



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

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www.epa.state.oh.us

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

August 23, 2007

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mike Bell
Technology Projects Manager
Etna Products Inc.
16824 Park Circle Drive
Chagrin Falls, OH 44023

**RE: ETNA PRODUCTS INC., OHD004224036, GEAUGA COUNTY, RCRA/LQG,
COMPLIANCE EVALUATION INSPECTION, NOTICE OF VIOLATION**

Dear Mr. Bell:

On June 21, 2007, and June 22, 2007, Ohio EPA Division of Hazardous Waste Management (DHWM) conducted a compliance evaluation inspection at the Etna Products (Etna) facility located at 16824 Park Circle Drive in Chagrin Falls, Ohio. Etna is a manufacturer of specialty chemicals and lubricants for the metal working industry and qualifies as a Used Oil Processor and Large Quantity Generator (LQG) of hazardous waste. Hazardous waste generated at the facility includes resin production solvent wastes (D001, D035, F003), and spent trichloroethylene (D040, F001).

The purpose of this inspection was to determine Etna's compliance with Ohio's hazardous waste laws and regulations as found under the Ohio Revised Code and Ohio Administrative Code ("ORC" and "OAC" respectively). Etna was represented by you and Dennis Broadwater, the Production Manager while Ohio EPA was represented by me. Ohio EPA's inspection included an inspection of the Etna facility and a review of written documentation.

Based on this inspection, Ohio EPA has determined that Etna has violated the following state hazardous waste, universal waste and used oil regulations:

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

At the time of this inspection, Ohio EPA observed two open five-gallon satellite accumulation containers of hazardous waste located outside of the door to the laboratory. One container was labeled as "trichlor waste" while the other container was labeled as "titration waste".

Upon being informed of the container management regulations, the facility immediately instructed an employee to close both containers. Ohio EPA therefore considers this violation abated and no further action is required.

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

- A. At the time of this inspection, Ohio EPA observed one tote of spent wash solvent was not labeled with the words "Hazardous Waste".

Upon being informed of this violation of hazardous waste regulations, Etna immediately labeled the container with an accumulation date. Ohio EPA therefore considers this violation abated.

- B. At the time of this inspection, Ohio EPA observed one container of TCE waste (D040, F001) was not labeled with an accumulation date.

Upon being informed of this violation of hazardous waste regulations, Etna immediately labeled the container with an accumulation date. Ohio EPA therefore considers this violation abated.

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

At the time of this inspection, Ohio EPA observed one tote of spent wash solvent was not labeled with the words "Hazardous Waste".

Upon being informed of this violation of hazardous waste regulations, Etna immediately labeled the container with the words "Hazardous Waste". Ohio EPA therefore considers this violation abated.

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

At the time of this inspection, Etna did not have spill control equipment available in the hazardous waste accumulation area located in the receiving warehouse of Building 1.

On June 22, 2007, the second day of the inspection, Ohio EPA observed that Etna provided the appropriate spill control equipment for the hazardous waste accumulation area. Ohio EPA therefore considers this violation abated.

5. **OAC 3745-65-33 Testing and Maintenance of Equipment:** *All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency. The owner or operator must record the inspections in a log or summary.*

At the time of this inspection, Etna was not performing the required inspections of the emergency equipment associated with hazardous waste accumulation areas.

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

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

Etna accumulates hazardous waste on site in containers (drums and totes) to be shipped off site for disposal. Etna has not been performing the required weekly inspections of the hazardous waste accumulation areas and documenting them in a log or summary.

To demonstrate abatement of this violation, Etna must begin performing the weekly inspections of the hazardous waste accumulation areas immediately and log the inspection in an inspection log or summary. AMC must submit to this office, copies of two consecutive weeks of completed inspection log sheets for all hazardous waste accumulation areas on site. Ohio EPA provided Etna with example inspection log sheets at the time of this inspection.

7. **OAC Rule 3745-65-52 Content of Contingency Plan:**

(A) The contingency plan must describe the actions facility personnel must take to comply with rules 3745-65-51 and 3745-65-56 of the Administrative Code in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

(B) If the owner or operator has already prepared a "Spill Prevention, Control, and Countermeasures Plan" in accordance with 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency or contingency plan, he need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of Chapters 3745-65 to 3745-69 and 3745-256 of the Administrative Code.

(C) The contingency plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and Ohio EPA and local emergency response teams to coordinate emergency services, pursuant to rule 3745-65-37 of the Administrative Code.

(D) The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see rule 3745-65-55 of the Administrative Code), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates.

(E) The contingency plan must include a list of all emergency equipment at the facility [such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment] where this equipment is required. This list must be kept up to date. In addition, the contingency plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

(F) The contingency plan must include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).

Etna has a Spill Prevention, Control and Countermeasures (SPCC) Plan, however the plan does not incorporate hazardous waste management provisions that are sufficient to comply with OAC 3745-65-52.

To demonstrate abatement of this violation, please see Violation # 8.

8. **OAC Rule 3745-279-52 (B)(2)(b) Contingency Plan Requirements for Used Oil Processors:** *Owners and operators of used oil processors and re-refiners facilities shall comply with the following requirements:*

Content of contingency plan.

(b) If the owner or operator has already prepared a spill prevention, control, and countermeasures (SPCC) plan in accordance with 40 CFR Part 112, or some other emergency or contingency plan, the owner or operator need only amend that plan to incorporate used oil management provisions that are sufficient to comply with the requirements of Chapter 3745-279 of the Administrative Code.

Etna has a Spill Prevention, Control and Countermeasures (SPCC) Plan, however the plan does not incorporate used oil management provisions that are sufficient to comply with the requirements of OAC 3745-279.

To demonstrate abatement of Violations #7 and #8, Etna must amend the facility SPCC plan to incorporate hazardous waste management provisions required by OAC Rule 3745-65-52 and used oil provisions required by OAC Rule 3745-279-52. Etna will submit a copy of the revised plan to this office for review. Upon approval by Ohio EPA, Etna will send a copy of the amended SPCC plan to all local police departments, fire departments, hospitals, and local emergency response teams that may be requested to provide emergency services. Etna must document that this has been done and submit said documentation to this office.

An example contingency plan was given to you at the time of this inspection and may be found on Ohio EPA's website at:

9. **OAC 3745-65-16 (A)(B)(C) Personnel training:**
- (A) (1) *Facility personnel /must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Chapters 3745-65 to 3745-69 and 3745-256 of the Administrative Code. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (D)(3) of this rule.*
- (2) *This program /must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures, (including, but not limited to, contingency plan implementation), relevant to the positions in which they are employed.*
- (3) *At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with*

emergency procedures, emergency equipment, and emergency systems, including, where applicable;

- (a) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;*
- (b) Key parameters for automatic waste feed cut-off systems;*
- (c) Communications or alarm systems;*
- (d) Response to fires or explosions;*
- (e) Response to ground water contamination incidents; and*
- (f) Shutdown of operations.*

- (B) Facility personnel must successfully complete the program required in paragraph (A) of this rule within six months after January 7, 1983 or six months after the date of their employment or assignment to a facility, or to a new position at a facility, whichever is later. Employees hired after January 7, 1983 must not work in unsupervised positions until they have completed the training requirements of paragraph (A) of this rule.*
- (C) Facility personnel must take part in an annual review of the initial training required in paragraph (A) of this rule.*

At the time of this inspection, Etna did not have a hazardous waste training program that included annual refresher training in the facility hazardous waste contingency plan implementation.

To demonstrate compliance, Etna will submit to this office documentation that all employees involved with hazardous waste management have been trained in the revised and approved hazardous waste management portion of the facility SPCC plan. Etna must also submit a statement indicating that the facility will include annual refreshers of the hazardous waste training to all employees involved in the management of hazardous waste.

10. **OAC 3745-65-16 (D) Job Titles and Descriptions:**

The owner or operator shall/must maintain the following documents and records at the facility:

(1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;

(2) A written job description for each position listed under paragraph (D)(1) of this rule. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but shall/must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;

(3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (D)(1) of this rule; and

(4) Records that document that the training or job experience required under paragraph (A), (B), and (C) of this rule has been given to, and completed by, facility personnel.

At the time of this inspection, Etna did not have job titles and descriptions for all positions involved in hazardous waste management at the facility.

To demonstrate compliance, Etna must develop job titles and descriptions for all positions involved in hazardous waste management. An example of job titles and descriptions was given to you at the time of this inspection. The facility will submit to this office:

- A list of positions that manage hazardous waste.
- A **list of employees which fill each position** that manages hazardous waste.
- Job titles and descriptions for **each position** involved in hazardous waste management, which meet the requirements of OAC 3745-65-16 (D) (1) through (4).

Please note - The job descriptions should make clear who has the duty to inspect hazardous waste accumulation areas and emergency equipment, to label, date and close hazardous waste containers, to sign manifests, to submit annual reports and any other duties regarding the management of hazardous waste.

Example job titles and descriptions may be found on Ohio EPA's website at:

<http://www.epa.state.oh.us/dhwm/SamplePersonnelTraining.doc>

11. **OAC 3745-279-52 (A)(5) Required Aisle Space:** *The owner or operator shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.*

At time of this inspection, Ohio EPA observed that Etna did not maintain adequate aisle space in the used oil storage area of the warehouse to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment in an emergency.

To demonstrate abatement of this violation, Etna must submit to this office documentation in the form of photographs demonstrating that containers of used oil are being managed in the warehouse with appropriate aisle space to allow for the unobstructed movement of personnel and emergency equipment in the event of an emergency.

12. **OAC 3745-279-54 (C) Secondary containment for containers:** *Secondary containment for containers. Containers used to store or process used oil at processing and re-refining facilities must be equipped with a secondary containment system.*

(1) *The secondary containment system must consist of, at a minimum:*

- (a) Dikes, berms or retaining walls; and*
- (b) A floor. The floor must cover the entire area within the dike, berm, or retaining wall; or*
- (c) An equivalent secondary containment system.*

(2) *The entire containment system, including walls and floor, must be sufficiently impervious to used oil to prevent any used oil released into the containment system from migrating out of the system to the soil, ground water, or surface water.*

Etna receives used oil for processing in containers (drums and totes) from its customers. The containers of used oil are stored in the receiving warehouse in Building 1 prior to processing. As a Used Oil Processor, Etna is required to provide a secondary containment system for containers of used oil. At the time of this inspection, Ohio EPA observed that Etna does not provide secondary containment for containers of used oil as required per OAC Rule 3745-279-54.

To demonstrate abatement of this violation, Etna must submit to this office documentation demonstrating that Etna has established a secondary containment system for the used oil container storage area as required per OAC Rule 3745-279-54 (C).

13. **OAC Rule 3745-270-07(A) Testing, Tracking, and Record keeping Requirements for Generators, Treaters, and Disposal Facilities:** *Generators shall retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to this rule for at least three years from the date that the waste that is the subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal.*

At the time of this inspection, Etna did not have on site Land Disposal Restriction (LDR) forms for the following hazardous waste sent off site:

- Xylene, methanol waste (D035, D001, F003) shipped to Chemical Solvents (profile #CSI 020926).
- Waste trichloroethylene (D040, D022, D001) shipped to Chemical Solvents (profile #CSI 18703).
- Waste flammable liquid (D001) shipped to Veolia on hazardous waste manifest #000086620 VES (profile #WIP 398515)

To demonstrate abatement of this violation, Etna must submit to this office copies of the LDR forms for each of the hazardous waste streams listed above.

14. **OAC Rule 3745-279-57 (B) Reporting Requirements for Used Oil Processors:** *Reporting. A used oil processor/re-refiner must report to the director, in the form of a letter, on a biennial basis by March first of each even numbered year, the following information concerning used oil activities during the previous calendar year:*

- (1) The U.S. EPA identification number, name, and address of the processor/re-refiner;*
- (2) The calendar year covered by the report; and*
- (3) The quantities of used oil accepted for processing/re-refining and the manner in which the used oil is processed/re-refined, including the specific processes employed.*

Etna has notified as an LQG of hazardous waste and has been submitting annual hazardous waste reports. However, Etna also operates as a used oil processor, but has not notified the Director of the facilities used oil processing activities or submitted the biennial reports of said activity as required by OAC Rule 3745-279-57.

To demonstrate abatement of this violation, Etna must submit to Ohio EPA's Central Office, a used oil processor report for the calendar year of 2006 which includes all the information outlined above. Please send 2006 Used Oil Processor Biennial report to:

Paula Canter
Ohio EPA DHWM Regulatory and Information Services
P. O. Box 1049
Columbus, Ohio 43216-1049

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Etna must also submit a copy of said report to this office along with a statement from the facility regarding future compliance with the used oil processor biennial reporting requirements.

Ohio EPA has the following concerns which must be addressed.

1. Etna generates a "scrap oil" that is managed in a 2,500 gallon tank prior to being shipped off site to Vexor as a non-hazardous waste (profile #VEX 3884). Ohio EPA requires the following information regarding the generation and management of this waste stream:
 - Etna must provide a discussion regarding how the "scrap oil" is generated.
 - If the "scrap oil" is shipped off site for disposal as a non-hazardous waste (and not recycled as used oil), Etna must submit information/documentation demonstrating how the "scrap oil" is characterized to determine if it is a hazardous waste.
 - Etna must provide information from the receiving facility (Vexor) regarding how the "scrap oil" is disposed, recycled or treated.
 - If the "scrap oil" is shipped off site to be burned for energy recovery, Etna must provide information demonstrating that the "scrap oil" meets the specifications of OAC Rule 3745-279-11.
2. Etna manufactures lubricants and cutting oils for the metal working industry. When contaminated and no longer useable, Etna's customers ship their used oil back to Etna for processing. Per OAC 3745-279-53, the owner or operator of a used oil processing/re-refining facility must determine whether the total halogen content of used oil managed at the facility is above or below one thousand parts per million (ppm). Etna must submit to this office information/documentation regarding how the total halogen content of the used oil received at the facility is determined and whether or not it is processed through a tolling arrangement with the generator (OAC Rule 3745-279-24 (C)).
3. At the time of this inspection, Etna was unaware of the record keeping requirements due to their status as a used oil processor. While the facility was able to pull together some information regarding used oil shipments accepted for processing, not all the required information was accessible at the time of this inspection. Per OAC Rule 3745-279-56 (A) used oil processors must keep a record of each shipment of used oil accepted for processing and must include the following information:

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- (1) The name and address of the transporter who delivered the used oil to the processor/re-refiner;
- (2) The name and address of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining;
- (3) The U.S. EPA identification number of the transporter who delivered the used oil to the processor/re-refiner;
- (4) The U.S. EPA identification number (if applicable) of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining;
- (5) The quantity of used oil accepted; and
- 6) The date of acceptance.

Etna must submit to this office information/documentation regarding how the facility tracks used oil shipments accepted for processing. These records may take the form of a log, invoice, manifest, bill of lading or other shipping documents. Please submit four consecutive weeks of used oil shipments accepted at the facility, demonstrating how Etna is maintaining the required information for each shipment of used oil accepted by the facility for processing.

Enclosed you will find copies of the checklists completed at the time of the inspection. I have also included a copy of Ohio EPA's guidance document titled "Used Oil Processors and Re-Refiners" to assist you in returning to compliance.

Please submit all of the requested documentation to my attention within thirty (30) days of receipt of this letter demonstrating that all issues have been addressed.

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

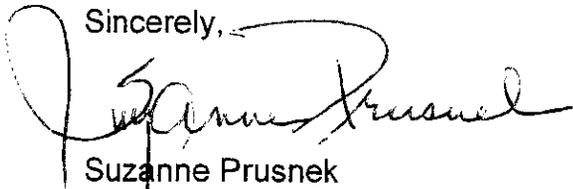
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The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for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

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

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

Sincerely,



Suzanne Prusnek
Environmental Specialist
Division of Hazardous Waste Management

SP:cl

Enclosures

cc: Natalie Oryshkewych, DHWM, NEDO, OEPA
Harry Sarvis, DHWM, CO, OEPA

ec: Frank Popotnik, DHWM, NEDO, OEPA

E-mail this completed form to tammy.mcconnell@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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2. Site EPA ID No. EPA ID Number: OHD004224036

3. Site Name Name: Etna Products, Inc. Website (optional):

4. Site Location Information
 Street Address: 16824 Park Circle Drive
 City, Town, or Village: Chagrin Falls State: OH
 County Name: Geauga Zip Code: 44023

5. Site Land Type (check only one)

Private	County	District	Federal	Indian	Municipal	State	Other
X							

6. NAICS code(s) www.census.gov/epcd/www/naics.html

A. 32551	B.
C.	D.

7. Facility Representative: First Name: Michael MI: T Last Name: Bell
 Phone Number: 440-543-9845 Phone Number Extension:
 E-Mail Address: Mikebell@etna.com
 Fax Number: Fax Number Extension:

Only provide address information if it is different than the site address.
 Street or P.O. Box:
 City, Town or Village:
 State: Country: Zip Code:

8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.

A. Name of Site's Legal Owner:	Date Became Owner (mm/dd/yyyy):																
Ike Tripp	1/01/1990																
Mark with an X	<table border="1"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td align="center">X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>	Private	County	District	Federal	Indian	Municipal	State	Other	X							
Private	County	District	Federal	Indian	Municipal	State	Other										
X																	
Street or P.O. Box: P.O. Box 23609																	
City, Town, or Village:	Owner Phone #:																
Chagrin Falls																	
State: OH	Country: Geauga Zip Code: 44023																
B. Name of Site's Operator:	Date Became Operator (mm/dd/yyyy):																
Same as above																	
Operator Type: Mark with an X	<table border="1"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>	Private	County	District	Federal	Indian	Municipal	State	Other								
Private	County	District	Federal	Indian	Municipal	State	Other										
Street or P.O. Box:																	
City, Town, or Village:	Operator Phone #:																
State:	Country: Zip Code:																

9. Violations Cited? Yes No

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

<input type="checkbox"/> Not Regulated
--

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 type="checkbox"/> 4. Recycler of Hazardous Waste

9. Violations Cited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No						
<input checked="" type="checkbox"/> a. Large Quantity Generator (LQG):	<input type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> b. Small Quantity Generator (SQG)	<input type="checkbox"/> a. Small Quantity On-site Burner Exemption					
<input type="checkbox"/> c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> d. United States Importer of Hazardous Waste	<input type="checkbox"/> 6. Underground Injection Control Facility					
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/> 7. Hazardous Waste Transporter					
B. Universal Waste Activities	C. Used Oil Activities					
<input checked="" type="checkbox"/> 1. Small Quantity Handler of Universal Waste <small>(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):</small>	<input checked="" type="checkbox"/> 1. Used Oil Generator					
<input type="checkbox"/> 2. Large Quantity Handler of Universal Waste <small>(accumulates 5,000 kg or more).</small>	<input type="checkbox"/> 2. Used Oil Transporter Indicate Type(s) of Activity(ies) <input type="checkbox"/> Transporter					
<input type="checkbox"/> 3. Destination Facility for Universal Waste <small>(Check all boxes below that apply for each of the three types of facilities above.)</small>	<input type="checkbox"/> Transfer Facility					
	<input type="checkbox"/> 3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies) <input checked="" type="checkbox"/> Processor <input type="checkbox"/> Re-refiner					
<u>Generated</u> <u>Accumulated</u>						
A. Batteries <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> 4. Off-Specification Used Oil Burner					
B. Pesticides <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> 5. Used Oil Fuel Marketer -					
C. Thermostats <input type="checkbox"/> <input type="checkbox"/>	Indicate Type(s) of Activity(ies)					
D. Lamps <input checked="" type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> a. Marketer Who Directs Shipment of Off- Specification Oil <input type="checkbox"/> b. Used Oil to Off-Specification Used Oil Burner					
11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAinfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.						
D001	D035	D040	F001	F003		
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.						
N	Announced ?	Additional Facility Representatives:				
N	Tanks?	Other comments:				
Y	Containers?					
13. Name of Inspector(s)		Name of Inspector(s)			Date of inspection/ Time (mm-dd-yyyy) (HH:MM)	
Suzanne Prusnek OEPA/DHWM/NEDO					06-21-2007	
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)	

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

USED OIL TRANSPORTER AND TRANSFER FACILITIES

16. Does the used oil transporter process used oil? [3745-279-41(A)] If so: Yes ___ No ___ N/A RMK# ___
- Is the used oil transporter in compliance with the requirements for processors/re-refiners in 3745-279-50 to 3745-279-59 (except as provided in 3745-279-41(B) and (C))? [3745-279-41(A)] Yes ___ No N/A RMK# ___
17. Has the used oil transporter notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-42(A)] Yes ___ No N/A RMK# ___
18. Has the used oil transporter delivered all used oil to:
- a. Another used oil transporter that has a U.S. EPA ID#? [3745-279-43(A)(1)] Yes ___ No N/A RMK# ___
 - b. A used oil processing/re-refining facility that has a U.S. EPA ID#? [3745-279-43(A)(2)] Yes ___ No N/A RMK# ___
 - c. An off-spec used oil burning facility that has a U.S. EPA ID#? [3745-279-43(A)(3)] Yes ___ No N/A RMK# ___
 - d. An on-spec used oil burning facility? [3745-279-43(A)(4)] Yes ___ No N/A RMK# ___
19. Has the used oil transporter complied with all applicable USDOT regulations (49 CFR 171 to 180)? [3745-279-43(B)] Yes ___ No N/A RMK# ___
20. Has the used oil transporter had a discharge of used oil? If so: Yes ___ No ___ N/A RMK# ___
- Did they take the appropriate action as outlined in 3745-279-43(C)? Yes ___ No N/A RMK# ___
21. Has the used oil transporter determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? [3745-279-44(A)] Yes ___ No N/A RMK# ___
22. Does the transporter retain all records of analyses and information used to comply with 3745-279-44 for at least three years? [3745-279-44(D)] Yes ___ No N/A RMK# ___
23. Does the owner/operator of a used oil transfer facility:
- a. Stored used oil in tanks, containers, or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-45(B)] Yes ___ No N/A RMK# ___

- b. Stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-45(C)] Yes ___ No N/A RMK# ___
- c. Provide secondary containment for containers used to store used oil as required by 3745-279-45(D)? [3745-279-45(D)] Yes ___ No N/A RMK# ___
- d. Provide secondary containment for existing aboveground tanks required by 3745-279-45(E)? [3745-279-45(E)] Yes ___ No N/A RMK# ___
- e. Provide secondary containment for new aboveground tanks as required by 3745-279-45(F)? [3745-279-45(F)] Yes ___ No N/A RMK# ___
- f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-45(G)] Yes ___ No N/A RMK# ___
- g. Upon detection of a release of used oil: [3745-279-45(H)]
- i. Stopped the release? Yes ___ No N/A RMK# ___
- ii. Contained the release? Yes ___ No N/A RMK# ___
- iii. Cleaned up and managed the used oil and other materials? Yes ___ No N/A RMK# ___
- iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A RMK# ___
24. Does the used oil transporter keep a record of each shipment of used oil? [3745-279-46(A)] Yes ___ No N/A RMK# ___
- a. Does each record include the name and address of the generator, transporter or processor/re-refiner who provides the used oil for transport? [3745-279-46(A)(1)] Yes ___ No N/A RMK# ___
- b. Does each record include the U.S. EPA ID# of the generator, transporter or processor/re-refiner (if applicable) that provides the used oil for transport? [3745-279-46(A)(2)] Yes ___ No N/A RMK# ___
- c. Does each record include the quantity of used oil accepted? [3745-2679-46(A)(3)] Yes ___ No N/A RMK# ___

- d. Does each record include the date of acceptance? [3745-279-46(A)(4)] Yes ___ No N/A RMK# ___
- e. Does each record include the signature of a representative of the generator, transporter, processor/re-refiner that provided the used oil for transport? [3745-279-46(A)(5)] Yes ___ No N/A RMK# ___
25. Does the used oil transporter keep a record of each shipment of used oil that is delivered to another used oil transporter, burner, processor/re-refiner, or disposal facility? [3745-279-46(B)] Yes ___ No N/A RMK# ___
- a. Does each record include the name and address of the receiving facility or transporter? [3745-279-46(B)(1)] Yes ___ No N/A RMK# ___
- b. Does each record include the U.S. EPA ID# of the receiving facility or transporter? [3745-279-46(B)(2)] Yes ___ No N/A RMK# ___
- c. Does each record include the quantity of used oil delivered? [3745-279-46(B)(3)] Yes ___ No N/A RMK# ___
- d. Does each record include the date delivered? [3745-279-46] Yes ___ No N/A RMK# ___
- e. Does each record include the signature of a representative of the receiving facility or transporter (intermediate rail transporters are not required to sign a record of delivery)? [3745-279-46(B)(5)] Yes ___ No N/A RMK# ___
26. Does the used oil transporter who exports used oil to a foreign country comply with 3745-279-46(B)(1) to (B)(4)? [3745-279-46(C)] Yes ___ No N/A RMK# ___
27. Does the used oil transporter retain all records required under 3745-279-46 for at least three years? [3745-279-46(D)] Yes ___ No N/A RMK# ___
28. Does the used oil transporter generate residues from the storage or transportation of used oil? Yes ___ No ___ N/A RMK# ___
- If so, are they managed as specified in 3745-279-10(E)? [3745-279-47] Yes ___ No N/A RMK# ___

REMARKS

USED OIL STANDARDS FOR PROCESSORS AND RE-REFINERS

29. Has the used oil processor and/or re-refiner notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-51(A)] Yes No N/A ___RMK#___
30. Does the owner/operator of a used oil processing or re-refining facility comply with the following:
- a. Is the facility maintained and operated to minimize the possibility of fire, explosion, or release of used oil? [3745-279-52(A)(1)] Yes No N/A ___RMK#___
 - b. Is the facility equipped with the equipment in 3745-279-52(A)(2), if necessary? Yes No N/A ___RMK#___
 - c. Are all communication systems, alarm systems, fire protection equipment, spill control equipment, and decontamination equipment tested and maintained as required? [3745-279-52(A)(3)] Yes No N/A ___RMK#___
 - d. Is there access to communication or alarm system(s)? [3745-279-52(A)(4)] Yes No N/A ___RMK#___
 - e. Is the required aisle space being maintained? [3745-279-52(A)(5)] Yes ___ No N/A ___RMK#___
 - f. Are arrangements maintained with local authorities? [3745-279-52(A)(6)] Yes No N/A ___RMK#___
31. Has the owner/operator of a used oil processing and re-refining facility complied with the following requirements:
- a. Has a contingency plan been developed? [3745-279-52(B)(1)] *S.P.C. only* Yes ___ No N/A ___RMK#___
 - b. Does the contingency plan contain the requirements of 3745-279-52(B)(2)? Yes ___ No N/A ___RMK#___
 - c. Have copies and revisions been maintained and submitted to all local authorities? [3745-279-52(B)(3)] Yes ___ No N/A ___RMK#___
 - d. Is the contingency plan reviewed and amended whenever one of the events in 3745-279-52(B)(4) occurs? Yes ___ No N/A ___RMK#___
 - e. Is an emergency coordinator on the premises or on call at all times to meet the requirements of 3745-279-52(B)(5) and (6)? Yes No N/A ___RMK#___

32. Does the used oil processor/re-refiner determine whether the total halogen content of the used oil being managed at the facility is above or below 1000 ppm? [3745-279-53(A)] Yes No N/A RMK#
To be determined
33. Does/has the used oil processor/re-refiner:
- a. Only store used oil in tanks, containers or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-54(A)] Yes No N/A RMK#
- b. Only store used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-54(B)] Yes No N/A RMK#
- c. Provide secondary containment for containers as required by 3745-279-54(C)? Yes No N/A RMK#
- d. Provide secondary containment for existing aboveground tanks as required by 3745-279-54(D)? Yes No N/A RMK#
- e. Provide secondary containment for new aboveground tanks as required by 3745-279-54(E)? Yes No N/A RMK#
- f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil" [3745-279-54(F)] Yes No N/A RMK#
- g. Upon detection of a release of used oil, done the following in accordance with 3745-279-54(G):
- i. Stopped the release? Yes No N/A RMK#
- ii. Contained the release? Yes No N/A RMK#
- iii. Cleaned up and managed the used oil and other materials? Yes No N/A RMK#
- iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A RMK#
- h. Performed closure of aboveground tanks and containers in accordance with 3745-279-54(H)? Yes No N/A RMK#

34. Has the owner/operator of the used oil processing/re-refining facility developed, kept on-site, and followed a written waste analysis plan which meets the requirements in 3745-279-53 and, if applicable 3745-279-72? [3745-279-55] Yes ___ No N/A ___ RMK# see below Accounting information
35. Does the used oil processor/re-refiner keep a record of each shipment of used oil accepted for processing/re-refining? [3745-279-56(A)] Yes No N/A ___ RMK# 1
- a. Does each record include the name and address of the transporter who delivered the used oil to the processor? [3745-279-56(A)(1)] Yes ___ No N/A ___ RMK# 1
- b. Does each record include the name and address of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(2)] Yes ___ No N/A ___ RMK# 1
- c. Does each record include the U.S. EPA ID # of the transporter who delivered the used oil to the processor/re-refiner? [3745-279-56(A)(3)] Yes ___ No N/A ___ RMK# 1
- d. Does each record include the U.S. EPA ID # (if applicable) of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(4)] Yes ___ No N/A ___ RMK# 1
- e. Does each record include the quantity of used oil accepted? [3745-279-56(A)(5)] Yes ___ No N/A ___ RMK# 1
- f. Does each record include the date of acceptance? [3745-279-56(A)(6)] Yes ___ No N/A ___ RMK# 1
36. Does the used oil processor/re-refiner keep a record of each shipment of used oil that is shipped to a used oil burner, processor/re-refiner, or disposal facility? [3745-279-56(B)] Yes ___ No N/A ___ RMK# 1
- a. Does each record include the name and address of the transporter who delivers the used oil to the burner, processor/re-refiner or disposal facility [3745-279-56(B)(1)] Yes ___ No N/A ___ RMK# 1
- b. Does each record include the name and address of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(2)] Yes ___ No N/A ___ RMK# 1

1. Facility must submit information not rec'd at time of inspection: see POV

- c. Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner, processor/re-refiner or disposal facility? [3745-279-56(B)(3)] Yes ___ No N/A ___ RMK# 1
- d. Does each record include the U.S. EPA ID# of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(4)] Yes ___ No N/A ___ RMK# 1
- e. Does each record include the quantity of used oil shipped? [3745-279-56-(B)(5)] Yes ___ No N/A ___ RMK# 1
- f. Does each record include the date of shipment? [3745-279-56(B)(6)] Yes ___ No N/A ___ RMK# 1
37. Does the used oil processor/re-refiner retain all records required under 3745-279-56 for at least three years? [3745-279-56(C)] Yes ___ No N/A ___ RMK# 1
38. Does the owner/operator keep an operating record at the facility? [3745-279-57(A)(1)] Yes ___ No N/A ___ RMK# 1
- a. Does the operating record include records and results of used oil analysis performed as described in the analysis plan required under 3745-279-55? [3745-279-57(A)(2)(a)] Yes ___ No N/A ___ RMK# 1
- b. Are summary reports and details of all incidents that require implementation of the contingency plan as specified in 3745-279-52(B) maintained in the operating record? [3745-279-57(A)(2)(b)] Yes ___ No N/A ___ RMK# 1
39. Does the used oil processor/re-refiner report to the director in the form of a letter, on a biennial basis by March 1, the following information:
- a. The U.S. EPA ID#, name and address of the processor/re-refiner? [3745-279-57(B)(1)] Yes ___ No N/A ___ RMK# ___
- b. The calendar year covered by the report? [3745-279-57(B)] Yes ___ No N/A ___ RMK# ___
- c. The quantities of used oil accepted for processing/re-refining and the manner in which the used oil is processed/re-refined, including the specific processes employed? [3745-279-57(B)] Yes ___ No N/A ___ RMK# ___
40. Does the used oil processor/re-refiner, who initiates a shipment of used oil off-site, use a used oil transporter that has a U.S. EPA ID#? [3745-279-58] Yes No N/A ___ RMK# ___

41. Does the used oil processor/re-refiner generate residues from the storage, processing or re-refining of used oil? [3745-279-59] Yes No N/A RMK#
- If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-59] Yes No N/A RMK#

REMARKS

STANDARDS FOR USED OIL BURNERS WHO BURN OFF-SPEC USED OIL FOR ENERGY RECOVERY

42. Is off-spec used oil fuel burned for energy recovery only in industrial furnaces identified in 3745-50-10, or boilers as defined in 3745-50-10 and identified in 3745-279-61(A)(2), or hazardous waste incinerators? [3745-279-61(A)] Yes No N/A RMK#
43. Does the used oil burner process used oil? [3745-279-61(B)] Yes No N/A RMK#
- If so, have they complied with the requirements for processors in 3745-279-50 to 3745-279-59? [3745-279-61(B)] Yes No N/A RMK#
44. Has the used oil burner notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-62(A)] Yes No N/A RMK#
45. Does the used oil burner determine whether the total halogen content of the used oil being managed at the facility is above or below 1000 ppm? [3745-279-63(A)] Yes No N/A RMK#
46. Does the used oil burner retain records of all analyses conducted or information used to comply with 3745-279-63 for at least three years? [3745-279-63(D)] Yes No N/A RMK#
47. Does the used oil burner:
- a. Only store used oil in tanks, containers; or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-64(A)] Yes No N/A RMK#
- b. Only stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-64(B)] Yes No N/A RMK#
- c. Provided secondary containment for containers as required by 3745-279-64(C)? Yes No N/A RMK#

- d. Provided secondary containment for existing aboveground tanks as required by 3745-279-64(D)? Yes ___ No N/A RMK# ___
- e. Provided secondary containment for new aboveground tanks as required by 3745-279-64(E)? Yes ___ No N/A RMK# ___
- f. Labeled all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-64(F)] Yes ___ No N/A RMK# ___
- g. Upon detection of a release of used oil, done the following in accordance with 3745-279-64(G):
- i. Stopped the release? Yes ___ No N/A RMK# ___
 - ii. Contained the release? Yes ___ No N/A RMK# ___
 - iii. Cleaned up and managed the used oil and other materials? Yes ___ No N/A RMK# ___
 - iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A RMK# ___
48. Does the used oil burner keep a record of each used oil shipment accepted for burning? [3745-279-65(A)] Yes ___ No N/A RMK# ___
- a. Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-65(A)(1)] Yes ___ No N/A RMK# ___
 - b. Does each record include the name and address of the generator or processor/re-refiner who sent the used oil to the burner? [3745-279-65(A)(2)] Yes ___ No N/A RMK# ___
 - c. Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-65(A)(3)] Yes ___ No N/A RMK# ___
 - d. Does each record include the U.S. EPA ID# (if applicable) of the generator or processor/re-refiner who sent the used oil to the burner? [3745-279-65(A)(4)] Yes ___ No N/A RMK# ___
 - e. Does each record include the quantity of the used oil accepted? [3745-279-65(A)(5)] Yes ___ No N/A RMK# ___
 - f. Does each record include the date of acceptance? [3745-279-65(A)(6)] Yes ___ No N/A RMK# ___

49. Are the records described in 3745-279-65(A) maintained for at least three years? [3745-279-65(B)] Yes ___ No N/A RMK# ___
50. Prior to accepting the first shipment of off-spec used oil fuel from a generator, transporter, or processor/re-refiner, does the used oil fuel burner provide to the generator, transporter, or processor/re-refiner a one-time written and signed notice certifying that:
- a. The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-279-66(A)(1)] Yes ___ No N/A RMK# ___
- b. The burner will burn the used oil only in an industrial furnace or boiler identified in 3745-279-61? Yes ___ No N/A RMK# ___
51. Is the certification maintained for at least three years from the date the burner last received a shipment of off-spec used oil from the generator, transporter, or processor/re-refiner? [3745-279-66(B)] Yes ___ No N/A RMK# ___
52. Does the used oil burner generate residues from the storage or burning of used oil? [3745-279-67] Yes ___ No ___ N/A RMK# ___
- If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-67] Yes ___ No N/A RMK# ___

REMARKS

STANDARDS FOR USED OIL MARKETERS

53. Does the used oil fuel marketer initiate shipments of **off-spec** used oil only to a used oil burner that has an a U.S. EPA ID# and burns the used oil in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-71] Yes ___ No N/A RMK# ___
54. Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil meets the specification for used oil fuel under 3745-279-11 keep copies of analyses of the used oil (or other information used to make the determination) for at least three years? [3745-279-72(B)] Yes ___ No N/A RMK# ___
55. Has the used oil marketer notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-73(A)] Yes ___ No N/A RMK# ___

56. Does the used oil marketer keep a record of each shipment of **off-spec** used oil directed to a used oil burner? [3745-279-74(A)] Yes ___ No N/A RMK# ___
- a. Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-74(A)(1)] Yes ___ No N/A RMK# ___
- b. Does each record include the name and address of the burner who receives the oil? [3745-279-74(A)(2)] Yes ___ No N/A RMK# ___
- c. Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-74(A)(3)] Yes ___ No N/A RMK# ___
- d. Does each record include the U.S. EPA ID# of the burner? [3745-279-74(A)(4)] Yes ___ No N/A RMK# ___
- e. Does each record include the quantity of the used oil shipped? [3745-279-74(A)(5)] Yes ___ No N/A RMK# ___
- f. Does each record include the date of shipment? [3745-279-74(A)(6)] Yes ___ No N/A RMK# ___
57. Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil **meets the fuel specifications** under 3745-279-11 keep a record of each shipment of used oil to an on-spec used oil burner? [3745-279-74(B)] Yes ___ No N/A RMK# ___
- a. Does each record include the name and address of the facility receiving the shipment? [3745-279-74(B)(1)] Yes ___ No N/A RMK# ___
- b. Does each record include quantity of used oil fuel delivered? [3745-279-74(B)(2)] Yes ___ No N/A RMK# ___
- c. Does each record include date of shipment or delivery? [3745-279-74(B)(3)] Yes ___ No N/A RMK# ___
- d. Does each record include a cross-reference to the record of used oil analysis or other information used to make the determination that the used oil meets the specification as required in 3745-279-72(A)? [3745-279-74(B)(4)] Yes ___ No N/A RMK# ___
58. Are the records described in 3745-279-74(A) and (B) maintained for at least three years? [3745-279-74(C)] Yes ___ No N/A RMK# ___

59. Before the used oil generator, transporter or processor/re-refiner directs the first shipment of **off-spec** used oil to a burner, does he obtain a one time written and signed notice from the burner certifying that:

a. The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-279-75(A)(1)]

Yes ___ No N/A RMK# ___

b. The burner will burn the off-spec used oil only in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-75(A)(2)]

Yes ___ No N/A RMK# ___

60. Is the certification maintained for at least three years from the date the last shipment of off-spec used oil was shipped to the burner? [3745-279-75(B)]

Yes ___ No N/A RMK# ___

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REMARKS

LAR QUANTITY GENERATOR REQUIREMENTS

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

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

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

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

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

Safety Equipment Used:

GENERAL REQUIREMENTS

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

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

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

- 10. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]
a. Container that meets 3745-66-70 to 3745-66-77? Yes [] No [] N/A [x]
b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? Yes [] No [] N/A [x]

- c. Drip pads that meet 3745-69-40 to 45-69-45? Yes No N/A
- d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: Complete appropriate checklist for each unit.

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

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

MANIFEST REQUIREMENTS

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

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

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

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

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

15. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes No N/A

16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] Yes No N/A

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

17. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes No N/A
18. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes No N/A
19. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes No N/A

NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.

PERSONNEL TRAINING

20. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes No N/A
21. Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes No N/A
22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A
23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes No N/A
24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A
25. Does the generator keep records and documentation of:
- a. Job titles [3745-65-16D(1)]? Yes No N/A
 - b. Job descriptions [3745-65-16D(2)]? Yes No N/A
 - c. Type and amount of training given to each person [3745-65-16D(3)]? Yes No N/A

- d. Completed training or job experience required [3745-65-16D(4)]? Yes No N/A
26. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes No N/A

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed

Name of Employee

Date Trained

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

CONTINGENCY PLAN

27. Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes No N/A
SPCC plan only

28. Does the plan describe the following:

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

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

29. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes No N/A
30. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] Yes No N/A
31. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes No N/A

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

EMERGENCY PROCEDURES

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

NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

PREPAREDNESS AND PREVENTION

33. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes No N/A
34. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:
- a. Internal communications or alarm system? [3745-65-32(A)] Yes No N/A
- b. Emergency communication device? [3745-65-32(B)] Yes No N/A

- c. Portable fire control, spill control & decon equipment? [3745-65-32(C)] Yes No N/A
- d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes No N/A

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

35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes No N/A
36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A
37. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] Yes No N/A
38. If there is only one employee on the premises, is there immediate access to a device (ex.phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] Yes No N/A
39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes No N/A
41. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes No N/A

SATELLITE ACCUMULATION AREA REQUIREMENTS

42. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes No N/A
- b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes No N/A
- c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A
- d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes No N/A

- e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes No N/A
- f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes No N/A
- a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes No N/A
- b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes No N/A

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

44. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes No N/A
45. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No N/A
46. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A
- b. In good condition? [3745-66-71] Yes No N/A
- c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) Yes No N/A
- "Week" means 7 consecutive days.
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes No N/A

49. Are containers of incompatible waste stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes No N/A
50. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] Yes No N/A
51. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] Yes No N/A

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

52. If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] Yes No N/A

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

53. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes No N/A
54. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A
55. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes No N/A