



State of Ohio Environmental Protection Agency

**Northeast District Office**

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

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

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

June 27, 2007

**RE: ESAB Welding & Cutting Products, Inc.  
OHD 000821454  
Ashtabula County  
RCRA Large Quantity Generator  
Inspection; Used Oil Inspection  
Notice of Violation for Universal Waste  
Management Requirements**

Jim Beckwith  
Environmental  
ESAB Welding & Cutting Products, Inc.  
3325 Middle Road  
Ashtabula, Ohio 44005-0710

Dear Mr. Beckwith:

On June 12, 2007, Ohio EPA's Division of Hazardous Waste Management (DHWM) and Division of Surface Water(DSW), conducted compliance evaluation inspections (CEI's) of ESAB Welding & Cutting Products, Inc. (ESAB) located at 3325 Middle Road in Ashtabula, Ohio. The purpose of DHWM's inspection was to determine ESAB's compliance with Ohio's hazardous waste laws and rules as adopted under the Ohio Revised Code (ORC) Chapter 3734 and Chapter 3745 of the Ohio Administrative Code (OAC). Ohio EPA was represented by this writer and Virginia Wilson. ESAB was represented by George Gilbert, Cheri Houser and Joe Nagy. Ms. Wilson will follow-up with a separate report.

Enclosed is a copy of the following documents: RCRA Subtitle C Site Identification/Verification Form; RCRA Hazardous Waste Generator Inspection Checklist; Used Oil Inspection Checklist; and Small Quantity Universal Waste Handler Requirements Checklist.

Also, enclosed are the following Universal Waste Management guidance documents: June 2005, Universal Waste Rules for Handlers of Lamps; December 2004, Universal Waste; and January 2007, Fluorescent Lamps: What You Should Know. information on Universal Waste Rules Facility Ground Water Inspection Checklist" completed by Kevin Palombo.

Based upon the information gathered during this inspection, the following represents DHWM's findings.

**ESAB was found in violation of the following Universal Waste management requirements regarding management of spent fluorescent lamps.**

**OAC 3745-273-13(D)(1), Containers or packages of spent lamps must remain closed.**

Jim Beckwith  
ESAB Welding & Cutting Products, Inc.  
June 27, 2007  
Page 2

**One open top, 55 gallon drum, marked with a universal waste label, was storing spent 8 foot lamps. This container failed to be closed.**

**OAC 3745-273-14(E), Containers or packages of spent lamps are to be labeled with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)."**

**The card board shipping packages (cartons) containing spent lamps failed to be marked appropriately.**

**OAC 3745-273-15(C)(1), Mark Universal Waste with the earliest date it became a waste.**

**The containers of spent universal waste lamps failed to be marked with the date the lamps became a waste.**

**Please within thirty (30) days of the date of this letter, e-mail to my attention, digital photos showing that ESAB has corrected the above Universal Waste violations. My e-mail address is: [kris.coder@epa.state.oh.us](mailto:kris.coder@epa.state.oh.us).**

**The following comments are taken from the June 7, 2006, (letter dated July 7, 2006 to Craig King attached) "Results of the RCRA Facility Ground Water Inspection (FGWI) which was conducted by Kevin Palombo. To date, these concerns remain unresolved. These concerns are being brought to your attention and need your immediate response. Please inform me in writing as to ESAB's intent in regard to resolving each of the following concerns.**

- 1) **Several wells that have been decommissioned over the years (MW-214, MW-202A, MW-201, and MW-221) remain on site maps without any reference to the fact that they have been removed. This can be confusing. Please clearly indicate on current site maps which wells were decommissioned along with the date of removal.**
- 2) **All wells that are part of the current ground water monitoring program were noted to be well marked, with good surface seals, caps, and locks. There are many other wells present on site that were installed for various historical and current investigations. For example, seventeen monitoring wells (MW-05-A through MW-05-Q) were installed in May of 2005 as part of a Voluntary Action Program (VAP) petition. These wells were noted to be in good condition, but their well numbers were not clearly marked on the outside casings. Please clearly mark the well numbers on the outside casings of these wells.**
- 3) **Four or five unidentified wells with rusted casings were noted on site southeast of the hazardous waste landfill. These wells, believed to be related to a historical ground water investigation, are not locked and do not have well caps. Please provide locks and well caps for these wells. Also, please clearly add the well numbers on the outside casings of these wells.**

Jim Beckwith  
ESAB Welding & Cutting Products, Inc.  
June 27, 2007  
Page 3

- 4) A nylon cord was used to raise and lower the bailer into the well. ESAB's Ground Water Sampling and Analysis Plan (SAP) states that fluorocarbon resin coated stainless steel, stainless steel wire or other inert line will be used. DDAGW recommends that the stainless steel options or polypropylene cord be used. **Please state how ESAB will resolve this concern.**
- 5) According to the SAP (pg. B-13), one field blank should be collected during each sampling event. This can be an atmospheric blank or an equipment blank. This blank was not collected during the sampling event. **Ohio EPA recommends that ESAB amend this portion of the Ground Water Sampling and Analysis Plan by submitting a letter to Ohio EPA requesting removal of this requirement.**

In addition, enclosed is a March 29, 2007, Interoffice Memorandum from Kevin Palumbo to Kris Coder which includes two additional comments which ESAB needs to resolve.

If you have any questions or you would like to discuss these concerns, please call Kevin Palumbo at (330) 963-1292. Please, at your earliest convenience, submit a response to the above concerns to my attention at Ohio EPA, Northeast District Office, Division of Hazardous Waste Management, 2110 East Aurora Road, Twinsburg, Ohio 44087. Also, your response to the above concerns can be e-mailed to my attention at [kris.coder@epa.state.oh.us](mailto:kris.coder@epa.state.oh.us).

Thank you for your cooperation in this matter.

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

Sincerely,



Kris L. Coder  
Environmental Specialist  
Division of Hazardous Waste Management

KLC:cl  
Enclosure

cc: George W. Gilbert, ESAB, Plant Manager

ec: Natalie Oryshkewych, DHWM, NEDO  
Harry Sarvis, DHWM, CO  
Kevin Palumbo, DDAGW, NEDO  
Virginia Wilson, DSW, NEDO

---

**RCRA HAZARDOUS WASTE GENERATOR  
INSPECTION CHECKLIST for June 12, 2007 For  
ESAB Welding & Cutting Products**

---

\*\*\*\*\*

**PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY**

This inspection was conducted as a joint wastewater (Division of Surface Water) and RCRA hazardous waste inspection. Virginia Wilson, Division of Surface Water, did the Wastewater side of the inspection. The inspection was unannounced. The following environmental personnel were not available, Jim Beckwith and Chuck Larson. They were offsite receiving training, EHS training in Florence, SC. George Gilbert, Plant Manager and Cheri Houser, Human Resources, assisted us during the inspection. Also, assisting us was Joe Nagy, Maintenance Supervisor, and Autumn who is an operator in the wastewater treatment plant.

Facility makes welding wire. The raw material is steel coils. They draw the wire using various size dies and lubricants. Prior to drawing the steel coils are cleaned by acid pickling. A copper coating is applied to some wire as it passes through a copper sulfate solution. The facility has a wastewater treatment system under NPDES permit. ESAB is pursuing a VAP cleanup of the site and Kevin Svitana is the lead CP. RCRA unit, such as the closed landfill, are not part of the VAP clean up.

ESAB submitted an annual hazardous waste report for 2006. As part of the report ESAB has identified as a LQG quantity generator of hazardous waste. Much of ESAB's ongoing production wastes are treated onsite in its wastewater treatment system. The majority of the wastes reported in the 2006 annual report appear to be small quantities of miscellaneous wastes such as waste flammable liquids, spent pickle liquor, spent caustic liquid, waste oxidizing liquid containing silver nitrate, waste phosphorus pentoxide, waste zinc dust, waste aerosol cans, waste paint related material, waste calcium hypochlorite, waste calcium carbide, and waste potassium hydroxide solution. Previous inspections have shown that, although ESAB is acting as a LQG of hw, they are more likely a SQG. ESAB is a used oil generator and a Universal Waste generator of spent fluorescent bulbs. ESAB's former hw <90 day accumulation area was located in a bay adjacent to the wastewater treatment unit. It is now used to stage spent UW lamps and other non-haz wastes. The current <90 day accumulation area is now in the building adjacent to and just north of the office. A closed landfill exists on-site. It resulted from the closure of former hw impoundments. OEPA acknowledged closure of these units on 07/06/94. Waste in the landfill includes F006, K062 (K063 is no longer listed.). The landfill is under post-closure care and maintenance and semi-annual gw monitoring. On the date of this inspection Ohio EPA noted a closed and locked gate to the landfill and the required posted warning signs on the fence. These were noted while we walked the discharge ditch of the wastewater treatment facility. From observations outside the fence, the grass cover looked good with no obvious erosion or slumping noted.

ESAB's P2 activities were noted as follows: ESAB participates in a fluorescent bulb recycle program; scrap wire is sorted and segregated into green scrap wire bins located throughout the facility and is sold offsite to a local scrap recycler, Weingold; a wire descaling process eliminates the use of stronger chemicals, high pressure water is used to descale the metal wire which generates a metal scale which is recycled offsite to the metal scrap recycler; "mother tanks" contain raw materials which are used in the wire manufacturing process, these tanks allow raw materials to recirculate which helps minimize the amount of wastes generated; wood pallets are sold to a wood pallet recycler. During the inspection of the manufacturing portion of the facility we noted a blue, satellite drum of aerosol cans in the Maintenance Department that was marked appropriately and closed; a green drum of used oil marked "used oil" was noted in the Oil Room; spent fluorescent lamps were noted in cardboard shipping containers stored in the bay adjacent to the wastewater treatment plant. The wastewater treatment filter cake was noted in the roll-off box below the filter press in the wastewater treatment plant. The filter cake is managed as non-haz waste and is shipped off-site to a local landfill, Geneva Landfill. In the current <90 day hw accumulation area four, 55 gallon drums of spent chromic acid were noted. These drums were labeled and had dates of accumulation of 4/24/07. Mr. Gilbert showed me a drum inventory log that is maintained at this location.

**LARGE QUANTITY GENERATOR REQUIREMENTS**

**GENERAL REQUIREMENTS**

- 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes  No  N/A \_\_\_ RMK# \_\_\_
- 2. Has the generator obtained an identification number? [3745-52-12] Yes  No  N/A \_\_\_ RMK# \_\_\_
- 3. Were annual reports filed with Ohio EPA on or before March 1<sup>st</sup>? [3745-52-41] Yes  No  N/A \_\_\_ RMK# \_\_\_

**WASTE IMPORT/EXPORT REQUIREMENTS**

- 4. Does the generator import or export hazardous waste? If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
  - a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] Yes \_\_\_ No  N/A  RMK# \_\_\_

- b. Has the generator complied with special manifest requirements? [3745-52-54] Yes \_\_\_ No  N/A  RMK# \_\_\_
- c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] Yes \_\_\_ No  N/A  RMK# \_\_\_
- d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes \_\_\_ No  N/A  RMK# \_\_\_
- e. Are export related documents being maintained on-site? [3745-52-57] Yes \_\_\_ No  N/A  RMK# \_\_\_

**GENERATOR CLOSURE REQUIREMENTS**

- 5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

- a. Describe the unit(s) which the generator has closed.

The former <90 day hw accumulation is the bay adjacent to the wastewater treatment facility. It is now being used for staging of wastes including UW fluorescent bulbs and non-hazardous wastes. The current location of the <90 day hw accumulation area is described above.

- b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

- c. Please provide a description of the documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standards.

**NOTE: 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]**

## REMARKS

**MANIFEST REQUIREMENTS** No hazardous waste manifests were reviewed during this inspection. A records review will be conducted during the next inspection. It is anticipated that a records review will be part of the next inspection which will be conducted in the near future following the plant shut down in July.

**NOTE:** *While the statement is a certification that a P2 strategy is in place, signing the statement does not establish any legal obligations with which the company must comply. In other words, there is no violation of the hazardous waste rules if they sign the manifest and they don't have a program in place.*

1. 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  RMK#\_\_\_

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

**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)]*

3. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] Yes \_\_\_ No  N/A  RMK#\_\_\_

**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)].*

4. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: Yes\_\_\_ No\_\_\_ N/A  RMK#\_\_\_

a. 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  RMK#\_\_\_

5. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] Yes \_\_\_ No  N/A  RMK#\_\_\_

6. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: Yes\_\_\_ No\_\_\_ N/A  RMK#\_\_\_

a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)]

Yes \_\_\_ No  N/A  RMK# \_\_\_

b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]

Yes \_\_\_ No  N/A  RMK# \_\_\_

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

Yes  No  N/A \_\_\_ RMK# \_\_\_

**REMARKS**

**PERSONNEL TRAINING** No personnel training records were reviewed as part of this inspection. Current environmental management personnel were offsite receiving training. It is anticipated that a records review will be part of the next inspection which will be conducted in the near future following the plant shut down in July.

1. Does the generator keep records required by 3745-65-16(D) including:
- a. Job titles, as they relate to hazardous waste management, and the name of each employee filling each job? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
  - b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
  - c. Type and amount of both introductory and continuing training to be given to each person filling a position? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
  - d. Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

**NOTE:** *If the facility's business practices precludes written job titles/descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.*

2. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
3. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]
- a. Emergency procedures? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
  - b. Emergency equipment? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
  - c. Emergency systems? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

4. Does emergency training described in 3(a), (b) and (c) above include, *where applicable*: [3745-65-16(A)(3)(a-f)
- a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- b. Key parameters for automatic waste feed cut-off systems? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- c. Communication or alarm system? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- d. Response procedures for fire/explosions? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- e. Response to groundwater contamination incidents? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- f. Shutdown procedures? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
5. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
6. 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 \_\_\_ RMK# \_\_\_
7. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
8. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
9. 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 \_\_\_ RMK# \_\_\_
10. **Optional:** 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 manifests, etc.

**Job Performed**

**Name of Employee**

**Date(s)Trained**

**REMARKS**

**CONTINGENCY PLAN**      The plan was not specifically reviewed as part of this inspection. It is anticipated that a records review will be part of the next inspection which will be conducted in the near future following the plant shut down in July.

- 1. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]
  - a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste?      Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
  - b. Arrangements/agreements with emergency authorities? [3745-65-37]      Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
  - c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator?      Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
  - d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities?      Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
  - e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary?      Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

**NOTE:** *If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 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)]*

- 2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]      Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- 3. 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 \_\_\_ RMK# \_\_\_

4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

#### EMERGENCY COORDINATOR

5. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes  No  N/A \_\_\_ RMK# \_\_\_  
George Gilbert is the EC

**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*

6. 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 \_\_\_ RMK# none reported by facility reps.
- a. Was the contingency plan implemented? [3745-65-51(B)] Yes \_\_\_ No  N/A  RMK# \_\_\_
- b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes \_\_\_ No  N/A  RMK# \_\_\_
- 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  RMK# \_\_\_

**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.*

#### REMARKS

**PREPAREDNESS AND PREVENTION [3745-52-34(A)(4)]**

1. 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 \_\_\_RMK#\_\_\_
2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]
- a. Internal alarm system? Yes  No  N/A \_\_\_RMK#\_\_\_
- b. Emergency communication device? Yes  No  N/A \_\_\_RMK#\_\_\_
- c. Portable fire control, spill control and decon equipment? Yes  No  N/A \_\_\_RMK#\_\_\_
- d. Water of adequate volume/pressure? Yes  No  N/A \_\_\_RMK#\_\_\_
3. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes  No  N/A \_\_\_RMK#\_\_\_
4. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33] Yes  No  N/A \_\_\_RMK#\_\_\_
5. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32*)? [3745-65-34] Yes  No  N/A \_\_\_RMK#\_\_\_
6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes  No  N/A \_\_\_RMK#\_\_\_
7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes  No  N/A \_\_\_RMK#\_\_\_
- a. Where authorities have declined to enter into arrangements/agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes \_\_\_ No  N/A  RMK#\_\_\_

## REMARKS

### GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] Yes  No  N/A \_\_\_ RMK# \_\_\_

### SATELLITE ACCUMULATION AREA REQUIREMENTS [3745-52-34(C)(1)]

2. Does the generator ensure that satellite accumulation area(s):
- During this inspection of the manufacturing portion of the facility a satellite accumulation area for empty aerosol cans was noted located in the Maintenance Shop. See comments in the summary above.
- a. Are at or near a point of generation? Yes  No  N/A \_\_\_ RMK# \_\_\_
- b. Are under the control of the operator of the process generating the waste? Yes  No  N/A \_\_\_ RMK# \_\_\_
- c. Do not exceed a total of 55 gallons of hazardous waste? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- d. Do not exceed one quart of acutely hazardous waste at any one time? Yes \_\_\_ No  N/A  RMK# \_\_\_
- e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? Yes  No  N/A \_\_\_ RMK# \_\_\_

**NOTE:** *The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to Ohio EPA's November 1994 Guidance on the Location of Satellite Accumulation Areas.*

3. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so: Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? Yes \_\_\_ No  N/A  RMK# \_\_\_

b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded?

Yes \_\_\_ No  N/A  RMK# \_\_\_

**USE AND MANAGEMENT OF CONTAINERS** Four hazardous waste drums were noted in the current <90 day hw accumulation area. See comments above.

4. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]

Yes  No  N/A \_\_\_ RMK# \_\_\_

5. Is the accumulation date on each container? [3745-52-34(A)(2)]

Yes  No  N/A \_\_\_ RMK# \_\_\_

6. Are hazardous wastes stored in containers which are:

a. Closed (except when adding/removing wastes)? [3745-66-73(A)]

Yes  No  N/A \_\_\_ RMK# \_\_\_

b. In good condition? [3745-66-71]

Yes  No  N/A \_\_\_ RMK# \_\_\_

c. Compatible with wastes stored in them? [3745-66-72]

Yes  No  N/A \_\_\_ RMK# \_\_\_

d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]

Yes  No  N/A \_\_\_ RMK# \_\_\_

7. Is the container accumulation area(s) inspected weekly? [3745-66-74] (*Note location in general information section of checklist*)

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_ It is anticipated that a records review will be part of the next inspection which will be conducted in the near future following the plant shut down in July.

a. Are inspections recorded in a log or summary? [3745-66-74]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_ It is anticipated that a records review will be part of the next inspection which will be conducted in the near future following the plant shut down in July.

8. For ignitable and/or reactive hazardous waste(s):

- a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes \_\_\_ No  N/A  RMK# \_\_\_
- b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] Yes \_\_\_ No  N/A  RMK# \_\_\_

**PRE-TRANSPORT REQUIREMENTS** These requirements were not reviewed as part of this inspection.

9. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
10. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
11. 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 \_\_\_ RMK# \_\_\_

C:\Documents and Settings\KCoder\My Documents\Folder\esabcklist0607.wpd

**REMARKS**

It is anticipated that an inspection records review for the closed landfill will be part of the next inspection which will be conducted in the near future following the plant shut down in July.

## USED OIL INSPECTION CHECKLIST (Short Version)

ESAB USED Oil Inspection on 6/12/2007

**NOTE:** *This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.*

### PROHIBITIONS

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

### USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes \_\_\_ No  N/A  RMK# \_\_\_
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes  No  N/A \_\_\_ RMK# \_\_\_ One green, 55 gallon drum of used oil marked "used oil" was noted in the ESAB's Oil Room.
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# \_\_\_ No used oil release was noted during this inspection.
- b. Contained the release? Yes \_\_\_ No  N/A  RMK# \_\_\_

- c. Cleaned up and properly managed the used oil and other materials? Yes \_\_\_ No  N/A  RMK# \_\_\_
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes \_\_\_ No  N/A  RMK# \_\_\_
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes \_\_\_ No  N/A  RMK# \_\_\_
- b. Is the heater designed to have a maximum capacity of not more that 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 an U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes  No  N/A \_\_\_ RMK# \_\_\_

#### USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes \_\_\_ No  N/A  RMK# \_\_\_
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes \_\_\_ No  N/A  RMK# \_\_\_
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes \_\_\_ No  N/A  RMK# \_\_\_

#### WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes  No  N/A \_\_\_ RMK# \_\_\_

C:\Documents and Settings\KCoder\My Documents\Folder\esabusedoilcllist0607.wpd

#### REMARKS

**SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS**

For ESAB on inspection of June 12, 2007.

**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**

onsite during this inspection.

No UW batteries were noted

**UNIVERSAL WASTE BATTERIES**

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

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

Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

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

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

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

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

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

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

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

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

### **UNIVERSAL WASTE LAMPS**

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

Cartons of UW lamps were being stored in the former <90 day hw accumulation area (bay) adjacent to the wastewater treatment facility. One open top drum marked with a universal waste label was storing spent 8 foot lamps. It was not closed.

Yes x No  N/A \_\_\_ RMK# \_\_\_

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

Yes \_\_\_ No x N/A \_\_\_ RMK#  
Spent lamps were in original shipping cartons and one open drum that was not closed. The drum was marked with a Universal Waste label. The cartons were not marked and dated.

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#  
See remarks above.

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

### ACCUMULATION TIME

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

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

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes \_\_\_ No  N/A \_\_\_ RMK#  
Cartons were not dated.
- 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# See remarks above.
- 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#  
Lamps accumulate in the former <90 day hw accumulation area.

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# \_\_\_

### **RESPONSE TO RELEASES**

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

Yes \_\_\_ No  N/A  RMK# \_\_\_  
Ohio EPA did not note any release of lamps.

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

Yes \_\_\_ No  N/A  RMK# \_\_\_

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

Yes \_\_\_ No  N/A  RMK# \_\_\_

### **OFF-SITE SHIPMENTS**

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

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

Yes  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# \_\_\_  
The shipping requirements were not evaluated as part of this inspection.

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 x RMK#\_\_\_
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes\_\_\_ No\_\_\_ N/A x 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:
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes\_\_\_ No\_\_\_ N/A x 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 x 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 x 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 x RMK#\_\_\_

### **EXPORTS**

24. Is waste being sent to a foreign destination? If so: Yes\_\_\_ No x N/A x 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 x 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 x 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 x RMK#\_\_\_

**REMARKS**

management is being provided as part of this report.

**Guidance information on lamp**

	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE</b> <b>IDENTIFICATION/VERIFICATION FORM</b>	For Ohio EPA use only
--	---	-----------------------

E-mail this completed form to [tammy.mcconnell@epa.state.oh.us](mailto:tammy.mcconnell@epa.state.oh.us) or mail it to Tammy McConnell, Central Office

<b>Site EPA ID No.</b>	<b>EPA ID Number:</b> OHD000821454
------------------------	------------------------------------

<b>Site Name</b>	<b>Name:</b> ESAB Welding and Cutting Products Inc.	<b>Website:</b> (Optional)
------------------	---	----------------------------

<b>Site Location Information</b>	<b>Street Address:</b> 3325 Middle Rd	
	<b>City, Town, or Village:</b> Ashtabula	<b>State:</b> OH
	<b>County Name:</b> Ashtabula	<b>Zip Code:</b> 44004

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

<b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>				
--	--	--	--	--

<b>Facility Representative</b>  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	<b>First Name:</b> Jim		<b>MI:</b>	<b>Last Name:</b> Beckwith		
	<b>Phone Number:</b> (843) 673-7769			<b>Phone Number Extension:</b>		
	<b>E-Mail Address:</b> <a href="mailto:jbeckwith@esab.com">jbeckwith@esab.com</a>					
	<b>Fax Number:</b> (440) 992-1219			<b>Fax Number Extension:</b>		
	<b>Street or P.O. Box:</b> Same as location					
	<b>City, Town or Village:</b>					
	<b>State:</b>		<b>Country:</b>		<b>Zip Code:</b>	

<b>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</b>	<b>Name of Site's Legal Owner:</b> Charter PLC				<b>Date Became Owner (mm/dd/yyyy):</b> 08/20/1987				
	<b>Owner Type:</b>	<b>Private</b> x <input type="checkbox"/>	<b>County</b> <input type="checkbox"/>	<b>District</b> <input type="checkbox"/>	<b>Federal</b> <input type="checkbox"/>	<b>Indian</b> <input type="checkbox"/>	<b>Municipal</b> <input type="checkbox"/>	<b>State</b> <input type="checkbox"/>	<b>Other</b> <input type="checkbox"/>
	<b>Street or P.O. Box:</b> 52 Grosvenor Gardens								

<b>City, Town or Village:</b> London SW1W	<b>Owner Phone #:</b> (843) 673-7769
<b>State:</b> OH	<b>Country:</b> England <b>Zip Code:</b> 44004

<b>Name of Site's Operator:</b> George Gilbert					<b>Date Became Operator (mm/dd/yyyy):</b> 3/10/2005				
<b>Owner Type:</b>	<b>Private</b> x <input type="checkbox"/>	<b>County</b> <input type="checkbox"/>	<b>District</b> <input type="checkbox"/>	<b>Federal</b> <input type="checkbox"/>	<b>Indian</b> <input type="checkbox"/>	<b>Municipal</b> <input type="checkbox"/>	<b>State</b> <input type="checkbox"/>	<b>Other</b> <input type="checkbox"/>	

<b>Street or P.O. Box:</b> 3325 Middle Rd	
<b>City, Town or Village:</b> Ashtabula	<b>Operator Phone #:</b> (440) 992-4412
<b>State:</b> OH	<b>Country:</b> USA <b>Zip Code:</b> 44004

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

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

<b>Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)</b>	
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Underground Injection Control Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption

**Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply))**

<input checked="" type="checkbox"/> <b>Small Quantity Handler of Universal Waste</b>	<input type="checkbox"/> <b>Large Quantity Handler of Universal Waste</b> (accumulates 5,000 kg. or more)
<input type="checkbox"/> <b>Destination Facility for Universal Waste</b>	

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

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

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

<b>Announced</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Additional Facility Representatives:</b>	<b>George Gilber, Plant Manager; Cheri Houser, Human Resources; Joe Nagy, Maintenance Supervisor</b>
<b>Tanks</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Other Comments:</b> Joint RCRA hazardous waste and Surface Water inspection. ESAB has a closed landfill which is under operational controls through a Hazardous Waste Facility Post Closure Plan Former Lime Pond and Associated Impoundment, prepared for the ESAB Group, Inc. on July 2002 by DLZ Ohio, Inc. This Operations/Maintenance Plan includes semi-annual gw monitoring.	
<b>Containers</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		

<b>Name of Inspector(s)</b>	<b>Name of Inspector(s)</b>	<b>Date of Inspection/Time (mm/dd/yyyy) (hh:mm)</b>
<b>Kris Coder</b>	<b>Virginia Wilson, DSW</b>	<b>June 12, 2007; 10:00 a.m.</b>

**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.

<b>Signature of Owner, Operator, or an Authorized Representative</b>	<b>Name and Title (Print)</b>	<b>Date (mm/dd/yyyy)</b>