



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

March 3, 2008

RE: MASTER CHROME SERVICES
CEI - LQG
OHD 987 040 326
CUYAHOGA COUNTY
NOTICE OF VIOLATION

Michael Rowe
Master Chrome Services
3709 Herman Ave. NW
Cleveland, OH 44102

CERTIFIED MAIL

Dear Mr. Rowe:

On February 13, 2008, Ohio EPA, represented by Ed D'Amato/DHWM-NEDO, inspected Master Chrome Services for compliance with Ohio hazardous waste laws and regulations found in Chapters 3734 of the Ohio Revised Code (ORC) and 3745 of the Ohio Administrative Code (OAC)

You represented Master Chrome Services during the inspection.

Master Chrome Services is a hardchrome plating facility.

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

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

(A)(2) A generator may, for ninety days or less, accumulate and/or conduct treatment of hazardous waste that is generated on site, provided that...The date upon which each period of accumulation...begins is clearly marked and visible for inspection on each container

There were seven drums of lead chromate waste in the hazardous waste accumulation area. None of the hazardous waste labels included the accumulation date. To abate this violation, you must properly date the containers, photograph them, and send the photographs to this office.

2. Unlawful Treatment, Storage, Disposal, or Transportation of Hazardous Waste ORC 3734.02(F)

No person shall store, treat, or dispose, transport or cause to be transported, regardless of whether generated on or off the premises where the waste is stored, treated, or disposed, any hazardous waste except at or to a permitted hazardous waste facility

At the time of the inspection, there were seven drums of lead chromate waste in the hazardous waste accumulation area. Six of the drums were full. The seventh was about 1/2 full. You explained that you were still accumulating waste in the seventh drum. Since March 30, 2005, Master Chrome has accumulated 6 drums of lead chromate waste in violation of this rule. You must immediately dispose of these six drums. You must submit copies of the disposal paperwork to this office.

3. Emergency Equipment Inspections
OAC 3545-65-33

All communication and emergency equipment shall be tested and maintained as necessary to assure proper operation in time of emergency

Master Chrome Services is not conducting emergency equipment inspections. To abate this violation, you must immediately begin conducting emergency equipment inspections and send a copy of the inspection log to this office that shows at least one actual inspection has been completed.

4. Universal Waste Management Standards—Containers
OAC 3745-13(D)

A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage...such containers must be kept closed and must lack evidence of leakage, spillage or damage

Master Chrome Services had at least 3 boxes of fluorescent lamps that were not packaged per this rule. The boxes were not closed and at least two of them contained lamps that were too big for the boxes in which they were contained. To abate this violation, you must properly package the lamps, photograph them, and submit the photographs to this office.

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

(A)(1) Facility personnel shall successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with hazardous waste requirements

(A)(2) [Personnel training] shall include instruction which teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed

In 2006, Master Chrome Services notified Ohio EPA that it was a large quantity generator for 2006. You did not have any records showing that Charles Rowe or Todd Murphy have received training per this rule. You explained that Charles Rowe will conduct weekly inspections in your absence and one of Todd Murphy's responsibilities is moving hazardous waste drums. To abate this violation, you must provide training to these employees. To abate this violation, you must submit an outline of the training you provided them and documentation that they completed the training.

The following Ohio EPA fact sheets may be helpful to you:

Hazardous Waste Generator Categories and Episodic Generation:
http://www.epa.state.oh.us/dhwm/pdf/Episodic_Generation.pdf

Commercial Facilities Accepting Hazardous Waste in Ohio:
<http://www.epa.state.oh.us/dhwm/pdf/accepting.pdf>

MASTER CHROME SERVICES
MARCH 3, 2008
PAGE – 3 –

You may be able to reduce operating costs with waste minimization/pollution prevention practices. The Ohio EPA offers pollution prevention assessments to help you decide which practices would benefit your operations. If you would like to have a pollution prevention assessment, or would like more information, please contact Adrienne LaFavre at (330) 963-1250. The Office of Compliance Assistance and Pollution Prevention website at <http://www.epa.state.oh.us/ocapp/ocappmain.html> is also a good source of information.

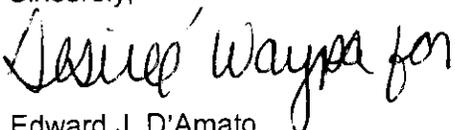
You explained that Master Chrome Services is considering installing new, energy efficient lighting fixtures. For information about energy efficient lighting and other potential energy saving opportunities, the Ohio Department of Development, Office of Energy Efficiency is a good source of information:

http://www.odod.state.oh.us/cdd/oeec/ci_services.htm

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

Enclosed is a copy of the checklist used for the inspection. Please feel free to contact me at (330) 963-1170 if you have any questions.

Sincerely,



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

EJD:ddw

Enclosures

cc: Natalie Oryshkewych, DHWM, NEDO
Harry Sarvis, DHWM, CO
ec: Frank Popotnik, DHWM, NEDO



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Ted Strickland, Governor
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April 17, 2008

RE: MASTER CHROME
OHD 987040326
CUYAHOGA COUNTY
NOTICE OF VIOLATION

Michael Rowe
Master Chrome Services
3709 Herman Ave. NW
Cleveland, OH 44102

CERTIFIED MAIL

Dear Mr. Rowe:

On February ¹³15, 2008, Ohio EPA, represented by Edward D'Amato/DHWM-NEDO, inspected Master Chrome Company for compliance with Ohio hazardous waste laws and regulations found in Chapters 3734 of the Ohio Revised Code (ORC) and 3745 of the Ohio Administrative Code (OAC).

As a result of that inspection, you received a Notice of Violation (NOV) letter from Ohio EPA dated March 3, 2008. Due to an error on my part, you received a draft copy of the NOV that contained several errors and omissions. As a result, Ohio EPA is retracting the original NOV. This letter will serve as the official correspondence regarding the February 15, 2008 inspection.

Please note that the violations have not changed, and no new ones have been cited in this letter. Furthermore, the facsimile and e-mail you submitted on March 25, 2008 remain valid and will be considered Master Chrome Services' response to this NOV. Ohio EPA has reviewed the documentation you submitted and will be issuing a Partial Return to Compliance letter in the near future. I apologize for any confusion this has caused.

The following violations of Ohio's hazardous waste laws and regulations were found during the February 15, 2008 inspection:

**1. Dating of Hazardous Waste Containers
OAC 3745-52-34 (A)(2)**

(A)(2) A generator may, for ninety days or less, accumulate and/or conduct treatment of hazardous waste that is generated on site, provided that...The date upon which each period of accumulation...begins is clearly marked and visible for inspection on each container

There were seven drums of lead chromate waste in the hazardous waste accumulation area. None of the hazardous waste labels included the accumulation date. To abate this violation, you must properly date the containers, photograph them, and send the photographs to this office.

**2. Unlawful Treatment, Storage, Disposal, or Transportation of Hazardous Waste
ORC 3734.02(E) and (F)**

No person shall store, treat, or dispose, transport or cause to be transported, regardless of whether generated on or off the premises where the waste is stored, treated, or disposed, any hazardous waste except at or to a permitted hazardous waste facility

At the time of the inspection, there were seven drums of lead chromate waste in the hazardous waste accumulation area. The drums were stored indoors and were in good condition with no visible leaks. Six of the drums were full. The seventh was about ½ full. You explained that you were still accumulating waste in the seventh drum. Since March 30, 2005, Master Chrome has accumulated 6 drums of lead chromate waste in violation of this rule. You must immediately dispose of these six drums. You must submit copies of the disposal paperwork to this office.

Since Master Chrome violated ORC §3734.02(E) and (F), Master Chrome is subject to all applicable general facility standards found in OAC Chapters 3745-54 and 55. Also, Master Chrome will be required to submit to Ohio EPA a closure plan which complies with OAC Chapters 3745-54 and 55. Ohio EPA will notify you in writing in the near future with specific requirements for submittal of the closure plan. Additionally, at any time Ohio EPA may assert its right to have Master Chrome begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

**3. Emergency Equipment Inspections
OAC 3545-65-33**

All communication and emergency equipment shall be tested and maintained as necessary to assure proper operation in time of emergency

Master Chrome is not conducting emergency equipment inspections. To abate this violation, you must immediately begin conducting emergency equipment inspections and send a copy of the inspection log to this office that shows at least one actual inspection has been completed.

**4. Universal Waste Management Standards-Containers
OAC 3745-273-13(D)**

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Master Chrome had at least 3 boxes of fluorescent lamps that were not packaged per this rule. The boxes were not closed and at least two of them contained lamps that were too big for the boxes in which they were contained. To abate this violation, you must properly package the lamps, photograph them, and submit the photographs to this office.

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You explained that Master Chrome is considering installing new, energy efficient lighting fixtures. For information about energy efficient lighting and other potential energy saving opportunities, the Ohio Department of Development, Office of Energy Efficiency is a good source of information:

http://www.odod.state.oh.us/cdd/oeec/i_services.htm

MASTER CHROME
APRIL 17, 2008
PAGE - 4 -

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

Sincerely,



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

EJD:ddw

cc: Natalie Oryshkewych, DHWM, NEDO
Harry Sarvis, DHWM, CO
Mitch Matthews, DHWM, CO
ec: Frank Popotnik, 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: <u>OH 987 040 326</u>								
3. Site Name	Name: <u>Master Chrome Services</u>					Website: (Optional)			
4. Site Location Information	Street Address: <u>3709 Herman Ave</u>					State: <u>OH</u>			
	City, Town, or Village: <u>Cleveland</u>					Zip Code: <u>44102</u>			
	County Name: <u>Cuyahoga</u>								
5. Site Land Type (check only one)	<input checked="" type="checkbox"/> Private	<input type="checkbox"/> County	<input type="checkbox"/> District	<input type="checkbox"/> Federal	<input type="checkbox"/> Indian	<input type="checkbox"/> Municipal	<input type="checkbox"/> State	<input type="checkbox"/> Other	
6. NAICS code(s) www.census.gov/epcd/www/naics.html	<u>332813</u>								
7. Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: <u>Rowe</u>			MI:		Last Name: <u>Michael</u>			
	Phone Number:				Phone Number Extension:				
	E-Mail Address:								
	Fax Number:				Fax Number Extension:				
	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	Name of Site's Legal Owner: <u>Marion Florian</u>					Date Became Owner (mm/dd/yyyy):			
	Owner Type:	<input type="checkbox"/> Private	<input type="checkbox"/> County	<input type="checkbox"/> District	<input type="checkbox"/> Federal	<input type="checkbox"/> Indian	<input type="checkbox"/> Municipal	<input type="checkbox"/> State	<input type="checkbox"/> Other
	Street or P.O. Box:								
	City, Town or Village:				Owner Phone #:				
	State:				Country:		Zip Code:		
	Name of Site's Operator:					Date Became Operator (mm/dd/yyyy):			
	Owner Type:	<input type="checkbox"/> Private	<input type="checkbox"/> County	<input type="checkbox"/> District	<input type="checkbox"/> Federal	<input type="checkbox"/> Indian	<input type="checkbox"/> Municipal	<input type="checkbox"/> State	<input type="checkbox"/> Other
	Street or P.O. Box:								
	City, Town or Village:				Operator Phone #:				
	State:				Country:		Zip Code:		
9. Violations Cited?	<input 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) } <u>Category</u>				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input checked="" type="checkbox"/> Small Quantity Generator (SQG) } <u>varies</u>									
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> 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 5,000 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		10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
	Managed	<input type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input type="checkbox"/>	<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, 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.			
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.			
Announced	<input type="checkbox"/> Yes <input type="checkbox"/> No	Additional Facility Representatives:	
Tanks	<input type="checkbox"/> Yes <input type="checkbox"/> No	Other Comments:	
Containers	<input type="checkbox"/> Yes <input type="checkbox"/> No		
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Ed D'Amato			2/19/08 ~ 10:00 Am
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)

LA \geq QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

CESQG: \leq 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: \geq 1,000 Kg. (~300 gallons) of waste in a calendar month or \geq 1 Kg. of acutely hazardous waste in a calendar month.

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

Safety Equipment Used:

GENERAL REQUIREMENTS

- 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A
- 2. Are records of waste determination 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

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 \S 3734.02 (E) & (F)? \rightarrow >180 days. No 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
- b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? Yes No N/A
- c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A
- d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet JRs, 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 public 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

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.

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

[Facility Name/Inspection Date]

[ID number]

LQG

Page 4 of 7

- 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 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:
- 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

[Facility Name/Inspection Date]

[ID number]

LQG

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) "Week" means 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 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 and 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