



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

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

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

June 3, 2008

**RE: Tremco, Inc.
OHD 004 205 365
Large Quantity Generator
Notice of Violation and
Return to Compliance**

James F. Walker
Tremco Inc.
4475 E. 175th St.
Cleveland, Ohio 44128

Dear Mr. Walker:

The Ohio EPA Division of Hazardous Waste Management conducted an inspection of Tremco located at 4475 E. 175th Street, Cleveland, Ohio, on May 12 and 16, 2008. For this I met with you, Willie Spikes, and Glenn Strasshofer. The purpose was to determine if Tremco had violations of Ohio's hazardous waste and used oil laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC).

This letter will document any violations and concerns found. It also documents how you have corrected the violations and addressed the concerns.

Another purpose of the inspection was to look for ways Tremco may be able to reduce its waste generation, conserve energy, and save money. An attachment to this letter covers these issues.

The following violations were found: (These follow the order of the enclosed checklists)

1. OAC rule 3745-65-16(D)(2) – Job descriptions.
This rule requires a job description for each position related to hazardous waste management.

Tremco violated this rule by not having a job description for the emergency coordinators. The job description emailed to me on May 21, 2008, by Glenn Strasshofer shows that Tremco has corrected this violation.

2. OAC rule 3745-65-33 – Testing and maintenance of equipment.
This rule requires that all facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency.

James F. Walker
Tremco Inc.
June 3, 2008
Page 2

Tremco violated this rule by having spill control equipment in a location that was not easily accessible to the hazardous waste storage area. In particular, an overhead door needed to be opened to get from the hazardous waste storage area to the spill control equipment. On May 16, 2008 I saw that you had corrected this violation by moving the spill control equipment to a better location. You also added a quick-release closure to this spill cart and revised your inspection checklist and contingency plan accordingly.

3. OAC rule 3745-279-22(C) - Used oil labels.
This rule requires containers and aboveground tanks used to store used oil at generator facilities to be labeled or marked clearly with the words Used Oil.

Tremco violated this rule by having two containers of used oil at the storm water treatment system and one container of used oil near the maintenance shed that were not labeled as used oil. On May 16, 2008, I saw that you had corrected this violation by labeling these containers.

The used oil container near the maintenance shed had an open funnel in it. This container should be stored closed so that rainwater doesn't fill it and, possibly, cause the used oil to overflow. Other metal drums of material were also stored outside in this area. You may want to get plastic covers similar to shower caps for the metal drums you store outside to avoid rusting and/or leaking at the bung cap.

Concerns:

1. On May 12, 2008, I saw waste on the outside concrete areas that had come from the dust collector for the powders handling areas. You have determined that this waste is not a hazardous waste based on the MSDS for the powders used. I reviewed some of these MSDS with you and your determination appears to be reasonable. On May 16, 2008 I saw that you had cleaned up these areas of waste spillage. You also stated you are looking into ways to control this in the future, possibly by coating the concrete in this area so that any future spills can be more completely swept up.
2. On May 12, 2008, I saw pieces of a resin-like waste on the gravel outside at your wastewater frac tank. On May 16, 2008, I saw that these had been cleaned up.

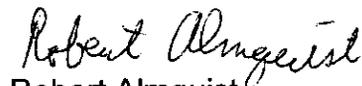
The Division of Hazardous Waste Management has created an email service to provide updates on events and news related to hazardous waste activities in Ohio. You can find more information and sign up at: <http://www.epa.state.oh.us/dhwm/listserv.html>.

James F. Walker
Tremco Inc.
June 3, 2008
Page 3

You can find copies of the regulations and other information on the Division of Hazardous Waste Management web page at: <http://www.epa.state.oh.us/dhwm/>.

If you have any questions, please contact me at (330) 963-1217, or robert.almquist@epa.state.oh.us.

Sincerely,



Robert Almquist
Division of Hazardous Waste Management

RA:cl
Enclosures

cc. Natalie Oryshkewych, DHWM, NEDO

ec. Frank Popotnik, DHWM, NEDO
Harry Sarvis, DHWM, CO
Glenn Strasshofer, Tremco
James Walker, Tremco

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.

Pollution Prevention Attachment
to May 2008 letter to
Tremco Inc. (OHD 004 205 365)

The following is offered as information and suggestions that you may want to investigate further. If requested, I can provide paper copies of the documents and websites for which the links are given. If you have any questions, want additional information, or a more detailed assessment, you can contact me at 330-963-1217 or robert.almquist@epa.state.oh.us

Waste Solvent:

Tremco generated over 200,000 pounds of waste solvent during 2007 and the generation rate during 2008 seems to be similar. You have many systems and equipment in place to minimize this – reuse of waste solvent, a used solvent coordinator, dedicated kettles, and newer kettles with better cleaning systems. Further review and refinement of these may provide additional waste minimization. See the Further Assessment section below if you want assistance with this.

The purchase and operation of a waste solvent distillation system may be able to pay for itself in a short time. The solvent naphtha and the xylene used may need to be distilled separately. Information regarding on-site solvent recycling equipment is enclosed and can be found at:

<http://www.epa.state.oh.us/ocapp/p2/fact9.pdf>

and

<http://mntap.umn.edu/mach/62-Still.pdf>

A solvent distillation cost calculator can be found at:

<http://www.iwrc.org/SBPPC/costCalcs/solvent.cfm>

This site also contains a searchable vendor database.

An additional list of vendors of distillation units can be found at:

<http://www.epa.state.oh.us/ocapp/p2/solventeq.html>

Debris from Equipment Cleaning:

Tremco generated over 90,000 pounds of debris from equipment cleaning during 2007. These include rags that can't be sent to a laundry, absorbent pads, and plastic used to cover product drums. These have been shipped out as a D001 and F003 hazardous waste. These waste codes may not apply and these wastes may not be hazardous waste.

In 2006 Ohio EPA changed the way we view how listed waste, such as F003, applies to wastes such as rags. An article regarding this is enclosed. In general, rags would not be a F003 waste because they are not a spent solvent as the listing description requires.

Since these wastes are not a liquid, it also does not appear that the D001 code applies. A copy of OAC 3745-51-21 which covers the characteristic of ignitability

is enclosed for your review. During the inspection we did, however, see a bottle of liquid ink in one of the containers of this waste. In order to ship this waste as a nonhazardous waste you would need to start a program that prevents ignitable liquids from being put in these containers.

It may also be of interest that the US EPA published a final rule on July 14, 2006 which changed part of the rule that defines an ignitable hazardous waste. Specifically the ignitable compressed gas and oxidizer definitions were changed. A copy of two nonconsecutive pages of this notice is enclosed. The Ohio EPA may adopt this rule in the future. The Federal Register, which publishes new rules, can be found at: <http://www.gpoaccess.gov/fr/index.html> and the Code of Federal Regulations (including US EPA rules) can be found at: <http://www.gpoaccess.gov/cfr/index.html>

Further Assessment

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides compliance and pollution prevention assistance on environmental issues related to air, land, and water. If desired, this can include an onsite assessment of your operations with a resulting report containing waste minimization and energy conservation suggestions. They can be contacted at 800-329-7518 or <http://www.epa.state.oh.us/ocapp/ocapp.html>

The Small Business Development Centers of Ohio can help with professional guidance by connecting you with research, financing sources, and training opportunities.

<http://development.ohio.gov/>

Energy Conservation Information:

You told me that Tremco has a program with General Electric to upgrade the lighting at this facility. Lighting upgrades often have relatively short payback periods due to the energy saved and often by improved working conditions also.

Other sources of energy conservation information are listed here:

ENERGY STAR is a government-backed program helping businesses and individuals protect the environment through superior energy efficiency. Their website is at:

<http://www.energystar.gov/>

This link leads to the part of the site that deals with improving the energy performance of buildings and plants:

http://www.energystar.gov/index.cfm?c=business.bus_index

The US Department of Energy has various software tools to help identify and analyze energy system savings opportunities in your plant. These can be found at: <http://www1.eere.energy.gov/industry/bestpractices/software.html>

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

Energy savings can come from sources that may be unexpected such as vending machines:

http://www.energystar.gov/index.cfm?c=vending_machines.pr_vending_machines

and exit signs:

http://www.energystar.gov/index.cfm?c=exit_signs.pr_exit_signs

The following reports are about different ways to plan for an uncertain energy future:

Why Your Plant Should be Energy Efficient, 2007

http://www.eere.energy.gov/industry/bestpractices/energymatters/articles.cfm/article_id=247

Energy Strategy for the Road Ahead, 2007 (36 pages)

http://www.energystar.gov/ia/business/GBN_Energy_Strategy.pdf

Financial

One way to approach facility pollution prevention is to find out which wastes are costing you the most money and focus your efforts on reducing those wastes first. Actual costs paid to have the waste hauled away are only one part of this cost analysis. More information regarding cost analysis can be found at:

Cost Analysis for Pollution Prevention, 2005

<http://www.ecy.wa.gov/pubs/95400.pdf>

There are various grants, loans, and tax incentives available for environmental projects in Ohio. A listing of these can be found at:

<http://www.epa.state.oh.us/ocapp/funding.html>

Included in this list are some administered by the Ohio Department of Development:

<http://www.odod.state.oh.us/EconomicDevelopment.htm>

and the Conversion Facilities Exemption which was designed to encourage and reward businesses for investing in energy conversion, solid waste energy conversion, or thermal efficiency improvements. This is administered by the Ohio Department of Taxation (contact Greg Cartier (614) 466-8581).

The City of Cleveland's Economic Development Department offers a loan program and a tax incentive program.

<http://www.city.cleveland.oh.us/government/departments/econdev/edind.html>

The Clean Air Resource Center offers help in understanding EPA air quality requirements. In addition, if your business is required to purchase new

equipment, they can offer better-cost financing with special tax incentives. Their phone number is 800-225-5051.

<http://www.ohioairquality.org/>

Waste Exchange:

If waste chemicals could still be used by another company you may be able to save on disposal costs. A waste exchange such as Ohio's Material Exchange which can be found at:

<http://www.epa.state.oh.us/ocapp/p2/omex/omex.html>

may help you find such a company.

Ohio Environmental Protection Agency
**RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to
tammy.mcconnell@epa.state.oh.us or mail it to Tammy
McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OHD004205365								
3. Site Name	Name: Tremco Inc.					Website: (Optional)			
4. Site Location Information	Street Address: 4475 E 175 th St.					State: OH			
	City, Town, or Village: Cleveland					Zip Code: 44128			
	County Name: Cuyahoga								
5. Site Land Type (check only one)	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
6. Mailing code(s) www.epa.gov/epca/w/na.html	32551		32552						
7. Facility Representative	First Name: Glenn			MI:	Last Name: Strasshofer				
Additional names can be recorded in number 12	Phone Number: 216-378-6341				Phone Number Extension:				
	E-Mail Address: strassgl@tremcoinc.com								
	Fax Number: 216-752-5005				Fax Number Extension:				
Only provide address information if it is different than the site address	Street or P.O. Box:								
	City, Town or Village:					Country:		Zip Code:	
	State:								
8. US Owner and Operator of the Site Additional Owners and Operators in the Community See for on another page of the form	Name of Site's Legal Owner: RPM International					Date Became Owner (mm/dd/yyyy): 02/01/1998			
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: PO Box 777								
	City, Town or Village: Medina					Owner Phone #:		Zip Code: 44258	
	State: OH					Country:			
9. Violations Cited? 10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)	Name of Site's Operator: Tremco Inc.					Date Became Operator (mm/dd/yyyy): 05/01/1998			
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: 3735 Green Rd.								
	City, Town or Village: Beachwood					Operator Phone #:		Zip Code: 44122	
	State: OH					Country:			
<input type="checkbox"/> Not Regulated <input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input checked="" type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG)									
<input type="checkbox"/> Hazardous Waste Transporter <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste <input type="checkbox"/> Recycler of Hazardous Waste <input type="checkbox"/> Underground Injection Control Facility					<input type="checkbox"/> Conditionally Exempt Small Quantity Generator <input type="checkbox"/> United States Importer of Hazardous Waste <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace <input type="checkbox"/> Small Quantity On-Site Burner Exemption <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption				

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))

<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)
<input type="checkbox"/> Destination Facility for Universal Waste	

Check all boxes below that apply for each of the three types of facilities above		10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
	Managed	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	

11. 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, P012). 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 F003

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

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:	Willie Spikes, Jim Walker
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments:	
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		

13. Name of Inspector(s) Robert Almquist Name of Inspector(s) _____ Date of Inspection/Time (mm/dd/yyyy) (hh:mm) 5/12/2008

14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified persons properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage this site or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Owner, Operator, or an Authorized Representative	Name and Title (Print)	Date (mm/dd/yyyy)

Process, Waste, and Pollution Prevention Summary for:

Tremco, OH 004 205 365, LQG, 5-12-08 inspection

#	Process generating the waste	Waste description and haz. codes	Profile #	Date of last analysis	Date of last LDR	Amount generated (2007 annual report)	On-site management	Off-site management	Current pollution prevention	Possible pollution prevention
1	Washing out of mixing kettles when switching to a new product. Typically solvent 186 (solvent naphtha) is used. For some products solvent 184 (xylene and ethyl benzene) is used.	Used solvent from equipment cleaning, D001, F003	020551		Use one each time they ship it. Saw one dated 1-24-08	165,788 P (2640 G shipped in Jan. 2008)	Label solvent after use and then use it as an ingredient or for cleaning again (after third use it is shipped out), have one person (Willie Spikes) coordinate solvent use so new solvent is not used when used solvent is available.	Chemical Solvents, Cleveland, OH Management code H061 – fuel blending	Dedicated kettles, product sequencing Newer kettles have better cleaning system	Purchase distillation unit
2	When drums of waste 1 are	Sludge from used solvent, D001, F003				59,088 P				

	<p>processed at Chemical Solvents there is sludge in them which Chemical Solvents reports as management code H141 – transfer offsite. This is why Tremco reports these as different wastes on their annual report.</p>									
3	<p>Old raw materials, unworkable offspec. mixes</p>	<p>Offspec/obsolete product, D001</p>	<p>WPS 62667</p>		<p>Saw 2008 LDR form</p>	<p>116,352 P (4000 P shipped in Jan. 2008)</p>	<p>Stored in drums</p>	<p>Ross Incineration, Grafton, OH management code H040 – incineration</p>		<p>Improve inventory and process control</p>

4	Same as waste 3 – just goes to a different TSD (at least during 2007)	Offspec/obsolete product, D001	023930			39,875 P		Chemical Solvents Management codes H061 (fuel blending) and H141 (transfer offsite)		
5	Rags if caulk sets up on them, mats, plastic films used to cover drums before packaging of caulk	Debris from equipment cleaning, D001, F003	WPS 62497		Saw one dated 1-24-08	91,389 P (9,200 P shipped in Jan. 2008)		Ross Incineration, Grafton, OH Management code H040 incineration		
6	Same as waste 5 – just goes to a different TSD (at least during 2007)	Adsorbents with used solvent, D001, F003	18421			1,238 P		Chemical Solvents Management code H141 transfer off-site		
7	Lab operations	Used 184 solvent,								

		included in above wastes								
8	2 parts washers using solvent 186	Included in above wastes								
9	Every 3 months or so need to high pressure water blast a kettle, done by MPW	wastewater	30664-N			58,000 G shipped in 2006, none shipped yet during 2008	Pumped to frac tank stored outside	General Environmental Management		
10	Solids separated out of waste 9	Solids				Included as part of waste 16	Put in open bin stored outside, then transferred to drums	General Environmental Management		
11	Baghouse for powders processing areas	Bag house dust	Q-2002-1106-A36	No analysis has been done. They rely on review of MSDS of			Collected from baghouse in drums. Dust transferred from drums to large cardboard box.	Chemtron		Better transfer of waste dust to avoid dust getting on the outside concrete in this

				powders used.						area
1 2	Stormwater	Stormwater					Treated including a oil skimming hose	Discharged to NEORS		See comment for waste 11
1 3	Maintenance of hydraulic drives and skimming from stormwater treatment	Used oil	5992 NL			3 drums shipped out on 1-31-08	Stored in drums including at the oil skimmer of the wastewater treatment system and in drum outside by the maintenance/storage building	General Environmental Management		
1 4	Lighting	Vapor globes and fluorescent tubes				405 P shipped on 1-31-08		Environmental Recycling, Bowling Green, OH		
1 5		Silicone waste	5994NV-S			2600 P shipped in Jan. 2008		General Environmental Management		
1 6		Waste caulks and sealants	5993NV-S			3700 P shipped in Jan. 2008		General Environmental Management		

**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 than 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-transport 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.

Keyword: UsedOilChecklistforGenerators.Oct.2007.doc

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 ___ RMK# ___

2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes No N/A ___ RMK# ___

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

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# ___
Didn't see waste battery storage.
Told they are in Mr. Spikes' office
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 or the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)]

no

Yes If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)]
No

Yes ___ No N/A RMK# ___

N/A

RMK#
6.

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

Yes ___ No N/A RMK# ___

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

Yes ___ No N/A RMK# ___

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

Yes ___ No N/A ___ RMK# ___
Didn't see this storage

UNIVERSAL WASTE LAMPS

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

Yes No N/A ___ RMK# ___

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-

Yes ___ No N/A RMK# ___

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# ___

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 ___ RMK# ___
- 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# ___
405 P shipped 1-31-08

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 x 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_ 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:

No_

N/A

RMK#_

21.

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 x ___ N/A ___ RMK# ___

a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]

Yes ___ No N/A ___ RMK# ___

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)]

Yes ___ No N/A ___ RMK# ___

c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]

Yes ___ No N/A ___ RMK# ___

**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

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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Is the HW a metal-bearing HW?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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 <u>one</u> of the following conditions apply. [3745-270-03(c)]	
	i. Contains > 1% TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	ii. Contains organic constituents or cyanide at levels greater than the UST levels?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iii. Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iv. Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	v. Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	Was the HW treated by wastewater treatment?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: If Yes, HW is improperly being treated by dilution.		
	b. Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTIFICATION FORM					
17.	a.	Contains all information in #11 a-g above and	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
		ii. Maintain a copy of the notice onsite?[3745-270-09(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
		iii. Include in the notification: [3745-270-09(D)(1)(a)]			
		1. Name & address of receiving landfill?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
		2. Description of HW when generated?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
		3. HW code when generated?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
		4. Treatability group when generated?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
		5. Underlying hazardous constituents present when generated?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	iv.	Contain the right certification statement as required by 3745-70-07(b)(4)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

**LA E QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

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:

GENERAL REQUIREMENTS

- | | | | | | | |
|---|-----|-------------------------------------|----|-------------------------------------|-----|--------------------------|
| 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 4. Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 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 | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 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 | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 8. Does the generator accumulate hazardous waste? | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

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

NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G) & (H).

- | | | | | | | |
|---|-----|--------------------------|----|-------------------------------------|-----|--------------------------|
| 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 | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| c. Drip pads that meet 3745-69-40 to 3745-69-45? | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| d. Containment building that meets 3745-256-100 to 3745-256-102? | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |

NOTE: Complete appropriate checklist for each unit.

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

- | | | | | | | |
|---|-----|--------------------------|----|-------------------------------------|-----|--------------------------|
| 11. Does the generator export hazardous waste? If so: | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| b. Has the generator complied with special manifest requirements? [3745-52-54] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| d. Has an annual report been submitted to U.S. EPA? [3745-52-56] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| e. Are export related documents being maintained on-site? [3745-52-57(A)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

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 | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

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

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)].

- | | | | | | | |
|---|-----|-------------------------------------|----|--------------------------|-----|-------------------------------------|
| 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 | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)](1) & (2)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

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

NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.

PERSONNEL TRAINING

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 [3745-65-16D(1)]? Yes No N/A
 - b. Job descriptions [3745-65-16D(2)]? Yes No N/A
 - c. Type and amount of training given to each person [3745-65-16D(3)]? Yes No N/A
 - d. Completed training or job experience required [3745-65-16D(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

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

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

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

EMERGENCY PROCEDURES

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

NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

PREPAREDNESS AND PREVENTION

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)] 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 than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

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
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? [3745-66-73(B)] 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]

Saw report which included photos of the 8-16-06 triple scrubbing and rinsing of the area.

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