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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

October 14, 2008

RE: MACTAC
LARGE QUANTITY GENERATOR
OHD 004 155 347
SUMMIT COUNTY
NOV

Mr. Mark Cuenot
Mactac
4560 Darrow Road
Stow, OH 44224-1898

Dear Mr. Cuenot:

On September 25, 2008, Kris Coder and I, representing the Ohio Environmental Protection Agency (Ohio EPA), Division of Hazardous Waste Management, conducted a compliance evaluation inspection (CEI) at Mactac's facility located at 4560 Darrow Road, Stow, Ohio. Mactac 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). You and Shauna Miller represented Mactac during the CEI.

The inspection included a review of the facility's operations, as well as the management of wastes. Mactac was inspected for the requirements of a large quantity generator (LQG) of hazardous waste.

Ohio EPA identified the following violations of Ohio's hazardous waste laws. In order to correct the violations and concerns listed below, Mactac must do the following and send me the requested information **within 30 days** of the date of this letter:

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

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

(A) Mactac failed to conduct and record inspections at the 90-day hazardous waste accumulation area located outside the facility's Research and Development (R&D) Area.

In this area, the facility was accumulating hazardous waste solvent in a 250-gallon tote and hazardous waste solids in two 55-gallon drums. This area does not meet the requirements for a hazardous waste satellite accumulation area. The 250-gallon tote exceeds the 55-gallon limit for a satellite accumulation area, and the two 55-gallon drums receive waste from 5, 30-gallon satellite accumulation containers within the R&D Area.

(B) Mactac failed to conduct and record inspections at the 90-day hazardous waste accumulation area located at the Hazardous Waste Staging Area. In this area, the facility was accumulating: 7, 55-gallon drums of hazardous waste solvent; two 55-gallon drums of hazardous waste solids; and hazardous waste solvent contained in the portable transfer tank (aka honey dipper) which was 2/3 full. This area does not meet the requirements for a hazardous waste satellite accumulation area.

In order to abate these violations, Mactac must submit two consecutive weeks of completed inspection records for review for each area. An example inspection log may be found at: <http://www.epa.state.oh.us/dhwm/formslistchklst.html#hwForms>

2. Satellite Accumulation, OAC rules 3745-52-34(C)(1) and (C)(2) :

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, which is under control of the operator of the process generating the waste.

A generator who accumulates hazardous waste in excess of 55 gallons must comply within three days with OAC rule 3745-52-34(A). The generator must mark the container holding the excess accumulation of hazardous waste with the date the excess began accumulating.

(A) Mactac failed to comply with these rules by accumulation greater than 55 gallons of hazardous waste solids in two 55-gallon drums at the J Coating Line satellite accumulation area; failing to date the drums when the 55-gallon limit was exceeded; and failing to comply with OAC rule 3745-52-34(A) within three days.

(B) Mactac failed to comply with these rules by accumulation greater than 55 gallons of hazardous waste solvent in two 55-gallon drums and four 5-gallon pails at the G Coating Line satellite accumulation area; failing to date the drums when the 55-gallon limit was exceeded; and failing to comply with OAC rule 3745-52-34(A) within three days.

(C) Mactac failed to comply with these rules by accumulation greater than 55 gallons of hazardous waste solvent in two 55-gallon drums at the K Coating Line satellite accumulation area; failing to date the drums when the 55-gallon limit was exceeded; and failing to comply with OAC rule 3745-52-34(A) within three days.

In order to abate these violations, Mactac must respond in writing how it will comply with the satellite accumulation rules; submit photographs of each area demonstrating only 55 gallons per waste stream is accumulating; and complete employee training on satellite accumulation procedures. Ohio EPA's fact sheet on satellite accumulation areas may be found at: <http://www.epa.state.oh.us/dhwm/guidancedocuments.html>

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

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

Mactac failed to place an accumulation start date on the 250-gallon tote located outside the R&D Area.

In order to abate this violation, Mactac must submit a photograph demonstrating the 250-gallon tote is dated; and submit evidence that employees have been trained to track and transfer the tote's accumulation date to the 55-gallon drums during waste transfer.

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

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

Mactac failed to place an accumulation start date on the following containers located at the Hazardous Waste Staging Area:

- (A) Six, 55-gallon drums of hazardous waste solvent;
- (B) Two, 55-gallon drums of hazardous waste solids;

- (C) Hazardous waste solvent contained in the honey dipper; and
- (D) One, 55-gallon drum of hazardous waste solvent by the hot dip tank.

In order to abate this violation, the facility must submit photographs demonstrating the violations identified in 7(C) and 7(D) are dated. Violations 7(A) and 7(B) were abated during the inspection.

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

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

Mactac failed to place an accumulation start date on a 55-gallon drum of spent hazardous waste solvent located at the E Coating Line.

In order to abate this violation, Mactac must submit a photograph demonstrating the drum is dated; and submit a written procedure that outlines how spent solvent line flush drums will be managed.

6. Open Container, OAC rule 3745-66-73(A):

A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

Mactac failed to keep the following hazardous waste containers closed at the Hazardous Waste Staging Area:

- (A) Four 55-gallon drums of hazardous waste solvent; and
- (B) One 55-gallon drum of hazardous waste solvent located by the hot dip tank.

In order to abate this violation, Mactac must submit a photograph that demonstrates the 55-gallon drum at the hot dip tank is closed. The remaining containers were closed during the inspection.

7. Open Container, OAC rule 3745-66-73(A):

A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

Mactac failed to keep the following hazardous waste containers closed:

- (A) 55-gallon drum of hazardous waste solvent at the E coating line;
- (B) Two 55-gallon drums of hazardous waste solvent at two separate areas along the H coating line;
- (C) 55-gallon drum of hazardous waste solvent at the K Coating Line satellite accumulation area; and
- (D) Four 5-gallon pails of hazardous waste solvent at the G Coating Line satellite accumulation area.

In order to abate these violations, Mactac must submit photographs that demonstrate each of the identified containers are closed, and submit a written procedure that outlines how spent solvent line flush drums will be managed.

8. Labeling Satellite Container, OAC rule 3745-52-34(C)(1)(b):

A satellite accumulation container must be marked or labeled with either the words “hazardous waste” or other words that identify the contents of the container.

Mactac failed to label the following satellite accumulation containers with the words “hazardous waste” or other words that identify the contents of the container:

- (A) 55-gallon drum and 4, 5-gallon pails of hazardous waste solvent at the G Coating Line satellite accumulation area;
- (B) 55-gallon drum of hazardous waste solvent at the K Coating Line satellite accumulation area;

In order to abate these violations, Mactac must submit photographs that demonstrate each of the identified containers are labeled, and complete employee training on satellite accumulation procedures.

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

While being accumulated, each container must be labeled or marked clearly with the words “hazardous waste.”

Mactac failed to label the following containers at the Hazardous Waste Staging Area with the words “hazardous waste:”

- (A) 55-gallon drum of hazardous waste solvent located near the hot dip tank; and
- (B) The “honey dipper.” Though this unit may have had a label at one time, it was not legible during the inspection.

In order to abate this violation, Mactac must submit photographs that demonstrate the containers are labeled.

10. Used Oil Labeling, OAC rule 3745-279-22(C)(1):

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

Mactac failed to label two 55-gallons drums of used oil at the Maintenance Dock.

These violations were abated during the inspection and no further response is required.

11. Universal Waste Batteries, OAC rule 3745-273-14(A):

Universal waste batteries, or a container in which batteries are contained, must be labeled or marked clearly with any one of the following phrases: universal waste batteries, waste batteries, or used batteries. Mactac failed to label three boxes of universal waste batteries located at the Maintenance Dock.

In order to abate this violation, Mactac must submit photographs demonstrating the universal waste batteries have been labeled.

12. Universal Waste Lamps, OAC rule 3745-273-14(E):

Each lamp, or a container or package in which lamps are contained, must be labeled or marked clearly with any one of the following phrases: universal waste lamps, waste lamps, or used lamps.

Mactac failed to label four boxes of universal waste lamps located at the Maintenance Dock.

In order to abate this violation, Mactac must submit photographs demonstrating the universal waste lamps have been labeled.

13. Universal Waste Lamps, OAC rule 3745-273-13(D)(1) and (2):

A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

A small quantity handler of universal waste must immediately clean up and place in a container any lamp that is broken and must place in a container any lamp that shows evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous constituents to the environment. Containers must be closed, structurally sound, compatible with the contents of the lamps, and must lack evidence of leakage, spillage, or damage that could cause leakage or releases of mercury or other hazardous constituents to the environment under reasonably foreseeable conditions.

Mactac failed to close four boxes of universal waste lamps located at the Maintenance Dock. Broken lamps were observed in each of the boxes. Although incidental breakage is allowed under the universal waste rules, if managed appropriately, a generator may not crush lamps and manage them as universal waste.

In order to abate this violation, Mactac must submit photographs demonstrating the universal waste lamps have been contained in a closed container or package.

Ohio EPA's guidance document on Fluorescent Lamps may be found at: <http://www.epa.state.oh.us/dhwm/guidancedocuments.html>

14. Universal Waste Accumulation, OAC rule 3745-273-15(A) and (C):

A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, unless the requirements of paragraph (B) of this rule are met.

(A) Mactac accumulated its universal waste batteries for longer than year. The last shipment of universal waste batteries was in August 2007.

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. This demonstration may be made by methods listed in OAC rule 3745-273-15(C)(1) to (6).

Mactac failed to demonstrate the length of time the following universal wastes had accumulated on-site:

- (B) Three 5-gallon containers containing nickel/cadmium, lithium, and lead acid batteries located at the Battery Storage Area outside R&D;
- (C) Three boxes of universal waste batteries located at the Maintenance Dock; and
- (D) Four boxes of lamps located at the Maintenance Dock.

In order to abate these violations, Mactac must submit documentation that demonstrates all universal waste batteries have been sent off-site, and submit photographs demonstrating universal waste lamps containers are dated.

15. Contingency Plan, OAC rule 3745-65-51 through 53
Each owner or operator shall have a contingency plan for the facility.

OAC rule 3745-65-51: Each owner or operator shall have a contingency plan for the facility. The contingency plan shall be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous constituents to air, soil, or surface water. The contingency plan shall be implemented whenever there is a fire, explosion, or release of hazardous waste or hazardous constituents which could threaten human health or the environment.

OAC rule 3745-65-52: (A) The contingency plan must describe the actions facility personnel must take to comply with OAC rules 3745-65-51 and 3745-65-56 in response to fires, explosions, or releases of hazardous waste or hazardous constituents to air, soil, or surface water at the facility. (C) The plan must describe arrangements agreed to by local fire and police departments, hospitals, contractors, and Ohio EPA and local emergency response teams. (D) The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (listed as primary and alternates). (E) The plan must include a list of all emergency equipment at the facility and include its location and physical description. (F) The plan must include an evacuation plan and include evacuation signals and routes of evacuation.

OAC rule 3745-65-53: A copy of the contingency plan and all revisions shall be submitted to all local police departments, fire departments, hospitals, and Ohio EPA and local emergency response teams that may be requested to provide emergency services.

Mactac failed to have a contingency plan available on-site that met the requirements of these rules.

In order to abate this violation, Mactac must develop and submit a contingency plan to Ohio EPA for review. Upon approval by Ohio EPA, Mactac must distribute the plan to emergency authorities and submit documentation demonstrating its submittal (copy of certified mail receipts or cover letter). An example contingency plan may be found in Ohio EPA's Generator Handbook (November 2005) at:
<http://www.epa.state.oh.us/dhwm/guidancedocuments.html>

16. Personnel Training, OAC rules 3745-65-16(A), (C), and (D):
Facility personnel must complete training on hazardous waste management procedures.

OAC rules 3745-65-16(A): Facility personnel must complete training that teaches them to perform their duties in a way that ensures compliance with the hazardous waste rules.

The personnel training program must: be directed by a person trained in hazardous waste management procedures; include instruction on hazardous waste management procedures and contingency plan implementation procedures relevant to the positions in which they are employed; and ensure facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems.

Due to the nature and number of hazardous waste container management violations noted during the CEI, it is apparent the current training program is not effective.

OAC rule 3745-65-16(C): Facility personnel must take part in an annual review of the initial training.

Mactac failed to provide annual training to its employees since March 2007.

OAC rules 3745-65-16(D): The facility must maintain the following documents and records at the facility: (1) job titles, as they relate to hazardous waste management, and the name of each employee filling each job; (2) a written job description for each position at the facility, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position; (3) a written description of the type and amount of both introductory and continuing training to be given to each person filling a position; and (4) records that document that the training or job experience required by this rule has been given to, and completed by, facility personnel.

The personnel training documents were not available for review during the CEI.

In order to abate this violation, Mactac must complete personnel training and submit the following documentation:

- **A copy of the training materials provided to each employee. The training should include: hazardous waste management procedures, contingency plan contents and implementation, used oil management procedures, and universal waste management procedures;**
- **A copy of the sign-in sheets documenting the date(s) when training was provided to each employee, and documentation that the trainer received outside training within the last year; and**
- **The personnel training documents/records required by OAC rule 3745-65-16(D)(1-4).**

Ohio EPA's guidance documents and fact sheets on hazardous waste management may be found at: <http://www.epa.state.oh.us/dhwm/formsandpubs.html>

17. Concern:

The facility has a portable spill control equipment kart that meets the requirements of OAC rule 3745-65-32(C). The spill kart is located within the central portion of the main plant. The facility's main 90-day hazardous waste accumulation area (Main 90-day Area) is located in a separate, stand alone building.

The facility should consider placing a small spill station within the Main 90-day Area for immediate use. In addition, OAC rule 3745-66-76 requires that containers of ignitable waste be located at least 50 feet from the facility property line. **Please verify the Main 90-day Area is located 50 feet from the property line.**

18. Concern:

An inspection of the Main 90-day Area revealed 4, 55-gallon drums containing hazardous waste solids that had an accumulation date of July 1, 2008. **Please submit a copy of the hazardous waste manifest documentation these drums were sent off-site for disposal.**

19. Concern:

An inspection of the Main 90-day Area revealed 3, 55-gallon drums that were labeled as "Hazardous Caution, Flammable and Corrosive" that had an accumulation date of July 16, 2008. It was indicated during the inspection that the facility was awaiting laboratory analysis for the contents of these drums. **Please submit a copy of laboratory analysis and documentation these drums were sent off-site for disposal.**

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. As indicated during the inspection, please feel free to contact me or OCAPP should your facility be interested in these services. OCAPP may be contacted at: (800) 329-7518 or <http://www.epa.state.oh.us/opp/ocapp.html>. The facility may want to evaluate purchasing a solvent distillation unit, further information may be found at: <http://www.epa.state.oh.us/ocapp/p2/fact9.pdf>

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 Balsler
District Representative
Division of Hazardous Waste Management

WB:ddw

Enclosure

ec: Nyall Mckenna, DHWM, NEDO
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.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office	Ohio Environmental Protection Agency RCRA SUBTITLE 3 SITE IDENTIFICATION/VERIFICATION FORM		For Ohio EPA use only						
2. Site EPA ID No.	EPA ID Number: OHD 004 155 347								
3. Site Name	Name: Mactac		Website (optional):						
4. Site Location Information	Street Address: 4560 Darrow Rd								
	City, Town, or Village: Stow		State: OH						
	County Name: Summit		Zip Code: 44224-1898						
5. Site Land Type (check only one)	<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	
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: Cuenot		MI:	Last Name: Mark					
	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	<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:				
	B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):						
	Operator Type: Mark with an X	<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 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 checked="" type="checkbox"/>	a. Large Quantity Generator (LQG):	<input type="checkbox"/>	5. Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/>	b. Small Quantity Generator (SQG)	<input type="checkbox"/>	a. Small Quantity On-site Burner Exemption
<input type="checkbox"/>	c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/>	b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/>	d. United States Importer of Hazardous Waste	<input type="checkbox"/>	6. Underground Injection Control Facility
<input type="checkbox"/>	e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/>	7. Hazardous Waste Transporter
B. Universal Waste Activities		C. Used Oil Activities	
<input checked="" type="checkbox"/>	1. Small Quantity Handler of Universal Waste	<input checked="" type="checkbox"/>	1. Used Oil Generator
(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):		2. Used Oil Transporter Indicate Type(s) of Activity(ies)	
<input type="checkbox"/>	2. Large Quantity Handler of Universal Waste	<input type="checkbox"/>	Transporter
(accumulates 5,000 kg or more).		<input type="checkbox"/>	Transfer Facility
<input type="checkbox"/>	3. Destination Facility for Universal Waste	3. Used Oil Processor and/or Re-refiner	
(Check all boxes below that apply for each of the three types of facilities above.)		Indicate Type(s) of Activity(ies)	
	<u>Generated</u> <u>Accumulated</u>	<input type="checkbox"/>	Processor
A. Batteries	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/>	Re-refiner
B. Pesticides	<input type="checkbox"/> <input type="checkbox"/>	4. Off-Specification Used Oil Burner	
C. Thermostats	<input type="checkbox"/> <input type="checkbox"/>	5. Used Oil Fuel Marketer -	
D. Lamps	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	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:	Shauna Miller, Jim Sheak
Yes	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	Kris Coder	09-25-08 0910 to 1345

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)

**LAI . QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

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

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

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

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

Safety Equipment Used: *Level D*

GENERAL REQUIREMENTS

- | | | | | | | |
|---|-----|-------------------------------------|----|-------------------------------------|-----|--------------------------|
| 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 4. Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 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 | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 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 | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 8. Does the generator accumulate hazardous waste? | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

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

- | | | | | | | |
|--|-----|--------------------------|----|-------------------------------------|-----|--------------------------|
| 9. Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)? | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
|--|-----|--------------------------|----|-------------------------------------|-----|--------------------------|

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 | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| c. Drip pads that meet 3745-69-40 to 3745-69-45? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| d. Containment building that meets 3745-256-100 to 3745-256-102? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |

NOTE: Complete appropriate checklist for each unit.

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

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

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 | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

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 | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
|--|-----|-------------------------------------|----|--------------------------|-----|--------------------------|

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 | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

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

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

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

PERSONNEL TRAINING

20. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes No N/A
21. Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes No N/A
22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A
23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes No N/A
24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A
25. Does the generator keep records and documentation of:
- a. Job titles [3745-65-16D(1)]? Yes No N/A
 - b. Job descriptions [3745-65-16D(2)]? Yes No N/A
 - c. Type and amount of training given to each person [3745-65-16D(3)]? Yes No N/A
 - d. Completed training or job experience required [3745-65-16D(4)]? Yes No N/A
26. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes No N/A

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

Job Performed	Name of Employee	Date Trained
<i>Last Training Record was March 2007</i>		
<i>P.T. information not available for review</i>		

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 **TSD**
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

Full contingency plan not available for review

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] **100** Yes No N/A

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

EMERGENCY PROCEDURES

32. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes No N/A

a. Was the contingency plan implemented? [3745-65-51(B)] Yes No N/A

b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes No N/A

c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes No N/A

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

PREPAREDNESS AND PREVENTION

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

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

a. Internal communications or alarm system? [3745-65-32(A)] Yes No N/A

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

c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] **Evap Distance** 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] **Not 2/25 to 4/9/2008-weekly current** 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

[Facility Name/Inspection Date]

[ID number]

LQG/February 2007

Page 3 of 4

- d. Do not exceed one quart of acute hazardous waste at any one time? [3745-5-34(C)(1)] Yes No N/A
- e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes No N/A
- f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes No N/A
- a. Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes No N/A
- b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes No N/A

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

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

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

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

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. **2 Areas** 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] **TSD** 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/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# ___
Not Needed/Not breached
- 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# ___

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# ___

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# ___

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

ACCUMULATION TIME

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not:

Yes ___ No N/A ___ RMK# ___

a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]

Yes ___ No N/A ___ RMK# ___

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

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

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] *TBD - broken bottles not result spill - incidental leakage - need contained* 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# ___

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#
- 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#
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:
- 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
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS

1. Does the generator manage used oil in a surface impoundment or waste pile? If yes: Yes No N/A
- a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] Yes No N/A
2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes No N/A
3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? Yes No N/A

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil? If so, Yes No N/A
- a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] Yes No N/A

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

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

NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6. Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] Yes No N/A
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
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

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
 - b. Contained the release? Yes No N/A
 - c. Cleaned up and properly managed the used oil and other materials? Yes No N/A
 - d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A

ON-SITE BURNING IN SPACE HEATER

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:
- 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
 - b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A
 - c. Are the combustion gases from heater vented to the ambient air? Yes No N/A

GENERATOR TRANSPORTATION

11. If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]
- a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24] Yes No N/A
 - b. Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24] Yes No N/A

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

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
- 13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes No N/A
- 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

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.

Keyword: UsedOilChecklistforGenerators.Oct.2007.doc

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)] 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: 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: 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# ____

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*

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# ____

NOTE: *Wastes with EPA hazardous waste numbers K174 and K175 (chlorinated aliphatic wastes) have specific requirements in rule 3745-270-33. Waste with EPA hazardous waste numbers K176, K177 and K178 (inorganic chemical wastes) have specific requirements in rule 3745-270-36.*

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# ____

REMARKS

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

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: **MACTAC** Facility Type: **LQG** Date of Inspection: **09/25/08** EPA ID#: **OHD 004 155 347**

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
1	Scrap solvent, solvent contaminated solids, tank cleanings, line purge, Solvent Contaminated Rags/gloves, 5 parts Washers	Separate Liquid and Solid Waste Stream. D001, D018, D035, F003, F005	55-gallons drums. Three 90-day Areas: Storage Building, R&D, and Staging Area. 5 SA areas		Hukill Chemical, Beford, OH	Solvent Distillation
2	Solvent Recovery Unit Oxidizer Unit	Exhaust from coating lines go to either				
3	Production Waste Water	Non-hazardous water based emulsions	1,000-gallon tank Empty 2-3 times/month		American Environmental Services. Morgantown, WV	
4	Non-production waste water (pressure wash, floor sweeper)	Tested before discharge to sewer	800-gallon tank		Discharge to sewer	
5	Waste lamps and batteries	Universal Waste	5-gallon outside R&D and Maintenance area		Veolia Env. Services	
6	Used Oil	Maintenance	55-gallon drums at maintenance area			
7						

REMARKS-GENERAL INFORMATION

General Process Information:

Mactac applies solvent emulsion based adhesives to products, coats products, and cuts products to size/width at the Stow facility. The facility has 5 coating lines, 3 of which are running with plans to start a fourth.

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? **UNDECIDED** *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

Curier:

Facility has a UST tank farm: three for toluene, 1 MEK, and 1 low flash naptha that are pumped to batch tanks as needed. Compounding Rooms have 21 batch tanks. Recycle scrap metal, pallets, cardboard, cans, bottles, paper.