



State of Ohio Environmental Protection Agency

Northeast District Office

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

March 10, 2008

Clyde Earp
Environmental, Health and Safety Coordinator
Sovereign Circuits, Inc.
12080 DeBartolo Dr.
North Jackson, OH 44451

RE: SOVEREIGN CIRCUITS, INC., OHD986966893, MAHONING COUNTY, NOV

Dear Mr. Earp:

On February 26, 2008, Sherry Slone and I, representing Ohio EPA's Division of Hazardous Waste Management (DHWM), visited Sovereign Circuits, Inc. (SCI) located at 12080 DeBartolo Drive in North Jackson, Ohio to conduct a hazardous waste compliance evaluation inspection (CEI). SCI was represented by Mr. Michael Frank and you. Subsequently, on February 29, 2008, Sherry Slone and I participated in a conference call with Mr. Frank and you to discuss the findings of the February 26, 2008 inspection.

The purpose of the inspection was to determine SCI's 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). The inspection included a review of the facility's operations and records, as well as the management of wastes. SCI was inspected for the requirements of a large quantity generator (LQG) of hazardous waste.

Information obtained pertaining to process descriptions, hazardous waste generation and amount, and hazardous waste management units, is specified on the Process Description-Waste Activities Summary Sheet within the enclosed inspection checklist.

Based on the inspection, Ohio EPA has identified the following violations:

1. **OAC rule 3745-52-11, Waste Evaluation:** Any person who generates a waste must evaluate that waste to determine if it is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51.
 - A. SCI failed to evaluate the waste stream consisting of dust, generated from machining operations at the Precision Fabrication Area, in accordance with OAC Chapter 3745-51. To abate this violation, submit waste evaluation information for the aforementioned waste stream and inform me how it will be managed on-site and disposed.

- B. SCI failed to evaluate the waste stream consisting of dust, generated from machining operations at the Drill/Route Area, in accordance with OAC Chapter 3745-51. To abate this violation, submit waste evaluation information for the aforementioned waste stream and inform me how it will be managed on-site and disposed.
 - C. SCI failed to evaluate the waste stream consisting of spent rags, generated from the Plating Area, in accordance with OAC Chapter 3745-51. To abate this violation, submit waste evaluation information for the aforementioned waste stream and inform me how it will be managed on-site and disposed.
 - D. SCI failed to evaluate the waste stream consisting of spent rags, generated from the Soldermask Coating Area, in accordance with OAC Chapter 3745-51. To abate this violation, submit waste evaluation information for the aforementioned waste stream and inform me how it will be managed on-site and disposed.
 - E. SCI failed to evaluate the waste stream consisting of spent aerosol cans in accordance with OAC Chapter 3745-51. To abate this violation, submit waste evaluation information for the aforementioned waste stream and inform me how it will be managed on-site and disposed.
 - F. SCI failed to evaluate the waste stream consisting of solvent, generated from the parts washer in the Maintenance Area, in accordance with OAC Chapter 3745-51. To abate this violation, submit waste evaluation information for the aforementioned waste stream and inform me how it will be managed on-site and disposed.
 - G. SCI failed to evaluate the hazardous waste (D001) consisting of oil and flammable flux, generated from the Hot Air Level area, in accordance with OAC Chapter 3745-51. Specifically, SCI failed to evaluate this waste stream for metal contamination. To abate this violation, submit waste evaluation information for the aforementioned waste stream and inform me how it will be managed on-site and disposed.
2. **OAC rule 3745-52-20(A), Manifest Requirements:** A generator who offers hazardous waste for off-site treatment, storage or disposal must prepare a uniform hazardous waste manifest.

SCI failed to identify the amount (Box 11-Quantity) of hazardous waste offered for transportation on the initial copy of the following manifests: Shipments to Envirite dated February 28, 2007, manifest tracking numbers 001400148FLE and 001400149FLE. To abate this violation, SCI must provide instruction to all affected employees on the proper completion of a hazardous waste manifest.

This instruction must be included as part of the facility's personnel training program required under OAC rule 3745-65-16. SCI must address the aforementioned violation and submit documentation concerning the training provided to all affected employees.

3. **OAC rule 3745-52-34 (A)(2)(3), Labeling & Dating Accumulation Containers:**

While being accumulated on-site, each container with hazardous waste contents must be labeled, clearly marked, and visible for inspection with the words "Hazardous Waste" and the date upon which the accumulation period began.

A. SCI failed to label containers with the words "hazardous waste" and apply the date upon which the accumulation period began. The following containers were observed in violation of this rule:

- 1) Four, 55-gallon drums at the DES Room were not labeled as hazardous waste and lacked an accumulation start date;
- 2) 12, 55-gallon drums near the Waste Treatment System (WTS) were not labeled as hazardous waste and 10 lacked an accumulation start date;
- 3) Seven, 55-gallon drums near the WTS filter press were not labeled as hazardous waste and four lacked an accumulation start date;
- 4) Nine, 55-gallon drums near the PAL line were not labeled as hazardous waste and six lacked an accumulation start date;
- 5) Three, 55-gallon drums near the PAL line were not labeled as hazardous waste and lacked an accumulation start date;
- 6) Six, 55-gallon drums near the Pirana unit were not labeled as hazardous waste and four lacked an accumulation start date;
- 7) One, 55-gallon drum (Used Carbon) near the Ludy line was not labeled as hazardous waste;
- 8) One, 55-gallon drum (DES Carbon Tubes) in the Chemical Storage Area was not labeled as hazardous waste and lacked an accumulation start date;
- 9) 12, 55-gallon drums at the Outdoor Accumulation Area were not labeled as hazardous waste and four lacked an accumulation start date; and
- 10) One, 55-gallon drum (waste Glycol Ether PM Acetate) at the Outdoor Accumulation Area lacked an accumulation start date.

To abate this violation, submit photographs which clearly show that the above containers were labeled and dated in compliance with this rule.

B. During the inspection of the Hazardous Waste/Chemical Warehouse, two containers of hazardous waste were not visible for inspection. The containers were subsequently found to be labeled and dated. Identify in writing the corrective actions taken to prevent a recurrence of this violation.

4. **OAC rule 3745-52-34 (C)(1)(a)(b)(2), Satellite Accumulation Requirements:**

(C)(1) A generator may accumulate as much as fifty-five gallons of hazardous waste in containers at or near any point of generation provided that the generator complies with OAC rules 3745-66-71 [conditions of containers], 3745-66-72 [compatibility of waste with container], 3745-66-73(A) [management of containers] and marks the containers with the words "Hazardous Waste" or other words that identify its contents. (C)(2) A generator who accumulates hazardous waste in excess of 55-gallons at or near any point of generation must, with respect to that amount of excess waste, comply within three days of OAC rule 3745-52-34(A).

SCI failed to comply with OAC rule 3745-52-34(C)(1)(a)(b) at the following areas:

- A. A tray containing acid-carbon waste, observed near the Ludy line, was open and not labeled;
- B. The accumulation container for waste from the debur station for the Hollmuller line was not labeled;
- C. Three, 20-gallon containers of oil and flammable flux, observed in the Hot Air Level area, were open and not labeled;
- D. Three, 5-gallon containers of waste solvent, observed in the Soldermask Coating Area, were not labeled.

SCI failed to comply with OAC rule 3745-52-34(C)(2) at the following area:

- E. One, 55-gallon drum (Used Carbon) near the Ludy line was not labeled as hazardous waste.

To abate this violation, submit photographs which clearly show that the above areas are in compliance with this rule.

5. **OAC rule 3745-52-42(A)(1)(2), Exception Report and OAC rule 3745-52-40(B), Recordkeeping:**

A large quantity generator of hazardous waste must submit an exception report to the Ohio EPA if the facility has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

SCI failed to receive a copy of the manifest with the handwritten signature of the designated facility for the following manifests:

- A. Shipment to MicroNutrients, manifest dated March 2, 2005, manifest document number 03025;
- B. Shipment to MicroNutrients, manifest dated May 3, 2005, manifest document number 05035;
- C. Shipment to MicroNutrients, manifest dated September 8, 2005, manifest document number 09085;
- D. Shipment to Envirite, manifest dated November 18, 2005, manifest document number 11185; and
- E. Shipment to Veolia, manifest dated August 7, 2007, manifest tracking number 000039114VES.

To abate this violation, submit a legible copy of the aforementioned manifests with the handwritten signature of the designated facility.

6. **Personnel Training, OAC rule 3745-65-16(A)(1-3)(B)(C)(D)(1-4)(E)**: Facility personnel must complete training on hazardous waste management and emergency response procedures.

SCI failed to meet the following requirements of this rule:

- A. OAC rules 3745-65-16(A)(1-3): Facility personnel did not complete training that teaches them to perform their duties in a way that ensures compliance with the hazardous waste laws. The personnel training program must be directed by a person trained in hazardous waste management procedures; **include instruction on hazardous waste management procedures and contingency plan implementation**; and ensure facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems.
- B. OAC rule 3745-65-16(B): The facility failed to ensure that employees do not work in unsupervised positions until they have completed the required training.
- C. OAC rule 3745-65-16(C): The facility failed to conduct annual personnel training.
- D. OAC rules 3745-65-16(D)(1-4): The facility failed to maintain the following documents and records at the facility: (1) job titles, as they relate to hazardous waste management, and the name of each employee filling each job; (2) a written job description for each position at the facility, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position; (3) a written description of the type and amount of both introductory and continuing training to be given to each person filling a position; and (4) records that document that the training or job experience required by this rule has been given to, and completed by, facility personnel.
- E. OAC rules 3745-65-16(E): The facility must maintain training records as required by this rule.

To abate this violation, SCI must provide personnel training and submit the following documentation:

- A copy or description of the training topics provided to each employee who manages hazardous waste or who has responsibilities in the facility's contingency plan;
- A copy of the sign-in sheets documenting the date(s) when training was provided to each employee; and

- Personnel training documents and records required by OAC rule 3745-65-16(D)(1-4).
- Describe in writing how training records will be maintained in compliance with OAC rules 3745-65-16(E).

7. **OAC rule 3745-65-32(B), Required Equipment and OAC rule 3745-65-34(A), Access to Communication or Alarm System:** Facilities must be equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified: (B) A device, such as a telephone (immediately available at the scene of hazardous waste operations) or a hand-held two-way radio, capable of summoning emergency assistance.

SCI failed to have a telephone or emergency summoning device immediately available at the scene of hazardous waste operations at the Outdoor Storage Area. Identify in writing the corrective actions taken to abate this violation.

8. **OAC rule 3745-65-33, Testing and Maintenance of Emergency Equipment:** All facility communication or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment (where required) must be tested and maintained as necessary to assure its proper operation in time of emergency. The owner or operator must record the inspections in a log or summary.

SCI failed to conduct inspections of emergency equipment. To abate this violation, submit two weeks of documented inspections of all emergency equipment. These inspections must be consistent with the emergency equipment appearing in the facility's contingency plan.

9. **OAC rule 3745-65-52(D)(E)(F), Content of Contingency Plan:** (A) The contingency plan must 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; (D) List names, addresses, phone numbers of all persons qualified to act as an emergency coordinator; (E) 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. This list must be kept up to date and must include the location, and a physical description of each item on the list, and a brief outline of its capabilities; and (F) Include an evacuation plan for facility personnel.

SCI failed to maintain a contingency plan that meets the requirements of OAC rule 3745-65-52(D)(E)(F). To abate this violation, develop and submit a contingency plan that meets the requirements of OAC rule 3745-65-52. Please be advised that once the plan is developed, all required personnel must be trained on the plan per OAC rule 3745-65-16. Additionally, the plan must be distributed to all emergency authorities as required by OAC rule 3745-65-53.

10. **OAC rule 3745-66-71, Conditions of Containers:** If a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator must transfer the hazardous waste from the container into another container that is in good condition or manage the waste in another manner that complies with the requirements specified in this rule.

SCI failed to manage two, 1-cubic yard boxes of F006 hazardous waste in compliance with rule. These boxes were observed in the Chemical Storage Area and Hazardous Waste/Chemical Warehouse. Submit photographs and identify in writing the corrective actions taken to abate this violation.

11. **OAC rule 3745-66-74, Inspections:** The owner or operator must inspect areas where hazardous waste containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The owner or operator must record the inspections in an inspection log or summary.

SCI failed to conduct weekly inspections of hazardous waste containers during the following dates: September 7 through September 27, 2007; October 7, 2007; October 31, 2007; November 14, 2007; November 21, 2007; and November 26, 2007 through February 9, 2008. To abate this violation, submit two weeks of documented weekly inspections for containers at each of the hazardous waste accumulation areas.

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

SCI failed to accumulate universal waste lamps in containers/packages that were closed. Specifically, eight boxes were observed in the Laminate Storage Room that were open. To abate this violation, submit photographs which clearly show the universal waste lamps are being accumulated in a closed container.

13. **OAC rule 3745-273-14(E); Labeling/marketing Standards for Small Quantity Handlers of Universal Waste:** Universal waste lamps must be labeled/marked with one of the following phrases: "universal waste-lamp(s)," or "waste lamp(s)" or "used lamp(s)."

SCI failed to label/mark universal waste lamps with the words required by this rule. Specifically, one box observed in the Maintenance Area and eight boxes observed in the Laminate Storage Room lacked markings required by this rule. To abate this violation, submit photographs which clearly show that the containers of lamps have been labeled in compliance with this rule.

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

SCI failed to provide training to employees involved with universal waste management. To abate this violation, submit documentation that relevant employees were trained on universal waste management procedures.

15. **OAC rule 3745-279-22(C), Used Oil Storage Requirements:** Generators must store used oil in containers that are labeled with the words "Used Oil."

SCI failed to label one, 55-gallon drum, observed in the Compressor Room, with the words "Used Oil." To abate this violation, submit a photograph which clearly shows that the drum was labeled in compliance with this rule.

Ohio EPA requests additional information or offers the following comments:

1. Please identify how the spent methylene chloride will be managed from the Laboratory area.
2. During the inspection of the Bonding Area, disposable paper towels and gloves were observed in the recyclable materials container. These wastes (paper towels and gloves) should be managed separately from other recyclable materials. Please identify corrective actions implemented at this area.
3. Please identify the disposition of the following: A). Two boxes of adhesive observed in the Chemical Storage Area, and 2). One container of tin-clarifier material observed near the PAL line.
4. OAC rule 3745-66-76 states that containers of ignitable or reactive hazardous wastes may not be located within 50 feet of the facility's property line. Please identify the applicability of this rule to the Outdoor Accumulation Area found at the northeast corner of the site.
5. Ohio EPA has created an electronic news service to provide facilities with quick and timely updates on news and events related to hazardous waste activities in Ohio. For more information, please refer to: <http://www.epa.state.oh.us/dhwm/listserv.html>
6. Technical assistance and pollution prevention information is available from Ohio EPA at: <http://www.epa.state.oh.us/ocapp/ocapp.html>

SOVEREIGN CIRCUITS, INC.
MARCH 10, 2008
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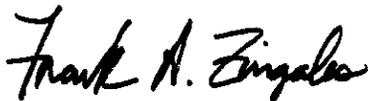
7. You may be able to reduce the amount of waste your facility generates by finding ways to recycle, reduce, or eliminate it. Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides free compliance and pollution prevention assistance on environmental issues related to air, land, and water. Should your facility be interested in receiving a free pollution prevention assessment in the future, please contact me or OCAPP. OCAPP may be contacted at (800) 329-7518 or via the internet at:
<http://www.epa.state.oh.us/ocapp/ocapp.html>

The above violations must be immediately addressed and all of the above requested documentation must be submitted to my attention at the Ohio EPA within 30 days of receipt of this letter. You may find copies of the hazardous waste rules and other information on Ohio EPA's web page at: <http://www.epa.state.oh.us/dhwm>.

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

Should you have any questions, please contact me at (330) 963-1108.

Sincerely,



Frank A. Zingales
Environmental Specialist
Division of Hazardous Waste Management

FAZ:ddw

Enclosure

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

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 or mail it to Tammy
McCConnell, Central Office

Site EPA ID No.	EPA ID Number: OHD986966893		
Site Name	Name: Sovereign Circuits, Inc.	Website: http://www.sovereign-circuits.com	
Site Location Information	Street Address: 12080 DeBartolo Dr.		
	City, Town, or Village: North Jackson	State: OH	
	County Name: Mahoning	Zip Code: 44451	
Site Land Type (check only one)	<input type="checkbox"/> Private	<input type="checkbox"/> County	
NAICS code(s) www.census.gov/epcd/www/naics.html	<input type="checkbox"/> District	<input type="checkbox"/> Federal	
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address Legal Owner and Operator of the Site. List Additional Owners and/or Operators in the Government Section or on another copy of this form page.	<input type="checkbox"/> Indian	<input type="checkbox"/> Municipal	
	<input type="checkbox"/> State	<input type="checkbox"/> Other	
	First Name: Clyde	MI: M.	Last Name: Earp
	Phone Number: 330-538-3900		Phone Number Extension: 211
	E-Mail Address: cearp@ddiglobal.com		
	Fax Number: 330-538-2434		Fax Number Extension:
	Street or P.O. Box:		
	City, Town or Village:		
	State:	Country:	Zip Code:
	Name of Site's Legal Owner:		
Date Became Owner (mm/dd/yyyy):			
Owner Type:	<input type="checkbox"/> 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	
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:	<input type="checkbox"/> 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	
Street or P.O. Box:			
City, Town or Village:		Operator Phone #:	
State:	Country:	Zip Code:	
Violations Cited?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
Type of Generator:			
<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 checked="" type="checkbox"/> Large Quantity Generator (LQG)	<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator		
<input type="checkbox"/> Small Quantity Generator (SQG)			
Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)			
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace		
<input type="checkbox"/> Underground Injection Control Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption		
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption		
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste			

Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply))	
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)
<input type="checkbox"/> Destination Facility for Universal Waste	

(Check all boxes below that apply for each of the three types or facilities above)	Used Oil Activities (Indicate Type(s) of Activity(ies))		
	Managed	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	

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.

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

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:	Michael Frank, VP Operations
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments:	
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (h:mm)
Frank Zingales	Sherry Slone	02/26/2008 0950

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)

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Sovereign Circuits, Inc. **Facility Type:** LQG **Date of Inspection:** February 26, 2008 **EPA ID number:** OHD986966893

General Process Information: Facility manufactures printed circuit boards (PCBs). See matrix for activities generating hazardous waste. During the February 26, 2008 inspection, hazardous waste was accumulated at the following four areas of the facility: 1). At or near the Waste Treatment System (WTS), 2). Chemical Storage Room, 3). Hazardous Waste/Chemical Storage Warehouse and 4). Outdoor Accumulation Area.

Regulatory/Enforcement History: None to date.

Additional P2 remarks and information: P2 Assessment conducted by OCAPP on February 16, 2006.

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste	Waste Description	Quantity Generated, Type of Accumulation, Location of Waste Accumulation Area	Type of On-Site Treatment	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1.	Chemical etching of PCBs.	Spent etchant-D002/D004 Spent etchant-D002/D004/D007/D008	8, 55-gallon drums/month 2, 55-gallon drums/month Wastes accumulated in drums at the Chemical Storage Room and Chemical Warehouse.	None	Heritage Micronutrients Indianapolis, IN INR000000463	
2.	Wastewater treatment.	Sludge-F006	2, 1-cubic yard boxes/month Wastes accumulated in containers at the WTS, Chemical Storage Room and Chemical Warehouse.	None	World Resources Co. Pottsville, PA PAD981038227	

3.	Hot oil fusing.	Water soluble oil and flammable flux-D001	Wastes accumulated in 55-gallon drums at the Chemical Storage Room.	None	Veolia Technical Solutions W. Carrollton, OH OHD093945293		
4.	Soldermask coating removal.	Waste solvent (Glycol Ether PM Acetate and Isopropyl alcohol) - D001	Wastes accumulated in 55-gallon drums at the Outdoor Accumulation Area.	None	Veolia Technical Solutions W. Carrollton, OH OHD093945293		
5.	PCB manufacturing-plating operations	Miscellaneous plating wastes-D002. See 2007 annual report.	Wastes accumulated in 55-gallon drums at the Chemical Storage Room.	None	Envirite of Ohio, Inc. Canton, OH OHD980568992		
6.	PCB manufacturing-plating operations involving precious metals.	Miscellaneous plating wastes-D002, D003, D011, F007, F009. See 2007 annual report.	Wastes accumulated in 55-gallon drums at the Chemical Storage Room.	None	Advanced Chemical Co. Warwick, RI RID059735761 Precious metal recovery.		
7.	PCB manufacturing.	Various PCB manufacturing wastes and rinses from plating lines.	Wastes accumulated in 55-gallon drums near the WTS. Wastes are then introduced into the WTS. Rinses are hardpiped to WTS.	Wastewater treatment with discharge to Mahoning Valley Sanitary - Meander Treatment Plant.			
8.	PCB manufacturing.	PCB manufacturing wastes.	Wastes accumulated in 55-gallon drums at the Outdoor Accumulation Area.		Awaiting information.		
9.	Maintenance	Used oil	Used oil accumulated in 55-gallon drum at the Compressor Room.	None	Veolia Technical Solutions W. Carrollton, OH OHD093945293		

10.	Maintenance	Universal waste lamps	Lamps accumulated in boxes in Maintenance Area and Laminate Storage Area.	None	Veolia Technical Solutions Port Washington, WI WID988566543 W. Carrollton, OH OHD093945293		
11.	PCB manufacturing materials for recycling.	Copper/gold/tin-lead frames, aluminum, solder dross and carbide bits.	Accumulated in 1-cubic yard boxes or other containers at the Chemical Storage Room and Chemical Warehouse.	None	Metallic Resources Twinsburg, OH OHD980701072 SIMS Recycling Solutions Franklin Park, IL ILD005087630		
12.	Film development.	Silver halide film.	Accumulated in 1-cubic yard boxes at the Laminate Storage Area for recycling.	None	Metallic Resources SIMS Recycling Solutions		
13.	Machining of PCBs at Precision Fabrication. Machining of PCBs at Drill/Route Area.	Waste dust.	Two waste dust collection units located outdoors.	None	Awaiting waste evaluation information.		
14.	Plating Area Soldermask Coating Room	Disposable towels.		None	Awaiting waste evaluation information.		
15.	Maintenance	Spent solvent from parts washer.		None	Awaiting waste evaluation information.		
16.	Various	Spent aerosol cans		None	Awaiting waste evaluation information.		

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE] 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 No N/A
2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] Yes No N/A
3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes No N/A
4. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] Yes No N/A
5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] Yes No N/A
6. Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] *To be determined.* Yes No N/A
7. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] Yes No N/A
8. Does the generator accumulate hazardous waste? Yes No N/A

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

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

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

10. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]
 - a. Container that meets 3745-66-70 to 3745-66-77? Yes No N/A
 - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? Yes No N/A
 - c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A
 - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: *Complete appropriate checklist for each unit.*

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

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

MANIFEST REQUIREMENTS

12. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes No N/A
13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Yes No N/A

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

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

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

15. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes No N/A
16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] Yes No N/A

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.

- 17. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes No N/A
- 18. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes No N/A
- 19. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes No N/A

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

PERSONNEL TRAINING

- 20. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes No N/A
- 21. Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes No N/A
- 22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A
- 23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes No N/A
- 24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A
- 25. Does the generator keep records and documentation of:
 - a. Job titles [3745-65-16D(1)]? Yes No N/A
 - b. Job descriptions [3745-65-16D(2)]? Yes No N/A
 - c. Type and amount of training given to each person [3745-65-16D(3)]? Yes No N/A
 - d. Completed training or job experience required [3745-65-16D(4)]? Yes No N/A
- 26. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes No N/A

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

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

CONTINGENCY PLAN

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

- e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes No N/A

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

29. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)] *Facility revising plan.* 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] *Facility revising plan.* 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 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 one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes No N/A

- d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes No N/A
- e. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
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
- c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A

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

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

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] *To be determined.* 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
No generator closure of a <90 day accumulation area has occurred.

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

LDR CHECKLIST

GENERAL LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] If so: Yes No N/A RMK# ____
Excludes those wastes under evaluation.
- a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)] Yes No N/A RMK# ____
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes No N/A RMK# ____
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] Yes No N/A RMK# ____
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes No N/A RMK# ____
4. Does the generator generate a characteristic hazardous waste? If so: Yes No N/A RMK# ____
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes No N/A RMK# ____
- NOTE: If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.**
5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so: Yes No N/A RMK# ____
- a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes No N/A RMK# ____
- NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]**
6. Has the generator correctly determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)] Yes No N/A RMK# ____

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

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

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

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

a. Has the facility complied with 3745-270-04? Yes No N/A RMK# _____

NOTIFICATION AND CERTIFICATION REQUIREMENTS

- 13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)] Yes No N/A RMK# ____
- 14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)] Yes __ No N/A RMK# ____
- 15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)] Yes __ No N/A RMK# ____
- 16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)] Yes __ No N/A RMK# ____
- 17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so: Yes No __ N/A RMK# ____
 - a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes No N/A RMK# ____

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

- 18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)] Yes No N/A RMK# ____

REMARKS

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 - None observed during the inspection.

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes ___ No N/A ___ RMK# ___
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes ___ No N/A ___ RMK# ___
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes ___ No ___ N/A ___ RMK# ___
 - b. Mix battery types in one container? Yes ___ No ___ N/A ___ RMK# ___
 - c. Discharge batteries to remove the electric charge? Yes ___ No ___ N/A ___ RMK# ___
 - d. Regenerated used batteries? Yes ___ No ___ N/A ___ RMK# ___
 - e. Disassemble them into individual batteries or cells? Yes ___ No ___ N/A ___ RMK# ___
 - f. Remove batteries from consumer products? Yes ___ No ___ N/A ___ RMK# ___
 - g. Remove the electrolyte from the battery? Yes ___ No ___ N/A ___ RMK# ___
- If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] Yes No ___ N/A ___ RMK# ___
6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] Yes ___ No N/A ___ RMK# ___
- a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] Yes ___ No N/A ___ RMK# ___
 - b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] Yes ___ No N/A ___ RMK# ___
7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)] Yes ___ No N/A ___ RMK# ___

UNIVERSAL WASTE LAMPS

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] Yes ___ No N/A ___ RMK# ___
9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes ___ No N/A RMK# ___
10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)" [3745-273-14(E)] Yes ___ No N/A ___ RMK# ___

NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes No ___ N/A ___ RMK# ___
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes ___ No N/A RMK# ___

NOTE: Accumulation is defined as date generated or date received from another handler.

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes No N/A ___ RMK# ___
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes ___ No ___ N/A ___ RMK# ___
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes ___ No ___ N/A ___ RMK# ___
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes ___ No ___ N/A ___ RMK# ___
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes ___ No ___ N/A ___ RMK# ___

e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)]

Yes ___ No ___ N/A ___ RMK# ___

f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)]

Yes X No ___ N/A ___ RMK# ___
Manifests documenting multiple off-site shipments on an annual basis.

EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]

Yes ___ No X N/A ___ RMK# ___

RESPONSE TO RELEASES - None observed during the inspection.

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]

Yes ___ No N/A ___ RMK# ___

15. Is the material released characterized? [3745-273-17(B)]

Yes ___ No N/A ___ RMK# ___

16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)]

Yes ___ No N/A ___ RMK# ___

OFF-SITE SHIPMENTS

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

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]

Yes X 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 X RMK# ___

19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)]

Yes X 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:

No universal waste shipments rejected.

a. Receive the waste back? [3745-273-18(E)(1)]

Yes ___ No ___ N/A ___ RMK# ___

b. Agree to where the shipment will be sent? [3745-273-18(E)(2)]

Yes ___ No ___ N/A ___ RMK# ___

21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following: Yes ___ No N/A ___ RMK# ___
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes ___ No ___ N/A ___ RMK# ___
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes ___ No ___ N/A ___ RMK# ___
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes ___ No N/A ___ RMK# ___
Facility does not accept off-site shipments of universal waste.
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# ___
Facility does not accept off-site shipments of universal waste.

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

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS

1. Does the generator manage used oil in a surface impoundment or waste pile? If yes: Yes No N/A
- a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] Yes No N/A
2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes No N/A
3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? Yes No N/A

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil? If so, Yes No N/A
- a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] Yes No N/A

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

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

NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6. Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] Yes No N/A
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
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

9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] *No releases observed during the inspection.*
- a. Stopped the release? Yes No N/A
- b. Contained the release? Yes No N/A
- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A

ON-SITE BURNING IN SPACE HEATER

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: Yes No N/A
- 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
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A

GENERATOR TRANSPORTATION

11. If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] *No self-transportation.* Yes No N/A
- a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24] Yes No N/A
- b. Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24] Yes No N/A

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

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
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes No N/A
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

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.