



State of Ohio Environmental Protection Agency

Northeast District Office

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

February 7, 2007

RE: NUTRON NAMEPLATE, INC.
SMALL QUANTITY GENERATOR
OHD 004 161 022
CUYAHOGA COUNTY
NOV

Mr. Bud Butchko
Nutron Nameplate, Inc.
31269 Lorain Rd.
North Olmstead, OH 44070

Dear Mr. Butchko:

On February 1, 2007, Frank Zingales and I, representing the Ohio Environmental Protection Agency (Ohio EPA), Division of Hazardous Waste Management, conducted a compliance evaluation inspection (CEI) at Nutron Nameplate's (Nutron) North Olmsted, Ohio facility. Nutron 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. Nutron was inspected for the requirements of a small quantity generator (SQG) of hazardous waste during the CEI. However, Nutron must submit the information requested below (See Comments 8 and 9) in order to confirm the facility's generator status.

Ohio EPA identified the following violations of Ohio's hazardous waste rules. In order to correct these violations, the facility 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; (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. An example emergency posting was provided to you during the inspection.

In order to abate this violation, the facility must submit a copy of the emergency posting along with a photograph demonstrating it is located by the telephone identified in Violation 2 below.

2. Emergency Communication, OAC rule 3745-65-32(B) and 3745-65-34(A):
Facilities shall be equipped with the following: A device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or local or Ohio EPA emergency response teams.

The facility failed to have a communication device at or near the hazardous waste accumulation area.

In order to abate this violation, the facility must submit a photograph demonstrating a telephone was installed at or near the hazardous waste accumulation area.

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.

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. 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 10 and 20-gallon container of solid hazardous waste located at the Screen Printing Area;
- Two, 5-gallon containers of solid hazardous waste located at the Paint Stripping Area; and
- A 5-gallon container of solid hazardous waste located at the Paint Booth.

These violations were abated during the inspection by placing a hazardous waste label on the containers. No further response is required.

5. 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.

This violation was abated during the inspection by placing the lamps in a closed cardboard container. No further response is required.

6. Universal Waste Labeling, OAC rule 3745-273-14(E):
Each lamp or a container or package in which universal waste lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste Lamps," or "Waste Lamps," or "Used Lamps."

The facility failed to label or mark containers of universal waste lamps according to this rule.

This violation was abated during the inspection by labeling the container as "used lamps." No further response is required.

7. 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 container of universal waste lamps had been accumulating on-site.

This violation was abated during the inspection by placing the date on the container. No further response is required.

8. Concern: Etch Rinse Water:

The facility currently manages its spent acid and caustic etch rinse waters as a hazardous waste. However, a 2001 analytical report indicates the rinse waters may be non-hazardous. The rinse waters accumulate in four 220-gallon tanks. If the rinse waters are a hazardous waste, the facility is required to comply with the hazardous waste Tank System Requirements (OAC rule 3745-66-90 through 101). In addition, the facility would be a large quantity generator of hazardous waste.

In order to address this concern, the facility must conduct a waste evaluation of the caustic and acid rinse waters and submit the results of the evaluation to Ohio EPA for review. In addition, please indicate how the spent acid and caustic rinse waters will be managed on-site and sent off-site for disposal.

9. Concern: Used Acids sent to Agmet Metals, Inc.

During the CEI, Nutron indicated that spent acid and caustic etch solutions and rinse waters from both etch lines are combined into one shipment to Agmet Metals, Inc. for reuse. Nutron also indicated that the waste was exempt from regulation as a waste.

OAC rule 3745-51-02 states that materials are not wastes when they can be shown to be recycled by being used as ingredients in an industrial process, to make a product, provided the materials are not reclaimed. Agmet Metals may accept used acids for continued use (See attached Ohio EPA letter dated May 4, 2006). Please note, this applies only to the used acids. Nutron cannot combine the spent caustic etch solutions with used acids for shipment to Agmet Metals for reuse. Nutron's caustic etch solutions must be managed separately as a hazardous waste.

Please inform Ohio EPA how the used/spent acid etch solution and spent caustic etch solution will be managed on-site and sent off-site for disposal.

The following additional guidance documents were provided to you during the inspection: Generator requirements and generator recordkeeping requirements summary tables; LQG checklist, and a satellite accumulation guidance document.

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>.

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

Enclosed you will find a copy of the checklists that we completed during the inspection. Should you have any questions, 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
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.

**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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
See Comment 8 |
| 2. | Has the generator obtained a U.S. EPA I.D. number? [3745-52-12] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 5. | Does the generator accumulate hazardous waste? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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 <u>in excess of (180/270) days</u> without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|--|

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

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 <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) and | 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.

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

LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] (possibly also cite 3745-52-11) **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] (possibly also cite 3745-52-11) 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#____

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]

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]

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? [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? [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? [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? [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

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? [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.*

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: Yes No N/A RMK#
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes No N/A RMK#
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes No N/A RMK#
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

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name:

Facility Type:

Date of Inspection:

EPA ID#:

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	ACID Etch	Used Acid For Reuse	1,55g/month			Re-use @ Agmet	Agmet Metals, INC
2	Caustic Etch	Spent Caustic D002/D007	1,55g/month				TBD (currently Agmet)
3	EtOH Rinse WATERS	TBD	~ 800g/6 months				TBD (currently Agmet)
4	Cleaning	WASTE SOLVENT FOO3	55g/month			on-site reuse switched to UNIKS	HUKILL Chemical
5	PAINT SCRAP, Screen & Booth	WASTE SOLIDS D001 F003 F005 D055	~5/6 DMS/6 months				HUKILL Chemical
6	Lighting	Universal Waste	unknown				McMaster-Carr
7	Film Processing	Silver Recovery	unknown			Recycle	Ross Graphics
8	Film Developer	VMP napha/Resist/ WATER MIX D001	55g/year				HUKILL

REMARKS-GENERAL INFORMATION

General Process Information:

Industrial nameplate manufacturer - metal and plastic (see Field Notes)

Regulatory/Enforcement History (if applicable):

7/17/01 LAST CEI.

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes* **TBD** 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/oc

Other:

- Launder Rags by Commercial Laundry service

Doing: - Used Acid to Adjust for Reuse

- On-site Re-use of solvent at PRINT Stripping

- Recycle Silver from developer.

- Switched to UV INKS & Curing