OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office

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

August 27, 2008

RE: PLASTI-KOTE CO., INC.
OHD 091 620 369
MEDINA COUNTY
CEI/NOV

Mr. Gino Savarino
Plant Manager
Plasti-Kote
1000 Lake Road
Medina, Ohio 44256

Dear Mr. Savarino:

On August 19, 2008, Ohio EPA conducted a compliance evaluation inspection of the Plasti-Kote Co., Inc., Medina facility, to determine Plasti-Kote's compliance with Ohio's hazardous waste laws and regulations as found under the Ohio Revised Code and the Ohio Administrative Code ("ORC" and "OAC" respectively). Plasti-Kote was represented by Duane Kenyon and you. The Ohio EPA was represented by Sherry Slone and me. The Ohio EPA's compliance inspection included an inspection of the facility operations and a review of written documentation. Based on this inspection, Ohio EPA has determined that Plasti-Kote has violated at least the following state hazardous waste regulations:

Violations:

1. ***Waste Evaluation, OAC 3745-52-11:*** Any person who generates a waste must evaluate the waste to determine if the waste is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51.

   During the inspection, Ohio EPA noted 12 drums of spent blasting material. Mr. Kenyon indicated during the inspection that contractors used to come into Plasti-Kote and re-use the material when cleaning tanks. Mr. Kenyon said that this is no longer the practice. Since Plasti-Kote no longer uses the material, it is a waste that must be evaluated and disposed of properly.

   During the inspection, I spoke to you about sample collection. Plasti-Kote needs to ensure that samples collected are representative of the waste, not just a grab sample collected from the top of the drum. If you would like additional guidance on collecting samples, please feel free to contact me. I also sent Mr. Kenyon a link to the Division of Hazardous Waste's Tier 1 data validation checklist. Any analytical testing done should be valid and using the checklist is a tool in demonstrating this.

Please submit the data documenting the waste characterization to abate this violation.

2. ***Labeling Requirements for Hazardous Waste Containers, OAC 3745-52-34(A)(2):*** Containers accumulating hazardous waste must be clearly marked with the date accumulation began.

   There were four (4) drums in the line 6 accumulation area that did not have the date accumulation began on them.

   This violation was abated before the inspection was completed. No further action is required.

3. ***Required [Emergency] Equipment, OAC rule 3745-65-32:*** All facilities shall be equipped with internal alarm system, communication device, portable fire control, spill control and decontamination equipment and water of adequate volume/pressure.

   The spill control for the production aerosol accumulation area and the acetone tank washer accumulation area was not in place at the time of the inspection; however, this was abated before the inspection was completed.

   No further action is required.

4. ***Contingency Plan Requirements, OAC rule 3745-65-52(D):*** The contingency plan must include a current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator and the contingency plan must be revised in response to personnel changes.

   Section1, page 7 of the contingency plan listed Troy Dunlap as an emergency coordinator. Appendix A1 did not include his name or contact information. The correct information was on the computer version of the contingency plan and a new page was printed and added to the plan.

   The violation is considered abated and no further action is required.

5. ***Labeling/marking- standards for small quantity handlers of universal waste, OAC rule 3745-273-14(A):*** Universal waste batteries or containers of batteries shall be labeled as "Universal Waste - Batteries," "Waste Battery(ies)", or "Used Battery(ies)."

The container of batteries was not labeled at the time of the inspection; however, this was abated before the inspection was completed.

No further action is required.

6. ***Labeling/marking- standards for small quantity handlers of universal waste, OAC rule 3745-273-14(E):*** Universal waste [fluorescent] lamps shall be labeled as "Universal Waste - Lamps," "Waste Lamp(s)", or "Used Lamp(s)."

   Only one of the containers of lamp waste was properly labeled at the time of the inspection. Plasti-Kote placed labels on all of the containers before the inspection was completed abating the violation.

   No further action is required.

7. ***Packaging of Universal Waste Lamps, OAC rule 3745-273-13(D)(1):*** Universal waste lamps must be contained in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with the contents of the lamps. In addition, the containers or packages must be closed, lack evidence of leakage, spillage or damage that could cause leakage

   There were 4 containers of lamps that were open at the time of the inspection. Plasti-Kote closed the containers before the inspection was completed abating the violation.

   No further action is required.

8. ***Accumulation Time for Universal Waste, OAC 3745-273-15(C):*** The length of time universal waste is stored must be documented in some manner.

   Only one of the containers had an accumulation date at the time of the inspection. Plasti-Kote placed accumulation dates on the other containers abating the violation.

   No further action is required.

9. ***Employee training for Small Quantity Handlers of Universal Waste, OAC rule 3745-273-16:*** All employees who handle or have responsibility for managing universal waste shall be informed of the proper handling and emergency procedures appropriate to the types of universal waste handled at the facility.

Based on violations 5, 6, 7 and 8 noted above, it appears that employees need to be re-trained in the proper management of universal waste at Plasti-Kote.

Please submit documentation that the appropriate personnel have been trained in the management requirements of universal waste.

In addition, Ohio EPA has the following concerns:

10. Ohio EPA noted that the inspection log for February 2, 2008 was present with Duane Kenyon's name on it; however, the form was not completed. Since the rules no longer specify the information that needs to be on an inspection log, this is not a violation. However, if Plasti-Kote is going to use a specific form for their inspections, it would be prudent to fill out the form.

11. While reviewing the land disposal restriction forms (LDR) it was unclear as to whether or not two of the waste streams (profile #0704-06122 and #0210-11567) currently going to Rineco have underlying hazardous constituents (UHCs) which should be noted on the LDR. As we stated during the inspection, if Rineco is treating and testing for all UHCs, then these do not need to be listed on the form. Plasti-Kote should determine if there are any UHCs in the waste above the treatment standards and if so, if Rineco is treating and testing for these constituents. If not, Plasti-Kote needs to amend the LDR form and notify Rineco and submit this information to Ohio EPA.

12. During the inspection, it was determined that four (4) of the <90 day accumulation areas could be managed as satellite areas. These four areas include:

    A. The line 6 filler area
    B. The Line 5 filler area
    C. The mixing room 2 dust and extruder area
    D. The QC lab area

    Based on a review of the weekly inspections, it appears that all of these areas meet the generator closure performance standard in OAC rule 3745-66-11.

13. Ohio EPA noted four drums in the production aerosol <90 day accumulation area that were not marked and had a few aerosol cans stuck to the bottom of three of the drums. Plasti-Kote indicated that these drums were used for the scrap aerosols and have since placed them to be re-used to collect scrap aerosols for disposal. Plasti-Kote should note that these drums would not be considered RCRA empty and therefore cannot be staged without being marked as hazardous waste.

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 (source reduction). For those wastes or pollutants that are generated, the second priority 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.

For more information about pollution prevention, including fact sheets or U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92/088), please contact the Ohio EPA Pollution Prevention Section at (614) 644-3469.

Failure to list specific deficiencies and/or violations in this communication does not relieve Plasti-Kote from the responsibility of complying with all applicable laws, rules and regulations.

Be advised that the Ohio EPA reserves the right pursuant to ORC Chapters 3734 and 6111 and any other applicable state and federal laws or regulations, to require further site investigation and remediation to address any unpermitted releases of hazardous waste, hazardous substances, industrial wastes, pollutants, and/or contaminants into the environment.

Further be advised that any instances of non-compliance can continue as subjects of pending or future enforcement actions.

Please respond to this letter in writing by October 3, 2008, and provide all of the information requested above. Should you have any questions or require additional information, please contact Frank Popotnik, my supervisor, or me at (330) 963-1200.

Sincerely,

Karen L. Nesbit
Division of Hazardous Waste Management

KLN:cl
Enclosure

ec: Harry Sarvis, DHWM, CO
Frank Popotnik, DHWM, NEDO

cc: Natalie Oryshkewych, DHWM, NEDO

Ohio Environmental Protection Agency

RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM

For Ohio EPA use only

E-mail this completed form to kristina.durnell@epa.state.oh.us
or mail it to Kristina Durnell, Central Office

Site EPA ID No.	**EPA ID Number: OHD091620369**							
Site Name	**Name: PLASTI-KOTE a wholly owned subsidiary of Valspar Corp**				**Website: (Optional)**			
Site Location Information	**Street Address: 1000 LAKE ROAD**							
	City, Town, or Village: MEDINA				**State: OH**			
	County Name: MEDINA				**Zip Code: 44256**			
Site Land Type (check one only)	**Private** ☒	**County** ☐	**District** ☐	**Federal** ☐	**Indian** ☐	**Municipal** ☐	**State** ☐	**Other** ☐
NAICS code(s) www.census.gov/epcd/www/naics.html	**32551**							
Facility Representative	**First Name: Gino**		**MI:**		**Last Name: Savarino**			
	Phone Number: 330 721 2519				**Phone Number Extension:**			
Additional names can be recorded in Comment 12	**E-Mail Address: gsavarino@valspar.com**							
	Fax Number:				**Fax Number Extension:**			
Only provide address information if it is different than the facility address.	**Street or P.O. Box:**							
	City, Town or Village:							
	State:			**Country:**	**Zip Code:**			
Legal Owner and Operator of the Site	**Name of Site's Legal Owner: VALSPAR CORP**			**Date Became Owner (mm/dd/yyyy): 4/03/1998**				
Additional Owners and Operators in the Comment Section or on an Attachment to this form	**Owner Type:**	**Private** ☒	**County** ☐	**District** ☐	**Federal** ☐	**Indian** ☐	**Municipal** ☐	**State** ☐	**Other** ☐
	Street or P.O. Box: 1101 SOUTH THIRD ST							
	City, Town or Village: MINNEAPOLIS			**Owner Phone #:**				
	State: MN			**Country: USA**	**Zip Code: 55415**			
	Name of Site's Operator: PLASTI-KOTE			**Date Became Operator (mm/dd/yyyy): 4/03/1998**				
	Owner Type:	**Private** ☒	**County** ☐	**District** ☐	**Federal** ☐	**Indian** ☐	**Municipal** ☐	**State** ☐	**Other** ☐
	Street or P.O. Box: 1000 LAKE ROAD							
	City, Town or Village: MEDINA			**Operator Phone #:**				
	State: OH			**Country: USA**	**Zip Code: 44256**			
Violations Cited?	☒ **Yes** ☐ **No**							

Type of Generator

☐ **Not Regulated**	☐ Conditionally Exempt Small Quantity Generator
☐ **UNKNOWN**: Cited for violation of 3745-52-11	☐ United States Importer of Hazardous Waste
☒ **Large Quantity Generator (LQG)**	☐ Mixed Waste (Hazardous and Radioactive) Generator
☐ **Small Quantity Generator (SQG)**	

Type of Regulated Waste Activity (Mark 'X' in all of the appropriate boxes)

☐ **Recycler of Hazardous Waste**	☐ **Exempt Boiler and/or Industrial Furnace**
☐ **Underground Injection Control Facility**	☐ **Small Quantity On-Site Burner Exemption**
☐ **Hazardous Waste Transporter**	☐ **Smelting, Melting, Refining Furnace Exemption**
☐ **Treater, Storer or Disposer of Hazardous Waste**	

Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply)

☒ Small Quantity Handler of Universal Waste	☐ Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)
☐ Destination Facility for Universal Waste	

(Check all boxes below that apply for each of the three types of facilities above)		Used Oil Activities (Indicate Type(s) of Activity(ies))	
	Managed	☒ **Used Oil Generator**	☐ **Off-Specification Used Oil Burner**
Batteries	☒	☐ **Used Oil Transporter**	☐ **Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil**
Pesticides	☐	☐ **Used Oil Transfer Facility**	☐ **Used Oil Fuel Marketer to Off-Specification Used Oil Burner**
Mercury containing equipment	☐	☐ **Used Oil Processor**	
Lamps	☒	☐ **Used Oil Re-refiner**	

Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the 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 D007 D008 D035 F003 F005

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

Announced	☐ **Yes**	☒ **No**	**Additional Facility Representatives:**	**Duane Kenyon** **Dennis Wilt (walk thru only)**
Tanks	☐ **Yes**	☒ **No**	**Other Comments:**	
Containers	☒ **Yes**	☐ **No**		

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy hh:mm)
KAREN L. NESBIT	SHERRY SLONE	8/19/2008 0920

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 .JANTITY GENERATOR REQUIRE .ENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

Facility Name: PLASTI-KOTE CO INC

Facility Hazardous Waste ID#: OHD 091620 369 **Date of CEI:** 8-19-08

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
LQG: ≥1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.
Safety Equipment Used: SAFETY GLASSES W/ SIDE SHIELDS, HEARING PROTECTION, STEEL TOED SHOES.

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] - 12 drums — Yes ☐ No ☒ N/A ☐
2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] — Yes ☒ No ☐ N/A ☐
3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] — Yes ☑ No ☐ N/A ☐
4. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] — Yes ☑ No ☐ N/A ☐
5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] — Yes ☑ No ☐ N/A ☐
6. Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] — Yes ☐ No ☑ N/A ☐
7. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] — Yes ☐ No ☑ N/A ☐
8. Does the generator accumulate hazardous waste? — Yes ☑ No ☐ N/A ☐
9. Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)? — Yes ☐ No ☑ N/A ☐
10. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]
    a. Container that meets 3745-66-70 to 3745-66-77? — Yes ☐ No ☐ N/A ☑
    b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? — Yes ☐ No ☐ N/A ☑
    c. Drip pads that meet 3745-69-40 to 3745-69-45? — Yes ☐ No ☐ N/A ☑
    d. Containment building that meets 3745-256-100 to 3745-256-102? — Yes ☐ No ☐ N/A ☑

11 Does the generator export hazardous waste? If so: Yes ☐ No ☑ N/A ☐

a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] Yes ☐ No ☐ N/A ☑

b. Has the generator complied with special manifest requirements? [3745-52-54] Yes ☐ No ☐ N/A ☑

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

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

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

13 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)]

14 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)]. -Switching to Ashland & have PCI (Pollution Control Ind.) & Chemco Ind.

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

16 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 waste they generate.

17 If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes ☑ No ☐ N/A ☐

18 If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes ☐ No ☐ N/A ☑

19 Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes ☑ No ☐ N/A ☐

PERSONNEL TRAINING

20 Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes ☑ No ☐ N/A ☐

21 Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes ☑ No ☐ N/A ☐

22 Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes ☑ No ☐ N/A ☐

23 Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes ☑ No ☐ N/A ☐

24 Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes ☑ No ☐ N/A ☐

25 Does the generator keep records and documentation of:

a. Job titles [3745-65-16(D)(1)]? Yes ☑ No ☐ N/A ☐

b. Job descriptions [3745-65-16(D)(2)]? Yes ☑ No ☐ N/A ☐

c. Type and amount of training given to each person[3745-65-16(D)(3)]? Yes ☑ No ☐ N/A ☐

d. Completed training or job experience required [3745-65-16(D)(4)]? Yes ☑ No ☐ N/A ☐

26 Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes ☑ No ☐ N/A ☐

Job Performed	Name of Employee	Date Trained

CONTINGENCY PLAN

27 Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes ☑ No ☐ N/A ☐

28 Does the plan describe the following:

a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes ☑ No ☐ N/A ☐

b. Arrangements with emergency authorities [3745-65-52(C)]. Yes ☑ No ☐ N/A ☐

c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes ☐ No ☑ N/A ☐

d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes ☑ No ☐ N/A ☐

e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes ☑ No ☐ N/A ☐

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

29 Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes ☑ No ☐ N/A ☐

30 Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] Yes ☐ No ☐ N/A ☑ – abated

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

EMERGENCY PROCEDURES

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

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

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

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

Revised Addendum A1 - include Troy

PREPAREDNESS AND PREVEN JN

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

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

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

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

c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] — Yes ☐ No ☑ N/A ☐

d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] (per facility rep) — Yes ☑ No ☐ N/A ☐

NOTE: Verify that the equipment is listed in the contingency plan.

35 Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] — Yes ☑ No ☐ N/A ☐

36 Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] — Yes ☑ No ☐ N/A ☐

37 Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] — Yes ☑ No ☐ N/A ☐

38 If there is only one employee on the premises, is there immediate access to a device (ex.phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] — Yes ☑ No ☐ N/A ☐

39 Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] — Yes ☑ No ☐ N/A ☐

40 Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] — Yes ☑ No ☐ N/A ☐

41 Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)? — Yes ☐ No ☐ N/A ☑

SATELLITE ACCUMULATION AREA REQUIREMENTS

42 Does the generator ensure that satellite accumulation area(s):

a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes ☑ No ☐ N/A ☐

b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes ☑ No ☐ N/A ☐

c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes ☑ No ☐ N/A ☐

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 words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes ☑ No ☐ N/A ☐

43 Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes ☐ No ☐ N/A ☑

a. Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes ☐ No ☐ N/A ☑

b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded?[3745-52-34(C)(2)] Yes ☐ No ☐ N/A ☑

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

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

44 Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes ☑ No ☐ N/A ☐

45 Is the accumulation date on each container? [3745-52-34(A)(2)] Yes ☑ No ☑ N/A ☐

aborted

46 Are hazardous wastes stored in containers which are:

a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes ☑ No ☐ N/A ☐

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

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

d. Handled in a manner which prevents rupture/leakage? [3745-66-7...] Yes ☑ No ☐ N/A ☐

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

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

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

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

49 Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes ☐ No ☐ N/A ☑

50 If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] Yes ☐ No ☐ N/A ☑

51 If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] Yes ☐ No ☐ N/A ☑

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

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

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

PRE-TRANSPORT REQUIREMENTS

53 Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes ☑ No ☐ N/A ☐

54 Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes ☑ No ☐ N/A ☐

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

GENERATOR LDR CHECKLIST
DOES NOT APPLY TO CESQGS

GENERAL REQUIREMENTS

1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07 (A)(7)]		Yes ☐ No ☐ N/A ☑
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)]		Yes ☑ No ☐ N/A ☐
NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07 (A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).			
3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]		Yes ☑ No ☐ N/A ☐
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]		Yes ☑ No ☐ N/A ☐
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,		Yes ☑ No ☐ N/A ☐
	a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)	Yes ☐ No ☐ N/A ☑
FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.			
6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]		Yes ☐ No ☐ N/A ☐
NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.			
NOTE: Written documentation of this determination is not required.			
7.	Did the generator treat his HW /soil on-site to meet the LDR treatment standard?		Yes ☐ No ☐ N/A ☑
NOTE If "Yes" see question #16.			
8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility?[3745-270-07(A)(2)]		Yes ☑ No ☐ N/A ☐
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]		Yes ☑ No ☐ N/A ☐
10.	Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)]		Yes ☑ No ☐ N/A ☐
	a.	Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes ☑ No ☐ N/A ☐

#1 - concern UHC's to Rinco
- aerosols + paint pigment (dust collector)

NOTIFICATION FORM				
11.	Does the LDR Notification form contain the following information:			
	a.	Manifest number of the first waste shipment to the TSD?[3745-270-07(A)(2)]		Yes ☑ No ☐ N/A ☐
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]		Yes ☑ No ☐ N/A ☐
	c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]		Yes ☑ No ☐ N/A ☐
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)].		Yes ☑ No ☐ N/A ☐
NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.				
	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]		Yes ☐ No ☐ N/A ☑
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories				
	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]		Yes ☐ No ☐ N/A ☐
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.				
	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for?[3745-270-07(A)(2)]		Yes ☑ No ☐ N/A ☐
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.				
PROHIBITED DILUTION				
12.	Is the HW treated by burning? If "No," go to #15.			Yes ☐ No ☑ N/A ☐
13.	Is the HW a metal-bearing HW?			Yes ☐ No ☐ N/A ☑
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.				
14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless **one** of the following conditions apply. [3745-270-03(c)]		
		i.	Contains > 1% TOC?	Yes ☐ No ☐ N/A ☑
		ii.	Contains organic constituents or cyanide at levels greater than the UST levels?	Yes ☐ No ☐ N/A ☑
		iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes ☐ No ☐ N/A ☑
		iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes ☐ No ☐ N/A ☑

		v.	Co-generated with a HW that must be combusted?	Yes ☐ No ☐ N/A ☑
	b.		If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes ☐ No ☐ N/A ☑
15.			Was the HW treated by wastewater treatment?	Yes ☐ No ☑ N/A ☐
	a.		Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes ☐ No ☐ N/A ☑
NOTE: If Yes, HW is improperly being treated by dilution.				
	b.		Does the waste carry the D001 code and contain ≥10% TOC?	Yes ☐ No ☐ N/A ☑
	c.		Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes ☐ No ☐ N/A ☑
NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B) and 3745-270-40(A)(3)].				
NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.				
GENERATOR TREATMENT				
16.			Does the generator treat to meet LDRs on-site [3745-270-40(A)]?	Yes ☐ No ☑ N/A ☐
			Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?	Yes ☐ No ☐ N/A ☑
			If "Yes"...complete the rest of the checklist. If "No"...stop...you are done.	
	a.		Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]	Yes ☐ No ☐ N/A ☑
	b.		Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]	Yes ☐ No ☐ N/A ☑
NOTE: This is a laboratory analysis but it does not have to be kept by the generator.				
	c.		Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]	Yes ☐ No ☐ N/A ☑
	d.		Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]	Yes ☐ No ☐ N/A ☑
	e.		Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]	Yes ☐ No ☐ N/A ☑
	f.		Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]	Yes ☐ No ☐ N/A ☑

NOTIFICATION FORM					
17.	a.	Contains all information in #11 a-g above and			Yes ☐ No ☐ N/A ☑
	b.	If the treated HW/soil is listed.....notification contains the following certification statement: " I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or trough knowledge of the waste, to support this certification that the waste complies with the treatment stands specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."			Yes ☐ No ☐ N/A ☑
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:			
		i.	Send a one-time notification to the director?[3745-270- 09 (D)]		Yes ☐ No ☐ N/A ☑
		ii.	Maintain a copy of the notice onsite?[3745-270-09(D)]		Yes ☐ No ☐ N/A ☑
		iii.	Include in the notification: [3745-270-09(D)(1)(a)]		
			1.	Name & address of receiving landfill?	Yes ☐ No ☐ N/A ☑
			2.	Description of HW when generated?	Yes ☐ No ☐ N/A ☑
			3.	HW code when generated?	Yes ☐ No ☐ N/A ☑
			4.	Treatability group when generated?	Yes ☐ No ☐ N/A ☑
			5.	Underlying hazardous constituents present when generated?	Yes ☐ No ☐ N/A ☑
		iv.	Contain the right certification statement as required by 3745-70-07(b)(4)?		Yes ☐ No ☐ N/A ☑

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS			
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more			
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less			
PROHIBITIONS			
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]		Yes ☐ No ☑ N/A ☐
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 ☐
WASTE MANAGEMENT & LABELING/MARKING			
UNIVERSAL WASTE BATTERIES			
3.	Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]		Yes ☐ No ☐ N/A ☑
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 ☐
5.	Does the SQUWH conduct any of the following activities:		
	a.	Sort batteries by type?	Yes ☐ No ☑ N/A ☐
	b.	Mix battery types in one container?	Yes ☑ No ☐ N/A ☐
	c.	Discharge batteries to remove the electric charge?	Yes ☐ No ☑ N/A ☐
	d.	Regenerated used batteries?	Yes ☐ No ☑ N/A ☐
	e.	Disassemble them into individual batteries or cells?	Yes ☐ No ☑ N/A ☐
	f.	Remove batteries from consumer products?	Yes ☑ No ☐ N/A ☐
	g.	Remove the electrolyte from the battery?	Yes ☐ No ☑ N/A ☐
	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 ☑
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 ☑
	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 ☑
	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 ☑
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 ☐
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 ☐
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		Yes ☐ No ☐ N/A ☑

	releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]		
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 ☐

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

ACCUMULATION TIME			
11.	Is the waste accumulated for less than one year? [3745-273-15(A)] If not:		Yes ☑ No ☐ N/A ☐
	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 ☐
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 ☑
	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 ☐
	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 ☑
	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 ☑
	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 ☑
	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 ☑
	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 ☑
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 ☐
RESPONSE TO RELEASES			
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]		Yes ☑ No ☐ N/A ☑
15.	Is the material released characterized? [3745-273-17(B)]		Yes ☐ No ☐ N/A ☑
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 ☑
OFF-SITE SHIPMENTS			
NOTE: If a SQUWH self-transports waste, then they must comply with the Universal Waste transporter requirements.			
17.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]		Yes ☑ No ☐ N/A ☐

NOTE: SQUWHs are prohibited to send waste to any other facility.			
18.	If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)]		Yes ☑ No ☐ N/A ☐
19.	Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)]		Yes ☑ No ☐ N/A ☐
20.	If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:		
	a.	Receive the waste back? [3745-273-18(E)(1)]	Yes ☐ No ☐ N/A ☑
	b.	Agree to where the shipment will be sent? [3745-273-18(E)(2)]	Yes ☐ No ☐ N/A ☑
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:		Yes ☐ No ☐ N/A ☑
	a.	Sending the waste back to the originating handler? [3745-273-18(F)(1)]	Yes ☐ No ☐ N/A ☑
	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 ☑
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 ☑
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 ☑
EXPORTS			
24.	Is waste being sent to a foreign destination? If so:		Yes ☐ No ☑ N/A ☐
	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 ☑
	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 ☑
	c.	Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes ☐ No ☐ N/A ☑

USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

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

PROHIBITIONS

1. Does the generator manage used oil in a surface impoundment or waste pile? If yes: Yes ☐ No ☑ N/A ☐

   a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] Yes ☐ No ☐ N/A ☑

2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes ☐ No ☑ N/A ☐

3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? Yes ☐ No ☐ N/A ☑

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

GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil? If so, Yes ☐ No ☑ N/A ☐

   a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] Yes ☐ No ☐ N/A ☑

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

5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes ☐ No ☐ N/A ☑

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

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

7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes ☑ No ☐ N/A ☐

8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes ☑ No ☐ N/A ☐

9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]

a. Stopped the release? Yes ☐ No ☐ N/A ☑

b. Contained the release? Yes ☐ No ☐ N/A ☑

c. Cleaned up and properly managed the used oil and other materials? Yes ☐ No ☐ N/A ☑

d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ☐ No ☐ N/A ☑

ON-SITE BURNING IN SPACE HEATER

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: Yes ☐ No ☑ N/A ☐

a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes ☐ No ☐ N/A ☑

b. Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour? Yes ☐ No ☐ N/A ☑

c. Are the combustion gases from heater vented to the ambient air? Yes ☐ No ☐ N/A ☑

GENERATOR TRANSPORTATION

11. If the generator self-transports used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] Yes ☐ No ☐ N/A ☑

a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24] Yes ☐ No ☐ N/A ☑

b. Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24] Yes ☐ No ☐ N/A ☑

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

COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes ☐ No ☐ N/A ☑

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

14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes ☐ No ☐ N/A ☑

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

Brief description of facility and processes:. Plasti-Kote is an aerosol packaging plant that manufactures paint then fills aerosol cans, stores and ships them. The facility may also manufacture other consumer product aerosols that are solvent based/blends like "Goof-Off". The facility had 5 aerosol production lines, one non aerosol line and two mixing rooms. The facility had 14 accumulation areas and they have ~31 satellite accumulation points.

Note – based on Ohio EPA's interpretation of the satellite accumulation rule, Plasti-Kote will now utilize 10 accumulation areas – 4 of the areas meet the generator closure performance standard (Line 6 Filler, Line 5 filler, Mixing Room 2 Dust and Extruder and the QC Lab) and will be managed as satellite accumulation areas.

Process from beginning to end: Raw material is received and stored either in outdoor tanks or inside the plant. Mixing Room 1's process is as follows: In the pre-mix room (above Mixing Room 1), the resin is measured and placed in a container. Solvent (usually xylene) is added and then dry raw materials are added (*e.g.* pigments, extenders, *etc.*). The material is mixed and then sent down to either the ball mill or one of the three sand mills. The material is now in a paste consistency. This paste is sent to a mixing station where more solvents and other ingredients (depending on formulation) are added. The material is mixed and a sample is taken for QC purposes. When the material passes QC it is pumped from the mix room to the fillers in the filling room, put into aerosol cans that have had the marble and valve already placed in/on the can. The cans go into the gas house (propane is the gas usually used) where the valve is sealed. The can is then weight checked where heavy cans are rejected and light cans are segregated and filled if possible. The filled can goes through a water bath and if required some cans get a nozzle, then the lid and label if necessary. If an aerosol is rejected based on the water bath – it becomes a hazardous waste. The cans then go into the packer and the boxes are sent over to the attached distribution center to await shipment.

Mixing Room 2 has a similar process and is where "Fleckstone" is made. The raw materials are measured then placed into containers. The material is sent to one of two mixers. The material is then heated (no greater than 140^0 F) to accelerate the setting process. Once the material has set it is sent to the extruder. The extruded material is allowed to set then it is sent to one of two mixers. The material is then sent to the 'vorti sieve' where particles too large to be expelled through the nozzle are removed from the paint. QC is done on the material and once it passes QC it goes through the same process as from Mixing Room 1.

The facility also has seven spray booths to paint the caps. Five are automated and two are for the Fleckstone.

Hazardous waste generated: Points of hazardous waste generation include:

1. At the 'vorti sieve'
2. From cleaning operations of the mixers and extruders in Mixing room 2
3. Solvents from the premix room

4. Paper bags contaminated with heavy metals in premix room (solid)
5. At each of the twelve mixing stations (solvent)
6. Dust collector for the premix room (dust)
7. Car paint area near mixers in Mixing room 1 (solvent)
8. The filling side of the mix room, at each point is a satellite drum (solvent)
9. At each of the fill stations of each of the five lines (solvent)
10. At each of the fill lines after gas house (aerosol cans)
11. All mopping done with solvent

2007 Haz. Waste Report: (note – Plasti-Kote no longer prints labels – many of these waste streams are from the cessation of this operation in 2007). Also – Plasti-Kote is working on changing to Ashland as their sole TSD.

1 Spent Paint Pigments Profile # 0210-11567, D007, D008, generated 2209 pounds. From the baghouse dust and extruder waste. Sent to Rineco in Arkansas for storage, bulking and/or transfer off-site

2. Spent Waste Acetone Profile #0308-11290, D001, D035, F003, F005, generated 656,659 pounds from cleaning out of process equipment. Sent to Chemical Solvents for solvent recovery/reclamation. Chemical Solvents has a dedicated tank for this waste

3. Scrap Paint Profile #0611-15143, D001, generated 75,210 pounds. Product/by-product production. Waste is sent to Rineco in Arkansas for Fuels blending for energy Recovery at another site.

4. Mercury and debris Profile #0703-03995, D009, generated from 16 pounds. What was this from? Not sure – believe to be from clean out. Sent to Rineco for storage, bulking and/or transfer off-site. Was this a one-time event? Yes

5. Off spec Aerosol cans, Profile # 0704-06122, D001, D035, Sent to Giant Resources Recovery – Arvonia in Arvonia, VA and Rineco in Arkansas for fuels blending.

6. Ink paste in cans Profile #0709-15136, D001, lab pack of discarded off-spec or out-of-date chemicals or products. Generated 622 pounds, sent to Rineco for fuels blending.

7. Printing chemicals, Profile #0709-15974, ****D001, F002, F003 and F005, lab pack of off-spec or out-of-date chemicals or products, generated 242 pounds, sent to WTI for incineration. Was this a one time event? Yes – discussed the use of F-codes on out-of date, un-used products.

8. Printing Chemicals and Inks Profile #0709-15976, D001, F002, F003, Lab pack of discarded off-spec or out-of-date chemicals or products. Generated 153 pounds, sent to WTI for incineration. Was this a one time event? Yes

9. Printing chemicals and inks, Profile 0709-15977, U134 (hydrogen fluoride or

hydrofluoric acid), Lab pack of discarded off-spec or out-of-date chemicals or products. Generated 7 pounds sent to WTI for incineration. Was this a one time event? Yes

10. Printing chemicals and inks, Profile # 0709-15982, D002, Lab pack of discarded off-spec or out-of-date chemicals or products. Generated 15 pounds, sent to WTI for incineration. Was this a one time event? Yes

11. Printing chemicals and inks, Profile # 0709-15983, D002, Lab pack of discarded off-spec or out-of-date chemicals or products. Generated 18 pounds, sent to WTI for incineration. Was this a one time event? Yes

12. Solid waste paint clean-up Profile #0709-16032, D001, from the cleaning of process equipment, generated 1099 pounds. Sent to Rineco in Arkansas for fuels blending for energy recovery at another site.

13. Alkyd resin, Profile # 0711-19619, D001, from the removal of tank sludge, sediment or slag, generated 8364 pounds (none generated the previous year). Sent Rineco in Arkansas for fuels blending for energy recovery at another site.

14. Alkyd Resin and water Profile #0711-19628, D001, from tank clean out generated 466 pounds. Sent Rineco in Arkansas for fuels blending for energy recovery at another site. Plasti-Kote tried to us water, but it didn't work, used bead blasting to clean tank.

15. Waste Fleckstone product, Profile # 9608-07320, D001, from product/by-product production, generated 53,687 pounds, Sent to Rineco in Arkansas for fuels blending for energy recovery at another site.

16. Scrap paint and debris, profile #9705-02043, D001, D035, F003, F005, from the cleaning out of process equipment, generated 3118 pounds. Sent to Rineco in Arkansas for fuels blending for energy recovery at another site.

17. Resin water solvent tank clean-out, D001, F003, F005, from the discarding of off-spec or out of date chemicals or products, generated 124 pounds sent to Chemtron for storage, bulking and/or transfer off-site

18. Spent 2010 cleaning solvent, D001, D035, F003, F005, from the clean out of process equipment, generated 4819 pounds, sent to Chemical Solvents, Denison, for solvent recovery

Used oil is collected in 55 gallon drums and sent to Rineco for reclamation. This too will be managed by Ashland once the switch takes place. Used oil is generated from change out/maintenance of the process machines.

Old batteries (lead/acid, alkaline, etc?) are managed as Universal Waste. Collected and sent to Rineco for recycling (again – to be switched to Ashland)

Universal waste thermostats, pesticides are not generated at this site

Universal Waste bulbs are being collected and managed as universal waste. Bulbs are sent to Rineco for recycling, this will be switching to Ashland

Contaminated rags and lab coats are laundered by Cintas.

Scrap metal is sent to Weingold for recycling

Regulatory/Enforcement History (if applicable): None