



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

October 30, 2007

**RE: The Wooster Brush Company
OHD 004469847
Wayne County
Small Quantity Generator (SQG) CEI
Notice of Violation/Return to Compliance**

Gary L. Leisure
Facilities Manager
The Wooster Brush Company
604 Madison Avenue
P.O. Box 6010
Wooster, OH 44691-6010

Dear Mr. Leisure:

On October 17, 2007, this writer and Nyall McKenna, representing Ohio EPA, Division of Hazardous Waste Management (DHWM), visited The Wooster Brush Company (Wooster Brush) located at 604 Madison Avenue, Wooster, Ohio. The purpose of the visit was to conduct a compliance evaluation inspection (CEI) to determine the facility's compliance with Ohio's hazardous waste laws and rules as adopted under the Ohio Revised Code (ORC) Chapter 3734 and Chapter 3745 of the Ohio Administrative Code (OAC). The CEI included a discussion of facility operations, a review of records and a visual inspection of the facility operations. You represented Wooster Brush.

The following represents Ohio EPA's findings:

Wooster Brush manufactures paint brushes, paint rollers, roller frames and trays, extension poles, surface prep tools and other numerous painting accessories.

They currently operate as a SQG. Previously, they were a large quantity generator before one of their manufacturing processes changed which reduced the amount of hazardous waste generated on a monthly basis.

Wooster Brush was inspected for the requirements of a SQG of hazardous waste and a used oil generator. Enclosed is the SQG Inspection Checklist which includes a Process Description, Waste Activity and P2 summary. Also, included is the checklist for a Used Oil generator.

The following violation of Ohio's hazardous waste laws or rules was noted during this inspection.

1) Violation of OAC 3745-52-34(C)(1)(b), Satellite accumulation requirements;

Gary L. Leisure
The Wooster Brush Company
October 30, 2007
Page 2

A generator may accumulate up to 55 gallons of a non-acute hazardous waste at the point of generation which is under the control of the operator if he marks the container with either the words "Hazardous Waste" or other words identifying the contents.

In the brush set-up area Wooster Brush failed to mark a 55 gallon, satellite drum of spent solvent, LS299, with the words "Hazardous Waste" or other words identifying the contents of the drum.

Corrective Measure: Later, during the inspection, Mr. Leisure placed a hazardous waste label on the drum and thus, abated the violation.

Ohio EPA noted that Wooster Brush has initiated the following Pollution Prevention (P2) activities:

- they recycle all their scrap metal to an offsite metal recycler;
- they segregate and bale cardboard on site and ship off site to a recycler;
- an engineering process change, as described in the inspection report, has reduced the amount and type of hazardous waste that was previously generated during the roller brush manufacturing process;
- scrap plastic components are re-ground on site and reused on site as needed;
- they recycle spent bulbs and spent batteries under the Universal Waste requirements;
- non-hazardous soy-based inks are used in their onsite printing process;
- they have an onsite store where they sell secondary or off-spec products to a local market; other wise, these off-spec and secondary products would be scrapped.

Enclosed is the following Ohio EPA guidance information on Universal Waste Management and Used Oil Management:

- June 2005, "Universal Waste Rules for Handlers of Lamps";
- December 2004, "Universal Waste";
- January 2007, "Fluorescent Lamps: What You Should Know";
- April 2006, "The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil."

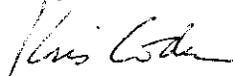
Thank you for your cooperation in this matter. If you have any questions about this letter, please call me at (330) 963-1266. A response to this letter is not required.

Gary L. Leisure
The Wooster Brush Company
October 30, 2007
Page 3

The DHWM 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.

Failure to list specific deficiencies in this communication does not relieve Wooster Brush from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve your facility from liability for any past or present violations of the state's hazardous waste laws.

Sincerely,



Kris Coder
Environmental Specialist
Division of Hazardous Waste Management

KC:cl
Enclosure

cc: Natalie Oryshkewych, NEDO, DHWM

ec: Harry Sarvis, CO, DHWM
Nyal McKenna, NEDO, DHWM

**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

Site EPA ID No.	EPA ID Number: OHD004469847									
Site Name	Name: The Wooster Brush Company	Website: (Optional)								
Site Location Information	Street Address: 604 Madison Avenue									
	City, Town, or Village: Wooster	State: OH								
	County Name: Wayne	Zip Code: 44691-6010								
Site Land Type (check only one)	<table border="1"> <tr> <td>Private <input checked="" type="checkbox"/></td> <td>County <input type="checkbox"/></td> <td>District <input type="checkbox"/></td> <td>Federal <input type="checkbox"/></td> <td>Indian <input type="checkbox"/></td> <td>Municipal <input type="checkbox"/></td> <td>State <input type="checkbox"/></td> <td>Other <input type="checkbox"/></td> </tr> </table>	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"/>	
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"/>			
NAICS code(s) www.census.gov/epod/www/naics.html	339994									
Facility Representative	First Name: Gary MI: L Last Name: Leisure									
Additional names can be recorded in number 12 Only provide address information if it is different than the site address Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Phone Number: (330) 264-4440	Phone Number Extension: 2244								
	E-Mail Address: Garyleisure@woosterbrush.com									
	Fax Number: (330) 263-0495	Fax Number Extension:								
	Street or P.O. Box: P O Box 6010									
	City, Town or Village: Wooster									
	State: OH	Country: USA Zip Code: 44691-6010								
	Name of Site's Legal Owner: The Wooster Brush Company		Date Became Owner (mm/dd/yyyy): Unknown							
	Owner Type: x	<table border="1"> <tr> <td>Private <input checked="" type="checkbox"/></td> <td>County <input type="checkbox"/></td> <td>District <input type="checkbox"/></td> <td>Federal <input type="checkbox"/></td> <td>Indian <input type="checkbox"/></td> <td>Municipal <input type="checkbox"/></td> <td>State <input type="checkbox"/></td> <td>Other <input type="checkbox"/></td> </tr> </table>	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"/>
	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: P O Box 6010									
City, Town or Village: Wooster	Owner Phone #: (330) 264-4440									
State: OH	Country: USA Zip Code: 44691-6010									
Name of Site's Operator: Same as above		Date Became Operator (mm/dd/yyyy): Unknown								
Owner Type: x	<table border="1"> <tr> <td>Private <input checked="" type="checkbox"/></td> <td>County <input type="checkbox"/></td> <td>District <input type="checkbox"/></td> <td>Federal <input type="checkbox"/></td> <td>Indian <input type="checkbox"/></td> <td>Municipal <input type="checkbox"/></td> <td>State <input type="checkbox"/></td> <td>Other <input type="checkbox"/></td> </tr> </table>	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"/>	
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: Same as above										
City, Town or Village:	Operator Phone #:									
State:	Country:	Zip Code:								
Violations Cited? Type of Generator	X Yes <input type="checkbox"/> No									

<input type="checkbox"/> Not Regulated	<input checked="" type="checkbox"/> Small Quantity Generator
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> United States Importer of Hazardous Waste
<input type="checkbox"/> Large Quantity Generator (LQG)	<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

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

<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Underground Injection Control Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption

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

<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste		<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulated 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)		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 & Fluorescent lamps	<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

Waste Codes for Federally Regulated Hazardous Wastes: Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U142). 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.

F002 F003 F005 D035 D039 D001

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:	na
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments:	The facility is no longer a LQG due mainly to an engineering change in a manufacturing process which reduced the quantity of hazardous waste generated.
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Kris Coder	Nyall McKenna	October 17, 2007: 10:45 a.m.

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

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

SMALL QUANTITY GENERATOR REQUIREMENTS
For The Wooster Brush Company (OHD004469847)
Inspection Conducted On October 17, 2007
By Kris Coder and Niall McKenna
Ohio EPA, Division Of Hazardous Waste Management (DHWM)

CESQG: ≤ 100 Kg. (approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month
LQG: ≥ 1,000 Kg. (-300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month
NOTE: *To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds*
Safety Equipment Used: steel toed boots, safety glasses

Since 1851 The Wooster Brush Company (Wooster Brush) has manufactured paint brushes, paint rollers, roller frames and trays, extension poles, surface prep tools and other numerous painting accessories. Gary L. Leisure, Facility Manager, has the over-all responsibility of hazardous waste management for Wooster Brush. They currently operate as a SQG but have maintained a hazardous waste management program comparable to a LQG, which they were up until a few years ago when one of their processes changed and reduced the amount of hazardous waste generated on a monthly basis. An engineering process change was modified for one of their products, i.e., they no longer generate a phenolic waste water (formerly D026 hazardous waste) from the production of their paint rollers. They have substituted a pre-impregnated paper for the phenolic resin. The roller brushes are made with plastic now. An epoxy product is now used to glue the brush filaments. Chemical Analytics, Inc., Romulus, MI receives their wastes and pick up the first Wednesday of every other month. The majority of the wastes taken off-site have been determined to be non-hazardous including oil spill pigs, spent contaminated epoxy resins, off-spec epoxy resins, spent cutting fluids, clean out of cooling system, etc. Occasionally, an epoxy catalyst may be generated (an amount to fill a 5 gallon pail) during a pump repair or during a power outage. These catalysts are normally hazardous because of flammability and are managed as D001 wastes. About three drums per year of spent paint stripper are generated as a hw. The spent paint stripper is a mixture of methylene chloride and perchloroethylene. This hazardous waste is generated at a satellite accumulation area in the Epoxy Resin Area of the facility where clean up of epoxy is done. Wooster Brush also generates used oil from equipment maintenance (presses) and accumulates used oil in light green, 55 gallon drums that are marked "Used Hydraulic Oil For Recycle". Campbell picks up the used oil and delivers new oil. Spent batteries and spent fluorescent bulbs accumulate as Universal Waste onsite and are recycled offsite. Spent batteries are received offsite by Environmental Recycling, Bowling Green, OH. The facility has one <180 day hazardous waste accumulation area at the Main Shipping Area which at the time of the inspection had no hazardous waste drums but one, 55 gallon drum of non-hazardous oily rags was noted. Mr. Leisure said this drum of oily rags would go offsite for incineration. Aerosol cans are collected for offsite disposal.

During the inspection the following copies of documents were received by Ohio EPA: a document summarizing the history of Wooster Brush; an August 1, 2007, hazardous waste manifest, tracking number 000500020GBF, of the most recent shipment of hazardous and non-hazardous waste to Chemical Analytics, Inc.; a Chemical Analytics, Inc.-Hazardous Waste Restricted from Land Disposal Notice; a completed Weekly Hazardous Waste Inspection for August 28, 2007; and a Straight Bill of Lading for a shipment of spent batteries to Environmental Recycling.

At this location Wooster Brush employs about 560 people and operates 3 shifts, 6 days per week. The facility has an internal response spill team as part of their plant emergency operations; posts and makes available MSDS's to employees; and conducts employee safety training through the Training Administrator.

The following areas of the facility were inspected and conditions were noted as follows:

- as noted above the facility's <180 day area is located in the Main Shipping area, in this area also was noted an over pack drum, extra empty drums and a fire extinguisher;
- next was a UW battery location with a few small batteries located on a skid;
- next was a Safety-Kleen parts washer which uses Solvent 142;
- next was an area where UW spent fluorescent bulbs are stored in cardboard cylinders (spent lamps are picked up every other month);
- next were empty light green drums used for storing used hydraulic oil, the marking on the drums was noted above, Mr. Leisure said that all used oil is analyzed before it is sent out to the recycler;
- next was the process that replaced the phenolic process, this process uses a plastic ribbon for manufacture of the roller brushes;
- next in the Brush Area, epoxy is used here to cement the bristle to the brush;
- next at the Brush Set Up Area was one, 55 gallon, satellite drum of spent solvent, LS 299, which needed a hazardous waste label or other identification, this violation was corrected by Mr. Leisure when he, later, placed a hazardous waste label on the drum;
- next we went to the Printing Department, here soy based inks are used to print packaging, non-hazardous waste ink is generated here;
- next we saw the pan manufacturing area where sheet metal is stamped into paint trays or pans.

SMALL QUANTITY GENERATOR REQUIREMENTS
For The Wooster Brush Company (OHD004469847)
Inspection Conducted On October 17, 2007
By Kris Coder and Nyall McKenna
Ohio EPA, Division Of Hazardous Waste Management (DHWM)

CESQG: ≤ 100 Kg. (approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month
LQG: ≥ 1,000 Kg. (-300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month
NOTE: *To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds*
Safety Equipment Used: steel toed boots, safety glasses

Since 1851 The Wooster Brush Company (Wooster Brush) has manufactured paint brushes, paint rollers, roller frames and trays, extension poles, surface prep tools and other numerous painting accessories. Gary L. Leisure, Facility Manager, has the over-all responsibility of hazardous waste management for Wooster Brush. They currently operate as a SQG but have maintained a hazardous waste management program comparable to a LQG, which they were up until a few years ago when one of their processes changed and reduced the amount of hazardous waste generated on a monthly basis. An engineering process change was modified for one of their products, i.e., they no longer generate a phenolic waste water (formerly D026 hazardous waste) from the production of their paint rollers. They have substituted a pre-impregnated paper for the phenolic resin. The roller brushes are made with plastic now. An epoxy product is now used to glue the brush filaments. Chemical Analytics, Inc., Romulus, MI receives their wastes and pick up the first Wednesday of every other month. The majority of the wastes taken off-site have been determined to be non-hazardous including oil spill pigs, spent contaminated epoxy resins, off-spec epoxy resins, spent cutting fluids, clean out of cooling system, etc. Occasionally, an epoxy catalyst may be generated (an amount to fill a 5 gallon pail) during a pump repair or during a power outage. These catalysts are normally hazardous because of flammability and are managed as D001 wastes. About three drums per year of spent paint stripper are generated as a hw. The spent paint stripper is a mixture of methylene chloride and perchloroethylene. This hazardous waste is generated at a satellite accumulation area in the Epoxy Resin Area of the facility where clean up of epoxy is done. Wooster Brush also generates used oil from equipment maintenance (presses) and accumulates used oil in light green, 55 gallon drums that are marked "Used Hydraulic Oil For Recycle". Campbell picks up the used oil and delivers new oil. Spent batteries and spent fluorescent bulbs accumulate as Universal Waste onsite and are recycled offsite. Spent batteries are received offsite by Environmental Recycling, Bowling Green, OH. The facility has one <180 day hazardous waste accumulation area at the Main Shipping Area which at the time of the inspection had no hazardous waste drums but one, 55 gallon drum of non-hazardous oily rags was noted. Mr. Leisure said this drum of oily rags would go offsite for incineration. Aerosol cans are collected for offsite disposal.

During the inspection the following copies of documents were received by Ohio EPA: a document summarizing the history of Wooster Brush; an August 1, 2007, hazardous waste manifest, tracking number 000500020GBF, of the most recent shipment of hazardous and non-hazardous waste to Chemical Analytics, Inc.; a Chemical Analytics, Inc.-Hazardous Waste Restricted from Land Disposal Notice; a completed Weekly Hazardous Waste Inspection for August 28, 2007; and a Straight Bill of Lading for a shipment of spent batteries to Environmental Recycling.

At this location Wooster Brush employs about 560 people and operates 3 shifts, 6 days per week. The facility has an internal response spill team as part of their plant emergency operations; posts and makes available MSDS's to employees; and conducts employee safety training through the Training Administrator.

The following areas of the facility were inspected and conditions were noted as follows:

- as noted above the facility's <180 day area is located in the Main Shipping area, in this area also was noted an over pack drum, extra empty drums and a fire extinguisher;
- next was a UW battery location with a few small batteries located on a skid;
- next was a Safety-Kleen parts washer which uses Solvent 142;
- next was an area where UW spent fluorescent bulbs are stored in cardboard cylinders (spent lamps are picked up every other month);
- next were empty light green drums used for storing used hydraulic oil, the marking on the drums was noted above, Mr. Leisure said that all used oil is analyzed before it is sent out to the recycler;
- next was the process that replaced the phenolic process, this process uses a plastic ribbon for manufacture of the roller brushes;
- next in the Brush Area, epoxy is used here to cement the bristle to the brush;
- next at the Brush Set Up Area was one, 55 gallon, satellite drum of spent solvent, LS 299, which needed a hazardous waste label or other identification, this violation was corrected by Mr. Leisure when he, later, placed a hazardous waste label on the drum;
- next we went to the Printing Department, here soy based inks are used to print packaging, non-hazardous waste ink is generated here;
- next we saw the pan manufacturing area where sheet metal is stamped into paint trays or pans.

The Wooster Brush Company (Wooster Brush)
OHD004469847
October 17, 2007 RCRA Hazardous Waste Inspection
Conducted by Kris Coder and Nyall Mckenna, DHWM

The following pollution prevention (P2) activities are being accomplished at Wooster Brush and were noted during the inspection:

- they recycle all their scrap metal to an offsite metal recycler;
- they segregate and bale cardboard onsite and ship offsite to a recycler;
- an engineering process change, as described in the inspection report, has reduced the amount and type of hazardous waste that was previously generated during the roller brush manufacturing process;
- scrap plastic components are re-ground onsite and reused onsite as needed;
- they recycle spent bulbs and spent batteries under the Universal Waste requirements;
- soy based inks are used in their onsite printing process;
- they have an onsite store where they sell secondary or off-spec products to a local market; otherwise, these off-spec and secondary products would be scrapped.

Klc:10/07

1. Have all wastes generated at the facility been adequately evaluated? [3745-52- Yes No N/A
2. Has the generator obtained a U.S. EPA I.D. number? [3745-52-12] Yes No N/A
3. Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)] Yes No N/A
4. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)] Yes No N/A
5. Does the generator accumulate hazardous waste? Yes No N/A

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

6. Has the generator accumulated hazardous wastes in excess of (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)] Yes No N/A

NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]

7. Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)] Yes No N/A

NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.

8. Does the generator treat hazardous waste in a:
- a. Container that meets 3745-66-70 to 3745-66-77? Yes 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: Complete appropriate checklist for each unit.

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

MANIFEST REQUIREMENTS

9. Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)] Yes No N/A
10. Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)] Yes No N/A
- a. Does the contractual agreement specify the type of waste and frequency of shipment? Yes No N/A
- b. Is the transport vehicle owned and operated by the reclaimer? Yes No N/A
- c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? Yes No N/A

NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.

11. Have items 1 through 20 of each manifest been completed?[3745-52-20(A)] Yes No N/A

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be complete. [3745-52-20 (A)]

12. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] Yes No N/A

NOTE: The generator may designate on the manifest one alternative facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]

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

14. Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)] Yes No N/A

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.

15. If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? [3745-52-42(B)] Yes No N/A

16. Are signed copies of all manifests being retained for at least three years? [3745-52-40] Yes No N/A

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

PREPAREDNESS AND PREVENTION

17. Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)] Yes No N/A

18. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]

a. Name and telephone number of emergency coordinator? Yes No N/A

b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes No N/A

c. Telephone number of local fire department? Yes No N/A

19. Are employees familiar with waste handling and emergency procedures [3745-52-34(D)(5)(c)] Yes No N/A

20. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)] Yes No N/A

21. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31] Yes No N/A

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

a. Internal Alarm system? [3745-65-32(A)] Yes No N/A

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

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

- d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes No N/A
23. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency?[3745-65-33] Yes No N/A
See Weekly Hazardous Waste Inspection report for August 28, 2007.
- a. Are inspections recorded in a log or summary? [3745-65-33]? Yes No N/A
24. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)] Yes No N/A
25. If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32?) [3745-65-34(B)] Yes No N/A
26. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
27. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes No N/A
28. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes No N/A

SATELLITE ACCUMULATION AREA REQUIREMENTS

29. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? {3745-52-34(C)(1)} Yes No N/A
- b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes No N/A
- c. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes No N/A
- d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. Yes No N/A
- e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
See remarks above in General Comments.
30. 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 the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes No N/A
- c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A

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

USE AND MANAGEMENT OF CONTAINERS See remarks in general comments above, there were no hazardous waste containers in Wooster Brush's <180 day hazardous waste accumulation area.

31. Has the generator marked contain with the words "Hazardous Waste"[3745-34(D)(4)] Yes No N/A
32. Is the accumulation date on each container? [3745-52-34(D)(4)] Yes No N/A
33. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A
- b. In good condition? [3745-66-71] Yes No N/A
- c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A

NOTE: Record location on process summary sheets and photograph the area.

34. Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days. Yes No N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
35. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes No N/A
36. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B) 3745-66-77(A)] Yes No N/A
37. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B) ? [3745-66-77(B)] Yes No N/A

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

PRE-TRANSPORT REQUIREMENTS

These requirements were not evaluated as part of this inspection.

38. Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes No N/A
39. Does each container ≤ 100 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A
40. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes No N/A

USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS
FOR THE WOOSTER BRUSH COMPANY

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 55 gallon drums that were light green in color and were labeled "Used Hydraulic Oil"(These drums were empty at the time of the inspection.)
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.