

January 26, 2007

**RE: EVEREADY PRODUCTS CORP.
OHD 004 186 987
NOTICE OF VIOLATION**

Daniel Harrington
Eveready Products Corp.
1101 Belt Line Street
Cleveland, Ohio 44109

Dear Mr. Harrington:

This letter will report on the recent hazardous waste inspection of Eveready Products Corp. (Eveready). It will document any violations and concerns found and outline any additional information needed by Ohio EPA. It will outline what you need to do to correct those violations and concerns and what documentation needs to be sent to Ohio EPA. A written response to these issues is required within 30 days.

The Ohio EPA Division of Hazardous Waste Management conducted an inspection of Eveready located at 1101 Belt Line Street in Cleveland, Ohio on January 12, 2007. The purpose was to determine if Eveready had violations of Ohio's hazardous waste and used oil laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC).

Another purpose of the inspection was to look for ways Eveready may be able to reduce its waste generation, conserve energy, and save money. An attachment to this letter covers these issues.

Below are listed the violations and concerns found during the inspection. Please also see the enclosed Process, Waste, and Pollution Prevention Summary and the enclosed inspection checklists.

Large Quantity Generator Requirements

1. OAC 3745-52-40(C) – Keep records of test results, waste analyses, etc.
This rule requires the generator to keep records of any test results, waste analyses, or other determinations made in accordance with OAC 3745-52-11 (hazardous waste determination).

Eveready violated this rule by not keeping the analytical results it used to determine that two wastes have certain characteristic hazardous waste codes. Specifically, the following codes for your mixed solvents – low CI2 (CSI profile number 020848): D008, D039, and D040. Also the D039 and D040 codes for your mixed solvents – high CI2 (CSI profile number 008115). You provided me with a copy of the customer profile sheet which states these chemicals are found above the TCLP limits, but which does not give the actual waste analysis data. **You must obtain this actual data and send a copy to me.**

2. OAC 3745-52-42(A)(1) – Return copies of manifests.

This rule requires the generator to contact the transporter and/or the designated facility if it has not received the manifest signed by the designated facility within 35 days of the shipment of the waste.

Eveready violated this rule by not having, at the time of the inspection, the manifest #51906 (dated 5-19-06) that had been signed by the designated facility. You corrected this during the inspection by having the designated facility fax this to you.

3. OAC rule 3745-65-16(D)(1) – Job titles and names.

This rule requires that the following documents and records be maintained at the facility: The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job.

Eveready violated this rule by not maintaining these job titles and the corresponding employee names. **These records must now be created and a copy sent to me.**

4. OAC rule 3745-65-16(D)(2) – Job descriptions.

This rule requires a job description for each position related to hazardous waste management. For example, if the employees holding a certain job title are responsible for taking the hazardous waste generated from cleaning lines to a specific waste drum then that should be specified in the job description. Another example would be to specify in a job description who is to sign and manage hazardous waste manifests.

Eveready violated this rule by not maintaining these job descriptions. **These records must now be created and a copy sent to me.**

5. OAC rule 3745-65-16(D)(3) – Description of training.

This rule requires a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position related to hazardous waste management.

Eveready violated this rule by not maintaining these descriptions. **These records must now be created and a copy sent to me.**

6. OAC 3745-65-16(C) – Annual review of initial training.
This rule requires that facility personnel take part in an annual review of the initial required training.

Eveready violated this rule by having the last annual review conducted in 2001. **Eveready must first submit the documents called for above and an outlined of its planned annual review. Then Eveready must conduct its annual review for the employees involved in the management of hazardous waste and submit documentation of that to me.**

7. OAC 3745-65-52(D) - Emergency coordinator contact information in the contingency plan.
This rule requires the contingency plan to list the names, addresses, and phone numbers (office and home) of all persons qualified to act as an emergency coordinator.

Eveready violated this rule by not including in the plan the office phone numbers of the emergency coordinator(s). **This information must be added and a copy of the revised page(s) sent to me.**

8. OAC 3745-65-52(E) – Contingency plan emergency equipment.
This rule requires the contingency plan to include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications, and alarm systems), where this equipment is required. Included must be the location, physical description, and capabilities of each item on the list.

Eveready violated this rule by not including this information in its contingency plan. **This information must be added and a copy of the revised page(s) sent to me. It is suggested that this equipment be marked on a map of the facility which is included in the contingency plan.**

9. OAC rule 3745-65-33 – Testing and maintenance of equipment.
This rule requires that 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.

Eveready violated this rule by not having spill control equipment next to its full drums of hazardous waste that are accumulated in the warehouse.

Please provide such spill control equipment and send documentation of that to me.

10. OAC rule 3745-65-33 – Testing and maintenance of equipment.
This rule also requires the owner or operator to record the emergency equipment inspections in a log or summary.

Eveready violated this rule by not having this required log or summary. An example log can be found at: <http://www.epa.state.oh.us/dhwm/pdf/equiplog.PDF>.

Submit documentation including a completed log to show that you have corrected this violation.

11. OAC 3745-65-35 – Required aisle space.
This rule requires aisle space to be maintained to allow the unobstructed movement of personnel, fire protection equipment, and spill control equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of the above-mentioned purposes.

Eveready violated this rule by not having adequate aisle space around its full drums of hazardous waste accumulated in the warehouse. This violation was corrected during the inspection by moving these drums.

12. OAC 3745-52-34(C)(1)(a) – Satellite accumulation area.
This rule requires that containers in satellite accumulation areas follow certain rules including being kept closed except when necessary to add or remove waste. The two buckets used in the lab to collect chlorinated and non chlorinated hazardous waste can be considered satellite accumulation areas.

Eveready violated this rule by not having one of these containers closed. More information regarding what constitutes closed can be found at: http://www.epa.state.oh.us/dhwm/pdf/Closed_Container_Guidance.pdf.
You corrected this violation during the inspection.

13. OAC 3745-52-34(C)(1)(b) – Satellite accumulation area.
This rule requires that containers in satellite accumulation areas be marked with the words hazardous waste or with other words identifying the contents. The two buckets used in the lab to collect chlorinated and non chlorinated hazardous waste can be considered satellite accumulation areas.

Eveready violated this rule by not labeling these containers as required. **Please label these containers and send documentation of that to me.**

14. OAC 3745-52-34(A)(3) – Labeling as hazardous waste.
This rule requires that, while being accumulated and/or treated on site, each hazardous waste container and tank must be labeled clearly with the words "Hazardous Waste."

Eveready violated this rule by having a bucket of hazardous waste that was located between the wipe production area and the filler area that was not labeled as hazardous waste. **Please correct this violation and submit documentation to show that.**

15. OAC rule 3745-66-73(A) – Keeping containers closed.
This rule requires that a container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

Eveready violated this rule by having a bucket of hazardous waste that was located between the wipe production area and the filler area that was open. **Please correct this violation and submit documentation to show that.**

16. OAC rule 3745-66-74 – Inspections of container storage areas.
This rule requires that the owner or operator must inspect areas where containers of hazardous waste are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The owner or operator must also record inspections in an inspection log or summary.

Eveready violated this rule by not conducting this inspection program since August of 2006. An example log can be found at: <http://www.epa.state.oh.us/dhwm/pdf/sqglog.PDF>.
Submit documentation including a completed log to show that you have corrected this violation.

Land Disposal Restriction Requirements

17. OAC rule 3745-270-07(A)(2) - Land disposal restriction notification sent to receiving facility.
This rule requires certain notification if the waste does not meet the treatment standard. This includes whether the waste is a wastewater or a nonwastewater. Wastewaters contain less than 1% by weight total organic carbon (TOC) and less than 1% by weight total suspended solids (TSS).

Eveready violated this rule because the Generator Notification to Chemical Solvents, Inc. form dated 5-9-00 for your mixed solvents – high Cl2 (CSI profile number 008115) did not list whether the waste is a wastewater or a nonwastewater. **Please determine this and send me an updated land disposal restriction notification form.**

Daniel Harrington
Eveready Products Corp.
January 26, 2007
Page 6

18. OAC rule 3745-270-07(A)(2) – Land disposal restriction notice sent to receiving facility.

This rule requires certain notification if the waste does not meet the treatment standard. This includes the EPA hazardous waste codes that apply to the waste.

Eveready violated this rule because the Generator Notification to Chemical Solvents, Inc. form dated 7-19-00 for your mixed solvents – low CL2 (CSI profile number 020848) did not list the D008 waste code which according to your Customer Profile Sheet dated 12-17-01 applies to this waste. **Please revise this form, as appropriate, and send a copy to me.**

Concerns:

1. Your mixed solvents – low CL2 waste (profile number 020848) was last shipped with the following waste codes listed on the manifest: D008, D039, D040, F002, F003, F005. The manifest instructions regarding listing waste codes state you are to use the codes which are most representative of the properties of the waste. The profile sheet you gave me for this waste (dated 12-17-01) lists the flash point for this waste as less than 73 degree F. Therefore, the D001 waste code should be listed on the manifest. Also, based on your description of your process and waste management, the F002 and F005 codes do not appear to apply to this waste. Please keep in mind that whether a waste has listed waste codes such as F002 and F005 is not affected by the results of testing that waste. It is only dependant on whether the listing description is met, for example, whether the solvent contained, before use, 10 % or more of the listed solvents.
2. Your mixed solvents – high CL2 waste (profile number 008115) was last shipped with the following waste codes on the manifest: D001, D039, D040, F002, F003, F005. Based on your description of your process and waste management, the F003 and F005 codes do not appear to apply to this waste.
3. Your contingency plan had a narrative evacuation plan. However, I suggest you add evacuation routes to a map of the facility to be included in the contingency plan.
4. We saw a parts washer that was between the wipe production area and the filler area. You said it was not currently in use and that you were not sure whether it contained cleaning fluid. **Please let me know if it contains any material and, if it does, what you plan to do with the material.**
5. Universal waste, including burned out fluorescent tubes, can be accumulated for no longer than one year unless it is solely for the purpose of accumulation of such quantities to facilitate proper recovery or treatment. Your last shipment of waste fluorescent tubes was on 4-11-05. **Please either ship the waste fluorescent tubes now onsite and send a copy of the shipping paper to me or send me a description as to why these tubes need to be accumulated for a longer time.**

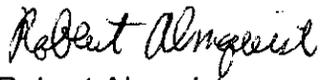
Daniel Harrington
Eveready Products Corp.
January 26, 2007
Page 7

Please send a written response to this letter within 30 days including the documentation required above.

You can find copies of the regulations and other information on the Division of Hazardous Waste Management web page at <http://www.epa.state.oh.us/dhwm/>.

If you have any questions, please contact me at (330) 963-1217, or robert.almquist@epa.state.oh.us.

Sincerely,



Robert Almquist
Division of Hazardous Waste Management

RA:cl
Enclosures

cc: Natalie Oryshkewych, DHWM, NEDO
ec: Frank Popotnik, DHWM, NEDO
Harry Sarvis, DHWM, CO
Nyall McKenna, DHWM, NEDO
Steve Howley, Eveready Products Corp.

Notice:

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

E-mail this completed form to tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office	U.S. Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM		For Ohio EPA use only																		
2. Site EPA ID No.	EPA ID Number: OHD 004 186 987																				
3. Site Name	Name: Eveready Products Corp.	Website (optional):	http://www.evereadyproducts.com/index.php																		
4. Site Location Information	Street Address: 1101 Belt Line																				
	City, Town, or Village: Cleveland	State: OH																			
	County Name: Cuyahoga	Zip Code: 44109																			
5. Site Land Type (check only one)	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	X									
Private	County	District	Federal	Indian	Municipal	State	Other														
X																					
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A.		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: Daniel		MI: P																		
	Last Name: Harrington																				
	Phone Number: 216-661-2755		Phone Number Extension: 17																		
	E-Mail Address: dharrington@evereadyproducts.com																				
	Fax Number: 216-741-1391		Fax Number Extension:																		
	Street or P.O. Box:																				
	City, Town or Village:																				
State: OH		Country: Ashtabula	Zip Code: 44004																		
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: Eveready Products Corp.		Date Became Owner (mm/dd/yyyy): 12-1-79																		
	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Owner Type:</td> <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>Mark with an X</td> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Owner Type:	Private	County	District	Federal	Indian	Municipal	State	Other	Mark with an X	X							
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	Mark with an X	X																			
	Street or P.O. Box:																				
	City, Town, or Village:		Owner Phone #:																		
	State:		Country:	Zip Code:																	
	B. Name of Site's Operator: Eveready Products Corp.		Date Became Operator (mm/dd/yyyy): 12-1-79																		
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Mark with an X																					
Street or P.O. Box:																					
City, Town, or Village:		Operator Phone #:																			
State:		Country:	Zip Code:																		
9. Violations Cited?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No																		
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)																					
<input type="checkbox"/> Not Regulated																					

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

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

B. Universal Waste Activities	C. Used Oil Activities															
<input checked="" type="checkbox"/> 1. Small Quantity Handler of Universal Waste (Indicate types of universal waste generated and/or accumulated (check all boxes that apply):	<input type="checkbox"/> 1. Used Oil Generator															
<input type="checkbox"/> 2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more).	<input type="checkbox"/> 2. Used Oil Transporter Indicate Type(s) of Activity(ies) <input type="checkbox"/> Transporter <input type="checkbox"/> Transfer Facility															
<input type="checkbox"/> 3. Destination Facility for Universal Waste (Check all boxes below that apply for each of the three types of facilities above.)	<input type="checkbox"/> 3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies) <input type="checkbox"/> Processor <input type="checkbox"/> Re-refiner															
<table border="1"> <thead> <tr> <th></th> <th>Generated</th> <th>Accumulated</th> </tr> </thead> <tbody> <tr> <td>A. Batteries</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>B. Pesticides</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>C. Thermostats</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>D. Lamps</td> <td><input checked="" type="checkbox"/></td> <td><input 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 type="checkbox"/>	<input type="checkbox"/> 4. 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 type="checkbox"/>														
	<input type="checkbox"/> 5. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies) <input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Oil <input type="checkbox"/> b. Used Oil to Off-Specification Used Oil Burner															

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

D001	D008	D039	D040	F002	F003
------	------	------	------	------	------

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

No	Announced ?	Additional Facility Representatives:	Steve Howley
no	Tanks?	Other comments:	
yes	Containers?		

13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
Robert Almquist		1-12-07

14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of owner, operator, or an authorized representative	Name and Title (Print)	Date (mm-dd-yyyy)

Process, Waste, and Pollution Prevention Summary for:

Eveready Products Corp., OHD 004 186 987, LQG, 1-12-07 inspection

#	Process and waste	Generation and accumulation details	On-site management	Off-site management	Current pollution prevention	Possible pollution prevention
1	Cleaning of tanks, lines, and aerosol can filling equipment using solvent 142-66 (petroleum distillates)	CSI profile # 20848. 11 drums shipped on 11-15-06 which is basically how much was generated since the last shipment which was on 8-3-06.	Accumulated in a satellite drum labeled antiseize in the filler area and in a satellite drum in the compoundin g area. Filled drums are then moved to a storage area in the warehouse.	Shipped to Chemical Solvents Inc. using waste codes of D008, D039, D040, F002, F003, F005.	Reuse solvent when possible.	<ol style="list-style-type: none"> 1. Take waste code of F005 off manifest because it does not meet that listing description. 2. If waste code of F002 does not apply (that is there is no cross contamination from the spent TCE) then take that off of manifest. 3. Add a compressed gas such as nitrogen to the solvent which will make it clean better and therefore can use less. 4. Schedule production runs of products so that cleaning is needed less often. 5. Evaluate the use of less hazardous solvents. 6. Segregate wastes further as some may be nonhazardous. 7. Distill and reuse solvents on site.
2	Cleaning of tanks, lines, and aerosol can filling equipment using acetone	Same as waste 1.				

3	Cleaning of tanks, lines, and aerosol can filling equipment using Neu-Tri solvent (trichloroethylene)	CSI profile # 008115. 6 drums shipped on 11-15-06 which is basically how much was generated since the last shipment which was on 8-3-06.	Collected in a satellite drum in the compoundin g area. Filled drums are then moved to a storage area in the warehouse.	Shipped to Chemical Solvents Inc. using waste codes of D001, D039, D040, F002, F003, F005.	Reuse solvent when possible.	1. Take waste code of F005 off manifest because it does not meet that listing description. 2. If waste code of F003 does not apply (that is there is no cross contamination from the spent acetone) then take that off of manifest. Also see items 3,4, 5, and 7 above.
4	Cleaning of tanks, lines, and aerosol can filling equipment using water	CSI profile # 27474. Last shipped one drum on 2-27-06.	Collected in a drum in the filler area and also in a drum in the compoundin g area. Filled drums are then moved to a storage area in the warehouse.	Shipped to Chemical Solvents as a non hazardous waste.		Schedule production runs of products so that cleaning is needed less often.
5	Heated water bath used for DOT required testing of filled aerosol cans	Water discharged to sanitary sewer every night.				Determine if it could be changed less frequently.

6	Heated water bath used for DOT required testing of filled aerosol cans	If can bursts during testing then product is skimmed off the water and disposed with either waste 1,2, 3, or 4 depending on the product that was in the can.				
7	Aerosol can filling	Off-spec. aerosol cans with material in them.	unknown	Shipped to Giant Resource Recovery using waste codes of D001, D035, D039, D040. Last shipment was in 2005.	Rework them if possible.	Purchase an aerosol can puncturing unit.
8	Aerosol can filling	Off-spec empty aerosol cans.		Disposed with solid waste (regular trash).		Send them out as scrap metal.

Pollution Prevention Attachment to January 2007 letter to Eveready Products (OHD 004 186 987).

The following is offered as information and suggestions that you may want to investigate further. If requested, I can provide paper copies of the documents and websites for which the links are given. If you have any questions or want additional information, please contact me at 330-963-1217 or robert.almquist@epa.state.oh.us.

General:

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides compliance and pollution prevention assistance on environmental issues related to air, land, and water. If desired, this can include an onsite assessment of your operations with a resulting report containing waste minimization and energy conservation suggestions. They can be contacted at 800-329-7518 or <http://www.epa.state.oh.us/ocapp/ocapp.html>.

Significant pollution prevention opportunities can be realized when the cost of managing each waste is tied back to the production process where it originated. If all the true costs are assessed, then the true potential savings of a pollution prevention project can be seen. More information, including worksheets, can be found at: <http://www.ecy.wa.gov/pubs/95400.pdf>.

Production run schedule:

Eveready may wish to further evaluate its scheduling of runs of certain products so as to increase the amount of time between product changes and, therefore, equipment cleaning intervals as well.

Further waste segregation:

Eveready uses petroleum distillates (Solvent 142-66) for some cleaning. The use of this solvent on its own does not make the waste solvent a hazardous waste. This is because the flash point of this solvent is listed as 142 to 150 degrees F and petroleum distillates is not listed in the chemicals that would make it a F001 through F005 hazardous waste. This waste solvent is however mixed with your F003 hazardous waste (acetone cleaning waste) which makes the whole mixture a F003 hazardous waste. If the spent petroleum distillates are kept separate, you may be able to show that it is a nonhazardous waste. This could reduce your disposal costs and hazardous waste generation rate.

Solvent use:

Eveready uses trichloroethylene to clean its equipment after certain product runs. You told me that the cost to dispose of this waste is three times the amount it is for your other hazardous waste solvent. If the purchase price of the trichloroethylene is also higher, then this may be the place to start looking for cost reductions. I have enclosed a document called Replacing TCE: Alternatives for Surface Cleaning Operations. I received this document from Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) in August 2006.

You may be able to replace acetone and trichloroethylene with solvents that will not generate hazardous waste. A good place to start investigating this would be to talk to your current supplier of cleaning solvents.

Solvent alternatives include bio-based solvents which are derived from agricultural crops. An article regarding this is enclosed and can be found (with its associated links) at: <http://www.epa.state.oh.us/dhwm/pdf/NotifierFall04.pdf>.

Solvent distillation:

You may want to consider doing onsite distillation of your waste solvent so that it can then be reused. More information regarding this can be found at: <http://www.epa.state.oh.us/ocapp/p2/fact9.pdf>.

The above link also has a link to a list of vendors of distillation units. Additional information can be found at: <http://mntap.umn.edu/mach/62-Still.pdf>.

Aerosol can puncturing unit:

In 2005 Eveready shipped off-spec. aerosol cans as hazardous waste. You may want to look into buying an aerosol can puncturing unit. These units puncture the can, allow any fluids to drain into a container, and, if equipped with air filters, capture the propellants. These cans can then be recycled as scrap metal. Here are websites of some of the companies that sell such units:

<http://www.aerosolv.com/index.html>.

<http://www.americangasproducts.com/Default2.htm>.

<http://www.herkules.us/crusherscompactors.html>.

Currently Eveready is disposing of empty waste aerosol cans in its regular trash. These cans can also be recycled. Some nearby scrap metal collectors are:

Buckeye Metal (216-351-8494)

Recycle Midwest (216-481-9490)

PSC Metals (216-341-3400)

Lab chemical waste:

At the inspection you showed me lab chemicals that Eveready no longer has a use for. If these chemicals could still be used by another company, you may be able to save on disposal costs. A waste exchange such as Ohio's Material Exchange which can be found at: <http://www.epa.state.oh.us/ocapp/p2/omex/omex.html>, may help you find such a company.

Energy use reduction:

ENERGY STAR is a government-backed program helping businesses and individuals protect the environment through superior energy efficiency. Their website is at: <http://www.energystar.gov/>.

The following link leads to the part of the site that deals with improving the energy performance of buildings and plants:

http://www.energystar.gov/index.cfm?c=business.bus_index.

As an example, this site says that the exit signs in a facility may offer a way to reduce electricity costs and reduce maintenance costs. Exit signs that are labeled as ENERGY STAR operate on 5 watts or less per face, compared to standard signs, which use as much as 40 watts per face. These more efficient exit signs use light emitting diodes (LED) which can last up to 10 years without a lamp replacement, compared to less than one year for an exit sign using incandescent bulbs. More information, including a list of products and a savings calculator can be found at:

http://www.energystar.gov/index.cfm?c=exit_signs.pr_exit_signs.

Ohio businesses that spend less than \$150,000 on their annual energy bill now have a tool to help them reduce energy waste and hold costs down. The Ohio Department of Development has developed a free online tool that is confidential and easy to use. If you are looking for ways to save on energy expenses at your business, visit the Small Business Energy Saver at:

<http://www.energyguide.com/EnergySmartSBE/welcomeba.asp?referrerid=227&sid=436>.

Grant funding is available for business owners who are ready to implement measures suggested by the Ohio Small Business Energy Saver. For more information, visit:

http://www.odod.state.oh.us/cdd/oeel/ELFGrant.htm#NOFA_07-05.

The Ohio Department of Development's Office of Energy Efficiency may also be able to help with energy efficiency issues. Their web site is at:

<http://www.odod.state.oh.us/cdd/oeel/>.

Environment Self-Assessment Guide:

In June 2006 Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) published a 56 page Small Business Environmental Compliance Self-Assessment Guide which can be found at:

<http://www.epa.state.oh.us/ocapp/sb/publications/selfgde.pdf>.

Reduce waste generated from cleaning pipes, lines and hoses

It may be possible to reduce the length of some of the hoses that transfer your products. This could save in raw material and cleaning solvent costs. A shorter hose length would mean less surface area inside the hose for products to stick to after the product is transferred. More product left in the hose means more solvent is needed to clean it out.

When replacing or adding hoses you may want to consider hoses with a Teflon coating on the inside. Teflon has a low coefficient of friction so it will help prevent deposits of product building up in the hose and will keep flow rates high. This should reduce both your product losses and cleaning solvent usage. Some companies that sell this type of hose can be found at:

<http://www.crpindustries.com/teflon.htm>

http://www.nationalhose.com/teflon_hose.htm

You may be able to use a much lower volume of cleaning solvent in conjunction with either air purging and/or plastic pig purging. Polyurethane pigs are used with pipe cleaning systems and have also been used in the painting and coating industry to clean transfer lines and recover product. A paint manufacturing plant found that sending pigs consisting of foam plugs through the pipes using compressed air forced most of the paint out and, therefore, less cleaning solvent was needed. They found this change to have a payback period of only two months. Details on this case study can be found at:

<http://es.epa.gov/techinfo/research/reduce/rrel506.html>

Some companies that sell this type of equipment can be found at:

<http://www.pipepigs.com/>

<http://www.ryanprocess.com/pigs.html>

LARGE QUANTITY GENERATOR REQUIREMENTS

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

Facility Name: Eveready Products ID #: OHD 004 186 987 Inspection Date: 1-12-07

CESQG: <100Kg. (Approximately 25-30 gallons) of waste in a calendar month.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
 LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or >1 Kg. Of acutely hazardous waste in a calendar month.
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

- | | | | | | |
|---|-----|-------------------------------------|----|-------------------------------------|-------|
| 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] | Yes | <input checked="" type="checkbox"/> | No | N/A | — |
| 2. Has the generator obtained a U.S. EPA identification number? [3745-52-12] | Yes | <input checked="" type="checkbox"/> | No | N/A | — |
| 3. Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)] | Yes | <input checked="" type="checkbox"/> | No | N/A | — |
| 4. 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 | <input checked="" type="checkbox"/> | N/A — |
| 5. 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 | <input checked="" type="checkbox"/> | N/A — |
| 6. Does the generator accumulate hazardous waste? | Yes | <input checked="" type="checkbox"/> | 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.

- | | | | | | |
|---|-----|--|----|-------------------------------------|-------|
| 7. Has the generator accumulated hazardous waste on-site in <u>excess</u> of 90 days without a permit or an extension from the director ORC 3734.02 (E) & (F)? | Yes | | No | <input checked="" type="checkbox"/> | N/A — |
|---|-----|--|----|-------------------------------------|-------|

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

- | | | | | | |
|--|-----|---|----|--|-------|
| 8. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)] | | | | | no |
| 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) and	Yes	<input type="checkbox"/>	No	<input 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 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 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.

9. 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 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 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 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 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 type="checkbox"/>

MANIFEST REQUIREMENTS

10. 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"/>
11. 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)]

12. 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	N/A	<input type="checkbox"/>
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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)].

13. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]

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

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

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

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

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

17. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]

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

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

18. 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	<input type="checkbox"/>	No	N/A	<input type="checkbox"/>
-----	--------------------------	----	-----	--------------------------

19. Does the personnel training program include instructions to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)]

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

20. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A
21. 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
22. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A
-
23. Does the generator keep records including: job titles [D(1)], job descriptions [D(2)], type and amount of training given to each person [D(3)] and documentation of completed training or job experience required [D(4)]? [3745-65-16(D)] Yes No N/A
24. 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.

Job Performed

Name of Employee

Date Trained

CONTINGENCY PLAN

25. 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
26. 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 | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
|-----|--------------------------|----|-------------------------------------|-----|--------------------------|
- e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]
- | | | | | | |
|-----|-------------------------------------|----|--|-----|--------------------------|
| Yes | <input checked="" type="checkbox"/> | No | | N/A | <input type="checkbox"/> |
|-----|-------------------------------------|----|--|-----|--------------------------|

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)]

27. 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 | <input checked="" type="checkbox"/> | No | | N/A | <input type="checkbox"/> |
|-----|-------------------------------------|----|--|-----|--------------------------|
28. 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 | <input checked="" type="checkbox"/> | No | | N/A | <input type="checkbox"/> |
|-----|-------------------------------------|----|--|-----|--------------------------|
29. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]
- | | | | | | |
|-----|-------------------------------------|----|--|-----|--------------------------|
| Yes | <input checked="" type="checkbox"/> | No | | N/A | <input type="checkbox"/> |
|-----|-------------------------------------|----|--|-----|--------------------------|

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

30. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: unknown
- | | | | | | |
|-----|--------------------------|----|--|-----|--------------------------|
| Yes | <input type="checkbox"/> | No | | N/A | <input type="checkbox"/> |
|-----|--------------------------|----|--|-----|--------------------------|
- a. Was the contingency plan implemented? [3745-65-51(B)]
- | | | | | | |
|-----|--------------------------|----|--|-----|--------------------------|
| Yes | <input type="checkbox"/> | No | | N/A | <input type="checkbox"/> |
|-----|--------------------------|----|--|-----|--------------------------|
- b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?
- | | | | | | |
|-----|--------------------------|----|--|-----|--------------------------|
| Yes | <input type="checkbox"/> | No | | N/A | <input type="checkbox"/> |
|-----|--------------------------|----|--|-----|--------------------------|
- c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)?
- | | | | | | |
|-----|--------------------------|----|--|-----|--------------------------|
| Yes | <input type="checkbox"/> | No | | N/A | <input type="checkbox"/> |
|-----|--------------------------|----|--|-----|--------------------------|

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

31. 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
32. 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)] unknown Yes No N/A
- b. Emergency communication device? [3745-65-32(B)] Yes No N/A
- c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes No N/A
- d. Water of adequate volume/pressure? [3745-65-32(D)] unknown Yes No N/A

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

33. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes No N/A
34. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A
35. 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
36. 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
37. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
38. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes No N/A

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

SATELLITE ACCUMULATION AREA REQUIREMENTS

40. 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 anyone time? [3745-52-34(C)(1)] Yes No N/A

d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes No N/A

e. Containers are marked with words Hazardous Waste or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A

41. 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

42. Has the generator marked containers with the words Hazardous Waste? [3745-52-34(A)(3)] Yes No N/A
43. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No N/A
44. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A
- b. In good condition? [3745-66-71] Yes No N/A
- c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A
- NOTE: Record location on process summary sheets and photograph the area.*
45. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC1.44(A) Week means seven 7 consecutive days. Yes No N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
46. 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
47. 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
48. 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

49. 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 of commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

50. 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 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

51. 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)] unknown Yes No N/A

52. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] unknown Yes No N/A

53. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] unknown Yes No N/A

UNIVERSAL WASTE HANDLER REQUIREMENTS - SMALL QUANTITY - BATTERIES AND LAMPS

Facility Name: Eveready Products

ID #: OHD004186987

Inspection Date: 1-12-07

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more

Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No N/A ___RMK#
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes No N/A ___RMK#

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES did not discuss batteries at the inspection

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes ___ No N/A ___RMK#
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes ___ No N/A ___RMK#
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes ___ No ___ N/A ___RMK#
 - b. Mix battery types in one container? Yes ___ No ___ N/A ___RMK#
 - c. Discharge batteries to remove the electric charge? Yes ___ No ___ N/A ___RMK#
 - d. Regenerated used batteries? Yes ___ No ___ N/A ___RMK#
 - e. Disassemble them into individual batteries or cells? Yes ___ No ___ N/A ___RMK#
 - f. Remove batteries from consumer products? Yes ___ No ___ N/A ___RMK#
 - g. Remove the electrolyte from the battery? Yes ___ No ___ N/A ___RMK#

If so, are the casings or the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)]

Yes ___ No ___ N/A ___ RMK#

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)]

Yes ___ No N/A ___ RMK#

a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]

Yes ___ No N/A ___ RMK#

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]

Yes ___ No N/A ___ RMK#

7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]

Yes ___ No N/A ___ RMK#

UNIVERSAL WASTE LAMPS

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]

Yes ___ No N/A ___ RMK#
unknown

9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]

Yes ___ No N/A ___ RMK#
unknown

10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)]

Yes ___ No N/A ___ RMK#
unknown

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

ACCUMULATION TIME

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

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

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes No N/A ___ RMK#
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes ___ No ___ N/A ___ RMK#
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes ___ No ___ N/A ___ RMK#
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes ___ No ___ N/A ___ RMK#
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes ___ No ___ N/A ___ RMK#
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes ___ No ___ N/A ___ RMK#
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes No ___ N/A ___ RMK#

EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] Yes ___ No N/A ___ RMK#
unknown

RESPONSE TO RELEASES no releases seen

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes ___ No N/A ___ RMK#
15. Is the material released characterized? [3745-273-17(B)] Yes ___ No N/A ___ RMK#
16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes ___ No N/A ___ RMK#

OFF-SITE SHIPMENTS

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

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

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

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes ___ No N/A ___ RMK#
unknown
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No N/A ___ RMK#
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes ___ No ___ N/A ___ RMK#

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

Yes ___ No ___ N/A ___ RMK#

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

Yes ___ No N/A ___ RMK#

a. Sending the waste back to the originating handler? [3745-273-18(F)(1)]

Yes ___ No ___ N/A ___ RMK#

b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)]

Yes ___ No ___ N/A ___ RMK#

22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]

Yes ___ No N/A ___ RMK#

23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)]

Yes ___ No N/A ___ RMK#

EXPORTS

24. Is waste being sent to a foreign destination? If so:

Yes ___ No X N/A ___ RMK#

a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]

Yes ___ No N/A ___ RMK#

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)]

Yes ___ No N/A ___ RMK#

c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]

Yes ___ No N/A ___ RMK#

REMARKS

Land Disposal Restriction Requirements

Facility Name: **Eveready Products** ID #: **OHD004186987** Inspection Date: **1-12-07**

GENERAL LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] If so:
- Yes No N/A RMK#
- a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)]
- Yes No N/A RMK#
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)]
- Yes No N/A RMK#
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1]
- Yes No N/A RMK#
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1]
- Yes No N/A RMK#
4. Does the generator generate a characteristic hazardous waste? If so:
- Yes No N/A RMK#
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)]
- Yes No N/A RMK#

NOTE: If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so:
- Yes No N/A RMK#
- a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)]
- Yes No N/A RMK#

NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]

6. Has the generator correctly determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)]

Yes No N/A RMK#

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

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03]

Yes No N/A RMK#

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

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)]

Yes No N/A RMK#

NOTE: *In other words, is combustion a legitimate treatment method.*

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)]

Yes No N/A RMK#

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] If so:

Yes No N/A RMK#

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

Yes No N/A RMK#

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] If so:

Yes__No_X_N/A__RMK#__

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

Yes__NoN/A__RMK#__

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment?
If so:

Yes__No_X_N/A__RMK#__

a. Has the facility complied with 3745-270-04?

Yes__NoN/A__RMK#__

REMARKS

NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)]
Yes__NoXN/A__RMK#__

14. If a generator's waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)]
Yes_NoN/A_X_RMK#

15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)]
Yes_NoN/A_X_RMK#

16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)]
Yes_NoN/A_X_RMK#

17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so:
Yes__NoX__N/A__RMK#__

a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)]
Yes_NoN/A__RMK#__

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

18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)]
Yes_XNoN/A_RMK#__

REMARKS

GENERATORS TREATING HAZARDOUS WASTE no treatment occurring

1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? Yes__No__N/A__RMK#__
2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)] Yes__No__N/A__RMK#__
- a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] Yes__No__N/A__RMK#__
- b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes__No__N/A__RMK#__
3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes__No__N/A__RMK#__
4. Has the generator followed their WAP [3745-270-07(A)(5)]? Yes__No__N/A__RMK#__
5. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes__No__N/A__RMK#__
-

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

6. Has the generator sent a notification and certification with the initial shipment of waste?[3745-270-07(A)(5)(c)] Yes__No__N/A__RMK#__
7. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] Yes__No__N/A__RMK#__
8. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following: Yes__No__N/A__RMK#__
- a. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes__No__N/A__RMK#__
- b. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)] Yes__No__N/A__RMK#__
-

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

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

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

10. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: Yes__ No__ N/A__ RMK# __
- a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49 (C)] Yes__ No N/A__ RMK# __
11. Does each notification/certification form completed, contain the information found in Table 1? [3745-270-07(A)(3)] Yes__ No N/A__ RMK# __
-

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

REMARKS

HAZARDOUS DEBRIS

- 1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)?
Yes__ No__ N/A__ RMK#__

 - 2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.)
Yes__ No__ N/A__ RMK#__

 - 3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so:
Yes__ No__ N/A__ RMK#__
 - a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)]
Yes__ No__ N/A__ RMK#__
-

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

- 4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so:
Yes__ No__ N/A__ RMK#__
 - a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)]
Yes__ No__ N/A__ RMK#__

- 5. Is the waste a PCB waste under 40 CFR Part 761? If so:
Yes__ No__ N/A__ RMK#__
 - a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)]
Yes__ No__ N/A__ RMK#__

- 6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)]
Yes__ No__ N/A__ RMK#__

- 7. Does the owner/operator of a treatment facility that claims the debris is excluded from regulation as a hazardous waste under 3745-51-03(F)(1) maintain the following information?
Yes__ No__ N/A__ RMK#__
 - a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)]
Yes__ No__ N/A__ RMK#__

 - b. Records of key operating parameters of the treatment unit?

[3745-270-07(D)(3)(b)]

Yes__NoN/A__RMK#__

- c. A certification statement for each shipment of treated debris?
(See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)]

Yes__NoN/A__RMK#__

8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F)(1) have the following information? [3745-270-07(D)(3)]

Yes__No__N/A__RMK#__

- a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)]

Yes__NoN/A__RMK#__

- b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)]

Yes__NoN/A__RMK#__

- c. Technology used from Table 1? [3745-270-07(D)(1)(c)]

Yes__NoN/A__RMK#__

9. Has the above notification been sent to the director? [3745-270-07(D)(1)]

Yes__No__N/A__RMK#__

REMARKS

TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13? [3745-270-07(B)]

Yes__NoN/A__RMK#__

2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)]

Yes__NoN/A__RMK#__

Note: *No further notification is necessary until such time that the waste changes or the receiving facility changes.*

3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07? [3745-270-07(B)(3)]

Yes__NoN/A__RMK#__

4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so:**

- a. Has the facility complied with the generator notification/certification requirements?
[Table 1, 3745-270-07(B)(5)]

5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? **If so:**

- a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)], excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)] Yes__NoN/A__RMK# __
- b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4)[3745-270-07(B)(6)] Yes__NoN/A__RMK# __
- c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)] Yes__NoN/A__RMK# __

- 6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)] Yes__NoN/A__RMK# __

- 7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have:
 - a. Copies of all notices and certifications required in 3745-270? Yes__NoN/A__RMK# __
 - b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49? Yes__NoN/A__RMK# __
 - c. The testing frequency specified in the facility's WAP and have they followed the protocol? Yes__NoN/A__RMK# __

REMARKS