



State of Ohio Environmental Protection Agency

Northeast District Office

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

CERTIFIED MAIL

August 21, 2007

Andy Getz
Preferred Airparts, LLC
11234 Hackett Road
P. O. Box 12
Kidron, OH 44636

**RE: PRIORITY AIR CHARTER/PREFERRED AIRPARTS, WAYNE COUNTY
CESQG COMPLIANCE INSPECTION, NOTICE OF VIOLATION (NOV)
COMPLAINT NUMBER 6986**

Dear Mr. Getz:

On July 12, 2007, Nyall McKenna and I, as representatives of the Ohio EPA's Division of Hazardous Waste Management, conducted an inspection of Priority Air Charter LLC and Preferred Airparts LLC (Priority Air Charter/Preferred Airparts); both located at 11234 Hackett Road, Kidron, Ohio, for compliance with Ohio's hazardous waste and used oil regulations. You and Brian Stoltzfus represented Priority Air Charter/Preferred Airparts (the facilities) during the inspection.

This inspection was in response to a complaint received by Ohio EPA expressing concern that parts cleaning operations at the facilities were generating hazardous wastes that were discharged to the facilities' on-site septic system.

During the inspection visit on July 12, 2007, Brian Stoltzfus, as a representative of Priority Air Charter/Preferred Airparts, stated that the facilities would only respond to certain questions in writing after receiving written questions. Priority Air Charter/Preferred Airparts had recently been the subject of an inspection by Ohio EPA Division of Surface Water, and had concluded that it would have been better to respond to questions during that inspection in writing.

In response to this request, I sent a letter to you dated July 19, 2007, requesting, among other things, additional information on: materials used that when spent or otherwise discarded might be a hazardous waste; copies of MSDSs for such materials; and certain information on hazardous waste management at the facility. On July 24, 2007, I received a letter dated July 23, 2007, from you requesting an extension to respond to the July 19, 2007 letter. By my letter dated July 26, 2007, an extension was granted. On August 17, 2007, I received an undated, unsigned response to my July 19, 2007 letter.

The inspection included a review of the facility's operations, as well as waste management practices and documentation. Priority Air Charter/Preferred Airparts was inspected for the requirements of a conditionally exempt small quantity generator (CESQG) of hazardous waste. Based on the information provided to me it appears that Priority Air Charter/Preferred Airparts may generate less than 220 pounds of hazardous waste per calendar month, but as I am not able to precisely quantify the generation rate, Ohio EPA reserves the right to evaluate Priority Air Charter/Preferred Airparts for compliance as a small quantity generator (SQG) or a large quantity generator (LQG), if future information should indicate that Priority Air Charter/Preferred Airparts has a rate of hazardous waste generation greater than 220 pounds per calendar month.

Priority Air Charter LLC and Preferred Airparts LLC (Priority Air Charter/Preferred Airparts), are both located at 11234 Hackett Road, Kidron, Ohio. Priority Air Charter LLC operates an express air charter service from this location. Preferred Airparts LLC sells used and new aircraft parts from this location. The businesses share physical facilities and apparently are under common control.

As part of the used aircraft parts business, Preferred Airparts LLC cleans certain used aircraft parts before placing into stock for sale. Solvents used to clean used parts appear to include materials that contain more than 10% methylene chloride before use. Other solvents used at the facilities include: acetone, methyl ethyl ketone, toluene and mineral spirits.

This letter will explain the violations I found and steps you need to take to correct them.

I found the following violations of Ohio's hazardous waste laws:

1. ORC 3734.02 (E) & (F) Treatment, storage, disposal

Based on the following information, Priority Air Charter/Preferred Airparts has been determined to be the operator of an unpermitted hazardous waste disposal facility:

- Used air craft parts are cleaned in the cleaning room;
- Water spray is used to rinse parts in the cleaning room;
- Water discharge from the cleaning room is routed to the grease trap;
- Water from the grease trap goes to an on-site sand filter and leach field;
- I observed two products containing methylene chloride present in the cleaning room during the facility walk-through, namely a five gallon pail of ZEP Formula 4481 which was labeled "Paint Stripper" and several aerosol cans of ZEP OFF. Although Priority Air Charter/Preferred Airparts does not include these materials in the list of materials used in the cleaning room in its response received August 17, 2007, my observation of these materials supports the premise that these solvents are used for parts cleaning.

Material compositions were determined from MSDSs obtained from the ZEP internet site. ZEP Formula 4481 is described as “a brush-on, rinse-off, solvent paint stripper.” Per the MSDS, ZEP Formula 4481 contains 80-90% by weight methylene chloride. ZEP OFF is described as a “solvent-based stripper that dissolves and removes most paints, decals, varnishes and gasket adhesives, quickly and safely... Residue can easily be removed by scraping or by rinsing with water or solvent.” Per the MSDS, ZEP OFF contains 60-70% by weight methylene chloride.

- I observed a one gallon container of toluene in the cleaning room during the facility walk-through. It was reported during the walk-through that it was used for wipe down of cleaned parts. Although Priority Air Charter/Preferred Airparts does not include toluene in the list of materials used in the cleaning room in its response received August 17, 2007, my observation and sample results discussed below support the premise that it is used for parts cleaning.
- A sample taken on January 12, 2007 from the grease trap which receives water from the parts cleaning room located at Priority Air Charter/Preferred Airparts and analyzed by Stark Envirolab, Inc. indicated the following constituents present at the following concentrations:

Acetone	1,760	micrograms/liter
Chlorobenzene	70.8	micrograms/liter
Methylene Chloride	27,100	micrograms/liter
Toluene	128	micrograms/liter

- A 55 gallon drum of El Dorado Product PR-3510 was observed in the “lean-to” adjacent to the west hanger. Per the MSDS as supplied by Priority Air Charter/Preferred Airparts, in its response received August 17, 2007, PR-3510 contains 45-55% by weight dichloromethane (i.e., methylene chloride). However, no information has been provided or no observations were made during the inspection that connects usage of this product to the parts cleaning room. Priority Air Charter/Preferred Airparts, in its response received August 17, 2007, stated that wastes from usage of this and all materials for which an MSDS was provided “are limited to paper towels left to evaporate, then placed in the trash and saw dust that, when dry, is placed in the trash.”

Spent solvents that contained more than 10% methylene chloride before use are hazardous waste, F002. It appears that some spent solvents meeting the listing description for F002 were discarded by discharge into the water drain in the parts cleaning room and then subsequently disposed in the on-site sand filter and leach field for sanitary wastes.

The preceding information also supports the possibility that spent toluene was discharged to the water drain in the parts cleaning room.

Since Priority Air Charter/Preferred Airparts does not have a permit to dispose of hazardous wastes, Priority Air Charter/Preferred Airparts has violated the provisions of ORC 3734.02 (E) & (F). Since Priority Air Charter/Preferred Airparts violated ORC § 3734.02(E) and (F), Priority Air Charter/Preferred Airparts is subject to all applicable general facility standards found in OAC chapters 3745-54 and 55. Additionally, at any time Ohio EPA may assert its right to have Priority Air Charter/Preferred Airparts begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

Abatement of this violation will require Priority Air Charter/Preferred Airparts to:

- Submit a hazardous waste closure plan meeting the requirements of OAC Rule 3745-55-12 for the waste management and disposal units, which appear to be the current septic system, including but not limited to the grease trap, leach field, sand filter and associated piping, to this office within 30 days of receipt of this letter; and
- Implement this closure plan after approval by Ohio EPA.

Priority Air Charter/Preferred Airparts has requested to meet with Ohio EPA. The subject of response to and abatement of this violation would be an appropriate agenda item for that meeting.

2. OAC Rule 3745-52-11 Hazardous waste determination

Priority Air Charter/Preferred Airparts did not provide evidence during the on-site inspection or in written follow-up correspondence that they have evaluated their wastes to determine if they are hazardous wastes. For example, dust from the bead blaster in the East Warehouse had not been evaluated; no information on material used to clean paint guns in the East Warehouse was available; status and disposition of used fluorescent bulbs was not available; no indication that rags and wipers used with methyl ethyl ketone (MEK) were evaluated to determine if they exhibited a TCLP characteristic for MEK; and, no information was provided on wastes from the methylene chloride containing solvents observed in the parts cleaning room.

To return to compliance, Priority Air Charter/Preferred Airparts must develop a written plan for evaluating its wastes and submit the plan and evaluation results to this office within 30 days of receipt of this letter.

Enclosed you will find a copy of the checklists completed during the inspection.

You can find copies of Ohio's hazardous waste laws and regulations at our web page at: http://www.epa.state.oh.us/dhwm/laws_regs.html.

Ohio EPA DHWM factsheets can be found at the following internet site: <http://www.epa.state.oh.us/dhwm/factsheets.html>.

Ohio EPA guidance on "Hazardous Waste Generator Categories" can be found on the internet at: http://www.epa.state.oh.us/dhwm/pdf/Episodic_Generation.pdf.

PRIORITY AIR CHARTER/PREFERRED AIRPARTS
AUGUST 21, 2007
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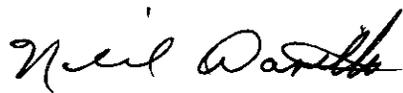
The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information at the following Web link: <http://www.epa.state.oh.us/dhwm/listserv.html>. Please feel free to share this information with your colleagues.

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 and pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. Your company can benefit economically, help preserve the environment and improve its public image through pollution prevention.

Present or past instances of non-compliance may be subjects of pending or future enforcement actions.

Should you have any questions regarding this letter, please contact me at (330) 963-1165.

Sincerely,



Neil J. Wasilk
Environmental Specialist
Division of Hazardous Waste Management

NJW:ddw

Enclosures

ec: Natalie Oryshkewych, Ohio EPA, DHWM, NEDO
Harry Sarvis, Ohio EPA, DHWM, CO
Nyall McKenna, Ohio EPA, DHWM, NEDO
Phil Rhodes, Ohio EPA, DSW, NEDO

NOTICE:

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

Priority Air Charter LLC and Preferred Airparts, LLC
11234 Hackett Road
P. O. Box 12
Kidron, OH 44636

PROCESS DESCRIPTION SECTION

Give a general process description (include all processes at the facility)

Neil Wasilk (NW) and Nyall McKenna (NM) arrived at about 10:20 a.m. on July 12, 2007. Met initially with Andrew (Andy) Getz. Mr. Getz is a relatively new employee responsible for human relations and several other functions.

We explained that we were there to investigate a complaint forwarded by OEPA DSW. The complaint expressed concern that hazardous wastes were being generated from the parts cleaning room and discharged to the on-site septic system.

The facility consists of a several aircraft hangers, a private runway and office buildings. Two businesses operate at this location both owned by Brian Stoltzfus and his brother Ken Stoltzfus Jr. The first business is an express air freight business, Priority Air Charter LLC. That company operates a small fleet of airplanes to pickup and deliver freight. The second business consists of selling aircraft parts, Preferred Airparts, LLC.

We started a review of facility operations with Mr. Getz discussing the facility floor drains and the grease trap. Mr. Getz stated that the facility's wash water from the cleaning room currently goes into a pipe and then out to a tank they call the grease trap. The grease trap collects water from the water softener, floor drains and drain in the parts cleaning room. Liquids from the grease trap mix with sanitary waste water and the mixture is treated in the on-site underground sand filter and leach field.

The facility was in the process of installing a water evaporator under a PTI from DSW. This is being done to resolve discharges to the on-site septic system that were not in accordance with DSW rules. As part of this project, the parts cleaning room is to be disconnected from the grease trap so that the liquid would in the future flow to an evaporator. Reportedly plans called for the grease trap to be crushed and buried. (In the closing meeting we recommended that none of the components of the septic system be removed at this time so as to reduce the scope of any potential future remediation of the current septic system.)

We were informed that the parts washer in the parts cleaning room uses Dyna 143 and that the soap tank uses El Dorado ED 305L. The parts cleaning process was described as follows:

- Part comes into the facility and gets its first inventory;
- Part into the solvent tank which uses naphtha;
- Part rinsed with water;
- Part is air blown or wiped off;
- Part bagged and ready for placing into inventory for sale.

Mr. Getz reported that some parts are also stripped with "aircraft stripper". We enquired how spent "aircraft stripper" was managed and asked if we could see an MSDS for "aircraft stripper" and other materials used at the facility.

We were joined by Brian Stoltzfus at about 10:45 a.m. We explained that we were there to investigate a complaint forwarded by OEPA DSW. The complaint expressed concern that hazardous wastes generated from the parts washing room were discharged to the on-site septic system.

Mr. Stoltzfus stated that during a previous inspection by Ohio EPA Division of Surface Water there had been some misunderstandings and he had been advised by Al Shapiro (perhaps Michael Shapiro) in OEPA Legal that the facility did not have to reply to oral questions during inspections and should ask for questions in writing and that they would respond in writing. Consequently neither he nor Mr. Getz were going to discuss waste management practices or provide MSDSs at this time. This request was made shortly after Mr. Getz mentioned that some parts were stripped with "aircraft stripper" and Ohio EPA asked for more information on how spent "aircraft stripper" was managed.

NW noted that OEPA could get a search warrant if necessary. NW and NM stated that while we could provide questions in writing after the inspection it would be difficult since we needed to know more information about the facility to determine what questions to ask.

The results from the 1-12-07 grease trap sample analyzed at Stark Envirolabs were discussed. The facility had obtained a sample for analysis for design of the new evaporator, but did not have any more recent data on the constituents identified in the 1-12-07 grease trap sample analysis.

Mr. Stoltzfus and Mr. Getz agreed to provide a walk-through of the facility and all four of us proceeded with the walk through portion of the inspection.

West Hanger

This hanger contains a few airplanes for the air freight business. Most of the liquid generated in this building is from washing the airplanes. The building drains empty into the either the oil water separator or septic system (notes differ). An airplane wash concentrate is used to clean the airplanes. LPS Presolve Cleaner/Degreaser to clean other items. A drum of new isopropyl alcohol (99%) was observed. Mr. Stoltzfus stated the alcohol was used as a deicer for airplanes in flight.

North Hanger

This building contains mostly stored parts and Mr. Stoltzfus' personnel airplanes (Bi plane, glider, etc). A used oil furnace is located in this building. Used oil generated on-site is burned in this furnace.

Maintenance Hanger

In this hanger the facility services, rebuilds, and salvage airplanes and their parts. A drum of mineral spirits was visible in this area. OEPA asked about painting the airplanes. Mr. Stoltzfus stated that they paint small parts or touch up an airplane. Big projects are outsourced.

A parts washer was observed. Under the parts washer were five gallon pails including Sky Kleen Aviation Solvent. Also observed were a 55 gallon drum with "100 Mineral" hand written on it and an aerosol can of ZEP OFF (Decal, Paint & gasket remover) which per the container contains methylene chloride.

West Warehouse

This is operated by the parts business; it includes a shop area and the parts cleaning room.

The parts cleaning room is designed to clean and degrease airplane parts and engines. Parts washer in this room uses ZEP Dyna 143 F solution. Several aerosol cans of ZEP OFF were in the room. Soap tank where parts are placed in a hot soap solution uses Eldorado ED 305 L solution. There is a cleaning booth where large parts are placed to be cleaned. Two aerosol cans of ZEP OFF Decal, Paint & gasket remover and a few bottles of spray containers of ZEP Orange Gel Degreaser were located next to the cleaning booth. A 5 gallon container of ZEP Formula 4481 – Neutral Paint Stripper is located in this room. (Both ZEP OFF and ZEP Formula 4481 contain methylene chloride.) Mr. Stoltzfus did not know what happens to the parts washer solution and wants us to put our questions in writing for this room. The drains in this room lead to the grease trap tank and then out to the sand filter and leach field.

East Warehouse

This building is used to store most of the parts for the parts selling business. A bead blaster for paint and corrosion removal and a small paint booth are located in this building. A box of dust was observed under the collector of the blaster; it had not been TCLP tested. MEK is used to clean the parts before they are painted; reportedly MEK is used as a wipe. Mr. Stoltzfus did not know what happens to the used paint and clean up materials from the gun cleaner after painting the parts. Batteries are collected and recycled off-site. Used bulbs are not recycled and have not been evaluated for TCLP.

Lean-to

There is a lean-to against the west hanger. Inside it contains a rack with 55 gallon drums of various chemicals including,

- Mineral Spirits
- MEK
- Toluene
- Thinner (No name just this word)
- Eldorado ED 305L Cleaning Solution
- Eldorado –PR 3510 –Paint Remover (PR 3510 contains methylene chloride, phenol and chromate.)

Closing meeting

Held at office where we initially met Mr. Getz and Mr. Stoltzfus.

Mr. Stoltzfus was concerned about the new evaporator and would we allow it. OEPA stated they had to eliminate all solvents or anything else that would make the liquid going to the evaporator a hazardous waste before it would be allowed under the hazardous waste rules. (The implications of the mixture rule for listed hazardous waste, such as F002 from spent solvent containing methylene chloride, had been discussed in some detail during other parts of the inspection.) OEPA stated that the facility probably would need to conduct a generator closure in accordance with a closure plan approved by OEPA on the wash room and current septic system including but not limited to the grease trap and sand filter before they hook up the plumbing from the clean room to the evaporator. NW instructed the facility not to remove or alter the grease trap or any other part of the waste water system.

NW mentioned the need to get a TCLP test for the bead blaster dust. NW suggested that the facility consider retaining a consultant. NW stated they will get a letter shortly asking for more information.

NW and NM left facility at about 1:30 p.m.

WASTE ACTIVITIES AND P2 SUMMARY SECTION

For each of the processes listed above that generate a waste give the following information: (1) name of process generating waste, (2) name or description of waste generated (e.g. sludge, solvent, ash, used oil, spent lamps, etc.), (3) EPA waste codes, if applicable, (4) quantity generated per month, (5) type of accumulation (container, tank, etc.) (6) waste accumulation location in facility, (7) type of on-site treatment (if used), (8) name of off-site management facility and type of waste management activity

occurring there, (9) Current P2 activities, and (10) P2 opportunities

REMARKS-GENERAL INFORMATION

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment?

*If yes, refer promptly to your district P2 coordinator.

Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or
p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other:

PRIORITY AIR PARTS / PREFERRED AIR PARTS
CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET

CESQG: <100Kg. (Approximately 25-30 gallons) of waste in a calendar month.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or >1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: $\text{Amount in gallons} \times \text{Specific Gravity} \times 8.345 = \text{Amounts in pounds}$.

Safety Equipment Used:

WASTE EVALUATION

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A
SEE NOV LETTER FOR MORE DETAILS

GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes No N/A
COULD NOT ESTABLISH RATE OF GENERATION

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes No N/A
SEE NOV LETTER FOR DETAILS

TREATMENT OF HAZARDOUS WASTE

4. Does the generator treat hazardous waste in a :
- 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

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

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

REMARKS

USED OIL INSPECTION CHECKLIST (Short version)

PRIORITY AIR CHARTER / PREFERRED AIR PARTS

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)? [3745-279-21(A)] Yes ___ No N/A ___ RMK#
NOT AWARE OF SUCH MIXING
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#
NO KNOWLEDGE OF > 1000 PPM
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#
*BURN ON-SITE PER
 OPERATOR*

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# ___

C:\My Documents\IOEPA Forms\USED OIL.SHORT.11.2004.wpd

REMARKS

PRIORITY # 2: CHARTER / PREFERRED AIRPORTS
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)] *SPENT FLUORESCENT BULBS. NO INFORMATION* Yes No ___ N/A ___ RMK#
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] *PROVIDED ON HOW MANAGED* Yes No ___ N/A ___ RMK#

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES — *NO INDICATION OF 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 ___ RMK# ___
 4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes ___ No N/A ___ RMK# ___
 5. Does the SQUWH conduct any of the following activities:
 - a. Sort batteries by type? Yes ___ No ___ N/A ___ RMK# ___
 - b. Mix battery types in one container? Yes ___ No ___ N/A ___ RMK# ___
 - c. Discharge batteries to remove the electric charge? Yes ___ No ___ N/A ___ RMK# ___
 - d. Regenerated used batteries? Yes ___ No ___ N/A ___ RMK# ___
 - e. Disassemble them into individual batteries or cells? Yes ___ No ___ N/A ___ RMK# ___
 - f. Remove batteries from consumer products? Yes ___ No ___ N/A ___ RMK# ___
 - g. Remove the electrolyte from the battery? Yes ___ No ___ N/A ___ RMK# ___
- If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] Yes No ___ N/A RMK# ___

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)]
- 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)]
- b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]
7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)" [3745-273-14(A)]

Yes ___ No N/A | RMK# ___

Yes ___ No N/A | RMK# ___

Yes ___ No N/A | RMK# ___

Yes ___ No N/A | RMK# ___

UNIVERSAL WASTE LAMPS

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]
9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]
10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)]

Yes ___ No N/A ___ RMK#

NO INFO AVAILABLE

Yes ___ No N/A ___ RMK#

Yes ___ No N/A ___ RMK#

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

generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

11. Is the waste accumulated for less than one year? Yes ___ No ___ N/A ___ RMK# ___ ✓
[3745-273-15(A)] If not:
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes ___ No N/A ___ RMK# ___ ✓

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

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

EMPLOYEE TRAINING

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

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes ___ No N/A ___ RMK# ___ ✓
15. Is the material released characterized? [3745-273-17(B)] Yes ___ No N/A ___ RMK# ___ ✓
16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes ___ No N/A ___ RMK# ___ ✓

OFF-SITE SHIPMENTS

NOTE: *If a SQUWH self-transport waste, then they must comply with the Universal Waste transporter requirements.*

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes ___ No N/A ___ RMK# ___ ✓

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 ___ RMK# ___ ✓
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes ___ No N/A ___ RMK# ___ ✓
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes ___ No ___ N/A ___ RMK# ___ ✓
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes ___ No ___ N/A ___ RMK# ___ ✓

21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following: Yes ___ No N/A ___ RMK# ___ ✓
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes ___ No ___ N/A ___ RMK# ___ ✓
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes ___ No ___ N/A ___ RMK# ___ ✓
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes ___ No N/A ___ RMK# ___ ✓
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes ___ No N/A ___ RMK# ___ ✓

EXPORTS

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

REMARKS