



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Road
Twinsburg, OH 44087-1924

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Laura H. Powell, Acting Director

January 17, 2007

**RE: OLYMCO INCORPORATED/DIVISION OF
DELTA PLATING, INC.
OHD 038 954 525
LARGE QUANTITY GENERATOR OF
HAZARDOUS WASTE
NOTICE OF VIOLATION**

William Sklavenitis
Olymco
2125 Harrison Ave., SW
Canton, Ohio 44706

Dear Mr. Sklavenitis:

The Ohio EPA Division of Hazardous Waste Management conducted an inspection of Olymco located at 2125 Harrison Ave., SW in Canton, Ohio, on December 12 and 18, 2006. Suzanne Prusnek and Robert Almquist represented the Ohio EPA for this inspection. The purpose was to determine if Olymco had violations of Ohio's hazardous waste and used oil laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC) and to investigate a complaint received by our office. A further purpose was to look for ways Olymco may be able to reduce its waste generation and conserve energy.

The complaint received alleged that hazardous waste was stored for longer than 90 days and that labels containing accumulation start dates had been removed and new labels with false accumulation start dates had been put on containers of hazardous waste. It was found that hazardous waste had been stored for over 90 days as explained in the violations below. Ohio EPA did not find any evidence that accumulation start dates were being falsified.

Below are listed the violations and concerns found during the inspection and what you need to do to correct or otherwise address them. Please also see the enclosed Process, Waste, and Pollution Prevention Summary and the enclosed inspection checklists.

The following violations were found:

1. Ohio Revised Code (ORC) 3734.13(D) - Enforcement orders; emergency orders; procedure upon violation.
ORC 3734.13(D) states that no person shall violate any term or condition of any order issued under this section.

Olymco violated ORC 3734.13(D) by not complying with order # 4 of the Director's Final Findings and Orders signed by Olymco on August 31, 2006. This order required Olymco to submit documentation demonstrating how it would manage the F006 hazardous waste generated from the reverse osmosis system in accordance with hazardous waste management rules. This documentation must be submitted as soon as possible. Please note other violations cited below which are a result of the mismanagement of this waste.

2. Ohio Revised Code (ORC) 3734.02(E) and (F) – Unpermitted storage of hazardous waste.

ORC 3734.02 (E) and (F) state that no person shall establish or operate a hazardous waste facility without a permit and that no person shall store, treat, or dispose of hazardous waste except at a facility with a hazardous waste permit.

Olymco violated ORC 3734.02(E) and (F) by storing its hazardous waste beyond 90 days. You stated that a past employee notified you that the B-9 nickel strip hazardous waste had been accumulated for 88 days. You said that this employee did not allow enough time to notify the disposal company in order for samples to be collected and paperwork prepared for the shipment. This waste was shipped on August 29, 2006 which was 4 days beyond the 90 day limit.

- A. Olymco violated ORC 3734.02(E) and (F) by storing its F006 hazardous waste filter press sludge beyond 90 days. You stated that this waste was stored beyond 90 days. It was shipped on September 7, 2006 which was 93 days since it was last shipped.
- B. Since Olymco violated (ORC) 3734.02(E) and (F), Olymco is subject to all applicable general facility standards found in OAC chapters 3745-54 and 55. Additionally, at any time Ohio EPA may assert its right to have Olymco begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

3. OAC 3745-65-52(E) – Contingency plan emergency equipment.
This rule requires the contingency plan to include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications, and alarm systems), where this equipment is required. Included must be the location, physical description, and capabilities of each item on the list.

Olymco violated this rule by not including in the plan the location of the Spill Response Equipment Cabinets and phone that would be used to respond to a hazardous waste spill. You documented your correction of this by sending me an updated building layout on January 10, 2007.

4. OAC 3745-52-34(A)(3) – Labeling as hazardous waste.
This rule requires that, while being accumulated and/or treated on site, each hazardous waste container and tank must be labeled clearly with the words “Hazardous Waste.”
 - A. Olymco violated this rule by having a tote containing hazardous waste stored in the chemical storage area that was not labeled as hazardous waste. Olymco corrected this by cutting open this tote and putting the solids in it into the hazardous waste debris box (waste profile 5556).
 - B. Olymco violated this rule by having a tank holding F006 R/O reject water (6515) that was not labeled as hazardous waste. You corrected this at the time of the inspection.

5. OAC 3745-52-34(A)(2) – Accumulation start date.
This rule requires that, while being accumulated and/or treated on site, each hazardous waste container must be labeled with the accumulation start date.

Olymco violated this rule by having a tote containing hazardous waste stored in the chemical storage area that was not labeled with the accumulation start date. Olymco corrected this by cutting open this tote and putting the solids in it into the hazardous waste debris box (waste profile 5556).

6. OAC rule 3745-66-73(A) – Keeping containers closed.
This rule requires that a container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

Olymco violated this rule by having a tote containing hazardous waste stored in the chemical storage area that was not closed. Olymco corrected this by cutting open this tote and putting the solids in it into the hazardous waste debris box (waste profile 5556).

7. OAC rule 3745-279-22(D) - Response to releases of used oil.
This rule requires that upon detection of a release of used oil to the environment, the generator must clean up and manage properly the released used oil and other materials.

Olymco violated this rule by having used oil that leaked from the air compressor on the concrete pad the compressor is on and in gravel nearby. This was corrected during the inspection.

8. OAC rule 3745-270-07(A)(6)(b) – Waste analysis data for land disposal restrictions.

This rule requires that if a generator determines that the waste is restricted based on testing then all waste analysis data must be retained on site in the generator's files.

Olymco violated this rule by not retaining on site the waste analysis data for the sodium dichromate/chrome rinse waste (5328). Olymco must obtain this waste analysis data and send a copy to me.

9. OAC rule 3745-270-07(A)(2) – Land disposal restriction notice sent to receiving facility.

This rule requires that if the waste does not meet the land disposal restriction treatment standard then, with the initial shipment of waste, the generator must send a one-time written notice to the receiving facility and place a copy of that notice in the generator's files. The notice must include the information in Column A of Table 1 (copy enclosed). This information includes the manifest number of the first shipment.

Olymco violated this rule by not having this manifest number on the land disposal notifications for the following wastes: 5556, 6476, 4330, 5328, and 6358. Please send me a complete land disposal notification for each of these wastes. Please also ensure that the wastewater/non-wastewater designation for wastes 6358 and 6476 are correct on these notifications.

10. OAC rules 3745-66-92, 3745-66-93, 3745-66-94, and 3745-66-95 – Hazardous waste tank system requirements.

These rules cover the requirements for a new tank system accumulating waste such as the R/O reject water (6515).

Olymco is in violation of these rules for not managing the tank system accumulating the R/O reject water (6515) as a hazardous waste tank. A plan for meeting these requirements must be submitted.

11. OAC rule 3745-52-20(A) – Manifests – general requirements.

This rule requires the generator to prepare a hazardous waste manifest prior to offering hazardous waste for transport off site.

Olymco violated this rule by failing to prepare hazardous waste manifests for multiple shipments of R/O reject water (6515) to Envirite. Olymco did not prepare these hazardous waste manifests because it listed this F006 hazardous

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waste as a nonhazardous waste on the manifests it used during shipment. Please send me a copy of a manifest you have used to ship this waste that lists the waste as a F006 hazardous waste.

12. OAC rule 3745-270-07(A)(1) – Determining if waste must be treated before being land disposed.

This rule requires that a generator of hazardous waste must determine if the waste has to be treated before it can be land disposed. This is done by determining if the hazardous waste meets the treatment standards in OAC rule 3745-270-40, 3745-270-45, or 3745-270-49.

Olymco violated this rule by not making this determination for the F006 R/O reject water (6515). Please make this determination and send me a description of it. Please also send me a copy of the appropriate land disposal restriction notification for this waste as required by OAC 3745-270-07(A)(2) or (A)(3), whichever applies.

13. OAC rule 3745-52-11 – Hazardous waste determination.
OAC rule 3745-52-11 requires that any person who generates a waste must determine if that waste is a hazardous waste using the procedure described in that rule.

Olymco violated this rule by not determining, in accordance with the rule, whether or not the waste from the dust collector for the buffing and polishing operation is a hazardous waste. You have since sampled that waste. Please send me a copy of the analytical report for this when it is available.

Some of this dust collector waste was seen on the ground outside by the dust collector. Even if it is not a hazardous waste, it is suggested that this waste be cleaned up and disposed. I also suggest that you try to purchase bags that can be fitted directly to the outlet of this dust collector to avoid such spillage and to lessen labor cost in dealing with this waste.

The following additional issues were found:

1. Rust Preventative Waste
Olymco uses a product called RP-501 Rust Preventative to dip some parts in to prevent them from rusting. When no longer usable this solution is stored and then shipped to Akron-Canton Waste Oil. You said this spent material is a used oil. I talked with the manufacturer of this material who said it is 76% water and 16% sodium nitrate. I do not believe this spent material is classified as used oil.

It does not appear to meet the origin criteria as explained in the following document:

The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil:

http://www.epa.state.oh.us/dhwm/pdf/Used_Oil_Generators_Guidance.pdf.

Please respond with your determination as to whether this waste is a hazardous waste or not. Include a copy of any sample testing data used to make that determination. Akron-Canton Waste Oil may already have such sample data.

2. Hand Line Cleaners and Mild Acid

Spent cleaners and mild acid from the hand line are stored in totes and then used as a substitute for new acid or caustic in the wastewater treatment system. These spent cleaners are also used to replenish the cleaner tanks on the main line. You stated these materials are not wastes for these reasons. It is true that OAC 3745-51-02(E)(1) states that materials are not wastes when recycled by being used as effective substitutes for commercial products. However, OAC 3745-51-02(C)(4) states that materials are wastes when accumulated speculatively. This means that in order for these materials to not be regulated as wastes you must be able to show that at least 75% of the material is recycled during each calendar year. Some of the totes of this material that we saw were clearly labeled with the material name and generation date but some were not. Please respond with a procedure that you will use to ensure that this material is not speculatively accumulated. Such a procedure may include labeling of the totes and/or keeping a log of them and a first generated – first used policy.

3. Personnel Training

You provided job descriptions and training records. I came across the following issue in my review of these. The two job descriptions for Chemical Add Technician and Group Leader did not appear on the training records. Are there current employees that hold these jobs?

4. Contingency Plan

It is suggested that you update Table 1 – Hazardous Waste Table in the contingency plan to include the B-9 Nickel Strip waste (profile 6476).

5. Material Stored in Chemical Storage Area

Many materials were seen in the chemical storage area. Some were not clearly labeled and one drum labeled sulfuric acid was open. I encourage you to sell or properly dispose of any chemicals that Olymco will not be using. A waste exchange such as Ohio's Material Exchange which can be found at:

<http://www.epa.state.oh.us/ocapp/p2/omex/omex.html> may help you find a company that can use materials you no longer need.

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6. Land Disposal Restrictions
Olymco has been shipping the sodium dichromate/chrome rinse waste (5328) using the hazardous waste codes of D002, D007, and F006. It does not appear that this waste fits the F006 listing description. Please investigate this and let me know the results of that investigation.

7. Land Disposal Restrictions
Olymco has been shipping the soap/cleaner waste (4330) using the D002, D007, and D008 waste codes. Recent waste analysis data (dated 12-15-06) did not find any TCLP lead levels in this waste and, therefore, the D008 waste code may not be needed. Please review past waste analysis and/or process changes and determine if the D008 waste code applies to this waste.

Please send a written response to this letter within 30 days including the documentation required above.

Olymco currently cuts open, rinses, and disposes of plastic drums that are no longer needed. I encourage you to talk to your suppliers or other suppliers about taking back the empty drums. The following list of drum reconditioners and recyclers may be useful if a supplier that takes the drums back is not feasible:
<http://www.epa.state.oh.us/opp/recyc/drums.html>.

You said Olymco is researching whether to start copper plating. I believe the following company sells noncyanide copper plating solutions:
<http://shorinternational.com/PlatingAccessory.htm>.

Here is a general document regarding the use of copper and copper compounds:
http://www.epa.state.oh.us/opp/mercury_pbt/fact93.pdf.

Electrolytic recovery technology may be useful for a copper line as discussed here:
http://p2librarv.nfesc.navy.mil/P2_Opportunity_Handbook/1_7.html.

The Ohio Department of Development's Office of Energy Efficiency may be able to help with energy efficiency issues. Their web site is at:
<http://www.odod.state.oh.us/cdd/oeef/>.

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides compliance and pollution prevention assistance on environmental issues related to air, land, and water. They can be contacted at 800-329-7518 or <http://www.epa.state.oh.us/ocapp/ocapp.html>. In June 2006 they published a 56 page Small Business Environmental Compliance Self-Assessment Guide which can be found at: <http://www.epa.state.oh.us/ocapp/sb/publications/selfgde.pdf>.

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You can find copies of the regulations and other information on the Division of Hazardous Waste Management web page at <http://www.epa.state.oh.us/dhwm/>. If you have any questions, please contact me at (330) 963-1217, or robert.almquist@epa.state.oh.us.

Sincerely,


Robert Almquist
Division of Hazardous Waste Management

RA:cl
Enclosures

cc: Natalie Oryshkewych, DHWM, NEDO
Barb Knecht, HZW Environmental

ec: Frank Popotnik, DHWM, NEDO
Kris Coder, DHWM, NEDO
Suzanne Prusnek, DHWM, NEDO
Harry Sarvis, DHWM, CO
Jim Kavalec, DHMW, CO
Todd Anderson, Legal, CO

Notice:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your facility from its obligation 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	Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM		For Ohio EPA use only																			
2. Site EPA ID No.	EPA ID Number: OHD 038 954 525																					
3. Site Name	Name: Olymco Inc.		Website (optional:): www.olymco.com																			
4. Site Location Information	Street Address: 2125 Harrison Ave., SW																					
	City, Town, or Village: Canton		State: OH																			
	County Name: Stark		Zip Code: 44706-3005																			
5. Site Land Type (check only one)	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>				Private	County	District	Federal	Indian	Municipal	State	Other	X									
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X																						
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A. 332813		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: Gregory		MI:	Last Name: Kalikas																		
	Phone Number: 330-452-2300		Phone Number Extension:																			
	E-Mail Address: william@olymco.com				Fax Number Extension:																	
	Fax Number: 330-452-5425		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):																			
	Delta Plating, Inc.		June 1986																			
	Owner Type: Mark with an X	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>					Private	County	District	Federal	Indian	Municipal	State	Other	X							
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	City, Town, or Village:		Owner Phone #:																			
	State:		Country:		Zip Code:																	
	B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):																			
	Olymco Inc.		June 1986																			
Operator Type: Mark with an X	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>					Private	County	District	Federal	Indian	Municipal	State	Other	X								
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X																						
Street or P.O. Box: same																						
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)

- UNKNOWN: Cited for violation of 3745-52-11
- a. Large Quantity Generator (LQG):
- b. Small Quantity Generator (SQG)
- c. Conditionally Exempt Small Quantity Generator
- d. United States Importer of Hazardous Waste
- e. Mixed Waste (hazardous and radioactive) Generator

- 3. Treater, Storer or Disposer of Hazardous Waste
- 4. Recycler of Hazardous Waste
- 5. Exempt Boiler and/or Industrial Furnace
 - a. Small Quantity On-site Burner Exemption
 - b. Smelting, Melting, Refining Furnace Exemption
- 6. Underground Injection Control Facility

B. Universal Waste Activities

- 1. Small Quantity Handler of Universal Waste
(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):
- 2. Large Quantity Handler of Universal Waste
(accumulates 5,000 kg or more).
- 3. Destination Facility for Universal Waste
(Check all boxes below that apply for each of the three types of facilities above.)

Generated Accumulated

A. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
D. Lamps	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

C. Used Oil Activities

- 1. Used Oil Generator
- 2. Used Oil Transporter Indicate Type(s) of Activity(ies)
 - Transporter
 - Transfer Facility
- 3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)
 - Processor
 - Re-refiner
- 4. Off-Specification Used Oil Burner
- 5. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)
 - a. Marketer Who Directs Shipment of Off- Specification Oil
 - 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.

D002	D007	F006	D008			
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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:	William Sklavenitis, Barb Knecht, Steve Bell, George Erwin
yes	Tanks?	Other comments:	
yes	Containers?		

13.	Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
	Robert Almquist	Suzanne Prusnek	12-12 and 18-06

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)

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

Facility Name: **Olymco** ID #: **OHD 038 954 525** Inspection Date: **12-12 and 18-06**

CESQG: <100Kg. (Approximately 25-30 gallons) of waste in a calendar month.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
 LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or >1 Kg. Of acutely hazardous waste in a calendar month.
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used: Glasses and boots

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. 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"/> |
| 3. 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"/> |
| 4. 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"/> |
| 5. 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"/> |
| 6. 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.

- | | | | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| 7. Has the generator accumulated hazardous waste on-site in <u>excess</u> of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)? | Yes | <input checked="" type="checkbox"/> | No | <input 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).

- | | | | | | | |
|------------------------------------------------------------------------|-----|--------------------------|----|-------------------------------------|-----|--------------------------|
| 8. 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 checked="" type="checkbox"/> | N/A | <input 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 checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| c. Drip pads that meet 3745-69-40 to 3745-69-45? | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| d. Containment building that meets 3745-256-100 to 3745-256-102? | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |

NOTE: Complete appropriate checklist for each unit.

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

- | | | | | | | |
|--------------------------------------------------------------------------------|-----|--------------------------|----|-------------------------------------|-----|--------------------------|
| 9. 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 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 type="checkbox"/> |

c For manifests that have not been returned to the generator: has an exception report been filed? Yes No N/A
[3745-52-55]

d Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes No N/A

e Are export related documents being maintained on-site? [3745-52-57(A)] Yes No N/A

MANIFEST REQUIREMENTS

10 Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) Yes No N/A
[3745-52-20(A)]

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 completed. [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 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)].

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

14 Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] Yes No N/A

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

15 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

16 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

17 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

18 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

19 Does the personnel training program include instructions to ensure that facility personnel are able to Yes No N/A

- respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes No N/A
- 20 Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A
- 21 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
- 22 Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A
-
- 23 Does the generator keep records including: job titles [D(1)], job descriptions [D(2)], type and amount of training given to each person [D(3)] and documentation of completed training or job experience required [D(4)]? [3745-65-16(D)] Yes No N/A
- 24 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.*

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date Trained</u>
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CONTINGENCY PLAN

- 25 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
- 26 Does the plan describe the following:
- a Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes No N/A
- b Arrangements with emergency authorities [3745-65-52(C)]. Yes No N/A
- c A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes No N/A
- d A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes No N/A
- e An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes No N/A

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

- 27 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

- 28 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
- 29 Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes No N/A

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

EMERGENCY PROCEDURES

- 30 Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: unknown 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

- 31 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
- 32 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: Verify that the equipment is listed in the contingency plan.

- 33 Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes No N/A
- 34 Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A
- 35 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
- 36 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 Yes No N/A

3745-65-32) [3745-65-34(B)]

- 37 Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? Yes No N/A
 [3745-65-35]
- 38 Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes No N/A
- 39 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

- 40 Does the generator ensure that satellite accumulation area(s):
 - a Are at or near a point of generation? [3745-52-34(C)(1)] Yes No N/A
 - b Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes No N/A
 - c Do not exceed one quart of acutely hazardous waste at anyone time? [3745-52-34(C)(1)] Yes No N/A
 - d Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes No N/A
 - e Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
- 41 Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:
 - a Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes No N/A
 - b Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes No N/A
 - c Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A

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

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

- 42 Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes No N/A
- 43 Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No N/A
- 44 Are hazardous wastes stored in containers which are:
 - a Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A

b In good condition? [3745-66-71] Yes No N/A

c Compatible with wastes stored in them? [3745-66-72] Yes No N/A

d Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A

NOTE: Record location on process summary sheets and photograph the area.

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

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

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

47 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

48 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

49 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.

50 If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745- 66-11? [3745-52-34(A)(1)] Yes No N/A

NOTE: Please provide a description of the unit and documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

51 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)] unknown Yes No N/A

52 Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] not normally shipped in containers less than 110 gallons Yes No N/A

53 Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] unknown Yes No N/A

UNIVERSAL WASTE HANDLER REQUIREMENTS- SMALL QUANTITY- BATTERIES AND LAMPS

Facility Name: Olymco ID #: OHD 038 954 525 Inspection Date: 12-12 and 18-06

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

Olymco does not normally generate waste batteries

- 3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes ___ No N/A ___RMK#
- 4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes ___ No N/A ___RMK#
- 5. Does the SQUWH conduct any of the following activities:
 - a. Sort batteries by type? Yes ___ No ___ N/A ___RMK#
 - b. Mix battery types in one container? Yes ___ No ___ N/A ___RMK#
 - c. Discharge batteries to remove the electric charge? Yes ___ No ___ N/A ___RMK#
 - d. Regenerated used batteries? Yes ___ No ___ N/A ___RMK#
 - e. Disassemble them into individual batteries or cells? Yes ___ No ___ N/A ___RMK#
 - f. Remove batteries from consumer products? Yes ___ No ___ N/A ___RMK#
 - g. Remove the electrolyte from the battery? Yes ___ No ___ N/A ___RMK#

If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)]

Yes ___ No ___ N/A ___ RMK#

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)]

Yes ___ No N/A ___ RMK#

a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]

Yes ___ No N/A ___ RMK#

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]

Yes ___ No N/A ___ RMK#

7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]

Yes ___ No N/A ___ RMK#

UNIVERSAL WASTE LAMPS

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]

Yes No N/A ___ RMK#
During inspection Olymco removed packaging from the bottom of the box so that the tubes would fit all the way in and so that the box flaps could be closed.

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#
No broken tubes seen.

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? Yes No N/A RMK#
[3745-273-15(A)] If not:

a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes No N/A RMK#

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

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes No N/A ___RMK#
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes___ No___ N/A ___RMK#
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes___ No___ N/A ___RMK#
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes___ No___ N/A ___RMK#
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes___ No___ N/A ___RMK#
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes___ No___ N/A ___RMK#
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes___ No___ N/A ___RMK#

EMPLOYEE TRAINING

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

RESPONSE TO RELEASES

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

NOTE:

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#
unknown
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes X 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:
None has been rejected
- a. Receive the waste back? [3745-273-18(E)(1)] Yes ___ No ___ N/A ___RMK#

- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes ___ No ___ N/A ___ RMK#
21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
- 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#
Hasn't happened
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#
Hasn't happened

EXPORTS

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

REMARKS

USED OIL REQUIREMENTS

Facility Name: Olymco

ID #: OHD 038 954 525

Inspection Date: 12-12 and 18-06

NOTE: This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.

PROHIBITIONS

Olymco does not normally generate used oil, however, see question 9 in reference to a leak from the air compressor.

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes__No__ N/A __RMK#
Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes __ No N/A __RMK#
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No ____ N/A __RMK#
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes __ No N/A __RMK#

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes ___ No N/A ___RMK#
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes ___ No N/A ___RMK#
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes ___ No N/A ___RMK#
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes ___ No N/A ___RMK#
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes ___ No N/A ___RMK#
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes ___ No N/A ___RMK#

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

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

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

WASTE EVALUATION

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

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REMARKS

Land Disposal Restriction Requirements

Facility Name: Olymco ID #: OHD 038 954 525 Inspection Date: 12-12 and 18-06

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# ___
Question on B9 nickel strip (6476)
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# ___

Covered under question 1b

REMARKS

GENERATORS TREATING HAZARDOUS WASTE

1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40?

Yes ___ No ___ N/A ___ RMK# ___

2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)]

Yes ___ No N/A ___ RMK# ___

a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)]

Yes ___ No N/A ___ RMK# ___

b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)]

Yes ___ No N/A ___ RMK# ___

3. Is the WAP on-site in the facility's files and available to inspectors?

[3745-270-07(A)(5)(b)]

Yes ___ No N/A ___ RMK# ___

4. Has the generator followed their WAP [3745-270-07(A)(5)?

Yes ___ No N/A ___ RMK# ___

5. Have the treated wastes met the applicable treatment standards in 3745-270-40?

Yes ___ No N/A ___ RMK# ___

NOTE: If the waste is a characteristic waste, which has been treated to render it non hazardous and subsequently sent to a solid waste landfill, proceed to question 7 & 8.

6. Has the generator sent a notification and certification with the initial shipment of waste?[3745-270-07(A)(5)(c)]

Yes ___ No N/A ___ RMK# ___

7. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)]

Yes ___ No N/A ___ RMK# ___

8. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following:

Yes ___ No N/A ___ RMK# ___

a. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)]

Yes ___ No N/A ___ RMK# ___

b. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)]

Yes ___ No N/A ___ RMK# ___

NOTE: If the waste will be treated and monitored for all UHCs then they do not need to be listed on the notice.

9. Has the process/operation generating the waste or the solid waste landfill facility changed? If so:

Yes ___ No ___ N/A ___ RMK# ___

a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)]

Yes ___ No N/A ___ RMK# ___

b. Has the director been notified of such changes? [3745-270-09(D)]

Yes ___ No N/A ___ RMK# ___

NOTE: The director need only be notified on an annual basis but no later than December 31.

10. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so:

Yes ___ No ___ N/A ___ RMK# ___

a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49 (C)]

Yes ___ No N/A ___ RMK# ___

11. Does each notification/certification form completed, contain the information found in Table1? [3745-270-07(A)(3)]

Yes ___ No N/A ___ RMK# ___

NOTE: *If the waste will be treated and monitored for all constituents, there is no need to put them all on the LDR notice.*

REMARKS

HAZARDOUS DEBRIS

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)?

Yes ___ No ___ N/A ___ RMK# ___

2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.)

Yes ___ No ___ N/A ___ RMK# ___

3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so:

Yes ___ No ___ N/A ___ RMK# ___

a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)]

Yes ___ No N/A ___ RMK# ___

NOTE: *If immobilization has been used in a treatment train, it must be the last treatment technology used.*

4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so: Yes ___ No ___ N/A ___ RMK# ___
- a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] Yes ___ No N/A ___ RMK# ___
5. Is the waste a PCB waste under 40 CFR Part 761? If so: Yes ___ No ___ N/A ___ RMK# ___
- a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)] Yes ___ No N/A ___ RMK# ___
6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)] Yes ___ No N/A ___ RMK# ___
7. Does the owner/operator of a treatment facility that claims the debris is excluded from regulation as a hazardous waste under 3745-51-03(F)(1) maintain the following information? Yes ___ No ___ N/A ___ RMK# ___
- a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)] Yes ___ No N/A ___ RMK# ___
- b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)] Yes ___ No N/A ___ RMK# ___
- c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)] Yes ___ No N/A ___ RMK# ___
8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F)(1) have the following information? [3745-270-07(D)(3)] Yes ___ No ___ N/A ___ RMK# ___
- a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)] Yes ___ No N/A ___ RMK# ___
- b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)] Yes ___ No N/A ___ RMK# ___
- c. Technology used from Table 1? [3745-270-07(D)(1)(c)] Yes ___ No N/A ___ RMK# ___
9. Has the above notification been sent to the director? [3745-270-07(D)(1)] Yes ___ No ___ N/A ___ RMK# ___

REMARKS

TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS

Does the treating facility test waste according to their waste analysis

1. plan as required in 3745-54-13 or 3745-65-13?[3745-270-07(B)] Yes ___ No N/A ___ RMK# ___
2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)] Yes ___ No N/A ___ RMK# ___

Note: No further notification is necessary until such time that the waste changes or the receiving facility changes.

3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07?[3745-270-07(B)(3)] Yes ___ No N/A ___ RMK# ___
4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so:**
- a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)] Yes ___ No N/A ___ RMK# ___
5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? **If so:**
- a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)), excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)] Yes ___ No N/A ___ RMK# ___
- b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4)[3745-270-07(B)(6)] Yes ___ No N/A ___ RMK# ___
- c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)] Yes ___ No N/A ___ RMK# ___
6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)] Yes ___ No N/A ___ RMK# ___
7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have:
- a. Copies of all notices and certifications required in 3745-270? Yes ___ No N/A ___ RMK# ___
- b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49? Yes ___ No N/A ___ RMK# ___
- c. The testing frequency specified in the facility's WAP and have they followed the protocol? Yes ___ No N/A ___ RMK# ___

REMARKS