



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

September 26, 2007

**RE: KRAFTMAID CABINetry
GEAUGA COUNTY
OHD 986 971 679
LQG CEI NOTICE OF VIOLATION/
RETURN TO COMPLIANCE**

CERTIFIED MAIL

Mr. Tim More
Manager Environmental Affairs
KraftMaid
P.O. Box 1055
Middlefield, Ohio 44062

Dear Mr. More:

On September 14, 2007 the Ohio EPA conducted a compliance evaluation inspection (CEI) of KraftMaid Cabinetry Plant 2's, 15535 S State Avenue, Middlefield, Ohio facility to determine KraftMaid Cabinetry's compliance with Ohio's hazardous waste laws and rules as found under the Ohio Revised Code and the Ohio Administrative Code ("ORC" and "OAC" respectively). KraftMaid was represented by you. Sherry Slone and I represented the Ohio EPA.

This KraftMaid facility is a wood cabinet and countertop manufacturer. This facility finishes and fabricates wooden cabinets.

The Ohio EPA's compliance inspection included an inspection of the facility operations and a review of written documentation. In addition, Ohio EPA received an e-mail with five attachments on September 24, 2007. The e-mail documentation demonstrates employees have been trained in the proper procedures to avoid future instances of non compliance with the violations noted below. Based on this inspection, Ohio EPA has determined that KraftMaid has violated at least the following state hazardous waste regulations:

Violations:

1. **Waste Evaluation, OAC rule 3745-52-11:** Any person who generates a waste must evaluate the waste to determine if the waste is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51.

During the inspection, Ohio EPA noted that the incandescent bulbs generated by KraftMaid had not been characterized.

KraftMaid decided to manage the bulbs as universal waste abating the violation.

No further action is required.

2. **Satellite Accumulation Area Requirements, OAC 3745-52-34(C)(1)(b):** One of the provisions of satellite accumulation requires the generator to mark his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

The 55 gallon satellite container of liquid waste near the brush cleaning area was not labeled at the time of the inspection.

The drum was labeled during the inspection abating the violation.

No further action is required.

3. **Requirements for Hazardous Waste Containers, OAC 3745-66-73(A):** Containers of hazardous waste must be kept closed except when adding or removing waste.

Ohio EPA noted a 5-gallon bucket near the brush cleaning area that was open. In addition, there was a 55-gallon satellite container with a board funnel that was open.

As explained during the inspection, a container sitting on the board actively draining would not be a violation. However, at the time of the inspection, nothing was draining into the drum.

KraftMaid emptied the 5-gallon container and closed the 55-gallon drum during the inspection abating the violation. Workers have been instructed to empty the 5-gallon bucket immediately and to close the drum when not draining.

No further action is required.

4. **Labeling/marking- standards for small quantity handlers of universal waste, OAC 3745-273-14 (E):** Universal waste lamps shall be labeled as "Universal Waste - Lamps," "Waste Lamp(s)", or "Used Lamp(s)."

There was one box of fluorescent lamps not labeled at the time of the inspection. In addition, there were several loose bulbs that were not labeled.

The box was labeled and the loose bulbs were placed in boxes that were also labeled during the inspection abating the violation.

Mr. Tim More
KraftMaid
September 26, 2007
Page 3

No further action is required.

5. **Accumulation time limits – standards for small quantity handlers of universal waste, OAC 3745-273-15 (C):** A facility must be able to demonstrate the length of time that a universal waste has been accumulated.

The unlabeled box noted above and the loose bulbs did not have an accumulation date on them.

During the inspection, the noted box and the new boxes had accumulation dates placed on them abating the violation.

No further action is required.

6. **Packaging of universal waste lamp, OAC 3745-273-13 (D) (1):** Universal waste lamps must be contained in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with the contents of the lamps. In addition, the containers or packages must be closed, lack evidence of leakage, spillage or damage that could cause leakage.

The loose bulbs noted above were not packaged in accordance with the rules.

As stated above, KraftMaid placed the bulbs in boxes abating the violation.

No further action is required.

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>.

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. You can find more information at the following Web link <http://www.epa.state.oh.us/dhwm/listserv.html>.

Mr. Tim More
KraftMaid
September 26, 2007
Page 4

Failure to list specific deficiencies and/or violations in this communication does not relieve KraftMaid Cabinetry, Inc. from the responsibility of complying with all applicable laws, rules and regulations.

Enclosed you will find a copy of the checklists completed during the inspection. You can find copies of the rules and other information on the Division of Hazardous Waste's web page at <http://www.epa.state.oh.us/dhwm>.

Should you have any questions, please feel free to call me or my supervisor, Frank Popotnik at this office.

Sincerely,



Karen L. Nesbit
Division of Hazardous Waste Management

KLN:cl
Enclosure

ec: Frank Popotnik, DHWM, NEDO
Harry Sarvis, DHWM, CO

cc: Natalie Oryshkewych, DHWM, NEDO

Ohio Environmental Protection Agency
**RCRA SUBTITLE C SITE
 IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OHD 986 971 679								
3. Site Name	Name: KRAFTMAID CABINETRY PLANT 2				Website: kraftmaid.com (Optional)				
4. Site Location Information	Street Address: 15535 S STATE AVE								
	City, Town, or Village: MIDDLEFIELD				State: OH				
	County Name: GEAUGA				Zip Code: 44062				
5. Site Type	Private	County	District	Federal	Indian	Municipal	State	Other	
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Zip Code	33711								
7. Site Representative	First Name: TIM			MI:	Last Name: MORE				
8. Phone Number	Phone Number: 440-632-2795				Phone Number Extension:				
9. E-Mail Address	E-Mail Address: tmore@kraftmaid.com								
10. Fax Number	Fax Number: 440-632-2798				Fax Number Extension:				
11. Street or P.O. Box	Street or P.O. Box: 16052 INDUSTRIAL PKWY P.O. BOX 1055								
12. City, Town or Village	City, Town or Village: MIDDLEFIELD								
13. State	State: OH			Country: USA		Zip Code: 44062			
14. Name of Site's Legal Owner	Name of Site's Legal Owner:								
15. Date Became Owner	Date Became Owner (mm/dd/yyyy):								
16. Owner Type	Owner Type:	Private	County	District	Federal	Indian	Municipal	State	Other
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. Street or P.O. Box	Street or P.O. Box:								
18. City, Town or Village	City, Town or Village:				Owner Phone #:		Zip Code:		
19. State	State:			Country:		Zip Code:			
20. Name of Site's Operator	Name of Site's Operator:								
21. Date Became Operator	Date Became Operator (mm/dd/yyyy):								
22. Owner Type	Owner Type:	Private	County	District	Federal	Indian	Municipal	State	Other
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
23. Street or P.O. Box	Street or P.O. Box:								
24. City, Town or Village	City, Town or Village:				Operator Phone #:		Zip Code:		
25. State	State:			Country:		Zip Code:			
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
10A. Type of Regulated Waste Activity (Mark 'X' in all of the appropriate boxes)									
<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					
<input type="checkbox"/> Small Quantity Generator (SQG)									
<input type="checkbox"/> Hazardous Waste Transporter				Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste				Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Recycler of Hazardous Waste				Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Underground Injection Control Facility									

10B Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))

<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 1000 kg. or more)
<input type="checkbox"/> Destination Facility for Universal Waste	

Check all boxes below that apply for each of the three types of facilities above

	Managed	10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
Batteries	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
		<input type="checkbox"/> Used Oil Re-refiner	

11. 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, F003, 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 TRI info source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

D001 F003 F005

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

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments:
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

13. Name of Director(s) Name of Inspector(s) Date of Inspection/Time (mm/dd/yyyy) (hh:mm)

KAREN L NESBIT SHERRY SLONE 9/14/2007 0900

14. OPTION 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 prepared this system, those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

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

PROCESS DESCRIPTION SECTION

Give a general process description (include all processes at the facility)

Brief description of facility and processes: facility finishes and fabricates wooden cabinets. This building also houses the Kraftmaid World Headquarters.

Process from beginning to end: Plant 2 acts as the main 'hub' for all plants. Materials are received and dispensed to Plants 1 and 3.

Also, finished products from Plant 3 (doors) and Plant 1 (frames) come to Plant 2 to be assembled in the KAAT (Kitchen at a time) area.

Plant 2 builds bottoms, sides, backs and decorative molding from raw wood. Raw wood is received as sheet stock, cut to size, stains are applied then the stains are UV cured. A top coat finish may be applied. Stains are water based and applied by rollers. The excess stain is collected and re-circulated through the system. There are no solvent based stains. When stain colors are changed, the rollers are removed and a new set of rollers with the next color is put in its place. The 'old' stain is cleaned out of the roller system using water and solvents. Kraftmaid has experimented to determine how to minimize the amount of solvents used to clean the rollers.

Wastes/Hazardous waste generated:

From 2006 AR

970-2 Spent Solvents, D001/F003 generated 51590 G sent to Clean Harbors. These are generated at the finishing booths and clean out lines. Waste is accumulated in satellite drums prior to being moved to one of two hazardous waste accumulation areas

971-2 Stain Filters, D001, F003/5 generated 41360 pounds sent to Clean Harbors. This also includes rags with wipe-off. Waste is accumulated in satellite drums prior to being moved to one of two hazardous waste accumulation areas.

Additional information (e.g. points of generation) is noted in field notes found in DHWM/NEDO files.

Other wastes include:

980-2 – Water based clean-out managed as non-hazardous waste. Waste is collected in 55 gallon drums.

Fluorescent bulbs - (including metal halide) Universal Waste - sent to Clean Harbors. Bulbs are collected in the tool room in maintenance area

Batteries - collected and segregated as a Universal Waste and shipped to Inmetco, RBRC. Batteries are collected in the tool room and maintenance area.

Wiping rags and gloves - sent off for laundering and shipped back for re-use to Elite Clean Room Services, Michigan. Rags are accumulated in various locations within the facility, collected in polycarts for weekly shipments off-site.

Aerosol cans - punctured and drained with the cans going off as scrap metal - the draining considered to be the first step in the metals recycling process and therefore is not considered generator treatment. The drained waste is characterized and managed as a hazardous waste (970). Cans are punctured in the pump room and are sent off as scrap metal.

Used Oil – Generated from plant machines, air compressors, saws, etc. Used oil is collected in 55 gallon drums in the pump rooms

Scrap steel – Generated from metal banding, empty aerosol cans and other general maintenance. The scrap is sent to Alliance Metals Corp, in Alliance Ohio. Scrap is collected in a 20 – 30 yard roll-off box located outside on the northeast side of the building.

Saw Dust from APC and Wood Waste and Wood Grindings – end up in the large silo on the east side of the plant (it has the checkerboard pattern on it) and is used for animal bedding and boiler fuel off-site.

Cardboard – is collected and recycled at Gateway Recycling in Cleveland

Wood Pallets – are sent to Middlefield Pallets where they are fixed (if necessary) and re-used.

Office Paper – is collected and recycled at Gateway Recycling in Cleveland

Scrap Plywood – is sent to the Warren City Health Commission to be used for board-ups.

Infectious Waste – Kraftmaid contracts with Medcor which is an on-site medical company that is responsible for the medical waste.

Water based glue – is generated from the laminator and sent off site as a non hazardous waste to Clean Harbors

Kraftmaid is looking into recycling plastics and metal from the cafeteria

REMARKS-GENERAL INFORMATION

Regulatory/Enforcement History (if applicable): None

USED OIL INSPECTION CHECKLIST (Short Version)

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# ___
- 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 fired space heaters? [3745-279-23] If so: Yes No N/A RMK#
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes No N/A RMK#
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A RMK#
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A RMK#
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes No N/A RMK#

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

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

WASTE EVALUATION

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

C:\Documents and Settings\KNesbit\My Documents\Folder\INSPECTION INFO\USED OIL checklist.wpd

REMARKS

- Did have a release of used oil - did not leave property
 - was cleaned up. ↳ (not during inspection - but previous)

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

Facility Name: KRAFTMAID CABINETRY - PLANT 2

Facility Hazardous Waste ID#: OHD 906 971 679 Date of CEI: 14 SEPT 2007

CESQG: <100Kg. (Approximately 25-30 gallons) of waste in a calendar month.

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

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

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

Safety Equipment Used: SAFETY GLASSES W/ SIDE SHIELDS

GENERAL REQUIREMENTS

- 1 Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A
- concern - incandescent bulbs - to be managed as UW
- 2 Are records of waste determinations being kept for at least 3 years? [3745-52-40(C)] Yes No N/A
- 3 Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes No N/A
- 4 Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] Yes No N/A
- 5 Are annual reports kept on file for at least 3 years? [3745-52-40 (B)] Yes 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 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 N/A
- 8 Does the generator accumulate hazardous waste? Yes No N/A
- 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 N/A
- 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
 - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C) and Yes No N/A
 - c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A
 - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

- 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 of the 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

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 include instructions to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes No N/A

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: [3745-65-16(D)]
a. Job titles? [3745-65-16(D)(1)] Yes No N/A

b. Job descriptions? [3745-65-16(D)(2)], Yes No N/A

c. Type and amount of training given to each person? [3745-65-16(D)(3)], Yes No N/A

d. Completed training or job experience required? [3745-65-16(D)(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

<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

28 Does the plan describe the following:

a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes No N/A

b. Arrangements with emergency authorities [3745-65-52(C)]. Yes No N/A

c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes No N/A

d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes No N/A

e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes No N/A

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

29 Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes No N/A

30 Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] 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.

UV 2 - spill cabinet not on map.

EMERGENCY PROCEDURES

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

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

PREPAREDNESS AND PREVENTION

- 33 Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes No N/A
- 34 Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:
- a. Internal alarm system? [3745-65-32(A)] Yes No N/A
- b. Emergency communication device? [3745-65-32(B)] Yes No N/A
- c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes No N/A
- d. Water of adequate volume/pressure? [3745-65-32(D)] (per facility rep) 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 one quart of acutely hazardous waste at anyone time? [3745-52-34(C)(1)] Yes No N/A
 - d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes No N/A *- abated - one not closed - 5 gal bucket*
 - e. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A *- abated*
- 43 Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:
- a. Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes No N/A
 - b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes No N/A
 - c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A

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

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

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 and photograph the area.

47 Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven 7 consecutive days. Yes No N/A

a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A

48 Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes No N/A

49 Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(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 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

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS**Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more****Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less****PROHIBITIONS**

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

WASTE MANAGEMENT & LABELING/MARKING**UNIVERSAL WASTE BATTERIES**

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)] Yes ___ No N/A ___ RMK# ___
- abated during inspection

9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes ___ No N/A RMK# ___

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# ___
- abated

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#___

- one box batteries - box pre-paid, waiting until it's full

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

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes No N/A ___ RMK#___

a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes No ___ N/A ___ RMK#___

b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes ___ No ___ N/A RMK#___

c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes ___ No ___ N/A RMK#___

d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes ___ No ___ N/A RMK#___

e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes ___ No ___ N/A RMK#___

f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes ___ No ___ N/A RMK#___

EMPLOYEE TRAINING

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

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes No N/A RMK#

15. Is the material released characterized? [3745-273-17(B)] Yes No N/A RMK#

16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes No N/A RMK#

- manage broken bulbs as itw - told them to speak to cleaner handlers to see if they'll accept as UW

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#

19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No N/A RMK#

20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:

- a. Receive the waste back? [3745-273-18(E)(1)] Yes No N/A RMK#

- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes No N/A RMK#

21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following: Yes ___ No N/A RMK# ___
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes ___ No ___ N/A RMK# ___
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes ___ No ___ N/A RMK# ___
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes ___ No N/A RMK# ___
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes ___ No N/A RMK# ___

EXPORTS

24. Is waste being sent to a foreign destination? If so: Yes ___ No N/A ___ RMK# ___
- a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes ___ No N/A RMK# ___
- b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)] Yes ___ No N/A RMK# ___
- c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes ___ No N/A RMK# ___

REMARKS

LDR CHECKLIST

GENERAL LDR REQUIREMENTS

- 1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] If so: Yes No N/A RMK#
 - a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)] Yes No N/A RMK#
 - b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)]
ANNUAL TCLP, FP Yes No N/A RMK#
- 2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] Yes No N/A RMK#
- 3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes No N/A RMK#
- 4. Does the generator generate a characteristic hazardous waste? If so: D001 Yes No N/A RMK#
 - a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes No N/A RMK#

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

- 5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so: F003, F005 Yes No N/A RMK#
 - a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes No N/A RMK#
- 6. Has the generator correctly determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)] Yes No N/A RMK#

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] Yes__ No N/A RMK# ___

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

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] Yes__ No N/A RMK# ___

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

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes__ No N/A RMK# ___

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] If so: Yes__ No N/A ___ RMK# ___

a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05] Yes__ No N/A RMK# ___

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] If so: Yes__ No N/A ___ RMK# ___

a. The facility can land dispose of the waste. [3745-270-06] Yes__ No N/A RMK# ___

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? If so: Yes__ No N/A ___ RMK# ___

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

Yes__ No N/A RMK# ___

NOTIFICATION AND CERTIFICATION REQUIREMENTS

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

Yes No N/A___ RMK# ___

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

Yes__ No N/A RMK# ___

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

Yes__ No N/A RMK# ___

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

Yes__ No N/A RMK# ___

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

Yes__ No__ N/A RMK# ___

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

Yes__ No N/A RMK# ___

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

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

Yes No N/A___ RMK# ___

REMARKS