



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

CERTIFIED MAIL

March 8, 2007

Una A. Alexandrovic
Orbit Industries, Inc.
6840 Lake Abram Dr.
Middleburg Hts., OH 44130



**RE: ORBIT INDUSTRIES, OHR000102475, CUYAHOGA COUNTY
COMPLAINT 6930, SQG NOV/PRTC**

Dear Ms. Alexandrovic:

On February 26, 2007, I visited Orbit Industries, Inc. (Orbit) located at 6840 Lake Abram Drive, Middleburg Heights, Ohio to conduct an unannounced hazardous waste compliance evaluation inspection (CEI). The CEI was conducted in response to a complaint concerning the mismanagement of waste at your facility. Orbit was represented by you.

The purpose of the inspection was to determine Orbit's 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. Orbit was inspected for the requirements of a small quantity generator (SQG) of hazardous waste. However, the facility becomes an episodic large quantity generator (LQG) when process tanks are cleaned-out. Specifically, process tank materials when spent, are vacuumed directly into the hazardous waste transporter's vehicle.

On February 26, March 2, March 5 and March 7, 2007, I received your e-mails concerning requested facility compliance related documentation.

Information obtained pertaining to process descriptions, hazardous waste generation and amount, and hazardous waste management units, is specified on the Process Description-Waste Activities Summary Sheet within the enclosed inspection checklist.

Based on the inspection, Ohio EPA has identified the following violations:

- 1. OAC rule 3745-52-34 (D)(5)(c), Employees Must be Appropriately Trained: The generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.**

In December 2005 and January 2006, Orbit provided training on hazardous waste handling procedures. As evidenced by the violations discovered during the February 26, 2007 inspection, Orbit failed to ensure that relevant employees are familiar with hazardous waste handling procedures. **To abate this violation, submit a description of the type of re-training provided to employees on proper hazardous waste handling procedures. Additionally, please submit a list of the employees who were trained and the date they completed the training.**

2. **OAC rule 3745-52-34 (A)(2), Dating Accumulation Containers: While being accumulated on-site, each container with hazardous waste contents must be labeled or clearly marked with the date upon which the accumulation period began.**

Orbit failed to apply the accumulation start date to three containers of hazardous waste observed in the chemical storage area. These containers consisted of one, 55-gallon drum of used acetone rags; one overpack container of tri-acid waste; and one, 30-gallon container of expired sulfuric acid. **Based upon submitted documentation, Orbit has adequately abated this violation. No further response is required.**

3. **OAC rule 3745-52-34 (A)(3), Labeling Accumulation Containers: While being accumulated on-site, each container with hazardous waste contents must be labeled or clearly marked with the words "Hazardous Waste."**

Orbit failed to label four containers with the words "Hazardous Waste." These containers were observed in the chemical storage area and consisted of one, 55-gallon drum of used acetone rags; one, 55-gallon drum of tri-acid waste spill clean-up material; one overpack container of tri-acid waste; and one, 30-gallon container of expired sulfuric acid. **Based upon submitted documentation, Orbit has adequately abated this violation. No further response is required.**

4. **OAC rule 3745-66-73(A), Management of Containers: Any container holding hazardous waste must be closed ... except when it is necessary to add or remove waste.**

Orbit failed to close two containers of hazardous waste. These containers consisted of one, 55-gallon drum of tri-acid waste spill clean-up material and one overpack container of tri-acid waste. Additionally, the lid was ajar on the satellite accumulation container (55-gallon drum) for used acetone rags observed in the Acetone Product Area. The satellite accumulation container was later closed during the inspection. **Based upon submitted documentation, Orbit has adequately abated this violation. No further response is required.**

5. **OAC rule 3745-66-72, Compatibility of Waste with the Container: Any container holding hazardous waste must be made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.**

Orbit failed to accumulate tri-acid hazardous waste in a compatible container. In January 2007, the tri-acid waste was accumulated in a steel 55-gallon drum which began to leak. Subsequently, the steel drum had to be overpacked and the released waste cleaned-up. Currently, Orbit is accumulating the tri-acid hazardous waste in a plastic 55-gallon drum. **No further information is requested to abate this violation.**

6. **OAC rule 3745-270-07(A)(2), LDR Requirements: (A)(2): A generator of a hazardous waste must determine if the waste has to be treated before it can be land disposed. If the waste does not meet the treatment standard, with the initial shipment of waste to each treatment or storage facility, the generator shall send a one-time written notice to each treatment or storage facility receiving the waste, and place a copy in the generator's files. The notice must include the information in Column A of Table 1 of this rule. No further notification is necessary until such time as the waste changes or the treatment or storage facility changes, in which case a new notification must be sent to the new treatment or storage facility and a copy placed in the generator's files.**

As previously identified in Ohio EPA's letter dated February 22, 2006, the waste analysis data for the corrosive liquid waste (spent alkaline cleaner) indicated that it should be characterized as a D002/F001 listed hazardous waste due to the presence of trichloroethylene. It is Ohio EPA's understanding that the trichloroethylene originated from degreasing activities requiring the application of the F001 hazardous waste number. On July 7, 2006, Orbit shipped the spent alkaline cleaner as a D002/D040 hazardous waste. As such, Orbit failed to adequately evaluate this waste stream in accordance with OAC rule 3745-52-11 and 3745-270-07. While Orbit failed to adequately evaluate this waste, the hazardous waste was managed at a permitted facility. **Please describe in writing how Orbit will prevent a recurrence of this violation.**

On December 19, 2006, Orbit sent for off-site disposal, two drums (110-gallons) designated as spent absorbent, not DOT or RCRA regulated on manifest tracking number 000619325JJK. After receipt by the designated facility, the waste was found to be a hazardous waste (waste solids containing flammable liquid, D001/F003). The waste was subsequently managed as a D001/F003 hazardous waste. As a result, Orbit violated the following rules since they were not complied with when the waste was initially shipped on December 19, 2006:

7. **OAC rule 3745-52-11, Waste Evaluation:** Orbit failed to evaluate the above waste to determine if it was a hazardous waste.
8. **OAC rule 3745-52-20, Manifest Requirements:** Orbit failed to comply with the manifest requirements for hazardous waste.
9. **OAC rule 3745-52-31 & OAC rule 3745-52-32, Labeling and Marking:** Orbit failed to label and mark the containers of hazardous waste in accordance with DOT regulations under 49 CFR Part 172.

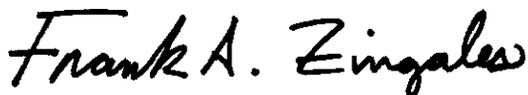
To abate the aforementioned violations, Orbit must provide instruction to all affected employees on the proper evaluation, management, and disposal of hazardous waste. This instruction must be included as part of the facility's personnel training required under OAC rule 3745-52-34(D)(5)(c). **Orbit must address the aforementioned violations and submit documentation concerning the training provided to all affected employees.**

The above violations must be immediately addressed and all of the above requested documentation of compliance must be submitted to my attention at the Ohio EPA within 30 days of receipt of this letter. You may find copies of the hazardous waste rules and other information on Ohio EPA's web page at: <http://www.epa.state.oh.us/dhwm>.

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

Should you have any questions, please contact me at (330) 963-1108.

Sincerely,



Frank A. Zingales
Environmental Specialist
Division of Hazardous Waste Management

FAZ:ddw

Enclosure

cc: Natalie Oryshkewych, DHWM, NEDO
Harry Sarvis, DHWM, CO
ec: Jim Kavalec, DHWM, CO
Elissa Miller, Legal, CO

E-mail this completed form to tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM		For Ohio EPA use only																				
2. Site EPA ID No.	EPA ID Number: OHR000102475																						
3. Site Name	Name: Orbit Industries, Inc.		Website (optional):																				
4. Site Location Information	Street Address: 6840 Lake Abram Dr.																						
	City, Town, or Village: Middleburg Hts.	State: OH																					
	County Name: Cuyahoga	Zip Code: 44130																					
5. Site Land Type (check only one)	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input type="checkbox"/></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	<input type="checkbox"/>											
Private	County	District	Federal	Indian	Municipal	State	Other																
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A.		B.																				
C.		D.																					
7. Facility Representative: Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	First Name: Una		MI: A.	Last Name: Alexandrovic																			
	Phone Number: 440-243-3311		Phone Number Extension: 217																				
	E-Mail Address: ualexand@orbitndt.com																						
	Fax Number: 440-243-3379		Fax Number Extension:																				
	Street or P.O. Box:																						
	City, Town, or Village:																						
State:		Country:		Zip Code:																			
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	A. Name of Site's Legal Owner:		Date Became Owner (mm/dd/yyyy):																				
	Owner Type: Mark with an X		<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input type="checkbox"/></td> </tr> </table>					Private	County	District	Federal	Indian	Municipal	State	Other	<input type="checkbox"/>							
	Private	County	District	Federal	Indian	Municipal	State	Other															
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>															
	Street or P.O. Box:																						
	City, Town, or Village:		Owner Phone #:																				
	State:		Country:		Zip Code:																		
	B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):																				
	Operator Type: Mark with an X		<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input type="checkbox"/></td> </tr> </table>					Private	County	District	Federal	Indian	Municipal	State	Other	<input type="checkbox"/>							
	Private	County	District	Federal	Indian	Municipal	State	Other															
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																
Street or P.O. Box:																							
City, Town, or Village:		Operator Phone #:																					
State:		Country:		Zip Code:																			
9. Violations Cited?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No																				
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)																							
<input type="checkbox"/> Not Regulated																							

10. Type of Regulated Waste Activity (Mark 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 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 RCRA Info source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

--	--	--	--	--	--	--

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

N	Announced ?	Additional Facility Representatives:
N	Tanks?	Other comments: Facility evaluated as a SQG based on monthly generation rate. However, the facility becomes an episodic LQG when process tanks are cleaned-out. Specifically, process tank materials when spent, are vacuumed directly into the hazardous waste transporter's vehicle.
Y	Containers?	

13.	Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
	Frank Zingales		02-26-2007 / 1035

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)

PROCESS DESCRIPTION / WASTE ACTIVITIES SUMMARY

Facility Name: Orbit Industries, Inc.

Facility Type: Small Quantity Generator (SQG)

EPA ID#: OHR 000 102 475

Process Information: Facility performs non-destructive testing. Hazardous waste is generated from vapor degreasing and etching activities as described below. Hazardous waste is accumulated in containers (drums) and stored in a generator accumulation area (Chemical Storage Area) located in the South building.

Regulatory / Enforcement History: DFF&Os dated January 12, 2007

Description of Waste				On-Site Management	Off-Site Management
Process/Activity Generating Waste	Waste Generated	Waste Code(s)	Quantity Generated	Type of Accumulation	Name, state, and type of activity occurring at the facility.
1. Vapor degreaser	Waste trichloroethylene	F001	SQG	Container-drum	Chemical Solvents, Inc. Cleveland, OH OHD 980 897 656
2. Nital Etch: Tri-Acid Rinse Water	Waste corrosive liquid	D002/D006/D007	SQG	Container-drum	Envirite of Ohio, Inc. Canton, OH OHD 980 568 992
3. Caustic/Nitric Etch and Nital Etch: process tank clean-outs	Waste corrosive liquid	- D002 - D002/F001 - D002/D006/D007	Episodic LQG	Not accumulated on-site. Transferred directly into transporters vehicle.	Envirite of Ohio, Inc.
4. Degreasing	Solvent (acetone) contaminated rags	D001/F003		Container-drum	Chemical Solvents, Inc.
5. Magnetic particle testing	Used oil			Container-drum	Chemical Solvents, Inc.
6. Inspections/maintenance	Spent lamps			Container-box	Luminaire Recyclers St. Paul, MN
7. Nital etch	Spent blasting media			Container-drum	Chemical Solvents, Inc.
8. Various	Spent floor absorbent			Container-drum	Chemical Solvents, Inc.

**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 or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month
 LQG: ≥ 1,000 Kg. (-300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds
 Safety Equipment Used:

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 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</u> (180/270) days 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)? | 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 | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 10. Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |

- 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)(d)] 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 per documentation or facility rep? [3745-65-32(D)] Yes No N/A
23. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency?[3745-65-33]
- a. Are inspections recorded in a log or summary? [3745-65-33]? Yes No N/A
24. 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
25. 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
26. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
27. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes No N/A
28. 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

29. 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
30. 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 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 ga' 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

31. Has the generator marked containers with the words "Hazardous Waste"[3745-52-34(D)(4)] Yes No N/A
32. Is the accumulation date on each container? [3745-52-34(D)(4)] Yes No N/A
33. 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.

34. 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
35. 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
36. 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
37. 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

38. 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
39. Does each container ≤ 100 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A
40. 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