



State of Ohio Environmental Protection Agency

Northeast District Office

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

February 13, 2007

RE: EXAL CORPORATION
CEI – LQG
OH0 000 072 173
MAHONING COUNTY
NOTICE OF VIOLATION

Tom Alcaro
Exal Corporation
One Performance Place
Youngstown, OH 44502

CERTIFIED MAIL

Dear Mr. Alcaro:

On January 30, 2007, Robert Almquist, DHWM-NEDO and I inspected Exal for compliance with Ohio hazardous waste laws and regulations found in Chapters 3734 of the Ohio Revised Code (ORC) and 3745 of the Ohio Administrative Code (OAC)

You, Tom Chupak, and Lincoln Scott represented Exal Corporation during the inspection.

Exal Corporation manufactures aluminum aerosol cans and specialty aluminum beverage cans and is a large quantity generator of hazardous waste (LQG).

This letter will explain the violations we found, other general concerns we have, and what you need to do to respond to them. We found the following violations of Ohio's hazardous waste regulations. In order to correct them you must do the following and send me all required information **within 30 days** of the date of this letter:

**1. Personnel Training Requirements
OAC 3745-65-16(A)(1) and (A)(2)**

Facility personnel shall successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with hazardous waste requirements...

[Personnel training] shall include instruction which teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed

No Exal employees are properly trained per this rule. Training for some employees was last done in 2001. Many employees who handle or manage hazardous waste have not been trained at all. To abate this violation, all employees who manage or handle hazardous waste must be trained.

Activities that require training include, **but are not limited to:** adding hazardous waste to or removing hazardous waste from containers, labeling and dating containers, moving/transporting containers around the facility, conducting hazardous waste and emergency equipment inspections, responding to releases/spills of hazardous waste, preparing hazardous waste for shipping, and signing hazardous waste manifests. You must submit copies of documentation showing that these employees have been trained. Such documentation shall include an outline of the training provided and a attendance sheet signed by each of the above employees.

2. Personnel Training Requirements
OAC 3745-65-16(C)

Personnel must take part in an annual review of the initial training.

Exal employees who handle or manage hazardous waste have not been given annual refresher training per this rule. To abate this violation, you must properly train all employees as required in Violation #1 and you must state, in writing, that Exal will adhere to this requirement from now on.

3. Personnel Training (Job Descriptions)
OAC 3745-65-16(D)(2) and (D)(3)

(D)(2): The owner or operator shall maintain the job titles for each position at the facility related to hazardous waste management, and the name of the employee filling each job;

A written job description for each position [related to hazardous waste management] that includes the requisite skill, education, or other qualifications, and duties of personnel assigned to each position;

(D)(3): The owner or operator must maintain 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];

Exal does not have job titles and descriptions for positions involved in handling or management of hazardous waste. To abate this violation, you must create job descriptions that meet all of the elements of this rule and submit copies to this office.

4. Content Contingency Plan (Emergency Coordinators)
3745-65-52 (D)

The contingency plan shall list names, addresses, and phone numbers of all persons qualified to act as emergency coordinator

Exal's contingency plan does not include a list of emergency coordinators per this rule. To abate this violation, you must develop a list of emergency coordinators and submit a copy of the list to this office.

5. Amendment of Contingency Plan
OAC 3734-65-54 (A)(6)

The contingency plan shall be reviewed and immediately amended if necessary, whenever:

Applicable rules are revised...

The facility changes in its design, construction, operation, maintenance, or other circumstances...

Exal's contingency plan has not been revised to incorporate the new building. To abate this violation, the contingency plan must be revised accordingly and you must submit a copy of it to this office.

**6. Content of Contingency Plan– Emergency Equipment
OAC 3734 65-52 (E)**

In addition, the contingency plan shall include the location and a physical description of each [emergency equipment] item on the list, and a brief outline of its capabilities. The list must be kept up to date

Exal's contingency plan does not list the location(s), physical description, and brief outline of capabilities of its emergency equipment. To abate this violation, you must update your contingency plan to include this information and send a copy of it to this office.

**7. Dating of Hazardous Waste Container Labels
OAC 3745-52-34 (A)(2)**

A generator may, for ninety days or less, accumulate and/or conduct treatment of hazardous waste that is generated on site, provided that...The date upon which each period of accumulation...begins is clearly marked and visible for inspection on each container

At the time of the inspection, there were six containers in the mixing room and 2 drums in the lacquer room that had not been marked with the accumulation date. To abate this violation, you must label the drums with the accumulation date, photograph them, and submit the photographs to this office. Please note that the accumulation date is the date in which hazardous waste is first placed in each container.

**8. General Inspection Requirements
OAC 3735-66-74(A)**

The owner or operator shall inspect areas, where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors

No inspection of Exal's less-than-90-day hazardous waste accumulation area was conducted during the week of July 31, 2006, due to the designated inspector being off on vacation. To abate this violation, Exal must explain, in writing, how it intends to prevent this violation from occurring in the future.

**9. Required Equipment (Spill Control)
OAC 3745-65-32(C)**

All facilities shall be equipped with the following equipment... portable fire extinguishers, spill control equipment and decontamination equipment

Exal's emergency equipment inspection logs, from April 2006 to present, indicate that emergency equipment consistent with the facility contingency plan is not available or easily accessible. Furthermore, there is no indication in the logs that actions have been taken to correct this deficiency.

Exal has oil dry, a broom and shovel located near its less-than-90-day accumulation area, but equipment listed in the facility contingency plan (including, but not limited to: absorbent media such as pads and booms, drum repair kit, chemical suits, gloves, etc.) was not.

To abate this violation, you must designate emergency equipment consistent with the facility contingency plan for the hazardous waste accumulation area. The equipment must be located nearby or within the less-than-90-day area. You must send photographs showing that this has been done.

10. Used Oil Storage Requirements for Generators (Labels)
OAC 3745-279-22(C)

Containers and above ground tanks used to store used oil at generator facilities shall be labeled or marked clearly with the words "Used Oil"

There were two drums in the laquer room that were not labeled per this rule. To abate this violation, you must label the drums, photograph them and send the photographs to this office.

11. Labeling of Containers (Satellite Accumulation)
OAC 3745-52-34 (C)(1)(b)

A generator may accumulate...hazardous wastes...at or near any point of generation where wastes initially accumulate, which is under control of the operator of the process generating the wastes...provided he...marks his containers either with the words 'Hazardous Waste' or with other words that identify the contents of the containers

In the new building there were five 5-gallon buckets collecting overflow lacquer from the machines that were not labeled per this rule. To abate this violation, you must properly label these containers, photograph them and submit the photographs to this office.

12. Exception Report
OAC 3745-52-42(A)(1)

A large quantity generator of hazardous waste who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the original transporter shall contact the transporter and/or the owner or operator of the facility to determine the status of the waste

You did not have return copies for manifest #195133 and #1951134. This violation was abated during the inspection when you contacted the Treatment, Storage, and Disposal facility and had them fax the return copies to you.

In addition to the above violation, the following concern must also be addressed:

1. A line operator in the new building explained that excess acetone that has been used to clean printing plates is poured into the container with the rags that are sent off for laundering. This is an illegal method for disposing of spent solvents.

To address this concern, you must properly train all employees who handle solvents and rags on proper disposal methods. You must document that they have been properly trained and submit copies of the documentation to this office.

You may be able to reduce operating costs with waste minimization/pollution prevention practices. The Ohio EPA offers pollution prevention assessments to help you decide which practices would benefit your operations. If you would like to have a pollution prevention assessment or would like more information please contact me. The Office of Compliance Assistance and Pollution Prevention website at <http://www.epa.state.oh.us/ocapp/ocappmain.html> is also a good source of information.

Ohio EPA has the following suggestions that may help reduce material and disposal costs. Ohio EPA offers these suggestions for informational purposes only. You are under no obligation to adopt any of them:

1. Exal may generate enough spent acetone and MEK to make an on-site solvent distillation unit cost effective. On-site distillation of solvent would decrease both solvent purchases and hazardous waste generation. This would require consistent segregation of solvent wastes. Below are links to some information about solvent distillation:

<http://www.epa.state.oh.us/dhwm/pdf/NotifierWinter03.pdf> (p. 3)

<http://www.epa.state.oh.us/dhwm/pdf/NotifierSpring04.pdf> (p. 6)

<http://www.epa.state.oh.us/dhwm/pdf/NotifierFall04.pdf> (p. 3)

<http://www.p2pays.org/ref/24/23606.pdf> (p. 4)

<http://www.epa.state.oh.us/ocapp/p2/fact9.pdf> (p. 3)

2. Currently, hazardous waste at Exal is picked up by your waste hauler once per week. As a large quantity generator of hazardous waste, you have 90-days from the time a waste is first generated to dispose of it. Using a longer interval may reduce your disposal costs by allowing higher-volume pricing and reducing per-pick up charges.
3. Exal generates a lot of empty drums which are managed by your waste hauler. Some material suppliers offer returnable containers (such as totes) for their products. This may be a more cost-effective alternative for container management. It may also be easier from an operations perspective to accumulate waste solvents in totes.
4. Due to the volume of solvents used by Exal, it may be cost effective to have them delivered in bulk to on-site tanks. Furthermore, if on-site solvent distillation proves feasible, the distillation unit(s) could be hard-piped to the tanks which may help reduce the time and expense associated with container handling.
5. 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. Two companies that sell teflon hoses can be found at the links below. Please note that Ohio EPA does not recommend or endorse specific products or companies. The links below are provided for reference purposes only. You should research additional companies that supply these products:

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

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

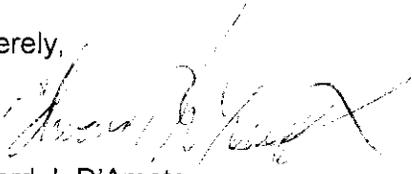
Enclosed are copies of the checklists used for the inspection.

EXAL CORPORATION
FEBRUARY 13, 2007
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Failure to list specific deficiencies in this communication does not relieve Exal Corporation from the responsibility of complying with all applicable Ohio EPA laws and regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Please feel free to contact me at (330) 963-1170 if you have any questions.

Sincerely,



Edward J. D'Amato
Environmental Specialist
Division of Hazardous Waste Management

EJD:ddw

Enclosures

cc: Natalie Oryshkewich, DHWM, NEDO
ec: Frank Popotnik, DHWM, NEDO
Robert Almquist, DHWM, NEDO
Harry Sarvis, DHWM, CO

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

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 No N/A
2. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes No N/A
3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] Yes 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 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 N/A

6. Does the generator accumulate hazardous waste? Yes No N/A

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

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

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

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

NOTE: Complete appropriate checklist for each unit.

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

9. Does the generator export hazardous waste? If so: Yes No N/A
 - a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] Yes No N/A
 - b. Has the generator complied with special manifest requirements? [3745-52-54] Yes No N/A
 - c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] Yes No N/A

d. Has an annual report been submitted to U.S. EPA? [3745-52-56]

Yes No N/A

e. Are export related documents being maintained on-site? [3745-52-57(A)]

Yes No N/A

MANIFEST REQUIREMENTS

10. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes No N/A

11. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Yes No N/A

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

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

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

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 No N/A

14. 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 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 No N/A

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 No N/A

17. 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

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 No N/A

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 No N/A

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.

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

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 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)]

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 No N/A

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 No N/A

29. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes No N/A

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES

30. 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

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)] 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)] 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 3745-65-34(A))? [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)] 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
Some are not labeled
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 ORC§1.44(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 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.

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

USED OIL INSPECTION CHECKLIST (Long Version)

PROHIBITIONS

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

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes ___ No N/A RMK# ___
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes ___ No N/A RMK# ___
6. Does the generator only store used oil in tanks, containers; or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes No N/A ___ RMK# ___
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No N/A ___ RMK# ___
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes ~~___~~ No N/A ___ RMK# ___
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes ___ No N/A RMK# ___
- b. Contained the release? Yes ___ No N/A RMK# ___
- c. Cleaned up and properly managed the used oil and other materials? Yes ___ No N/A RMK# ___
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A RMK# ___
10. Does the generator burn used oil in used-oil 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 a 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#

REMARKS

LDR REQUIREMENTS

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

2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] (possibly also cite 3745-52-11) Yes No N/A ___RMK#___

3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes No N/A ___RMK#___

4. Does the generator generate a characteristic hazardous waste? **If so:** Yes No ___ N/A ___ RMK#___
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes No N/A ___RMK#___

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

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

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

6. Has the generator **correctly** determined if restricted wastes meet or exceed treatment standards? [3745-270-07(A)(1)]

Yes No N/A ___ RMK# ___

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

Yes No N/A ___ RMK# ___

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

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

Yes No ___ N/A RMK# ___

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

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

Yes No ___ N/A RMK# ___

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

Yes ___ No N/A ___ RMK# ___

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

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] **If so:** Yes ___ No ___ N/A RMK# ___
- a. The facility can land dispose of the waste. [3745-270-06]
12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? Yes ___ No N/A ___ RMK# ___
- If so:**
- a. Has the facility complied with 3745-270-04? Yes ___ No N/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? [3745-270-07(A)(2)] Yes No N/A RMK# _____

- 14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1? [3745-270-07(A)(3)] Yes No N/A _____ RMK# _____

- 15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1? [3745-270-07(A)(4)] Yes _____ No N/A RMK# _____

- 16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1? [3745-270-07(A)(9)] Yes _____ No N/A RMK# _____

- 17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] **If so:**
 - a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes _____ No N/A RMK# _____

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

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

REMARKS

GENERATORS TREATING HAZARDOUS WASTE

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. 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.

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

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

8. Has the process/operation generating the waste or the solid waste landfill facility changed? If so: Yes ___ No ___ N/A RMK# ___

- a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] Yes ___ No N/A RMK# ___
- b. Has the director been notified of such changes? [3745-270-09(D)] Yes ___ No N/A RMK# ___

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

- 9. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: Yes ___ No ___ N/A 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# ___
- 10. Does each notification/certification form completed, contain the information found in Table1? [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 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 ___ No N/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 ___ No N/A RMK# ___

8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F) have the following information? [3745-270-07(D)(3)] Yes ___ No N/A RMK# ___
- a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)] Yes ___ No ___ N/A RMK# ___
- b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)] Yes ___ No N/A RMK# ___
- c. Technology used from Table 1? [3745-270-07(D)(1)(c)] Yes ___ No N/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

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 ___ No N/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 ___ No N/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 ___ No N/A RMK# ___

4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so:** Yes ___ No ___ N/A RMK# ___

a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)] Yes ___ No N/A RMK# ___

5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? **If so:** Yes ___ No ___ N/A RMK# ___

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 ___ No N/A RMK# ___

b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4)[3745-270-07(B)(6)] Yes ___ No N/A RMK# ___

c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B))(6)] Yes ___ No N/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 ___ No N/A RMK# ___

7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have: Yes ___ No ___ N/A RMK# ___

- a. Copies of all notices and certifications required in 3745-270? Yes ___ No N/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 ___ No N/A RMK# ___
- c. Followed the testing frequency specified in the facility's WAP? Yes ___ No N/A RMK# ___

REMARKS

Process, Waste, and Pollution Prevention Summary for:

Exal

#	Process	Waste, generation and accumulation details	On-site management	Off-site management	Current pollution prevention	Possible pollution prevention
1	Inner coating of cans	Drips from machine that does inner coating	Collected in bucket under machine then transferred to drum near the line	Chemtron either waste profile 426-02 or 321-05		
2	Line flush with MEK		Collected in bucket on the line then emptied into drum in the mixing room	Chemtron either waste profile 426-02 or 321-05		
3	Line flush with acetone		Collected in bucket on the line then emptied into drum in the mixing room	Chemtron either waste profile 426-02 or 321-05		
4	Overflow of lacquer from line		Collected in bucket on line then transferred to drum in the mixing	Chemtron either waste profile 426-02 or 321-05		

			room			
5	Cleaning of printing plates with acetone? and rags	Waste liquid left in pan after cleaning (not always generated when cleaning)	Poured in drum with rags that will go to laundry			
6	Two parts washers in the mixing room	Waste MEK	Emptied into drum in the mixing room	Chemtron either waste profile 426-02 or 321-05		
7	Four parts washers outside of mixing room: 1) cleaning cones used with epoxy, 2) cones with P.A.M., 3) filters with epoxy, 4) filters with P.A.M.	Liquid waste 1425 solvent and sludge from these parts washers		Chemtron either waste profile 426-02 or 321-05		
8	Cleaning of dust off of machines	Paper rags				
9	Cleaning (including cleaning of machines	Cloth rags	Covered rag cans throughout plants, then	Go to laundry		

	using acetone and rags used in the mixing room)		transferred to drums in the lacquer room			
10	Ink mixing room	Empty cans	Put into trash can, then picked up by cleaning service (S+K Cleaners)			
11	Ink mixing room	If get cans that have waste ink in them they put those on a pallet in the lacquer room				
12	Washing of cans before interior coating	Wash and rinse water	Goes to separator and then discharged to sanitary sewer			
13	Washing of cans before interior coating	Sludge from wash and rinse water separator		Shipped to PennOhio as nonhazardous pit sludge		
14	Lighting	Waste light bulbs and tubes		Shipped to PennOhio as universal waste		

15	Cleaning of inside lining and printing	Waste naphtha solvent		Shipped to Chemical Solvents as not RCRA regulated		
16	Parts washers – one on each line, one at maintenance shop, one in machine shop			Shipped to Safety-Kleen?		
17	machine maintenance	Used oil		Shipped to PennOhio		
18	Chemical use	Empty drums and pails		Shipped to PennOhio		
19	Dust control	Baghouse dust and filters		Shipped to PennOhio as non hazardous		
20	Aerosol can use	Empty aerosols		Disposed with solid waste (regular trash)		
21	Machine shop	Used water-soluble way oil and coolant	Stored in drum in machine shop	Shipped to PennOhio as used oil		
22	Manufacturing Aluminum cans	Off spec. cans		Compacted and sent to Niles Iron		
23	Packaging	cardboard		recycled		

E-mail this completed form to tammy.mccconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM		For Ohio EPA use only																																																																																																											
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3. Site Name	Name: <u>Exal Corporation</u>		Website (optional):																																																																																																											
4. Site Location Information	Street Address: <u>One Performance Place</u> City, Town, or Village: <u>Youngstown</u> State: <u>OH</u> County Name: <u>Mahoning</u> Zip Code: <u>44502</u>																																																																																																													
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7. Facility Representative: Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	<table border="1" style="width: 100%;"> <tr> <td>First Name: <u>Tom Chupak</u></td> <td>MI:</td> <td>Last Name: <u>Chupak</u></td> </tr> <tr> <td>Phone Number: <u>(330) 744 2367</u></td> <td colspan="2">Phone Number Extension:</td> </tr> <tr> <td colspan="3">E-Mail Address: <u>Tom.Chupak@exal.com</u></td> </tr> <tr> <td>Fax Number: <u>(330) 744-1124</u></td> <td colspan="2">Fax Number Extension:</td> </tr> <tr> <td colspan="3">Street or P.O. Box:</td> </tr> <tr> <td colspan="3">City, Town or Village:</td> </tr> <tr> <td>State:</td> <td>Country:</td> <td>Zip Code:</td> </tr> </table>			First Name: <u>Tom Chupak</u>	MI:	Last Name: <u>Chupak</u>	Phone Number: <u>(330) 744 2367</u>	Phone Number Extension:		E-Mail Address: <u>Tom.Chupak@exal.com</u>			Fax Number: <u>(330) 744-1124</u>	Fax Number Extension:		Street or P.O. Box:			City, Town or Village:			State:	Country:	Zip Code:																																																																																						
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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.	<table border="1" style="width: 100%;"> <tr> <td colspan="2">A. Name of Site's Legal Owner:</td> <td colspan="6">Date Became Owner (mm/dd/yyyy):</td> </tr> <tr> <td>Owner Type: Mark with an X</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><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td colspan="9">Street or P.O. Box:</td> </tr> <tr> <td colspan="4">City, Town, or Village:</td> <td colspan="5">Owner Phone #:</td> </tr> <tr> <td colspan="3">State:</td> <td colspan="2">Country:</td> <td colspan="4">Zip Code:</td> </tr> <tr> <td colspan="2">B. Name of Site's Operator:</td> <td colspan="7">Date Became Operator (mm/dd/yyyy):</td> </tr> <tr> <td>Operator Type: Mark with an X</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><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td colspan="9">Street or P.O. Box:</td> </tr> <tr> <td colspan="4">City, Town, or Village:</td> <td colspan="5">Operator Phone #:</td> </tr> <tr> <td colspan="3">State:</td> <td colspan="2">Country:</td> <td colspan="4">Zip Code:</td> </tr> </table>			A. Name of Site's Legal Owner:		Date Became Owner (mm/dd/yyyy):						Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Street or P.O. Box:									City, Town, or Village:				Owner Phone #:					State:			Country:		Zip Code:				B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):							Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Street or P.O. Box:									City, Town, or Village:				Operator Phone #:					State:			Country:		Zip Code:																	
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A. Hazardous Waste Activities																
(choose only one of the following categories)																
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> 3. Treater, Storer or Disposer of Hazardous Waste															
<input checked="" type="checkbox"/> a. Large Quantity Generator (LQG):	<input type="checkbox"/> 4. Recycler of Hazardous Waste															
<input type="checkbox"/> b. Small Quantity Generator (SQG)	<input type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace															
<input type="checkbox"/> c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/> a. Small Quantity On-site Burner Exemption															
<input type="checkbox"/> d. United States Importer of Hazardous Waste	<input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption															
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/> 6. Underground Injection Control Facility															
B. Universal Waste Activities	C. Used Oil Activities															
<input checked="" type="checkbox"/> 1. Small Quantity Handler of Universal Waste (Indicate types of universal waste generated and/or accumulated (check all boxes that apply):	<input checked="" type="checkbox"/> 1. Used Oil Generator															
<input type="checkbox"/> 2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more).	<input type="checkbox"/> 2. Used Oil Transporter Indicate Type(s) of Activity(ies)															
<input type="checkbox"/> 3. Destination Facility for Universal Waste (Check all boxes below that apply for each of the three types of facilities above.)	<input type="checkbox"/> Transporter															
	<input type="checkbox"/> Transfer Facility															
	<input type="checkbox"/> 3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)															
	<input type="checkbox"/> Processor															
	<input type="checkbox"/> Re-refiner															
	<input type="checkbox"/> 4. Off-Specification Used Oil Burner															
	<input type="checkbox"/> 5. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)															
	<input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Oil															
	<input type="checkbox"/> b. Used Oil to Off-Specification Used Oil Burner															
<table border="1" style="width:100%; border-collapse: collapse;"> <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 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 type="checkbox"/>	<input type="checkbox"/>
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D. Lamps	<input type="checkbox"/>	<input type="checkbox"/>														

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	F003	F005	D035	D002		
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12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

Y/N	Announced?	Additional Facility Representatives:	Tom Alcazar, Lee Lincoln Scott
Y/N	Tanks?	Other comments:	
Y/N	Containers?		

13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
Edward D. Matz	Robert Almyrist	1-3-2007

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

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