



Corr

State of Ohio Environmental Protection Agency

Northeast District Office

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

July 12, 2007

RE: PCC AIRFOILS, LLC
OHD 097-626-915
LAKE COUNTY
MENTOR PLANT
RCRA CEI NOV
SQG

Mr. Peter J. Anselmi
HSE Engineer
PCC Airfoils, LLC
8607 Tyler Blvd.
Mentor, OH 44060

Dear Mr. Anselmi:

On June 5, 2007, I, representing the Ohio Environmental Protection Agency's (Ohio EPA) Division of Hazardous Waste Management (DHWM), conducted an inspection for compliance with Ohio's hazardous waste regulations, as found in Chapter 3734 of the Ohio Revised Code (ORC), and Chapter 3745 of the Ohio Administrative Code (OAC) at PCC Airfoils, LLC (PCC), located at 8607 Tyler Blvd., Mentor, Ohio. You and Jeff Thomas represented the facility. During the inspection we talked about ways to prevent pollution by reducing waste. My inspection included an inspection of company operations, and a review of written documentation.

PCC manufactures industrial turbo blades. PCC generates the following hazardous waste streams: spent solvent from degreaser/parts cleaner (D039, D040, F001); spent acetone from wax mold assembly 9D001, F003); waste mercury solid from ground fluorescent light bulbs (D009); aerosol cans; and used oil. The following non-hazardous waste streams are generated: small propane bottles (recycled); ceramic and core waste; cardboard (recycled). PCC was evaluated as a small quantity generator of hazardous waste.

A copy of our checklist is enclosed for your information. At the time of the inspection, PCC was evaluated for compliance with applicable Hazardous Waste Regulations. The inspection revealed that PCC is in violation of the following regulations:

VIOLATIONS:

1. **OAC rule 3745-52-34(C)(1)(a), Container Management:**
Facilities shall manage hazardous wastes in containers which are: (A) closed (except when adding/removing waste); (B) in good condition (rule 3745-52-34(C)(1)); (C) compatible with wastes stored in them (rule 3745-52-34(C)(1)); and (D) handled in a manner which prevents rupture/leakage.

PCC failed to store/manage hazardous waste in a container which was closed. It was noted during the inspection that there were two 55-gallon drums of propane bottles being stored in the Hazardous Waste Accumulation Shed. At the time of the inspection, you were unsure how the bottles were to be managed, however you were managing them as a hazardous waste. It was noted that the two drums were not closed.

To abate this violation, PCC shall keep all containers of hazardous waste closed, except when adding/removing waste. To document compliance, PC shall submit a photograph of the properly closed container to the Ohio EPA's Northeast District Office (NEDO).

2. **OAC rule 3745-52-34(D)(4), Container Management:**
Facilities shall manage hazardous wastes in containers which are: labeled with the accumulation date.

PCC failed to label the two 55-gallon of propane bottles listed in Violation #1 with the accumulation date.

To abate this violation, PCC shall label all hazardous waste containers with the accumulation date. If the abovementioned containers are still being managed at the facility, then PCC shall submit a photograph of them with the proper labeling. The photograph shall be submitted to the Ohio EPA's NEDO.

3. **OAC 3745-65-33, Testing and Maintenance of Equipment:**

All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, shall be inspected on a weekly basis and tested and maintained as necessary to assure its proper operation in time of emergency. The owner or operator shall record the weekly inspections in a log or summary. They shall keep these records for at least three years from the date of the inspection. At a minimum, these records shall include the date and time of the inspection, the name of the person performing the inspection, a notation of the observations made, and the date and nature of any tests and any repairs or other remedial actions.

PCC failed to conduct inspections on the abovementioned equipment.

To abate this violation, PCC shall have dedicated emergency/spill control/decontamination equipment for the hazardous waste accumulation area. PCC shall also begin to inspect/test all communication/emergency/spill control/decontamination equipment on a timely basis to assure its proper operation in time of emergency. PCC shall also record the results of the inspections/tests in a log or summary. To document compliance, CTS shall submit a copy of a completed inspection log/summary to the Ohio EPA's NEDO. Please visit the following website for additional examples: <http://www.epa.state.oh.us/dhwm/formslistchklist.html>.

POLLUTION PREVENTION:

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (i.e. source reduction). For those wastes and pollutants that are generated, the second is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image by implementing pollution prevention programs. During the inspection, we talked about pollution prevention (P2) opportunities associated with your facility.

Ohio EPA has the following comments regarding pollution prevention activities at the PCC facility:

Quality programs integration with environmental improvement, cost savings and Environmental Management Systems

PCC is dedicated to improving quality. These efforts to continually improve quality can be equally successful at addressing environmental compliance and improvement for the facility. A major component of the quality concept is the elimination of wastes from the manufacturing process. This concept is also at the center of pollution prevention. By considering inputs and outputs from individual processes and looking to minimize wastes and improve quality, significant economic and environmental benefits are possible. The pollution prevention recommendations provided in this report might be excellent projects for quality teams to mutually reduce wastes and improve process performance. The following case study information is provided to illustrate the significance of this approach.

Neaton Auto Products Manufacturing, Inc.

Summary: Neaton has developed a pro-active and successful P2 program including hazardous material reduction, energy conservation, recycling and problem-solving techniques that have improved many areas of manufacturing. They established quality teams from production, engineering and maintenance to investigate scrap rates. Through these activities, Neaton has saved more than \$500,000 from internal scrap reductions, plastic recycling projects and production line improvements. For more information see the attached case study or view it online at www.epa.state.oh.us/opp/gov/neaton.pdf.

Along the lines of quality programs integration with environmental improvement and cost savings, integrating the quality concept with waste reduction can produce excellent benefits. This process could be an excellent first step in the direction of adopting an environmental management system for the facility. Environmental management systems (EMS) are a continual cycle of planning, implementing, reviewing and improving the actions that an organization takes to meet its environmental obligations. Pollution prevention is an integral component of an EMS. Pollution prevention identifies opportunities to reduce waste, allows flexibility and effective long term planning and increases efficiency. An EMS helps a company manage the environmental aspect of its business practices in a systemic way. Implemented correctly, it helps to ensure a company's compliance with all applicable laws and regulations, boosts productivity and enhances competitiveness. PCC is highly encouraged to integrate their strong quality initiative in this direction.

For more information about this specific opportunity, please contact Mike Kelley at michael.kelley@epa.state.oh.us or (614) 644-2930.

Alternatives to existing solvents

PCC currently uses various solvents as cleaners. There may be alternatives for these solvents that perform the same but are less hazardous for the environment and do not create health and safety issues for PCC's employees. Recent advances have been made in the development of less toxic and renewable solvents such as methyl soyates.

Methyl soyate is a non-hazardous soy methyl ester produced by the transesterification of soybean oil with methanol. It is commercially available from numerous manufacturers and suppliers, including several in Ohio. Methyl soyate can be used as an industrial cleaning solvent intended to replace mineral spirits, lacquer thinner, xylene, methyl ethyl ketone, and other hydrocarbon degreasing solvents. It is lower in toxicity than most other solvents, is readily biodegradable, and has a very high flash point and a low level of volatile organic compounds (VOCs), which also increases worker safety. As a solvent, methyl soyate is being adopted for many industrial applications. By utilizing methyl soyate, there could be significant savings of disposal costs with little increase in the purchase price. The change to non-hazardous cleaners would drastically reduce hazardous waste disposal costs for your facility. The following information is provided for exploring alternative solvents for processes at PCC.

For more information regarding soy-based solvents, see the enclosed documents, *Market Opportunity Summary: Soy-Based Solvents* and *Soy Methyl Ester Solvent Technical Background*.

Web site information

www.unitedsoybean.org
www.ohiochemical.com/Soy.html

The following is a list of companies/vendors that supply and manufacture alternative cleaning and degreasing products.

SOYsolv 6154 N CR 33 Tiffin, OH 44883 800-231-4274 Fax: 419-992-4595 steve@soysolv.com www.soysolv.com/zapper/index.htm	Phase III, Inc. 916 E. Baseline Rd., Ste. 101 Mesa AZ, 85204 480-503-2847 Fax: 480-503-1077 info@phaseiii.com www.phaseiii.com	Franmar Chemical, Inc. P.O. Box 97 Normal IL, 61761 800-538-5069 Fax: 309-862-1005 franmar@franmar.com www.franmar.com www.franmar.com/nontextile_trial.html
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8. Alternatives to existing penetrating fluid

PCC currently uses penetrating fluid in aerosol cans for routine maintenance and lubrication of equipment. The aerosol cans create an additional hazardous waste stream for PCC. There are alternative fluids available that perform the same function but are more environmentally preferable and can be purchased in large bulk containers. The penetrating fluid can then be transferred to smaller spray bottles and used as needed. This would eliminate aerosol can waste management issues and create a healthier work environment for equipment and maintenance operators. The following information provides more detail about alternative penetrating fluids and potential vendors.

Desilube Technology, Inc.
904 Breezewood Lane
Lansdale PA, 19446
610-792-9460
Fax: 610-948-0744
E-mail: yayen@snip.net

Desigreen Penetrant

Effective as a penetrant, lubricant, corrosion-inhibitor and anti-seizure compound.

IMET Corp.
23205 Mercantile Road
Cleveland OH, 44122
216-233-5486
Fax: 216-595-1741
E-mail: gencer@imet.net
www.imet.net

SoyClean Penetrant Lubricant

A natural soy based, non toxic product, multi-purpose lubricant that provides superior lubrication and dynamic penetration of rust. For use on frozen nuts and bolts, power tools, gears, valves, chains, sprockets and cables. It will not evaporate. It can be used as a cutting oil. No harmful fumes or vapors.

Aerosol spray cans are used. You may wish to consider using refillable spray bottles or hand pump spray bottle applicators in the future. The benefits to using refillable spray bottle applicators are:

1. reduces hazardous or solid waste disposal
2. reduces aerosol propellant discharge to the atmosphere
3. bulk purchase of many spray systems is less expensive than small quantity procurement of solutions in aerosol cans
4. ease see the following web site regarding refillable spray bottles, which includes a list of vendors:
<http://www.dtsc.ca.gov/PollutionPrevention/vsrfactsheets/vsr-refillable-spray-bottles.pdf>.
5. Please see the following web site regarding hand pump spray bottle applicators, which includes a list of vendors:
http://p2library.nfesc.navy.mil/P2_Opportunity_Handbook/8_I_9.html.
6. Another option that you may wish to consider is an aerosol can recycling system. This system punctures the can, empties the contents, and then the can is able to be recycled as scrap metal. Please see the following web site for more details, it also includes a list of vendors:
<http://es.epa.gov/oeca/fedfac/fflexp2/aerosolv/aersolv1.html>.

Fluorescent Lamps

PCC currently manages their fluorescent bulbs as a hazardous waste. Please be advised that you may manage your fluorescent bulbs as a "Universal Waste" and have them recycled, which is the preferred method. The following website contains a list of fluorescent bulb recyclers:

<http://www.epa.state.oh.us/dhwm/pdf/comp.lamp.ballast.list.pdf>. Ohio EPA does not endorse any company, and it is suggested that you evaluate their compliance with all applicable agencies prior to shipping your material. If you elect to manage your fluorescent bulbs as a Universal Waste in the future, the following rules must be complied with:

1. **OAC rule 3745-273-13(D)(1), Lamp Management:**
Small Quantity Generators of Universal Waste Handlers (SQGUWH) shall contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps. All containers or packages shall be closed and lack evidence of leakage, spillage or damage that could cause leakage.

2. **OAC rule 3745-273-14(E), Lamp labeling for SQGUWH:**
Lamps or containers or packages of lamps shall be labeled with the words “Universal Waste - Lamp(s)” or “Waste Lamp(s)” or “Used Lamp(s).”

3. **OAC rule 3745-273-15(A), Accumulation Time for SQGUW:**
A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler.

PCC should be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste. PCC may make this demonstration by:

- a. Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received;
- b. Marking or labeling each individual item of universal waste with the date it became a waste or was received;
- c. Maintaining an inventory system on-site that identifies the date each universal waste became waste or was received;
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste became a waste or was received;
- e. Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received;
or
- f. Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

The Office of Compliance Assistance and Pollution Prevention provides compliance and pollution prevention assistance on environmental issues related to air, land and water. Their website is: <http://www.epa.state.oh.us/opp/ocapp.html>.

Enclosed you will find a copy of the checklists that we completed during the inspection. You can find copies of the rules and other information on the division's web page at: <http://www.epa.state.oh.us/dhwm>.

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

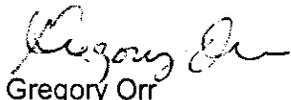
PCC AIRFOILS, LLC
JULY 12, 2007
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The above violation must be corrected, and documentation of the correction (i.e. copies of documents and photographs) must be sent to this office, to my attention, within thirty (30) days after receipt of this letter.

Failure to list specific deficiencies in this communication does not relieve PCC from the responsibility of complying with all applicable regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Should you have any questions or concerns, please do not hesitate to call me at (330) 963-1189.

Sincerely,



Gregory Orr
Environmental Specialist
Division of Hazardous Waste Management

GO:ddw

Enclosure

cc: Natalie Oryshkewych, DHWM, NEDO
ec: Gregory Orr, DHWM, NEDO

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

- unplanned sudden or nonsudden release of hazardous waste? [3745-65-31]
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 a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A
 - d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes No N/A
 - e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. Yes No N/A
 - f. Containers are marked with 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- 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

Name: PCC Airfoils, Mentor
ID number: OHD 097-626-915
Inspection date: 06/05/2007

USED OIL INSPECTION CHECKLIST (Short Version)

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

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes ___ No N/A ___ RMK# ___

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

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes ___ No N/A ___ RMK# ___
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes ___ No N/A ___ RMK# ___
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes No N/A ___ RMK# ___
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No N/A ___ RMK# ___

8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes No N/A RMK#
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes No N/A RMK#
- b. Contained the release? Yes No N/A RMK#
- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A RMK#
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A RMK#
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes No N/A RMK#
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes No N/A RMK#
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A RMK#
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A RMK#
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes No N/A RMK#

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

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

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11]

Yes No N/A ___ RMK# ___

G:\WPDOCS\NOV\alside2006usedoilchecklist.wpd

E-mail this completed form to tammy.mccconnell@pa.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: OHD 097-626-915																					
3. Site Name	Name: PCC AIRFOILS LLC MENTOR		Website (optional):																			
4. Site Location Information	Street Address: 8607 TYLER BLVD.																					
	City, Town, or Village: MENTOR		State: OH																			
	County Name: LAKE		Zip Code: 44060																			
5. Site Land Type (check only one)	<table border="1"> <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 align="center"><input checked="" type="checkbox"/></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	<input checked="" type="checkbox"/>									
Private	County	District	Federal	Indian	Municipal	State	Other															
<input checked="" type="checkbox"/>																						
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A. 333611		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: PETER		MI: J	Last Name: ANSELM I																		
	Phone Number: 440-205-2173			Phone Number Extension:																		
	E-Mail Address: pete.anseimi@pccmentor.com																					
	Fax Number: 440205-2250			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: PCC AIRFOILS LLC		Date Became Owner (mm/dd/yyyy): 06/01/1987																			
	Owner Type: Mark with an X		<table border="1"> <tr> <td>Private</td> <td>Co</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td align="center"><input checked="" type="checkbox"/></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>				Private	Co	District	Federal	Indian	Municipal	State	Other	<input checked="" type="checkbox"/>							
	Private	Co	District	Federal	Indian	Municipal	State	Other														
	<input checked="" type="checkbox"/>																					
	Street or P.O. Box: 8607 TYLER BLVD.																					
	City, Town, or Village: MENTOR		Owner Phone #: 440-255-3733																			
	State: OHIO		Country: USA		Zip Code: 44060																	
	B. Name of Site's Operator: PCC AIRFOILS LLC		Date Became Operator (mm/dd/yyyy): 06/01/1987																			
	Operator Type: Mark with an X		<table border="1"> <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 align="center"><input checked="" type="checkbox"/></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	<input checked="" type="checkbox"/>							
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Street or P.O. Box: 8607 TYLER BLVD																						
City, Town, or Village: MENTOR		Operator Phone #: 440-255-3733																				
State: OHIO		Country: USA		Zip Code: 44060																		
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		<input type="checkbox"/>	3. Treater, Storer or Disposer of Hazardous Waste
(choose only one of the following categories)		<input type="checkbox"/>	4. Recycler of Hazardous Waste
<input type="checkbox"/>	UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/>	5. Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/>	a. Large Quantity Generator (LQG):	<input type="checkbox"/>	a. Small Quantity On-site Burner Exemption
<input checked="" type="checkbox"/>	b. Small Quantity Generator (SQG)	<input type="checkbox"/>	b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/>	c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/>	6. Underground Injection Control Facility
<input type="checkbox"/>	d. United States Importer of Hazardous Waste	<input type="checkbox"/>	7. Hazardous Waste Transporter
<input type="checkbox"/>	e. Mixed Waste (hazardous and radioactive) Generator		
B. Universal Waste Activities		C. Used Oil Activities	
<input type="checkbox"/>	1. Small Quantity Handler of Universal Waste	<input checked="" type="checkbox"/>	1. Used Oil Generator
(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):		<input type="checkbox"/>	2. Used Oil Transporter Indicate Type(s) of Activity(ies)
<input type="checkbox"/>	2. Large Quantity Handler of Universal Waste	<input type="checkbox"/>	Transporter
(accumulates 5,000 kg or more).		<input type="checkbox"/>	Transfer Facility
<input type="checkbox"/>	3. Destination Facility for Universal Waste	<input type="checkbox"/>	3. Used Oil Processor and/or Re-refiner
(Check all boxes below that apply for each of the three types of facilities above.)		<input type="checkbox"/>	Indicate Type(s) of Activity(ies)
		<input type="checkbox"/>	Processor
		<input type="checkbox"/>	Re-refiner
		<input type="checkbox"/>	4. Off-Specification Used Oil Burner
		<input type="checkbox"/>	5. Used Oil Fuel Marketer -
			Indicate Type(s) of Activity(ies)
		<input type="checkbox"/>	a. Marketer Who Directs Shipment of Off- Specification Oil
		<input type="checkbox"/>	b. Used Oil to Off-Specification Used Oil Burner

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

D001	D009	D039	D040	F001	F003	
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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.

<u>Y / N</u>	Announced ?	Additional Facility Representatives:	PETER ANSELM, JEFFERY THOMAS
<u>Y / N</u>	Tanks?	Other comments:	
<u>Y / N</u>	Containers?		

13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
GREG ORR		06/05/2007

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)