



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

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

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

July 31, 2007

RE: EPCO EXTRUSION PAINTING COMPANY
OHD 986971224
MAHONING COUNTY
LARGE QUANTITY GENERATOR (LQG) CEI
NOTICE OF VIOLATION (NOV)

Gerald A. Emery
Plant Manager
EPCO Extrusion Painting Company
413 McClurg Road
Boardman, OH 44512

Dear Mr. Emery:

On July 18, 2007, this writer and Todd Surrena, representing Ohio EPA's Division of Hazardous Waste Management (DHWM), visited EPCO Extrusion Painting Company (EPCO) located at 413 McClurg Road, Boardman, Ohio. The purpose of the visit was to conduct a compliance evaluation inspection (CEI) to determine the facility's compliance with Ohio's hazardous waste laws and rules as adopted under the Ohio Revised Code (ORC) Chapter 3734 and Chapter 3745 of the Ohio Administrative Code (OAC). The CEI included a discussion of facility operations, a review of records and a visual inspection of the facility's operations. You and Mike Fisher represented EPCO.

The following represents Ohio EPA's findings:

EPCO is an aluminum extrusion and painting company. EPCO extrudes aluminum parts and paints the parts for offsite customers. EPCO is a LQG of hazardous waste. EPCO generates hazardous waste in the form of a waste chromium filter cake (F019) from a wastewater treatment filter press and paint related wastes from the paint booth. The waste chromium filter cake is managed in one CY super sacks at the filter press and the paint related wastes are managed in a 55 gallon satellite drum location at the paint booth. Hukill Chemical Corporation receives the paint waste and Envirite of Ohio, Inc. receives the waste chromium filter cake for offsite treatment. Vexor Technology Inc. (Vexor) transports these wastes to both Hukill and Envirite. Vexor receives a non-hazardous, non-regulated sand blast grit generated by EPCO. EPCO has one <90 day hazardous waste accumulation area which is located outside at the rear of the facility. Fluorescent bulbs are generated as Universal Waste. EPCO is a used oil generator.

EPCO was inspected for the requirements of a LQG of hazardous waste. Enclosed is the LQG Inspection Checklist which includes a summary of EPCO's Process Description and Waste Activity. A Used Oil Checklist is also enclosed.

During the inspection Ohio EPA noted the following violation of Ohio's hazardous waste rules:

Violation of personnel training requirements, OAC 3745-65-16 C; personnel involved in hazardous waste management must receive refresher training on an annual basis.

EPCO failed to provide training within a 365-day period following the last training event, which Ohio EPA understands was conducted in February 2006.

Corrective Measure: Ohio EPA understands that refresher training is scheduled to occur in August, 2007. Please forward the following information to my attention within thirty (30) days of the completion of the training in August:

- **A copy of the training agenda and the date of training;**
- **A copy the names and job titles of all personnel trained; and**
- **And a copy of the credentials of the trainer.**

These documents, showing EPCO's return to compliance, can be mailed to my attention at: Kris Coder, Ohio EPA, Northeast District Office, 2110 E. Aurora Rd., Twinsburg, OH 44087

Ohio EPA recommended the following two operational changes at EPCO:

- At the satellite drum location in the paint room, EPCO should design and implement a system to more efficiently drain the contents of paint pails into the satellite accumulation drum. At the time of the inspection the satellite drum was open and receiving waste from the paint pail. A hazardous waste container may be open when receiving waste but must be closed immediately after receiving waste.
- In the <90 day hazardous waste accumulation area, hazardous waste labels on the containers should face the aisle so they can be more easily inspected. At the time of the inspection labels were not facing the aisle and were difficult to inspect.

Ohio EPA encourages EPCO to take all necessary steps to prevent the potential for a release of hazardous waste in the <90 day hazardous waste accumulation area. EPCO's plan to seal the concrete joints is a good plan.

EPCO has initiated the following Pollution Prevention (P2) activities:

- On January 1, 2007, EPCO eliminated the use of xylene from their painting process and substituted PM acetate in an effort to reduce their hazardous waste generation and maintain air compliance. EPCO is now HAPS free.
- EPCO recycles its cardboard.

The following guidance information is enclosed:

- December 2004, DHWM Guidance Document, "Universal Waste" and January 2007, DHWM Guidance Document, "Fluorescent Lamps: What You Should Know".

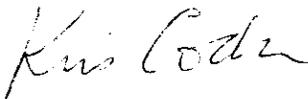
In addition, as requested, information on Conversion Coatings is being provided to you. Hopefully, it will be helpful.

Thank you for your cooperation in this matter. If you have any questions about this letter or the enclosed guidance information, please call me at (330) 963-1266 or Todd Surrena at (330) 963-1255.

The DHWM 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 EPCO from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve your facility from liability for any past or present violations of the state's hazardous waste laws.

Sincerely,



Kris Coder
Environmental Specialist
Division of Hazardous Waste Management

KC:ddw

Enclosure

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

| | | |
|--|---|-----------------------|
| | 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 McConnell, Central Office

| | |
|------------------------|------------------------------------|
| Site EPA ID No. | EPA ID Number: OHD986971224 |
|------------------------|------------------------------------|

| | | |
|-------------------|--|-------------------------------|
| Site Name: | Name: EPCO Extrusion Painting Company | Website: (Optional) |
|-------------------|--|-------------------------------|

| | | | |
|----------------------------------|---|--|------------------------|
| Site Location Information | Street Address: 413 McClurg Road | | |
| | City, Town, or Village: Boardman | | State: OH |
| | County Name: Mahoning | | Zip Code: 44512 |

| | | | | | | | | |
|---|--|---|---|--|---|--|--|--|
| Site Land Type (check only one) | Private x <input type="checkbox"/> | County y <input type="checkbox"/> | District t <input type="checkbox"/> | Federal <input type="checkbox"/> | Indian <input type="checkbox"/> | Municipal <input type="checkbox"/> | State <input type="checkbox"/> | Other r <input type="checkbox"/> |
|---|--|---|---|--|---|--|--|--|

| | | | |
|--|--------|--------|--|
| NAICS code(s) www.census.gov/epcd/www/naics.html | 331316 | 332812 | |
|--|--------|--------|--|

| | | | | | | |
|--|---|--|--------------|--------------------------------|------------------|--|
| Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address | First Name: Gerald | | MI: A | Last Name: Emery | | |
| | Phone Number: (330) 781-6100 | | | Phone Number Extension: | | |
| | E-Mail Address: gerrya@aeroext.com | | | | | |
| | Fax Number: (330) 781-6115 | | | Fax Number Extension: | | |
| | Street or P.O. Box: Same as location | | | | | |
| | City, Town or Village: | | | | | |
| | State: | | | Country: USA | Zip Code: | |

| | | | | | | | | | | |
|--|--|--|---|---|---|---|--|--|--|--|
| Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page | Name of Site's Legal Owner: Thomas Hutch | | | | Date Became Owner (mm/dd/yyyy): 04/17/2003 | | | | | |
| | Owner Type: | Private x <input type="checkbox"/> | County <input type="checkbox"/> | District <input type="checkbox"/> | Federal <input type="checkbox"/> | Indian <input type="checkbox"/> | Municipal <input type="checkbox"/> | State e <input type="checkbox"/> | Other <input type="checkbox"/> | |
| | Street or P.O. Box: 413 McClurg Road | | | | | | | | | |
| | City, Town or Village: Boardman | | | | Owner Phone #: (330) 781-6100 | | | | | |
| | State: OH | | | | Country: USA | | Zip Code: 44512 | | | |
| | Name of Site's Operator: Thomas Hutch | | | | Date Became Operator (mm/dd/yyyy): 04/17/2003 | | | | | |
| | Owner Type: | Private x <input type="checkbox"/> | County <input type="checkbox"/> | District <input type="checkbox"/> | Federal i <input type="checkbox"/> | Indian <input type="checkbox"/> | Municipal <input type="checkbox"/> | State <input type="checkbox"/> | Other <input type="checkbox"/> | |
| | Street or P.O. Box: 413 McClurg Road | | | | | | | | | |
| | City, Town or Village: Boardman | | | | Operator Phone #: (330) 781-6100 | | | | | |
| | State: OH | | | | Country: USA | | Zip Code: 44152 | | | |

| | |
|--------------------------|--|
| Violations Cited? | X <input type="checkbox"/> Yes <input type="checkbox"/> No |
|--------------------------|--|

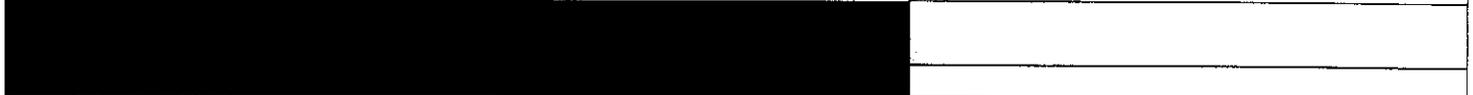
| | |
|---|--|
| Type of Generator | |
| <input type="checkbox"/> Not Regulated | <input type="checkbox"/> Conditionally Exempt Small Quantity Generator |
| <input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 | <input type="checkbox"/> United States Importer of Hazardous Waste |
| <input checked="" type="checkbox"/> Large Quantity Generator (LQG) | <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator |

| | |
|--|--|
| 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 |

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 of 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 |
| Fluorescent lamps | <input checked="" type="checkbox"/> | <input type="checkbox"/> Used Oil Transporter | <input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil |
| Batteries | | | |
| Pesticides | <input type="checkbox"/> | <input type="checkbox"/> Used Oil Transfer Facility | <input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner |



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

| | | | | | | |
|------|------|------|------|------|------|------|
| D001 | D002 | D007 | F007 | F003 | F005 | F019 |
|------|------|------|------|------|------|------|

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: | Mike Fisher |
| Tanks | <input type="checkbox"/> Yes | <input type="checkbox"/> No | Other Comments: EPCO is an aluminum extrusion and painting company. EPCO extrudes aluminum parts and paints the parts for offsite customers. EPCO generates hazardous waste in the form of a waste chromium filter cake (F019) from a wastewater treatment filter press and paint related wastes from the paint booth. The waste chromium filter cake is managed in one CY super sacks at the filter press and the paint related wastes are managed in a 55 gallon satellite drum location at the paint booth. EPCO has one <90 day hazardous waste accumulation area which is located outside at the rear of the facility. Fluorescent bulbs are generated as Universal Waste. EPCO is a used oil generator. | |
| 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) (hh:mm) |
| Kris Coder | Todd Surrena | July 18, 2007; 10:20 a.m. |

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 Description/Waste Activity Summary For EPCO Extrusion Painting Company:
Prepared by Kris Coder for the inspection on July 18, 2007.**

EPCO is an aluminum extrusion and painting company. They operate three shifts at this location. They are owned by Aerolite Extrusion Company located at 4605 Lake Park Road, Youngstown, OH 44512. At the EPCO location, extruded aluminum parts are painted for offsite customers. EPCO generates hazardous waste in the form of Cr waste filter cake (F019) from a wastewater treatment filter press and paint related wastes from the paint booths. The Cr waste filter cake is managed in one CY super sacks and the paint related wastes are managed in 55 gallon drums. Approximately, 2-3 drums of paint wastes (sludge and filters) are generated per month and approximately 13000 lbs of Cr filter cake are generated every 3 months. Hukill receives the paint waste and Envirite of Ohio, Inc. receives the Cr waste filter cake for offsite treatment. Vexor transports the wastes to both Hukill and Envirite. The Vexor facility located in Medina transports and receives a non-hazardous, non-regulated sand blast grit. According to Mr. Emery they are HAPS free. On January 1, 2007, they eliminated the use of xylene from their painting process and substituted PM acetate in an effort to reduce their hazardous waste generation and maintain air compliance. (This step appears to have been a good Pollution Prevention (P2) opportunity.) PM acetate is reclaimed offsite at Hukill which recovers about 65% which is returned for reuse. Dickey Electric receives their spent fluorescent lamps. One carton of spent lamps was noted accumulating in the maintenance shop along with a drum of used oil that was marked "used oil".

Ohio EPA received copies of EPCO's manifests and LDR's for shipments of wastes to Hukill and Envirite of Ohio, Inc. on June 26, 2007. The manifest document numbers and LDR's were 000140606JJK, 000140609JJK, 000140607JJK. Also received was one non-hazardous waste manifest to Vexor Technology Inc., manifest document number 62607. A copy of an LDR from Ross Environmental Services for manifest number 000140608JJK was also received. This shipment involved a shipment of D001, F003 xylene.

Ohio EPA noted that EPCO was not current on their annual hazardous waste training requirements. The last training was conducted in February 2006. They are scheduled to receive training in August 2007 by their outside consultant TLC. According to Mr. Emery six personnel will receive the hazardous waste training, including Mr. Emery and Mr. Fisher. It was discussed that EPCO employees who are required to receive training must receive the annual training within 12 months of the previous training. Ohio EPA noted this as a violation and will request a response showing that the training has been accomplished.

EPCO did not have any manifest issues, Contingency Plan issues or issues involving the weekly inspection of the <90 day hw accumulation area. The weekly inspection also included inspections of the emergency equipment and spill control equipment. Although there has been no changes to the Contingency Plan since the last inspection, Mr. Emery anticipates updating the Contingency Plan in the near future. Ohio EPA advised Mr. Emery to submit any changes to all emergency authorities that are past recipients of the plan.

At a satellite location in the painting room Ohio EPA noted that a 5 gallon pail was being drained into the satellite drum. The satellite drum in the paint room was labeled and open because it was receiving waste from the 5 gallon pail. Ohio EPA advised Mr. Emery and Mr. Fisher to close the drum once the 5 gallon pail finished emptying into the drum. Ohio EPA advised them that an alternative method to receive the waste from the 5 gallon pails might be more acceptable to minimize the release of volatiles into the paint room.

EPCO's <90 day hazardous waste accumulation area was located at the rear of the facility. It is a locked/fenced area with a concrete pad and a concrete berm. The waste drums and 1CY containers were stored orderly with ample aisle space. Ohio EPA recommended that the hazardous waste labels on the containers face the aisle so that they can be more easily inspected.

Regarding <90 day hazardous waste accumulation areas for LQG's of hazardous waste, as we explained during the inspection, Ohio EPA's regulations do not address the construction, containment or condition of the accumulation area. However, Ohio EPA's regulations do speak to "closure" of a <90 day hazardous waste accumulation area for a LQG. The regulations require that a LQG close a <90 day area such that all hazardous waste constituents are removed and none are left behind. Therefore, any thing that EPCO does to protect the <90 day area from spills or releases of hazardous waste will be very helpful when EPCO decides to finally close this unit. EPCO's plan to seal the concrete joints to keep the concrete pad in good condition is a very good plan. Ohio EPA encourages EPCO to take all the necessary steps to prevent the potential for a release(s) to the environment.

Another P2 activity is that EPCO recycles its cardboard.

Ohio EPA provided the following technical information: a Lynntech, Inc., "Environmental Friendly Conversion Coatings"; a research paper on "Non-Polluting Replacement for Chromate Conversion Coating & Zinc Phosphating in Powder Coating Applications"; and information on Metal Painting and Coating Operations.

In addition, Ohio EPA provided the following technical guidance documents:

- December 2004, "Universal Waste" and;
- January 2007, "Fluorescent Lamps: What You Should Know".

LA 1 QUANTITY GENERATOR REQUIREMENTS

For EPCO Extrusion Painting Company (EPCO),

July 18, 2007

Kris Coder and Todd Surrena

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

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

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

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

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

Safety Equipment Used:

safety glasses/w side shields and steel toed boots.

See attached Process Description/Waste Activity Summary.

- | | | | |
|---|---|--|------------------------------|
| 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 2. Are records of waste determination being kept for at least 3 years?[3745-52-40©]] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 4. Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)] <u>Ohio EPA received the 2006 Annual Report For EPCO on 02/27/2007.</u> | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 6. Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| 7. Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| 8. Does the generator accumulate hazardous waste? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

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

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

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

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

NOTE: Complete appropriate checklist for each unit.

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

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

MANIFEST REQUIREMENTS See notes above in the Process Description/Waste Activity Summary about manifests received by Ohio EPA.

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

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

- | | | | |
|--|---|-----------------------------|------------------------------|
| 14. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
|--|---|-----------------------------|------------------------------|

NOTE: The generator may designate 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 See notes above in the Process Description/Waste Activity Summary about 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)] As required in this rule, personnel must take part in an annual refresher. See notes above in the Process Description/Waste Activity Summary that discusses EPCO's need to complete the training annually. 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

notes above in Process Description/ the Activity Summary regarding the

Contingency Plan.

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

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

- 29. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes No N/A
- 30. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] As noted Mr. Emery plans to make some personnel revisions. Yes No N/A
- 31. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Mr. Emery is the EC and Mr. Fisher is the alternate. 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)] Evacuation alarm in the entire building. Yes No N/A
 - b. Emergency communication device? [3745-65-32(B)] Employees carry cell phones. Yes No N/A
 - c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] There is a spill control station located near the <90 day hazardous waste accumulation area which is just inside the bay door leading to the hazardous waste accumulation area. Yes No N/A

d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] On City water and Sewer. 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] Mike Fisher does the inspections and records them in an inspection log. Yes No N/A

36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes, inspection are recorded along with the weekly inspections of the <90 day hazardous waste accumulation area. 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 There is a satellite drum location in the paint room.

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)] At the time of the inspection the satellite drum was open and receiving waste. 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 See the notes in the Process Description/Waste Activity Summary regarding the <90 day hazardous waste accumulation area. The oldest container of Cr sludge was 6/1/07 and the oldest hazardous waste drum was 6/28/07.

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 store 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) Yes No N/A
 "Week" means 7 consecutive days.

- a. Are inspections recorded in a log or summary? [3745-66-74] See note above regarding emergency equipment inspection done by Walt McSherry. 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©]] 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 Mr. Emery said they follow the DOT pre-shipment requirements. Vexor transports their wastes.

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

USED OIL INSPECTION CHECKLIST (Short Version)

For EPCO Extrusion Painting Company(EPCO) on July 18, 2007 inspection by Ohio EPA

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# ___ Ohio EPA noted one 55 gallon drum in the maintenance area.
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# ___ The container was marked "used hydraulic oil".
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# ___

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REMARKS