



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

May 14, 2008

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

Eric Manuel  
Elyria Plating Corporation  
118 Olive Street  
Elyria, OH 44035

**RE: ELYRIA PLATING CORPORATION, LORAIN COUNTY, OHD004210035,  
RCRA/LQG, COMPLIANCE EVALUATION INSPECTION, NOTICE OF VIOLATION**

Dear Mr. Manuel:

On April 24, 2008, Ohio EPA's Division of Hazardous Waste Management (DHW) conducted a compliance evaluation inspection at the Elyria Plating Corporation, Inc. (EPC) facility located at 118 Olive Street, Elyria, Ohio. EPC is an electroplating operation and qualified as a Large Quantity Generator (LQG) of hazardous waste at the time of this inspection. Hazardous waste generated at the facility includes spent plating and cleaning baths (D006, D007) from electroplating operations at the facility.

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

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

1. **OAC Rule 3745-52-11 Hazardous waste determination:** *Any person who generates a waste in the state of Ohio, as defined in rule 3745-51-02 of the Administrative Code shall determine if that waste is a hazardous waste.*

At the time of the April 24, 2008 inspection, Ohio EPA observed the following containers of wastes which the facility had not characterized to determine if the waste is a hazardous waste:

In the shipping dock, in an area labeled "Spent plating solutions pending treatment", Ohio EPA observed at least twenty-two (22) totes of plating waste being accumulated while awaiting treatment through the facility on-site WWTU. At the time of this inspection, EPC had not characterized the spent plating solutions to determine if the wastes were hazardous wastes and must be managed as such. During this inspection, EPC stated that they will use their generator knowledge and manage the waste as hazardous wastes.

For wastes which the facility is unable to characterize using use generator knowledge, a **representative** sample of the waste must be collected and tested using the Toxicity Characteristic Leaching Procedure (TCLP), test Method 1311 in "Test Methods for Evaluating Solid Waste; Physical/Chemical Methods," U.S. EPA Publication SW-846. Note - the waste need only be tested for the eight RCRA metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver) and pH. A copy of the analytical data for waste must be submitted to this office, including a copy of the chain of custody.

To demonstrate abatement of this violation, EPC must submit to this office an inventory of the containers (totes) of hazardous waste in the shipping dock pending treatment through the facility WWTU. The inventory must include the following information:

- Applicable hazardous waste codes.
- Volume of hazardous waste in container.
- Source and date of generation.
- How the waste will be managed (process through WWTU, ship off-site, etc.).

Should EPC ship any of the containers of waste off site as a hazardous waste, EPC must, submit to this office, documentation confirming that the waste has been removed and properly disposed. Documentation must include a copy of the hazardous waste manifest(s) and Land Disposal Restriction (LDR) forms which accompanied the shipment(s) of hazardous waste off-site.

2. **OAC 3745-52-34(A)(3) Labeling:** *A generator may, for ninety days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit, provided that, while being accumulated and/or treated on-site, each container and tank is labeled or marked clearly with the words "Hazardous Waste".*

A. At the time of the April 24, 2008 inspection Ohio EPA observed the containers of hazardous waste being accumulated while waiting to be treated through the on-site WWTU (referenced in Violation #1 A) had not been labeled with the words Hazardous Waste.

To demonstrate abatement of this violation, please see Violation #5.

B. At the time of the April 24, 2008 inspection Ohio EPA observed at least eight (8) totes of plating waste being accumulated in Area B3 pending treatment through the on-site WWTU. EPC has characterized this material as a hazardous waste and thus marks the totes with red paint; however, none of the containers were labeled with the words "Hazardous Waste".

To demonstrate abatement of this violation, please see Violation #5.

3. **OAC 3745-52-34(A)(2) Accumulation Date:** *A generator may, for ninety days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit, provided that the date upon which each period of accumulation and/or treatment begins is clearly marked and visible for inspection on each container.*

A. At the time of the April 24, 2008 inspection Ohio EPA observed the containers of hazardous waste being accumulated while waiting to be treated through the on-site WWTU (referenced in Violation #1 A) had not been labeled with an accumulation date.

To demonstrate abatement of this violation, please see Violation #5.

B. At the time of the April 24, 2008 inspection Ohio EPA observed at least eight (8) totes of plating waste being accumulated in Area B3 pending treatment through the on-site WWTU. EPC has characterized this material as a hazardous waste and thus marks the totes with red paint; however, none of the containers were labeled with an accumulation date.

To demonstrate abatement of this violation, please see Violation #5.

Please note – the accumulation date is the date the material was generated (removed from the process line) and deemed a waste.

4. **OAC 3745-65-35 Required aisle space:** *The owner or operator shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of the above-mentioned purposes.*

A. At the time of the April 24, 2008 inspection Ohio EPA observed the containers of hazardous waste being accumulated while waiting to be treated through the on-site WWTU (referenced in Violation #1 A) did not have adequate aisle space to allow for the unobstructed movement of personnel, fire protection equipment, spill control equipment, or decontamination equipment in the event of an emergency.

To demonstrate abatement of this violation, please see Violation #5.

B. At the time of the April 24, 2008 inspection Ohio EPA observed at least eight (8) totes of plating waste being accumulated in Area B3 pending treatment through the on-site WWTU. EPC has characterized this material as a hazardous waste and thus marks the totes with red paint; however, the accumulation area did not have adequate aisle space to allow for the unobstructed movement of personnel, fire protection equipment, spill control equipment, or decontamination equipment in the event of an emergency.

To demonstrate abatement of this violation, please see Violation #5.

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

At the time of the inspection, Ohio EPA observed the containers (totes) of hazardous waste being accumulated for processing through the one site WWTU, had a large hole cut in the top of each tote to facilitate the pumping process therefore could not be closed when not adding to or removing waste from the container.

To demonstrate abatement of Violations #2, #3, #4 and #5, EPC must submit to this office the following documentation:

- Documentation in the form of photographs (one for each area) demonstrating that the hazardous waste being accumulated in both the shipping dock and Area B3, is being managed in containers that are kept closed.
- Photographs demonstrating that the closed containers are labeled with the words Hazardous Waste and an accumulation date representing the date the material became a waste.
- Photographs demonstrating that each of the two hazardous waste accumulation areas has been provided with sufficient aisle space to allow for the unobstructed movement of emergency equipment and personnel.

6. **OAC 3745-65-32(B) Required equipment:** *All facilities shall be equipped portable fire extinguishers, fire control equipment (including, but not limited to, special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment.*

At the time of this inspection, EPC did not have spill control and decontamination equipment available either of the hazardous waste accumulations areas in the shipping dock or Area B3, where liquid hazardous wastes are accumulated.

To demonstrate abatement of this violation, EPC must submit to this office documentation in the form of photographs demonstrating that spill control or decontamination equipment has been provided for the hazardous waste accumulation areas for both the shipping dock and Area B3.

7. **OAC 3745-65-34(A) Emergency communication device:** *All facilities shall be equipped with a device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or local or Ohio EPA emergency response teams.*

At the time of this inspection, Ohio EPA observed that EPC did not have an emergency communication device immediately available for employees performing operations at the hazardous waste roll-off box.

To demonstrate abatement of this violation, EPC must submit documentation demonstrating that the facility has provided an emergency communication device for employees performing operations at the hazardous waste roll-off box. Ohio EPA discussed with you the option of using the "buddy plan", where a second person acts as the emergency communication device and summons emergency assistance. Should EPC choose to implement the buddy plan in lieu of installing a phone or other mechanical device, the facility must then develop a written protocol for the buddy plan, incorporate it into the facility contingency plan and train employees in the protocol. EPC must submit a copy of the written protocol to this office along with documentation demonstrating that employees have been trained.

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

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

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

- A. EPC operates two filter presses which generate a hazardous waste that is collected in steel hoppers, which are then emptied into the Hazardous Waste roll-off box located on the north side of the facility. At the time of this inspection, Ohio EPA observed that the hoppers containing hazardous waste were not labeled with the words "Hazardous Waste", or words describing the contents.
- B. At the time of this inspection, Ohio EPA also observed that the hoppers were not covered when containing hazardous waste, as required by OAC Rule 3745-66-73.

Upon being informed of these violations and the regulations regarding satellite accumulation containers, EPC immediately labeled the hoppers with the words hazardous waste, and emptied the hoppers into the hazardous waste roll-off box. Ohio EPA therefore considers this violation abated.

9. **OAC 3745-65-33 Testing and maintenance of equipment:** *All facility communications 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.*

At the time of this inspection, EPC was not performing the required inspections of the emergency equipment associated with hazardous waste accumulation areas including the hazardous waste roll-off box and the two container accumulation areas located in the shipping dock and in Area B3.

EPC will immediately begin performing inspections of the emergency equipment associated with hazardous waste accumulation areas as necessary to assure its proper operation. To abate this violation, EPC will submit to this office a completed inspection log sheet to demonstrate that this has been done. An example of a blank inspection log sheet was given to you during the inspection and e-mailed to you subsequent to the inspection.

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

EPC accumulates hazardous waste on site in containers (a roll-off box and totes) for treatment through the on-site WWTU or to be shipped off site for disposal. EPC has not been performing the required weekly inspections of the hazardous waste accumulation areas and documenting them in a log or summary.

To demonstrate abatement of this violation, EPC must begin performing the weekly inspections of the hazardous waste accumulation areas immediately and log the inspection in an inspection log or summary. EPC must submit to this office, copies of two consecutive weeks of completed inspection log sheets for all hazardous waste accumulation areas on site. This submittal must include the two new hazardous waste accumulation areas in the shipping dock and in Area B3 in addition to the hazardous waste roll-off box on the north side of the facility. Ohio EPA provided EPC with example inspection log sheets at the time of this inspection and an electronic version was e-mailed to the facility subsequent to the inspection.

11. **OAC Rule 279-22(D) Response to releases of used oil:** *Upon detection of a release of used oil to the environment that is not subject to the requirements of Chapter 1301:7-9 of the Administrative Code and which has occurred after October 20, 1998, a generator must perform the following cleanup steps:*
- (1) Stop the release;*
  - (2) Contain the released used oil;*
  - (3) Clean up and manage properly the released used oil and other materials; and*
  - (4) If necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service.*

At the time of this inspection, Ohio EPA observed a release of used gear oil by the cadmium rack line. Ohio EPA advised the facility to clean-up the used oil and characterize it to determine if it is a hazardous waste.

To demonstrate abatement of this violation EPC must submit documentation to this office demonstrating that the source of the release has been repaired, the area has been cleaned up, the used oil has been characterized to determine if it is a hazardous waste and managed appropriately.

12. **OAC Rule 279-22(C)(1) Used oil requirements for generators:** *Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."*

At the time of this inspection, Ohio EPA observed the tank or containers used to accumulate the used oil generated from the skimmers was not marked or labeled with the words "Used Oil".

To demonstrate abatement of this violation, EPC must label the tank and containers used to manage used oil, with the words "Used Oil" and submit to this office documentation in the form of photographs demonstrating this has been done.

13. **OAC 3745-65-54 Amendment of contingency plan:** *The contingency plan must be reviewed, and immediately amended, if necessary, whenever:*
- (A) Applicable rules are revised;*
  - (B) The contingency plan fails in an emergency;*
  - (C) The facility changes- in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;*
  - (D) The list of emergency coordinators changes; or*
  - (E) The list of emergency equipment changes*

EPC has not updated the facility contingency plan to reflect changes in emergency coordinators, processes or hazardous waste generated at the facility.

To demonstrate abatement of this violation, see Violation #14.

14. **OAC 3745-65-52(C)(D)(E) Content of contingency plan:**
- (C) The contingency plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and Ohio EPA and local emergency response teams to coordinate emergency services, pursuant to rule 3745-65-37 of the Administrative Code.*
  - (D) The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see rule 3745-65-55 of the Administrative Code), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates.*
  - (E) The contingency plan must include a list of all emergency equipment at the facility [such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment] where this equipment is required. This list must be kept up to date. In addition, the contingency plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.*

At the time of this inspection, EPC's contingency plan had not been updated to include a current list of names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. Furthermore, the contingency plan must be updated to include additions and/or changes made to the facility processes and the hazardous waste generated from these processes. The updated plan must also include an updated list of all emergency equipment associated with the management of hazardous waste, the location of the equipment, a physical description and a brief outline of the capabilities.

To demonstrate abatement of this violation, EPC will update the hazardous waste contingency plan to include the complete names, addresses and phone numbers (home and office) of all employees qualified to act as emergency coordinators. Furthermore, EPC must include the locations of all the less than 90 day hazardous waste accumulation areas (including the shipping dock and Area B3), and the hazardous wastes managed in these areas. EPC must also include the emergency equipment from these areas in the list of emergency equipment itemized in the facility contingency plan.

EPC will submit a copy of said contingency plan to this office for review. Upon approval by this office, EPC must send a copy of the updated contingency plan to all local police departments, fire departments, hospitals, and local emergency response teams that may be requested to provide emergency services. EPC must document that this has been done and submit said documentation to this office. An example contingency plan was emailed to you in MS Word format subsequent to this inspection.

15. **OAC 3745-65-16 Personnel training:**

- (A) (1) *Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Chapters 3745-65 to 3745-69 and 3745-256 of the Administrative Code. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (D)(3) of this rule.*
- (2) *This program /must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures, (including, but not limited to, contingency plan implementation), relevant to the positions in which they are employed.*
- (3) *At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including, where applicable;*
- (a) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;*
  - (b) Key parameters for automatic waste feed cut-off systems;*
  - (c) Communications or alarm systems;*
  - (d) Response to fires or explosions;*
  - (e) Response to ground water contamination incidents; and*
  - (f) Shutdown of operations.*

- (B) *Facility personnel must successfully complete the program required in paragraph (A) of this rule within six months after January 7, 1983 or six months after the date of their employment or assignment to a facility, or to a new position at a facility, whichever is later. Employees hired after January 7, 1983 must not work in unsupervised positions until they have completed the training requirements of paragraph (A) of this rule.*
- (C) *Facility personnel shall/must take part in an annual review of the initial training required in paragraph (A) of this rule.*
- (D) *The owner or operator must maintain the following documents and records at the facility:*
  - (1) *The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;*
  - (2) *A written job description for each position listed under paragraph (D)(1) of this rule. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but shall/must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;*
  - (3) *A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (D)(1) of this rule; and*
  - (4) *Records that document that the training or job experience required under paragraph (A), (B), and (C) of this rule has been given to, and completed by, facility personnel.*
- (E) *Training records on current personnel must be kept until closure of the facility. Training records on former employees must be kept for at least three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.*

At the time of this inspection, EPC did not have a personnel training program for employees involved with hazardous waste management at the facility as required by Ohio hazardous waste regulations.

To demonstrate abatement of this violation, EPC must develop a personnel training program which meets the requirements of OAC rule 3745-65-16. **The personnel training program must be tailored to hazardous waste management at the EPC facility and specifically cover proper management of the hazardous wastes generated at that facility.** Incorporated into this program will be annual refreshers and a policy to train new employees within six months of their hiring date or transfer to a new position which manages hazardous waste. EPC will train its employees in this program and the updated contingency plan and submit to this office a copy of the training program, the qualifications of the trainer, a list of employees receiving the training and sign-in sheets demonstrating the training has been performed.

Furthermore, EPC will develop job titles and descriptions for all positions that manage hazardous waste which meet the requirements of OAC 3745-65-16(D). The facility must submit to this office:

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

Example job titles and descriptions may be found on Ohio EPA's website at:  
<http://www.epa.state.oh.us/dhwm/SamplePersonnelTraining.doc>

Ohio EPA has the following concern which must be addressed:

1. EPC has been managing the sludge generated from the WWTU as an F019 listed waste and shipping it off-site under the waste codes F019/D006. Upon reviewing the facility processes and waste generation, it is the position of Ohio EPA DHWM that the sludge does not meet the listing for F019, but is instead an F006 waste. The D006 waste code is redundant since cadmium (D006) is one of the metals cited in the basis for the F006 listing.

EPC must ensure that future shipments of the WWTU sludge are shipped off-site as F006 and not F019/D006. EPC must contact Envirite and correct the Land Disposal Restriction (LDR) form for this waste to list F006 as the waste code and ensure that a corrected copy is maintained in your records. EPC must submit to this office documentation from the next shipment of WWTU sludge to Envirite (hazardous waste manifest and LDR), demonstrating that the waste is being properly shipped off-site under the F006 waste code.

2. At the time of this inspection, EPC did not have any documentation regarding how the facility is managing spent fluorescent lamps generated at the facility. Ohio EPA discussed the Universal Waste rules with you and supplied EPC with a copy of Ohio EPA's factsheet on the proper management of universal waste lamps.

Please submit to this office a brief discussion on how EPC plans to manage any spent Fluorescent lamps generated at the facility.

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

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (*i.e.* source reduction). For those wastes and pollutants that are generated, the second is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image by implementing pollution prevention programs. The Office of Compliance Assistance and Pollution Prevention provides compliance and pollution prevention assistance on environmental issues related to air, land and water. Their web site is: <http://www.epa.state.oh.us/opp/ocapp.html>

ELYRIA PLATING CORPORATION  
MAY 14, 2008  
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The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information at the following Web link: <http://www.epa.state.oh.us/dhwm/listserv.html>.

Please feel free to share this information with your colleagues.

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

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

Sincerely,



Suzanne Prusnek  
Environmental Specialist  
Division of Hazardous Waste Management

SP:ddw

Enclosures

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

E-mail this completed form to <a href="mailto:tammy.mcconnell@epa.state.oh.us">tammy.mcconnell@epa.state.oh.us</a> or mail it to Tammy McConnell, Central Office	<b>Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM</b>	For Ohio EPA use only																
2. Site EPA ID No.	EPA ID Number: OHD004210035																	
3. Site Name	Name: Eric Manuel	Website (optional): www.elyriaplating.com																
4. Site Location Information	Street Address: 118 Olive Street																	
	City, Town, or Village: Elyria	State: OH																
	County Name: Lorain	Zip Code: 44035																
5. Site Land Type (check only one)	<table border="1"> <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 align="center">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) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	A. 332813	B.																
	C.	D.																
7. Facility Representative:  Additional names can be recorded in number 12.  Only provide address information if it is different than the site address.	First Name: Eric Manuel	MI: M	Last Name: Manuel															
	Phone Number: 440-365-8300		Phone Number Extension:															
	E-Mail Address: ericmanuel@windstream.net																	
	Fax Number:		Fax Number Extension:															
	Street or P.O. Box:																	
City, Town or Village:																		
State:		Country:	Zip Code:															
8. Legal Owner and Operator of the Site List  Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	A. Name of Site's Legal Owner:  Kevin Flanigan		Date Became Owner (mm/dd/yyyy):  09/15/1983															
	Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other									
		X																
	Street or P.O. Box: P.O. Box 26																	
	City, Town, or Village:	Grafton	Owner Phone #:															
	State:	Ohio	Country:	Zip Code:	44044													
	B. Name of Site's Operator:  Edward Manuel		Date Became Operator (mm/dd/yyyy):  4/1/2007															
	Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other									
		X																
	Street or P.O. Box: 118 Olive Street																	
City, Town, or Village:	Elyria	Operator Phone #:																
State:	Ohio	Country:	Zip Code:	44035														
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																		

<b>A. Hazardous Waste Activities</b>	
(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 type="checkbox"/> 4. Recycler of Hazardous Waste

9. Violations Cited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																
<input checked="" type="checkbox"/> a. Large Quantity Generator (LQG): <input type="checkbox"/> b. Small Quantity Generator (SQG) <input type="checkbox"/> c. Conditionally Exempt Small Quantity Generator <input type="checkbox"/> d. United States Importer of Hazardous Waste <input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace <input type="checkbox"/> a. Small Quantity On-site Burner Exemption <input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption <input type="checkbox"/> 6. Underground Injection Control Facility <input type="checkbox"/> 7. Hazardous Waste Transporter															
<b>B. Universal Waste Activities</b>																
<input checked="" type="checkbox"/> 1. Small Quantity Handler of Universal Waste (Indicate types of universal waste generated and/or accumulated (check all boxes that apply): <input type="checkbox"/> 2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more). <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 checked="" type="checkbox"/> 1. Used Oil Generator <input type="checkbox"/> 2. Used Oil Transporter Indicate Type(s) of Activity(ies) <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" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">Generated</th> <th style="text-align: center;">Accumulated</th> </tr> </thead> <tbody> <tr> <td>A. Batteries</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>B. Pesticides</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>C. Thermostats</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>D. Lamps</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> </tbody> </table>		Generated	Accumulated	A. Batteries	<input type="checkbox"/>	<input 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 <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
	Generated	Accumulated														
A. Batteries	<input type="checkbox"/>	<input 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"/>														
<b>11. Waste Codes for Federally Regulated Hazardous Wastes.</b> Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRA Info source record, you do not need to list them all. Instead just indicate the date of the most recent source record.																
D002	D006	D007	F006													
<b>12. Comments:</b> Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.																
N	Announced ?	Additional Facility Representatives:	Eric and Edmund Manuel													
N	Tanks?	Other comments:														
Y	Containers?															
13. Name of Inspector(s)		Name of Inspector(s)		Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)												
Suzanne Prusnek OEPA/DHWM/NEDO		Karen Nesbit OEPA/DHWM/NEDO		April 24, 2008 9:00 am												
<b>14. OPTIONAL CERTIFICATION.</b> 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)											

## 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# \_\_\_
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# \_\_\_
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# \_\_\_

C:\Documents and Settings\SPrusnek\My Documents\iFolder\Inspection stuff\USED OIL.SHORT.11.2004.fin.megaset.wpd

**REMARKS**

## LARGE QUANTITY GENERATOR REQUIREMENTS

### COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

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

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

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

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

Safety Equipment Used:

### GENERAL REQUIREMENTS

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

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

Elgria Plating 4/24/08  
[Facility Name/Inspection Date]  
OHDC04210035 [ID number]  
LQG/February 2007  
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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

*need to change waste code*

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  - *but no real decision or specifics*
- 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  - *need to add equip to new areas*

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  - address

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  PA system

b. Emergency communication device? [3745-65-32(B)] Yes  No  N/A  needed in 2 < 90 day areas

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  see above

38 If there is only one employee on the premises, is there immediate access to a device (ex.phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] Yes  No  N/A

39 Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes  No  N/A

40 Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes  No  N/A

41. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes  No  N/A

SATELLITE ACCUMULATION AREA REQUIREMENTS

42 Does the generator ensure that satellite accumulation area(s):

- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes  No  N/A
- b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes  No  N/A
- c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes  No  N/A
- d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes  No  N/A
- e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes  No  N/A
- f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes  No  N/A  *need for labels*

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  *roll-off - ok*

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  *note each on top need to x - for*
- 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 ORCS 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

*roll-off only*

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

*Used Oil is recycled -  
- H<sub>2</sub>O is decanted off + goes to WWTU*