.
LARGE QUANTITY GENERATOR
OHD 004-197-257
CUYAHOGA COUNTY
NOTICE OF VIOLATION

Mr. Richard Thornton
EHS Manager
DayGlo Color Corp.
4515 St. Clair Avenue
Cleveland, Ohio 44103

Dear Mr. Thornton:

On April 4, 2007, I, representing the Division of Hazardous Waste Management (DHWM) of the Ohio Environmental Protection Agency (Ohio EPA), conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at DayGlo Color Corp. (DayGlo), located at 4515 St. Clair Avenue, Cleveland, Ohio. DayGlo was 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). DayGlo was found to be a large quantity generator (LQG) of hazardous waste. During the inspection we also talked about possible ways to prevent pollution by reducing waste. You and Janice Udovich represented the facility during the inspection.

DayGlo produces pigments (specializing in fluorescent pigments), paints, dyes and liquid pigments. Waste generated from these processes include: flammable liquids; corrosive liquids (mostly from off-spec material, and from cleaning dyes); barium containing waste and lab packs. Hazardous waste generated include: waste flammable liquids containing propanol from dye production (D001); waste flammable liquid containing DMF methanol toluene from dye production (D001, F003, F005, used to make the dyes brighter); waste flammable liquid containing petroleum naphtha from paint (D001, used to clean vessels and equipment); waste methanol from dye production (D001, F003, used to clean/brighten up dyes); waste corrosive liquid containing hydrochloric acid (D002, used in the dye plant); waste aerosol (D001, off-spec material); waste hexamethylenediamine (D002, off-spec material); corrosive liquid sodium hydroxide (D002, outdated raw material); other off-spec and outdated raw material. 70% of the hazardous waste generated is from production, 30% is from cleaning. Not every waste stream is generated each month, nor is the rate of generation of any waste stream equal each month. Other waste streams generated include: fluorescent lamps (use General Electrics Ecolux "Green Lamps") which are disposed of as a solid waste; spent batteries (recycled); used oil (white oil, tongue oil, used to adjust viscosity and for lubrication - recycled); non-hazardous pigments (sent to solid waste landfill); non-hazardous residues (sent to solid waste landfill); cardboard/paper (incinerated on-site); wooden pallets (sold to recycler). Hukill Chemical Corp. and Chemtron Corp. receive the hazardous waste, which is transported by EnvirServ and Hukill Chemical Corp.

A copy of our checklist is enclosed for your information. At the time of the inspection, DayGlo was evaluated for compliance with applicable Hazardous Waste Regulations. The inspection revealed that DayGlo is in violation of the following regulations:

VIOLATIONS:

1. **OAC rule 3745-65-52, Content of Contingency Plan:**

The contingency plan shall: (A) describe the actions to be taken to comply with OAC rules 3745-65-51 and 3745-65-56 in response to fires, explosions, or unplanned releases of hazardous waste; (B) describe arrangements with local police and fire departments, hospitals, contractors, and Ohio EPA; (C) list names, addresses, phone numbers of all persons qualified to act as an emergency coordinator; (D) include a list of all emergency equipment at the facility, including, but not limited to, fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment; (E) include an evacuation plan for facility personnel where there is a possibility that evacuation may be necessary. This list must be kept up to date and shall include the location, and a physical description of each item on the list, and a brief outline of its capabilities.

DayGlo's contingency plan failed to include the following: a list of the home phone numbers of all current emergency coordinators.

To abate this violation, DayGlo shall modify the contingency plan to include the home phone numbers of all current emergency coordinators. To document compliance, DayGlo shall submit a copy only of the modified section of the contingency plan to the Ohio EPA's Northeast District Office (NEDO). Please see the following website regarding contingency plans: <http://www.epa.state.oh.us/dhwm/pdf/ContingencyPlanfactsheet.pdf>.

2. **OAC rule 3745-273-13(D)(1), Lamp Management:**

Small Quantity Generators of Universal Waste Handlers (SQGUWH) shall contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps. All containers or packages shall be closed and lack evidence of leakage, spillage or damage that could cause leakage.

It was noted during the inspection that the old fluorescent bulbs (not the GE Ecolux Fluorescent "Green" Lamps) were being stored in the Maintenance Department. The bulbs were not stored in containers which were closed.

To abate this violation, DayGlo shall place all of the fluorescent bulbs (that will be managed as a "Universal Waste" into the cardboard box or another container/package that is structurally sound, adequate to prevent breakage, and are compatible with the contents of the lamps. The container/package shall also be closed to prevent spillage or damage of the lamps. DayGlo shall document compliance by submitting a photograph(s) of the closed container of universal waste fluorescent bulbs to the Ohio EPA's NEDO.

3. **OAC rule 3745-273-14(E), Lamp labeling for SQGUWH:**

Lamps or containers or packages of lamps shall be labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s).

It was noted during the inspection that DayGlo failed to label the lamps or lamp containers, in Violation #2, with the above nomenclature. To abate this violation, DayGlo shall label all spent fluorescent lamps with the words "Universal Waste - Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)." To document compliance DayGlo shall submit photographs of the labeled lamps or container of lamps to the Ohio EPA's NEDO.

4. **OAC rule 3745-273-14(A), Battery Management:**
Small Quantity Generators of Universal Waste Handlers shall label battery(ies), container(s) of batteries with the words "Universal Waste-Batteries," or "Waste Battery(ies)," or "Used Battery(ies)."

It was noted during the inspection that there were 2 spent lead-acid batteries, and 1 15-gallon drum of cell batteries stored in the Maintenance Department. The batteries and the container lacked the above nomenclature. To abate this violation, DayGlo shall label the batteries, or container(s) of batteries with the words "Universal Waste Batteries," or "Waste Battery(ies)," or "Used Battery(ies)." To document compliance DayGlo shall submit photographs of the labeled batteries or container of batteries to the Ohio EPA's NEDO.

5. **OAC rule 3745-273-15(A), Accumulation Time for SQGUW:**
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, or received from another handler.

It was noted during the inspection that the fluorescent lamps and batteries mentioned in Violation #'s 2, 3 and 4 all lacked an accumulation date.

DayGlo shall be able to demonstrate the length of time that the universal waste (including both fluorescent bulb and spent batteries) has been accumulated from the date it becomes a waste. DayGlo may make this demonstration by:

- a. Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received;
- b. Marking or labeling each individual item of universal waste with the date it became a waste or was received;
- c. Maintaining an inventory system on-site that identifies the date each universal waste became waste or was received;
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste became a waste or was received;
- e. Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received;
or
- f. Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

Please inform me which method DayGlo will use to demonstrate the length of time that universal waste is accumulated.

The following website contains a list of fluorescent bulb recyclers: <http://www.epa.state.oh.us/dhwm/pdf/comp.lamp.ballast.list.pdf>. Ohio EPA does not endorse any company, and it is suggested that you evaluate their compliance with all applicable agencies prior to shipping your material.

6. **OAC rule 3745-52-34 (A), Labeling & Dating Accumulation Containers:**
While being accumulated on-site, each container or tank with hazardous waste contents must be labeled or clearly marked with the words "Hazardous Waste" and the date upon which the accumulation period began.

It was noted during the inspection that there was a 5-gallon container labeled as "Hazardous Waste, Petroleum Naphtha," located in the Hazardous Waste Accumulation Area in Plant #1. The container lacked the accumulation date.

To abate this violation DayGlo shall mark the container with the date upon which the accumulation period began. To document compliance DayGlo shall submit a photograph of the properly labeled container to the Ohio EPA's NEDO.

7. **OAC rule 3745-65-16, Personnel Training:**
(A) Facility personnel shall 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 hazardous waste regulations. The program shall be directed by a person trained in hazardous waste management procedures and shall 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. (B) Facility personnel shall take part in this program within six months after the date of their employment or assignment to a facility, or to a new position at the facility. (C) Facility personnel shall take part in an annual review of this program. (D) The owner or operator shall maintain documents (keep records of current employees until closure of facility; keep records of former employees at least 3-years from the last date the employee worked) and records at the facility that include: 1) Job titles, as they relate to hazardous waste management and the name of each employee filling each job. 2) Job description, including requisite skill, education, or other qualifications and duties of facility personnel assigned to each position. 3) Type and amount of both introductory and continuing training to be given to each person filling a position. 4) Documentation that personnel have completed the training program as detailed in 3745-65-16 (A), (B), and (C).

DayGlo's training records failed to include the job description (as they relate to hazardous waste management and the name of each employee filling each job).

To abate this violation, DayGlo shall submit documentation which demonstrates that DayGlo's personnel training program has been modified to incorporate the elements specified in OAC rule 3745-65-16 (D) (1-4), which includes the job title and job description of each employee which has duties in the management of hazardous waste. The documentation shall be submitted to Ohio EPA's NEDO.

Along with the abovementioned violations, the following comment was noted during the inspection.

COMMENT:

It was noted during the inspection that emergency equipment is tested/inspected and recorded in a log/summary as required by OAC rule 3745-65-33. You were advised to add the two-way radios to the inspection log/summary.

POLLUTION PREVENTION:

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. During the inspection, we talked about pollution prevention (P2) opportunities associated with your facility.

Alternatives to existing solvents

DayGlo has parts washer units that are serviced by Crystal Kleen. You may want to look into alternative solvents that may not generate a hazardous waste. One such alternative you may wish to consider is the use of Bioremediating Aqueous Parts Cleaners. These units break down environmentally hazardous or potentially hazardous materials through the action of living organisms. These highly effective parts cleaning systems can have extremely long bath lives. In fact, if maintained properly, some facilities can use the systems without changing baths for several years.

Other alternatives you may wish to consider are the use of non-hazardous or aqueous based solvents, or the use of on site solvent recycling systems. The payback for implementing any of these alternatives may be less than one year. If you would like an exact calculation for any of these options, please let me know and I will gladly do it. For more detailed information on alternative parts cleaning, please see the following web sites:

<http://www.epa.state.oh.us/opp/solvents/fact9.html>

<http://www.epa.state.oh.us/opp/parts-cleaning.html>

<http://www.clean.rti.org/> - which is the web site for SAGE (Solvent Alternatives Guide). SAGE is a comprehensive guide designed to provide pollution prevention information on solvent and process alternatives for parts cleaning and degreasing.

Methyl soyate is a non-hazardous soy methyl ester produced by the transesterification of soybean oil with methanol. It is commercially available from numerous manufacturers and suppliers, including several in Ohio. Methyl soyate can be used as an industrial cleaning solvent intended to replace mineral spirits, lacquer thinner, xylene, methyl ethyl ketone, and other hydrocarbon degreasing solvents. It is lower in toxicity than most other solvents, is readily biodegradable, and has a very high flash point and a low level of volatile organic compounds (VOCs), which also increases worker safety. As a solvent, methyl soyate is being adopted for many industrial applications. By utilizing methyl soyate, there could be significant savings of disposal costs with little increase in the purchase price. The change to non-hazardous cleaners would drastically reduce hazardous waste disposal costs for your facility. The following information is provided for exploring alternative solvents for processes at DayGlo.

For more information regarding soy-based solvents, see the enclosed documents, *Market Opportunity Summary: Soy-Based Solvents* and *Soy Methyl Ester Solvent Technical Background*.

Web site information

www.unitedsoybean.org
www.ohiochemical.com/Soy.html

The following is a list of companies/vendors that supply and manufacture alternative cleaning and degreasing products.

SOYSolv
6154 N CR 33
Tiffin, OH 44883
800-231-4274
Fax: 419-992-4595
steve@soysolv.com
[www.soysoolv.com/
zapper/index.htm](http://www.soysoolv.com/zapper/index.htm)

Phase III, Inc.
916 E. Baseline Rd., Ste. 101
Mesa AZ, 85204
480-503-2847
Fax: 480-503-1077
info@phaseiii.com
www.phaseiii.com

Franmar Chemical, Inc.
P.O. Box 97 Normal IL,
61761
800-538-5069
Fax: 309-862-1005
franmar@franmar.com
[www.franmar.com/
nontextile_trial.html](http://www.franmar.com/nontextile_trial.html)

An additional Web site to access other waste exchanges is at
www.metrokc.gov/hazwaste/imex/exchanges.html.

Recent listings under "**Materials Wanted**" at OMEEx for surplus chemicals, solvents and resins; cardboard; plastics and shrink wrap; scrap metal; and cardboard cores.

W09-07 Date Received: 5/30/02
SCRAP CARDBOARD

Always paying top dollar for scrap cardboard. Competitive hauling rates. OH Steve Grossman-The Grossman Group
1309 Cherokee Rose Drive
Columbus, OH 43081
Phone: 614-899-6759 FAX: 614-895-9330

W07-04 Date Received: 12/1/97
MISCELLANEOUS PLASTICS

Looking for stretch wrap, shrink wrap, camel back film, PVC, and HDPE for recycling. OH Jeff Ray Owner-Ray's Recycling
P.O. Box 321
Saint Marys, OH 45885
Phone: 419-394-6344 FAX: 419-394-7478

W10-09 Date Received: 8/3/98

SCRAP METALS

All non-ferrous and ferrous scrap metals. OH
Tom Mastrangelo
Victor Metals, Inc.
29319 Clayton Avenue
Wickliffe, OH 44092
Phone: 440-585-5959 FAX: 440-585-3121

Local Cardboard Recyclers (Taken from OPP's Cardboard Recyclers Directory Web page at www.epa.state.oh.us/opp/recyc/CardboardRecyclers.html)

Portage County

District Recycling Center
3588 Mogadore Road
Kent, Ohio 44240
330-678-8808
Fax: 330-678-9405

Cuyahoga County

BFI Waste Systems of Ohio, Inc.
8100 Old Granger Road
Garfield Heights, Ohio 44125
216-441-6300

Gateway Recycling
4133 East 49th Street
Cuyahoga Heights, Ohio 44105
216-341-8777

Stark County

Ace Rolloff
7222 Waynesburg Road
Waynesburg, Ohio 44688
330-492-2720
Fax: 330-866-5884

Carastar RFG, Cleveland
Recycling Plant
3400 Vega Avenue
Cleveland, Ohio 44113
216-961-5060
Fax: 216-961-1924

Cordell Hauling, Inc.
7018 Clark Ave.
Cleveland, Ohio 44102
216-651-4285

Mahoning County

BFI Waste Systems
3870 Hendricks Road
Youngstown, Ohio 44515
330-337-6156
Fax: 330-793-6595

Peltz Group
965 Wayside
Cleveland, Ohio 44110
216-481-3200
Fax: 216-481-4454

Ponz Industries
3800 Valley Road
Cleveland, Ohio 44109
216-661-8999
Fax: 216-661-8953

Republic Waste
3980 Jennings Road
Cleveland, Ohio 44109
216-741-4013
Fax: 216-351-4141

Weingold Rubbish
3915 East 91st Street
Cleveland, Ohio 44105
216-641-1071
Fax: 216-641-9378

Wooden Pallets

It was noted that some wooden pallets were being disposed of as a solid waste instead of being recycled. It is recommended that employees are reminded to properly manage these pallets. Please see the following web sites for a list of facilities that can recycle or reuse your wooden pallets:

- The Directory for Wood Waste and Pallet Recyclers / Reuse / Grinding Operations Located in Ohio which is available at: www.epa.state.oh.us/opp/recyc/pallets.html.
- The Ohio's Material Exchange (OMEx) statewide reuse and recycling service: <http://www.epa.state.oh.us/opp/recyc/omex.html>.

DAYGLO COLOR CORP.
APRIL 16, 2007
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I hope this information is helpful. I am committed to providing DayGlo with assistance in pollution prevention. I am available to provide additional information and resources for DayGlo. Additional information may be found on Ohio EPA's web site: www.epa.state.oh.us/opp. If you have any questions regarding the information provided in this letter or need additional assistance, feel free to contact me by e-mail at greg.orr@epa.state.oh.us or phone at (330) 963-1189.

Thank you for your interest in pollution prevention.

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 have not 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.htm>!. 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. You can find copies of the rules and other information on the division's web page at www.epa.state.oh.us/dhwm.

The abovementioned violations and concern must be corrected, and documentation of the correction must be sent to this office, to my attention within thirty (30) days of the date of this letter.

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

Should you have any questions or concerns, please do not hesitate to call me at (330) 963-1189.

Sincerely,



Gregory Orr
Environmental Specialist
Division of Hazardous Waste Management

GO:ddw

Enclosure

cc: Natalie Oryshkewych, DHWM, NEDO

E-mail this completed form to tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM		For Ohio EPA only																			
2. Site EPA ID No.	EPA ID Number: OHD004197257																					
3. Site Name	Name: DAYGLO COLOR CORP.		Website (optional:)																			
4. Site Location Information	Street Address: 4515 ST. CLAIR AVE.																					
	City, Town, or Village: CLEVELAND		State: OH																			
	County Name: CUYAHOGA		Zip Code: 44103																			
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									
Private	County	District	Federal	Indian	Municipal	State	Other															
X																						
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A. 325132		B. 32551																			
	C. 32591		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: JANICE		Mt:	Last Name: UDOVICH																		
	Phone Number: 216-391-7070			Phone Number Extension: 335																		
	E-Mail Address: judovich@dayglo.com																					
	Fax Number: 216-391-1408			Fax Number Extension:																		
	Street or P.O. Box:																					
	City, Town or Village:																					
State: OHIO		Country: USA		Zip Code: 13221																		
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):																			
	DAYGLO COLOR CORP.		01/01/1946																			
	Owner Type:	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>					Private	County	District	Federal	Indian	Municipal	State	Other	X							
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	Street or P.O. Box:																					
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	CLEVELAND		216-391-7070																			
	State: OHIO		Country: USA		Zip Code: 44103																	
	B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):																			
DAYGLO COLOR CORP.		01/01/1946																				
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Street or P.O. Box:																						
City, Town, or Village:		Operator Phone #:																				
CLEVELAND		216-391-7070																				
State: OHIO		Country: USA		Zip Code: 44103																		
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.)

A. Hazardous Waste Activities	
(choose only one of the following categories)	
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> 3. Treater, Storer or Disposer of Hazardous Waste
<input checked="" type="checkbox"/> a. Large Quantity Generator (LQG):	<input type="checkbox"/> 4. Recycler of Hazardous Waste
<input type="checkbox"/> b. Small Quantity Generator (SQG)	<input type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/> a. Small Quantity On-site Burner Exemption
<input type="checkbox"/> d. United States Importer of Hazardous Waste	<input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/> 6. Underground Injection Control Facility

B. Universal Waste Activities	C. Used Oil Activities															
<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 type="checkbox"/> 2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more).	<input type="checkbox"/> 2. Used Oil Transporter Indicate Type(s) of Activity(ies)															
<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"/> Transporter															
	<input type="checkbox"/> Transfer Facility															
	<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															
<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 type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>C. Thermostats</td> <td><input type="checkbox"/></td> <td><input 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 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
	Generated	Accumulated														
A. Batteries	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>														
B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>														
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>														
D. Lamps	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>														
	<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															

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.

D001	D002	D005	F003	F005		
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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.

Y / N	Announced ?	Additional Facility Representatives:	RICHARD THORNTON & JANICE UDOVICH
Y / N	Tanks?	Other comments:	
Y / N	Containers?		

13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
GREG ORR		04/04/2007

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)
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LDR REQUIREMENTS

Company: DayGlo

ID Number: OHD004197257

Inspection Date: 04/04/2007

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] (possibly also cite 3745-52-11) **If so:** Yes No N/A ___ RMK# ___
- a. **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-270-07(A)(6)] Yes No N/A ___ RMK# ___
- b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes No N/A ___ RMK# ___
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] (possibly also cite 3745-52-11) 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#

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

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

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

Note: In other words, is combustion a legitimate treatment method

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

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

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

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

a. The facility can land dispose of the waste. [3745-270-06]

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment?
If so:
 a. Has the facility complied with 3745-270-04?
- Yes ___ No N/A ___ RMK# ___
 Yes ___ No N/A RMK# ___

NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1? [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? [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? [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? [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:**
 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# ___
 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# ___

GENERATORS TREATING HAZARDOUS WASTE

- 1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? Yes___ No___ N/A X RMK#___
- 2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)] Yes ___ No N/A X RMK#___
 - a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] Yes ___ No N/A X RMK#___
 - b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes ___ No N/A X RMK#___
- 3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes ___ No N/A X RMK#___
- 4. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes ___ No N/A X RMK#___

NOTE: *If the waste is a characteristic waste, which has been treated to render it non hazardous and subsequently sent to a solid waste landfill, proceed to question 7 & 8.*

- 5. Has the generator sent a notification and certification with the initial shipment of waste?[3745-270-07(A)(5)(c)] Yes ___ No N/A X RMK#___
- 6. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] Yes ___ No N/A X RMK#___
- 7. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following:
 - i. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes ___ No N/A ___ RMK#___
 - ii. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)] Yes ___ No N/A ___ RMK#___

NOTE: *If the waste will be treated and monitored for all UHCs then they do not need to be listed on the notice.*

8. Has the process/operation generating the waste or the solid waste landfill facility changed? If so: Yes___ No___ N/A ___ RMK#___
- a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] Yes ___ No N/A ___ RMK#___
- b. Has the director been notified of such changes? [3745-270-09(D)] Yes ___ No N/A ___ RMK#___

NOTE: *The director need only be notified on an annual basis but no later than December 31.*

9. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: Yes___ No___ N/A X RMK#___
- a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49(C)] Yes ___ No N/A X RMK#___
10. Does each notification/certification form completed, contain the information found in Table1? [3745-270-07(A)(3)] Yes ___ No N/A X RMK#___

NOTE: *If the waste will be treated and monitored for all constituents, there is no need to put them all on the LDR notice.*

HAZARDOUS DEBRIS

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)? Yes___ No___ N/A X RMK#___
2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.) Yes___ No___ N/A X RMK#___
3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so: Yes___ No___ N/A X RMK#___
- a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)] Yes ___ No N/A X RMK#___

NOTE: *If immobilization has been used in a treatment train, it must be the last treatment technology used.*

4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so: Yes ___ No ___ N/A X RMK#___
- a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] Yes ___ No N/A X RMK#___
5. Is the waste a PCB waste under 40 CFR Part 761? If so: Yes ___ No ___ N/A X RMK#___
- a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)] Yes ___ No N/A X RMK#___
6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)] Yes ___ No N/A X RMK#___
7. Does the owner/operator of a treatment facility that claims the debris is excluded under 3745-51-03(F)(1) maintain the following information?
- a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)] Yes ___ No ___ N/A X RMK#___
- b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)] Yes ___ No N/A X RMK#___
- c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)] Yes ___ No N/A X RMK#___
8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F) have the following information? [3745-270-07(D)(3)] Yes ___ No N/A X RMK#___
- a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)] Yes ___ No ___ N/A X RMK#___
- b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)] Yes ___ No N/A X RMK#___
- c. Technology used from Table 1? [3745-270-07(D)(1)(c)] Yes ___ No N/A X RMK#___
9. Has the above notification been sent to the director? [3745-270-07(D)(1)] Yes ___ No N/A X RMK#___

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

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

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

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

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

Safety Equipment Used:

GENERAL REQUIREMENTS

- | | | | |
|---|---|--|------------------------------|
| 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 4. Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 6. Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| 7. Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| 8. Does the generator accumulate hazardous waste? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

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

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

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

- | | | | |
|---|------------------------------|--|------------------------------|
| 10. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)] | | | |
| a. Container that meets 3745-66-70 to 3745-66-77? | Yes <input type="checkbox"/> | No <input checked="" 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 checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| c. Drip pads that meet 3745-69-40 to 3745-69-45? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| d. Containment building that meets 3745-256-100 to 3745-256-102? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |

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

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 <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

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 <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
|--|---|-----------------------------|------------------------------|

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)].

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|---|---|--|------------------------------|
| 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 <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| 16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

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 and decon equipment? [3745-65-32(C)] Yes No N/A
- d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes No N/A

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

35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes No N/A
36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A
37. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] Yes No N/A
38. If there is only one employee on the premises, is there immediate access to a device (ex.phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] Yes No N/A
39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes No N/A
41. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes No N/A

SATELLITE ACCUMULATION AREA REQUIREMENTS

42. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes No N/A
- b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes No N/A
- c. Do not exceed 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 ac .arduous waste at any one time? [3745 34(C)(1)] Yes N 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) "Week" means 7 consecutive days. Yes No N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes No N/A
49. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes No N/A
50. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] Yes No N/A
51. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] Yes No N/A

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

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

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

PRE-TRANSPORT REQUIREMENTS

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

TANK SYSTEM REQUIREMENTS (OAC 3745-66-91 TO 3745-66-100)

(Please refer to the rules before or while completing this checklist.)

NOTE: *New Tank System - Installation commencing after July 14, 1986.*
Existing Tank System - Installation or operation commencing on/before July 14, 1986.

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

- NOTES:**
- A. *Secondary containment must be provided for all new tank systems or components, prior to their being put into service. [3745-66-93(A)(1)]*
 - B. *For an existing tank system(s) of **known and documentable age** secondary containment is required to be provided within two years after January 12, 1987, or when the tank system has reached 15 years of age, whichever came later. [3745-66-93(A)(3)]*
 - C. *Secondary containment is required for all existing tanks for which the **age cannot be documented**. The tanks were required to have secondary containment within eight years of January 12, 1987 or when the facility turned 15 years of age, whichever came later. [3745-66-93(A)4]*
 - D. *Tank systems that store/treat materials that become hazardous waste after January 12, 1987, must have secondary containment required within the time intervals in OAC 3745-66-93(A)(1) to (A)(4). The date the material became a hazardous waste must be used in place of January 12, 1987. [3745-66-93(A)(5)]*
 - E. *If the tank system has no secondary containment, or a variance from secondary containment requirements has been granted, skip to the middle of page 6 of this Tank Systems Checklist; (Tank Systems without secondary containment) .*

2. Is the secondary containment one of the following:

- a. An **External Liner** [3745-66-93(E)(1)(a) - (1)(f)] If so, Yes ___ No ___ N/A RMK# ___
 - i. Is liner designed or operated to contain 100% of the capacity of the largest tank? Yes ___ No N/A RMK# ___
 - ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? Yes ___ No N/A RMK# ___
 - iii. Is liner free of cracks and gaps? Yes ___ No N/A RMK# ___
 - iv. Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release? Yes ___ No N/A RMK# ___
 - v. Are chemically resistant water stops in place at all joints? (*concrete liners only*) Yes ___ No N/A RMK# ___

- vi. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? (*concrete liners only*) Yes ___ No N/A RMK#___
- b. **Vault System?** [3745-66-93(E)(2)(a) - (2)(f)] If so, Yes___ No___ N/A RMK#___
- i. Is vault system designed to contain 100% of the capacity in the largest tank? Yes ___ No N/A RMK#___
- ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? Yes ___ No N/A RMK#___
- iii. Are chemically resistant water stops in place at all joints? Yes ___ No N/A RMK#___
- iv. Is there a compatible interior coating to prevent migration into the concrete? Yes ___ No N/A RMK#___
- v. For **ignitable or reactive waste**: Is the vault system provided with means to prevent against the formation or ignition of vapors? Yes ___ No N/A RMK#___
- vi. Is vault system provided with an exterior moisture barrier? Yes ___ No N/A RMK#___
- c. **Double-Walled Tank?** [3745-66-93(E)(3)(a) - (3)(c)] If so, Yes No___ N/A___ RMK#___
- i. Is double-walled tank designed as an integral structure to contain any release from the inner tank? Yes No N/A ___ RMK#___
- ii. **If metal**, are the primary tank interior and outer shell exterior surfaces protected from corrosion? Yes ___ No N/A RMK#___
- iii. Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time? Yes No N/A ___ RMK#___
3. Is the secondary containment system for the tank(s) an equivalent device as described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D)(E)] Yes___ No___ N/A RMK#___

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

4. Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids? [3745-66-93(B)] Yes No N/A RMK#
5. Does the secondary containment system meet the following minimum requirements of 3745-66-93(C):
- a. Constructed or lined with compatible materials of sufficient strength to prevent failure? Yes No N/A RMK#
- b. Placed on a foundation or base capable of providing support? Yes No N/A RMK#
- c. Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time? Yes No N/A RMK#
- d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? Yes No N/A RMK#
- e. Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner? Yes No N/A RMK#

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

6. Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)? **If not**, is the ancillary equipment:
- a. Inspected daily? **AND**; Yes No N/A RMK#
- b. Is ancillary equipment one of the following:
- i. Above ground piping (exclusive of flanges, joints, valves and connections)? Yes No N/A RMK#
- ii. Welded flanges, welded joints and/or welded connections? Yes No N/A RMK#
- iii. Sealless or magnetic coupling pumps and/or sealless valves? Yes No N/A RMK#
- iv. Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown, and/or loss of pressure-actuated shut-off devices)? Yes No N/A RMK#

REMARKS

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

1. Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)] Yes ___ No N/A RMK# ___
2. Does the written assessment include the following: [OAC 3745-66-92(A)]
- a. Certification by an independent, registered, professional engineer? Yes ___ No N/A RMK# ___
 - b. Consideration of the design standards of the system? Yes ___ No N/A RMK# ___
 - c. Consideration of the hazardous characteristics of the waste(s)? Yes ___ No N/A RMK# ___
 - d. An evaluation by a corrosion expert (*if the external system/components are metal*)? Yes ___ No N/A RMK# ___
 - e. A determination of design and operational measures that will be needed to protect the tank system from potential damage (*for underground tank components*)? Yes ___ No N/A RMK# ___
 - f. Design considerations to ensure that the tank foundations will maintain the load of a full tank? Yes ___ No N/A RMK# ___
 - g. Design considerations for anchoring the unit to prevent floatation (*for tanks situated in a seismic fault zone or saturated zone*)? Yes ___ No N/A RMK# ___
 - h. Design considerations to ensure that the tank system will withstand the effects of frost heave (*for underground tank systems*)? Yes ___ No N/A RMK# ___
3. Are there written statements by those person who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)] Yes No N/A ___ RMK# ___

Do the written statements address all of the following:

- a. Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)] Yes No N/A RMK#
- b. Statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)] Yes No N/A RMK#
- c. Proper backfilling? [3745-66-92(C)] Yes No N/A RMK#
- d. Tightness test; if the tank was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)] Yes No N/A RMK#
- e. Proper support and protection of ancillary equipment? [3745-66-92(E)] Yes No N/A RMK#
- f. Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)] Yes No N/A RMK#

TANK SYSTEMS WITHOUT SECONDARY CONTAINMENT (OAC 3745-66-91)

1. For existing tank system, without secondary containment: Is there a written assessment on file which includes the following considerations: [3745-66-91(A)(B)] Yes No N/A RMK#
- a. Design standards? [3745-66-91(B)(1)] Yes No N/A RMK#
- b. The characteristics of hazardous waste(s) that have been or will be handled? [3745-66-91(B)(2)] Yes No N/A RMK#
- c. Corrosion protection measures? [3745-66-91(B)(3)] Yes No N/A RMK#
- d. The age of the tank system has been estimated or documented? [3745-66-91(B)(4)] Yes No N/A RMK#
- e. A leak test has been conducted? (*For non-enterable underground tanks*) [3745-66-91(B)(5)(a)] Yes No N/A RMK#
- f. A leak test or an internal inspection by qualified P.E. has been conducted? (*For other than non-enterable underground tanks and for ancillary equipment*) [3745-66-91(B)(5)(b)] Yes No N/A RMK#
- g. Is assessment certified by an independent, registered P.E.? [3745-66-91(A)] Yes No N/A RMK#

2. Have the tests specified in 1e and 1f been conducted annually on the tanks and ancillary equipment until secondary containment is provided? [3745-66-93(I)] **If so,** Yes ___ No N/A RMK# ___
- a. Have tests been certified by an independent, registered P.E.? Yes ___ No N/A RMK# ___
3. For tanks without secondary containment used to store or treat wastes which become hazardous wastes after July 14, 1986, has the assessment been completed within 12 months of the date the waste became a hazardous waste? [3745-66-91(C)] Yes ___ No N/A RMK# ___

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

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

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

1. Has the o/o documented the inspections required in 3745-66-95, in the operating record, including inspection of the following:
- Tank is underground, they rely on detection equipment rather than doing visual inspections**
- a. Spill control equipment (daily)? [3745-66-95(A)(1)] Yes ___ No N/A ___ RMK# ___
- b. Above ground portion of tank (daily)? [3745-66-95(A)(2)] Yes ___ No N/A ___ RMK# ___
- c. Data from leak detection equipment (daily)? [3745-66-95(A)(3)] Yes ___ No N/A ___ RMK# ___

- d. Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste (daily)? [3745-66-95(A)(4)] Yes ___ No N/A ___ RMK# ___
- e. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(B)(1)] Yes ___ No N/A ___ RMK# ___
- f. Where applicable, all sources of impressed current at least bi-monthly? [3745-66-95(B)(2)] Yes ___ No N/A ___ RMK# ___

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

1. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with **one of the following:** [3745-66-98(A)]
- a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-65-17(B)? [3745-66-98(A)(1)]; **OR** Yes ___ No N/A ___ RMK# ___
- b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A)(2)]; **OR** Yes No ___ N/A ___ RMK# ___
- c. The tank is used solely for emergencies? [3745-66-98(A)(3)] Yes ___ No N/A ___ RMK# ___
2. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (1996)? [3745-66-98(B)] Yes No N/A ___ RMK# ___
3. Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material? [3745-66-99] Yes ___ No N/A ___ RMK# ___
- a. **If so**, have the requirements of 3745-65-17(B) been met? Yes ___ No N/A RMK# ___

TANK SYSTEM - WASTE ANALYSIS REQUIREMENTS (OAC 3745-66-100)

1. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-100] Yes ___ No ___ N/A X RMK# ___
- a. Conducted waste analysis and trial treatment or storage tests? [3745-66-100(A)]; OR Yes ___ No ___ N/A X RMK# ___
- b. Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-100(B)] Yes ___ No ___ N/A X RMK# ___

TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE (OAC 3745-66-96)

1. Has there been a leak or spill from any tank system or has any tank system been found unfit for use? *If so*, did the o/o:
- a. Immediately cease flow of material into tank and investigate the cause of the release? [3745-66-96(A)] Yes ___ No N/A X RMK# ___
- b. Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time? [3745-66-96(B)(1)] Yes ___ No N/A X RMK# ___
- c. Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment? [3745-66-96(B)(2)] Yes ___ No N/A X RMK# ___
- d. Immediately conduct a visual inspection of the release? [3745-66-96(C)] Yes ___ No N/A X RMK# ___
- e. Prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C)(1)] Yes ___ No N/A X RMK# ___
- f. Properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)(2)] Yes ___ No N/A X RMK# ___
- g. Report the release to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)(2)] Yes ___ No N/A X RMK# ___
- h. Submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)] Yes ___ No N/A X RMK# ___

- i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)] Yes ___ No N/A RMK# ___
- j. For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)] Yes ___ No N/A RMK# ___

NOTE: *The requirements noted 1.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.*

2. In the event that the repairs to the tank system were major (replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from an independent, registered P.E. attesting that the repaired unit is capable of handling hazardous waste? [3745-66-96(F)] Yes ___ No N/A RMK# ___
- a. Was a copy of the certification submitted to the director within seven days after returning the system to use? [3745-66-96(F)] Yes ___ No N/A RMK# ___
3. If the o/o was unable to repair and return the unit to service as described in 1.a through 1.e, was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)] Yes ___ No N/A RMK# ___
4. Does the o/o have a tank system **with a variance from secondary containment** from which a release has occurred but has not migrated beyond the zone of engineering control? **If so,** Yes ___ No N/A ___ RMK# ___
- a. Has the o/o complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G)(3)] Yes ___ No N/A RMK# ___
- b. If soils cannot be contaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)] Yes ___ No N/A RMK# ___
5. Does the o/o have a tank system **with a variance from secondary containment** from which a release occurred and has migrated from the zone of engineering control? **If so,** Yes ___ No N/A ___ RMK# ___
- a. Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)] Yes ___ No N/A RMK# ___

b. If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(4)]

Yes ___ No N/A RMK# ___

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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

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 ___X___RMK#___
- f. Remove batteries from consumer products? Yes___ No___ N/A ___X___RMK#___
- g. Remove the electrolyte from the battery? Yes___ No___ N/A ___X___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 ___X___RMK#___

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] Yes ___ No N/A ___X___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 ___X___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 ___X___RMK#___

7. Are the battery(ies) or 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 X 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 X 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 X 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 X 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 X 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 X 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 X 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 X RMK# ___
15. Is the material released characterized? [3745-273-17(B)] Yes ___ No N/A X 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 X RMK# ___

OFF-SITE SHIPMENTS

NOTE: *If a SQUWH self-transport waste, then they must comply with the Universal Waste transporter requirements.*

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes No N/A RMK#

NOTE: SQUWHs are prohibited to send waste to any other facility.

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes No N/A RMK#

19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No N/A RMK#

20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:

a. Receive the waste back? [3745-273-18(E)(1)] Yes No N/A RMK#

b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes No N/A RMK#

21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:

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

Name: DayGlo
ID number: OHD 004-197-257
Inspection date: 4/4/07

USED OIL INSPECTION CHECKLIST (Short Version)

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

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes ___ No N/A ___ RMK# ___
- Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes ___ No N/A RMK# ___
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No N/A ___ RMK# ___
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes ___ No N/A ___ RMK# ___

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes ___ No N/A ___ RMK# ___
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes ___ No N/A ___ RMK# ___
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes No N/A ___ RMK# ___
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes ___ No N/A ___ RMK# ___
none at time of inspection
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes ___ No N/A ___ RMK# ___
none at time of inspection
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#