OhioEPA

State of Ohio Environmental Protection Agency

Northwest District Office

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Bowling Green, OH 43402-9398

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

Re: Metokote Corp. Plant 25
OHD048788426
Hazardous Waste
Allen County
NOV-PRTC

November 24, 2008

Mr. Matt Moyer
Metokote Corporation
1340 Neubrecht Road
Lima, Ohio 45801

Dear Mr. Moyer:

On October 21, 2008, Melissa Boyers and I conducted a hazardous waste compliance evaluation inspection of Metokote Corporation's Plant 25 (hereafter Metokote) located in Lima, Ohio on behalf of the Ohio Environmental Protection Agency (Ohio EPA). This inspection was conducted in order to determine Metokote's compliance with Ohio's hazardous waste laws as adopted under Chapter 3745 of the Ohio Administrative Code (OAC) and Chapter 3734 of the Ohio Revised Code (ORC). The Agency's inspection included a tour of your facility and a review of written documentation. This letter will explain the violations we found and what you need to do to correct the violations.

Metokote applies coatings to different metal products for various industries. Coatings which can be applied include electrocoating (e-coat) and powder coating. Metokote may begin using a solvent based spray coating in the future. The two main hazardous waste streams generated are used Dana Primer (F005, D001,D035) and ZEP 143 contaminated wipes and gloves (D001). Other wastes generated include universal waste bulbs and aerosol can residue (D001). You are currently operating as a small quantity generator of hazardous waste.

The following violations of Ohio's hazardous waste laws were observed and noted during the inspection:

1) <u>Weekly Container Inspections, OAC rule 3745-66-74:</u>
Container storage areas shall be inspected on a weekly basis looking for leaks and for deterioration. Ohio EPA interprets weekly to mean once within the seven day period following the previous inspection.

Metokote failed to conduct weekly inspections of the hazardous waste drum located in building ten used to collect ZEP 143 contaminated wipes/gloves from satellite areas located on production lines 10-7 and 10-8. Metokote also had five exceedances of weekly inspections in the main hazardous waste storage area.

To abate this violation, please submit to me four weeks of completed weekly inspection logs.

2) Container Storage Area, Labeling, OAC Rule 3745-52-34(D)(4):
The date upon which each period of accumulation and/or treatment begins must be clearly marked and visible for inspection.

The drum located in building ten used to collect hazardous waste zep rags was not labeled with an accumulation start date.

To abate this violation, you must submit a photograph showing that this drum has been properly labeled with an accumulation start date or confirm that you will no longer be managing the waste as hazardous (include analytical).

3) Satellite Accumulation Areas, Labeling, OAC Rule 3745-52-34(C)(1)(b):
Metokote must keep all hazardous waste satellite containers labeled with the words "hazardous waste". Tthere was one container located along line 10-7 and one container along line 10-8, both holding ZEP 143 wipes/gloves, that were not labeled with the words "hazardous waste". Additionally, there was one bucket of primer/solvent located in the Dana primer area that was not labeled.

During our inspection, the containers located in lines 10-7 and 10-8 were labeled. On October 22, 2008, I received an email showing that the bucket was removed and placed inside the satellite drum which is in the Dana Primer area. ***Therefore, this violation is considered abated.***

4) Satellite Accumulation Areas, Container Management, OAC Rule 3745-52-34(C)(1)(a):
A generator may accumulate as much as fifty-five gallons of hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under control of the operator of the process generating the waste provided the container holding the waste is closed except when it is necessary to add or remove waste.

Metokote had one open bucket of Dana primer waste. The two satellite containers holding ZEP 143 wipes/gloves in lines 10-7 and 10-8 were also open at the time of inspection.

During our inspection, the containers located in lines 10-7 and 10-8 were closed. On October 22, 2008, I received an email showing that the bucket of Dana primer waste was removed and placed inside the satellite drum which is in the Dana Primer area. ***Therefore, this violation is considered abated.***

5) Universal Waste Bulbs, Containers, OAC Rule 3745-273-13(D)(1):
All containers and packages holding universal waste bulbs must be closed and structurally sound to prevent breakage.

Metokote had two boxes of universal waste bulbs (HIDs) that were not in closed boxes.

On October 22, 2008, I received an email showing that the bulbs were properly placed in a larger box with a lid. ***Therefore, this violation is considered abated.***

6) Universal Waste Training, OAC Rule 3745-273-16:
Employees who handle or manage universal waste must be informed or trained about proper handling and emergency procedures, relative to their responsibilities.

Metokote has not properly trained employees on universal waste handling. Metokote must determine who will need trained, then conduct the training.

To abate this violation, you must submit sign in sheets or documentation to me showing that you have trained the appropriate individuals on universal waste handling. On October 28, 2008, you emailed me universal waste training documentation and attendance records of those who were trained on the same date.

Therefore, this violation is considered abated.

7) Underlying Hazardous Constituents, OAC Rule 3745-270-07(A)(2):
A generator must properly indentify all underlying hazardous constituents (UHCs) for which a characteristic waste must be treated. This is part of the land disposal restriction requirements.

Metokote did not properly identify all UHCs associated with the Dana primer waste (D001, D035, F005).

On October 20, 2008, you submitted an updated land disposal restriction form which included all associated UHCs. Therefore, this violation is considered abated.

Please respond, in writing, to this NOV letter within **thirty (30) days**. Your response must include all actions and timetables necessary to demonstrate compliance.

Additional Information
We discussed the solvent wipes/rags and gloves that you are currently disposing of as hazardous. The Material Safety Data Sheet (MSDS) for the solvent, Zep Dyna 143 shows that the solvent has a flashpoint of 143 degrees which would not make it a D001 ignitable waste. An ignitable waste is a waste that has a flashpoint of less than 140 degrees Farenheit. You stated that you are going to run analytical on the Zep solvent to be certain that the MSDS is correct. A pollution prevention opportunity exists whether these rags and gloves are hazardous or non-hazardous. Metokote could switch to cloth rags and gloves so that they could be laundered and recycled instead of being disposed. As we discussed during the inspection, I believe that Metokote could remain a small quantity generator if the rags/gloves are not a hazardous waste.

You can find copies of the rules and other information on the division's web page at http://www.epa.state.oh.us/dhwm. Ohio EPA also has helpful information about pollution prevention at the following web address http://www.epa.state.oh.us/ocapp/ocapp.html. We discussed Ohio EPA's on site compliance and P2 assessments. The contact for our Bowling Green office is Ron Nabors. He can be contacted at (419) 373-3147.

Enclosed you will find a copy of the checklists that Ohio EPA completed during the inspection. Should you have any questions, please feel free to call me at (419) 373-3114.

Sincerely,

Wendy Miller

Wendy Miller
Division of Hazardous Waste Management

/lb

Enclosures

pc: Jodi Birr, Metokote Corp. (same address, w/enclosures)
Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
NWDO File (w/original enclosure)

NOTE: Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Metokote 25 **Facility Type:** SQG **Date of Inspection:** 10-21-08 **EPA ID#:** OHD048788426

Waste Generated				*On- or Off-Site Management*		P2 Activities	
	Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	**Waste Description** (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	**QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area**	**Type of On-Site Treatment** (recycle, wwt, etc)	**Name, state, and type of activity occurring at the off-site facility.**	**Current P2 Activities**	**P2 Opportunities**
1	Primer application	Dana Primer F005, D001, D035	10-15 gallons/per month Satellite drum of rags and of primer waste/MEK		Petrochem		
2	Application of ZEP 143	Rags/gloves D001	3-5 drums/every 2-3 months		PSC		
3	Spent bulbs	Universal waste	Recycled		Environmental Recycling		
4	Used aerosol cans	Residue from cans D001	1 drum/year		Petrochem		
5	Paint stripping	Paint stripping operation D002, D008	No longer generate, 1 drum shipped 6/4/08				
6							
7							

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 <u>to meet</u> 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 ☑ No ☐ N/A ☐
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories				
	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]		Yes ☐ No ☑ N/A ☐ * updated 10-30-08
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.				
	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for?[3745-270-07(A)(2)]		Yes ☑ No ☐ N/A ☐
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.				
PROHIBITED DILUTION				
12.	Is the HW treated by burning? If "No," go to #15.			Yes ☐ No ☑ N/A ☐
13.	Is the HW a metal-bearing HW?			Yes ☐ No ☒ N/A ☐
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.				
14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless **one** of the following conditions apply. [3745-270-03(c)]		
		i.	Contains > 1% TOC?	Yes ☐ No ☐ N/A ☑
		ii.	Contains organic constituents or cyanide at levels greater than the UST levels?	Yes ☐ No ☐ N/A ☑
		iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes ☐ No ☐ N/A ☑
		iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes ☐ No ☐ N/A ☑
		v.	Co-generated with a HW that must be combusted?	Yes ☐ No ☐ N/A ☑
	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?		Yes ☐ No ☐ N/A ☑
15.	Was the HW treated by wastewater treatment?			Yes ☐ No ☑ N/A ☐
	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]		Yes ☐ No ☐ N/A ☑
NOTE: If Yes, HW is improperly being treated by dilution.				
	b.	Does the waste carry the D001 code <u>and</u> contain ≥10% TOC?		Yes ☐ No ☐ N/A ☑
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?		Yes ☐ No ☐ N/A ☑
NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B) and 3745-270-40(A)(3)].				
NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.				

GENERATOR TREATMENT				
16.	Does the generator treat to meet LDRs on-site [3745-270-40(A)]?			Yes ☐ No ☑ N/A ☐
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?			Yes ☐ No ☐ N/A ☑
	If "Yes"...complete the rest of the checklist. If "No"...stop...you are done.			
	a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]		Yes ☐ No ☐ N/A ☐
	b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]		Yes ☐ No ☐ N/A ☐
NOTE: This is a laboratory analysis but it does not have to be kept by the generator.				
	c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]		Yes ☐ No ☐ N/A ☐
	d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]		Yes ☐ No ☐ N/A ☐
	e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]		Yes ☐ No ☐ N/A ☐
	f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]		Yes ☐ No ☐ N/A ☐
NOTIFICATION FORM				
17.	a.	Contains all information in #11 a-g above and		Yes ☐ No ☐ N/A ☐
	b.	If the treated HW/soil is listed.....notification contains the following certification statement: " I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or trough knowledge of the waste, to support this certification that the waste complies with the treatment stands specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."		Yes ☐ No ☐ N/A ☐
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:		
		i.	Send a one-time notification to the director?[3745-270- 09 (D)]	Yes ☐ No ☐ N/A ☐
		ii.	Maintain a copy of the notice onsite?[3745-270-09(D)]	Yes ☐ No ☐ N/A ☐
		iii.	Include in the notification: [3745-270-09(D)(1)(a)]	
			1. Name & address of receiving landfill?	Yes ☐ No ☐ N/A ☐
			2. Description of HW when generated?	Yes ☐ No ☐ N/A ☐
			3. HW code when generated?	Yes ☐ No ☐ N/A ☐
			4. Treatability group when generated?	Yes ☐ No ☐ N/A ☐
			5. Underlying hazardous constituents present when generated?	Yes ☐ No ☐ N/A ☐
		iv.	Contain the right certification statement as required by 3745-70-07(b)(4)?	Yes ☐ No ☐ N/A ☐

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

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 X 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 X N/A ___ RMK#___

UNIVERSAL WASTE LAMPS

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 ☐ X N/A ___ RMK#___

- need to repackage HID bulbs
- fluorescents ok.

3. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] — Yes ___ No ☐ N/A X RMK#___

4. 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 X 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

5. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: — Yes X 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 X RMK#___

RESPONSE TO RELEASES

8. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] — Yes ___ No ❑ N/A _X_ RMK#___

9. Is the material released characterized? [3745-273-17(B)] — Yes ___ No ❑ N/A _X_ RMK#___

10. 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 _X_ RMK#___

OFF-SITE SHIPMENTS

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

11. 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.

12. 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 _X_ No ❑ N/A ___ RMK#___

13. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] — Yes _X_ No ❑ N/A ___ RMK#___

14. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do <u>one of the following</u>:

a. Receive the waste back? [3745-273-18(E)(1)] Yes__ No__ N/A _X_ RMK#___

b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes__ No__ N/A _X_ RMK#___

15. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following: Yes __ No ❑ N/A _X_ RMK#___

a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes__ No__ N/A _X_ 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 _X_ RMK#___

16. 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 _X_ RMK#___

17. 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 _X_ RMK#___

EXPORTS

18. 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 _X_ 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 _X_ 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 _X_ RMK#___

REMARKS

Ohio Environmental Protection Agency

RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM

For Ohio EPA use only

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

Site EPA ID No.	EPA ID Number: **OHD048788426**							
Site Name	Name: **Metokote Corporation**				Website: (Optional)			
Site Location Information	Street Address: **1340 Neubrecht Road** City, Town, or Village: **Lima** County Name: **Allen**				State: OH Zip Code: **45801**			
Site Land Type (check only one)	Private ☒	County ☐	District ☐	Federal ☐	Indian ☐	Municipal ☐	State ☐	Other ☐
NAICS code(s) www.census.gov/epcd/www/naics.html	**332812**							
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: **Matt** Phone Number: **419-996-7883** E-Mail Address: **mmoyer@metokote.com** Fax Number: **419-996-7973** Street or P.O. Box: City, Town or Village: State:			MI:	Last Name: **Moyer** Phone Number Extension: Fax Number Extension: Zip Code:			
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	Name of Site's Legal Owner: **Metokote Corporation**				Date Became Owner (mm/dd/yyyy):			
	Owner Type:	Private ☐	County ☐	District ☐	Federal ☐	Indian ☐	Municipal ☐	State ☐	Other ☐
	Street or P.O. Box: City, Town or Village: State:				Owner Phone #: Country:		Zip Code:	
	Name of Site's Operator: **Metokote Corporation**				Date Became Operator (mm/dd/yyyy):			
	Owner Type:	Private ☐	County ☐	District ☐	Federal ☐	Indian ☐	Municipal ☐	State ☐	Other ☐
	Street or P.O. Box: City, Town or Village: State:				Operator Phone #: United States		Zip Code:	

VIOLATIONS CITED?	☒ Yes ☐ No

TYPE OF HANDLER– A MINIMUM OF ONE BOX MUST BE CHECKED		
☐ Not a Generator	☐UNKNOWN:Cited for violation of 3745-52-11	☒Large Quantity Generator (LQG)
		☐Small Quantity Generator (SQG)
		☐Conditionally Exempt Small Quantity Generator
		☐U.S. Importer of Hazardous Waste
		☐Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

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

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY)

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

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

- ☐ Batteries
- ☐ Pesticides
- ☐ Mercury containing equipment
- ☒ Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S)

- ☐ Used Oil Generator
- ☐ Used Oil Transporter
- ☐ Used Oil Transfer Facility
- ☐ Used Oil Processor
- ☐ Used Oil Re-refiner
- ☐ Off-Specification Used Oil Burner
- ☐ Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
- ☐ 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, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

F005 **D001** **D035**

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

Announced	☐ Yes	☒ No	Additional Facility Representatives:	**Jodi Birr**
Tanks	☐ Yes	☒ No	Other Comments:	
Containers	☒ Yes	☐ No		

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Wendy Miller	**Melissa Boyers**	**10/21/2008 10:00 am**

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
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET

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

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] — Yes ☒ 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 ☒

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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 ☐

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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 ☐

a. Are inspections recorded in a log or summary? [3745-65-33]? Yes ☒ No ☐ N/A ☐

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

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

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

27. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes ☒ No ☐ N/A ☐

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

SATELLITE ACCUMULATION AREA REQUIREMENTS

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

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

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

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

d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes ☒ No ☐ N/A ☐

e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. 10-7 * 10-8 loading rooms / Dana primer bucket Yes ☐ No ☒ N/A ☐

f. Containers are marked with the words "Hazardous Waste" <u>or</u> other words identifying the contents? [3745-52-34(C)(1)(b)] Yes ☐ No ☒ N/A ☐

30. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: 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 ☒

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

USE AND MANAGEMENT OF CONTAINERS

31.	Has the generator marked containers with the words "Hazardous Waste"[3745-52-34(D)(4)]	Yes ☒	No ☐	N/A ☐
32.	Is the accumulation date on each container? [3745-52-34(D)(4)] ZEP drum	Yes ☐	No ☒	N/A ☐
33.	Are hazardous wastes stored in containers which are:			
	a. Closed (except when adding/removing wastes)? [3745-66-73(A)] C \ 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. add ZEP drum & also exceedances	Yes ☐	No ☒	N/A ☐
	a. Are inspections recorded in a log or summary? [3745-66-74]	Yes ☒	No ☐	N/A ☐
35.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes ☐	No ☐	N/A ☒
36.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B) 3745-66-77(A)]	Yes ☐	No ☐	N/A ☒
37.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B) ? [3745-66-77(B)]	Yes ☐	No ☐	N/A ☒

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

PRE-TRANSPORT REQUIREMENTS

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

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