



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

February 20, 2007

RE: MFG RESEARCH COMPANY
SMALL QUANTITY GENERATOR
OHD 982 420 093
ASHTABULA COUNTY
NOV

Ms. Sonja Ferrell
1315 West 47th Street
P.O. Box 675
Ashtabula, OH 44004

Dear Ms. Ferrell:

On February 9, 2007, the Ohio Environmental Protection Agency (Ohio EPA), Division of Hazardous Waste Management, conducted a compliance evaluation inspection (CEI) at MFG Research Company's (MFG) Ashtabula, Ohio facility. MFG was inspected to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC), and the rules promulgated thereunder in Chapter 3745 of the Ohio Administrative Code (OAC).

The inspection included a review of the facility's operations, as well as the management of wastes. MFG was inspected for the requirements of a small quantity generator (SQG) of hazardous waste. You represented the facility during the inspection.

Ohio EPA identified the following violations of Ohio's hazardous waste rules. In order to correct these violations, MFG must do the following and send me the required information **within 30 days** of the date of this letter:

1. Emergency Posting, OAC rule 3745-52-34(D)(5)(b):

The generator must post the following information next to the telephone: (i) The name and telephone number of the emergency coordinator(s); (ii) Location of fire extinguishers and spill control material, and if present, fire alarm(s); and (iii) The telephone number of the fire department, unless the facility has a direct alarm.

The facility failed to post this information at the Loading Dock hazardous waste accumulation area. An example emergency posting was provided to you during the inspection.

In order to abate this violation, the facility must submit a copy of its emergency posting along with a photograph demonstrating it is located at the hazardous waste accumulation area.

2. Manifest Requirements, OAC rule 3745-52-42(B)

A SQG who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 60 days of the date the waste was accepted by the initial transporter must submit a legible copy of the manifest, with some indication that the generator has not received confirmation of delivery, to the Ohio EPA.

Upon review of available manifests, Ohio EPA noted that the following manifest did not have the handwritten signature from the designated facility: #22439 dated August 23, 2006. MFG failed to notify and submit a copy of the above referenced manifest to the Ohio EPA after sixty days.

In order to abate this violation, the facility must submit a legible copy of the manifest with the handwritten signature from the designated facility.

3. Emergency Equipment Inspections, OAC rule 3745-65-33:

All facility communication or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment must be tested and maintained as necessary to assure its proper operation in time of emergency. The owner/operator must record the inspections in a log or summary.

The facility failed to conduct and record emergency equipment inspections since November 3, 2006. The inspections were previously conducted on a weekly basis and the task of completing inspections has not been reassigned since John Wheeler's retirement.

In order to abate this violation, the facility must submit a written inspection schedule (i.e. that outlines the frequency for inspecting and testing emergency equipment) and a copy of a completed inspection log for review. An example inspection log was provided to you during the inspection.

4. Aisle Space, OAC rule 3745-65-35:

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.

The facility failed to provide adequate aisle space at the Loading Dock hazardous waste accumulation area.

In order to abate this violation, MFG must submit photographs of the loading dock hazardous waste accumulation that demonstrates adequate aisle space is provided.

5. Satellite Accumulation – Open Container, OAC rule 3745-52-34(C)(1)(a):

A generator may accumulate as much as 55-gallons of hazardous waste in containers at or near the point of generation where waste initially accumulate provided he complies with rules 3745-66-71, 3745-66-72, and paragraph (A) or rule 3745-66-73 of the OAC.

The facility failed to keep a 5-gallon container of hazardous waste at the Carbon Machine Room closed. The 5-gallon container contained waste resin and strainers.

In order to abate these violations, the facility must submit a photograph demonstrating the 5-gallon container is closed.

6. Satellite Accumulation – Labeling, OAC rule 3745-52-34(C)(1)(b):

A generator may accumulate as much as 55-gallons of hazardous waste in containers at or near any point of generation where wastes initially accumulate provided the containers are marked either with the words “Hazardous Waste” or with other words that identify the contents of the containers.

The facility failed to label the following containers with the words “Hazardous Waste” or with other words that identify the contents of the containers:

- A 5-gallon container of spent acetone, inside a safety can, located outside the laboratory area;
- A 55-gallon drum of spent acetone located in safety cabinet in the Storage Area; and
- A 5-gallon container of waste resin and strainers at the Carbon Machine Room.

In order to abate these violations, the facility must submit photographs demonstrating the containers have been labeled.

7. Labeling, OAC rule 3745-52-34(A)(3):

While being accumulated and/or treated on-site, each container must be labeled or marked clearly with the words “Hazardous Waste.”

The facility failed to label the following containers of hazardous waste located at the Loading Dock with the words “Hazardous Waste:”

- A 55-gallon drum of oil-base paint;
- A 55-gallon drum of waste resin; and
- Two, 55-gallon drums of spent rags.

In order to abate this violation, the facility must submit photographs demonstrating the drums are labeled with the words “Hazardous Waste.”

8. Dating, OAC rule 3745-52-34(A)(2):

The date upon which each period of accumulation and/or treatment begins must be clearly marked and visible for inspection on each container.

The facility failed to date the following containers of hazardous waste located at the Loading Dock:

- A 55-gallon drum of oil-base paint;
- A 55-gallon drum of waste resin; and
- Two 55-gallon drums of spent rags.

In order to abate this violation, the facility must submit photographs demonstrating the drums have been dated.

9. Inspections, OAC rule 3745-66-74:

The owner or operator must inspect area where containers are stored, at least weekly, looking for leaks and deterioration caused by corrosion or other factors. The owner or operator must record inspections in an inspection log or summary.

The facility failed to conduct and record container accumulation area inspections on a weekly basis since November 3, 2006. In addition, the task of completing inspections has not been reassigned since John Wheeler's retirement.

In order to abate this violation, the facility must submit a writing procedure that outlines how the facility will comply with this rule and submit two consecutive weeks of completed inspection logs. An example inspection log was provided to you during the inspection.

10. Used Oil Labeling, OAC rule 3745-279:

Containers used to store used oil at generator facilities must be labeled or marked clearly with the words "used oil."

The facility failed to label three 55-gallon drums containing used hydraulic fluid and one 55-gallon drum containing used oil with the words "used oil."

In order to abate this violation, the facility must submit photographs demonstrating the four 55-gallon drums are labeled as "used oil."

11. Universal Waste Management, OAC rule 3745-273-13(D)(1):

Universal waste lamps must be contained in containers or packages that are: structurally sound; adequate to prevent breakage; compatible with the contents of the lamps; remain closed; and lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

The facility failed to accumulate universal waste lamps in a closed container. A box of universal waste lamps was open during the inspection.

In order to abate this violation, the facility must submit a photograph demonstrating the box of universal waste lamps is closed.

12. Universal Waste Accumulation, OAC rule 3745-273-15(C):

A small quantity handler of universal waste who accumulates universal waste shall be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration by: marking or labeling each container with the earliest date that any universal waste in the container became a waste or was received; marking or labeling each individual item of universal waste; maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste containers/items became a waste or was received; or placing the universal waste in a specific area and identifying the earliest date that any universal waste in the area became a waste or was received.

The facility failed to demonstrate the length of time a box of universal waste lamps had been accumulating on-site.

In order to abate this violation, the facility must submit documentation or a photograph demonstrating the length of time the box of lamps has been accumulating on-site.

13. Concern: Waste Resin:

MFG generates a characteristic hazardous waste resin that is subject to the requirements of OAC 3745-270-07. On occasion, you indicated that small quantities of waste resin solidifies during accumulation and is disposed as a non-hazardous solid waste. A resin solidified through polymerization (POLYM) meets the required treatment standard for the characteristic hazardous waste and associated underlying hazardous constituents. If the waste resin will be treated to meet land disposal restriction (LDR) requirements under OAC 3745-270 in the future, MFG must develop and follow a written waste analysis plan (WAP) pursuant to OAC 3745-270-07 (A)(5) and comply with the notification and certification requirements found in OAC 3745-270-09. **Please inform Ohio EPA how waste resin will be managed and disposed in the future.**

14. Concern: Generator Category:

MFG should update its notification of regulated waste activity information. MFG is currently a small quantity generator of hazardous waste and previously notified as a large quantity generator. The facility should submit a letter to Ohio EPA along with EPA Form 9029. EPA form 9029 and instructions on completing the form may be found at: <http://www.epa.state.oh.us/dhwm/notiform.html>

15. Concern: Waste Profiles:

The spent solvent and spent rag/wipe waste profiles should be updated. As indicated during the inspection and by a follow-up email, acetone is the only clean-up solvent used at the facility.

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides free compliance and pollution prevention assistance on environmental issues related to air, land and water. Should your facility be interested in receiving a free pollution prevention assessment in the future, please feel free to contact me or OCAPP. OCAPP may be contacted at: 800-329-7518 or <http://www.epa.state.oh.us/opp/ocapp.html>.

The following technical assistance guidance documents were provided to you during the inspection: fluorescent lamps, satellite accumulation, used oil, closed containers, land disposal restriction, generator requirement summary table and generator record keeping requirement summary tables

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.

Enclosed you will find a copy of the checklists that we completed during the inspection. Should you have any question, please feel free to call me at (330) 963-1278. You can find copies of the rules and other information on the DHWM's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,



Wade Balser
District Representative
Division of Hazardous Waste Management

WB:ddw

Enclosure

cc: Natalie Oryshkewych, DHWM, NEDO
Darlene Stanley, DES, Reynoldsburg
Nancy Zikmanis, DERR, NEDO
ec: Harry Sarvis, DHWM, CO

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

E-mail this completed form to tammy.mccconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office	Ohio Environmental Protection Agency RCRA SUB: E C SITE IDENTIFICATION/VERIFICAT FORM		For Ohio EPA use only																				
2. Site EPA ID No.	EPA ID Number: OHD 982 420 093																						
3. Site Name	Name: Molded Fiber Glass Research Company		Website (optional):																				
4. Site Location Information	Street Address: 1315 W. 47 th St.																						
	City, Town, or Village: Ashtabula	State: OH																					
	County Name: Ashtabula	Zip Code: 44004																					
5. Site Land Type (check only one)	<table border="1" style="width: 100%; text-align: center;"> <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><input type="checkbox"/></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	<input type="checkbox"/>											
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6. NAICS code(s) www.census.gov/epcd/www/naics.html	A.		B.																				
C.		D.																					
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: Sonja		MI:	Last Name: Ferrel																			
	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.	A. Name of Site's Legal Owner:		Date Became Owner (mm/dd/yyyy):																				
	Owner Type: Mark with an X		<table border="1" style="width: 100%; text-align: center;"> <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><input type="checkbox"/></td> </tr> </table>					Private	County	District	Federal	Indian	Municipal	State	Other	<input type="checkbox"/>							
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	Street or P.O. Box:																						
	City, Town, or Village:		Owner Phone #:																				
	State:		Country:		Zip Code:																		
	B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):																				
	Operator Type: Mark with an X		<table border="1" style="width: 100%; text-align: center;"> <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><input type="checkbox"/></td> </tr> </table>					Private	County	District	Federal	Indian	Municipal	State	Other	<input type="checkbox"/>							
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Street or P.O. Box:																							
City, Town, or Village:		Operator Phone #:																					
State:		Country:		Zip Code:																			
9. Violations Cited?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No																				
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)																							
<input type="checkbox"/> Not Regulated																							

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

A. Hazardous Waste Activities	
(choose only one of the following categories)	<input type="checkbox"/> 3. Treater, Storer or Disposer of Hazardous Waste
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> 4. Recycler of Hazardous Waste
<input type="checkbox"/> a. Large Quantity Generator (LQG):	<input type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace
<input checked="" 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	

B. Universal Waste Activities	C. Used Oil Activities
<input checked="" type="checkbox"/> 1. Small Quantity Handler of Universal Waste (Indicate types of universal waste generated and/or accumulated (check all boxes that apply):	<input checked="" type="checkbox"/> 1. Used Oil Generator
<input type="checkbox"/> 2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more).	<input type="checkbox"/> 2. Used Oil Transporter Indicate Type(s) of Activity(ies)
<input type="checkbox"/> 3. Destination Facility for Universal Waste (Check all boxes below that apply for each of the three types of facilities above.)	<input type="checkbox"/> Transporter
	<input type="checkbox"/> Transfer Facility
	<input type="checkbox"/> 3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)
	<input type="checkbox"/> Processor
	<input type="checkbox"/> Re-refiner
	<input type="checkbox"/> 4. Off-Specification Used Oil Burner
	<input type="checkbox"/> 5. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)
	<input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Oil
	<input type="checkbox"/> b. Used Oil to Off-Specification Used Oil Burner

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.

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

NO	Announced ?	Additional Facility Representatives:
NO	Tanks?	Other comments:
Yes	Containers?	

13.	Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
	Wade Balsler		2-9-07 0955 - 1200

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)

**SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

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

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

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

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

Safety Equipment Used:

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A
2. Has the generator obtained a U.S. EPA I.D. number? [3745-52-12] Yes No N/A
3. 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
4. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)] Yes No N/A
5. Does the generator accumulate hazardous waste? Yes No N/A

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

6. Has the generator accumulated hazardous wastes in excess of (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)] Yes No N/A

NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]

7. Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)] Yes No N/A

NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.

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

NOTE: Complete appropriate checklist for each unit.

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

MANIFEST REQUIREMENTS

9. Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)] Yes No N/A
10. Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)] Yes No N/A
- a. Does the contractual agreement specify the type of waste and frequency of shipment? Yes No N/A
- b. Is the transport vehicle owned and operated by the reclaimer? Yes No N/A
- c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? Yes No N/A

NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.

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

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

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

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

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

14. Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (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 made a good faith effort to minimize their waste generation.

15. If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? 3745-52-42(B)] Yes No N/A

16. Are signed copies of all manifests 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.

PREPAREDNESS AND PREVENTION

17. Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)] Yes No N/A

18. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]

a. Name and telephone number of emergency coordinator? Yes No N/A

b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes No N/A

c. Telephone number of local fire department? Yes No N/A

19. Are employees familiar with waste handling and emergency procedures [3745-52-34(D)(5)(c)] Yes No N/A

20. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(a)] Yes No N/A

21. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31] Yes No N/A

22. Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:

a Internal Alarm system? [3745-65-32(A)] Yes No N/A

b Emergency communication device? [3745-65-32(B)] Yes No N/A

c Portable fire control, spill control and decon equipment? [3745-65-32(C)]? Yes No N/A

d Water of adequate volume/pressure? [3745-65-32(D)] Yes No N/A

Note: water adequate per facility representative

23. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency [3745-65-33] Yes No N/A

24. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A

25. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)] Yes No N/A
26. 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
27. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
28. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes No N/A
29. 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

30. 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 any one time? [3745-52-34(C)(1)] Yes No N/A
 - d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. Yes No N/A
 - e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
31. 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 the 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

32. **Has** the generator marked containers with the words "Hazardous Waste" [3745-52-34(D)(4)] Yes No N/A
33. **Is** the accumulation date on each container? [3745-52-34(D)(4)] Yes No N/A
34. **Are** hazardous wastes stored in containers which are: Yes No N/A
- 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.

35. **Is** the container accumulation area(s) inspected at least 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
36. **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
37. **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
38. **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.

PRE-TRANSPORT REQUIREMENTS

39. Does each 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
40. Does each container ≤ 100 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A
41. 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

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 LAMPS

3. Does the SQUWH 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# _____
4. 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# _____
5. 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# _____

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

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

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

7. 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

8. 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

9. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes No N/A RMK# _____
10. Is the material released characterized? [3745-273-17(B)] Yes No N/A RMK# _____
11. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes No N/A RMK# _____

OFF-SITE SHIPMENTS

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

12. 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.*

13. 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# _____
14. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No N/A RMK# _____
15. 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#
16. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes No N/A 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#
17. 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#
18. 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

19. 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

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] *See Generator Checklist Yes No N/A RMK#___

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: **MFG Research Co.**

Facility Type: **SOG**

Date of Inspection: **2/9/07**

EPA ID#: **OND 982 420 093**

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
Manufacturing	Waste Resin D001	DRUM ~200 P/month	—	American Env. Services, INC Morgantown, WV		
2 Clean-up	Waste Acetone D001, F005, D055	DRUM ~300 P/month	—			Solvent Re-use
3 Clean-up	Waste Rags F005/F005	DRUM ~16 P/month	—			Commercial Laundry
4 Lighting	Spent lamps Universal Waste	unknown	—	Vexor Technologies		
5 Manufacturing Maintenance	Used OIL	unknown	—	Hukill Chemical		
Inventory	off-spec Binders Fillers	unknown	—			
7						
8						

REMARKS-GENERAL INFORMATION

General Process Information:

See Full Notes

Regulatory/Enforcement History (if applicable):

NONE

Additional P2 remarks and information:

TBD by Facility

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.

Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other: