



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Sauder Woodworking Co.
OHD 005035167
Fulton County
Hazardous Waste
Notice of Violation

May 10, 2007

Mr. Craig Drewes
Sauder Woodworking Company
502 Middle Street
Archbold, Ohio 43502

Dear Mr. Drewes:

Thank you for accompanying me during Ohio EPA's March 13 and March 16, 2007, inspections of the Sauder Woodworking Company (Sauder) at 503 Middle Street in Archbold, Ohio. Mr. Chris Maslo, Ohio EPA, DHWM, accompanied us on March 13, 2007. Ms. Carol Crisenbery of Sauder accompanied us both days. I inspected Sauder to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). My inspection included a tour of your facility and a review of written documentation. This letter will explain the violations I found and what you need to do to correct the violations.

Sauder is a manufacturer of ready to assemble laminated press board and fiber board furniture, cabinetry and shelving. Sauder is a privately owned business. The Sauder facility in Archbold consists of the following buildings (manufacturing centers):

- | | |
|------|---|
| B01 | Sauder Street Plant |
| B02 | Saturation Department |
| B06 | Barre Road Plant |
| B07 | Elm Street Plant |
| B08 | Lincoln Street Maintenance Building |
| B09 | Safety Building (Hazardous Waste Accumulation Building) |
| B010 | Brush Creek Plant |
| B011 | Co-Gen Power Plant |
| B012 | Myers Road Plant |
| B013 | Technical Center |
| B014 | Product Center |
| B017 | Product Testing |

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The facility consisting of these buildings, except B013 and B06, constitutes one contiguous property now, since hazardous waste can be transported to the Safety Building by only crossing some village roads and traveling on company owned drives and lots. As one contiguous property, only one identification number is necessary and Sauder already possess one and can continue to use it.

You explained that Sauder owns Sauder Street and you submitted a letter, dated March 17, 2007, from Village Administrator Dennis Howell, stating that "According to our records Sauder Street, from West Barre Road to the north, is a private road owned by Sauder Woodworking." If Sauder can develop some method for controlling access to both ends of Sauder Street, when it moves hazardous waste along Sauder Street, then B013 and B06 will be a part of this contiguous property and the waste can be taken to the Safety Building. Please indicate if you intend to control access to Sauder Street, in order to move hazardous waste along it, and describe the method you will use. If you move the accumulation area from the Safety Building you must be sure to follow the same rules for transporting hazardous waste.

Boards in this facility are processed in B01 and B012 in the following manner: Laminated, cut, edge banded, bored and packed. Lamination is done in the following manner: boards are sanded, acid catalyst is rolled on in a thin film, this film dries under lights, next the resin glue is rolled on, then the paper laminate is rolled onto the glued surface and is heated and pressed to complete the lamination process. After this, lamination boards are cut to size, and bored, etc., in B01, B02, B010 and B012.

Sauder generates the following hazardous wastes, used oil and universal waste:

1. Spent catalyst and Rinse Water (D002): This waste does not contain much water. The acid catalyst is circulated at the line to keep it from thickening. Over time it still thickens and picks up wood chips. It is run through a screen basket in the reservoir to remove particles. Periodically this basket is removed and rinsed out with water at a cleaning station (see photo in file). The waste is accumulated in a satellite accumulation container. Occasionally the reservoir is emptied and the waste is placed into the same satellite accumulation container, at the wash station. When the satellite accumulation container is about 3/4 full, the waste is pumped into a 275-gallon poly tote that is accumulated in and shipped from the Myers Road Plant and the Sauder Street Plant. The pH of the catalyst is 0.01-1.0. One to three totes are shipped each month. In 2006, Sauder shipped 6,950 gallons; which is 67,763 pounds; 30,764 kg - approximately 2,564 kg/month. The waste volume has increased over 2005, since production has increased. It is shipped to Chemtron Corp. in Avon Lake, Ohio.

2. Waste Solution from a Cleaning Process (D002): This is a waste sodium hydroxide (NaOH) cleaning solution from an Ultra-Sonic washer in B08, the Lincoln Street Maintenance Building. In 2006, Sauder generated 475 gallons; 4,275 pounds; 1,941 kg; or about 162 kg/month.
3. Waste Solution from Various Cleaning Processes (D001, F005): This is a combination of the following wastes: paint cleaning solvent from the Lincoln Street Maintenance Building (B08), parts washers waste from throughout the facility, floor cleaning and process equipment cleaning in the Saturation Department of Sauder Street Plant (B02) and also from building B08. Specifically: 1. waste isopropyl alcohol is generated in the Sauder Street Plant. 2. #314 Cleaner is used to clean coater rollers. Waste #314 cleanup solvent mixture is the hazardous waste F005 since the material is 76% 2-ethoxyethanol. 3. Two types of Egyptian paint thinners are used to clean equipment and soak brushes. Waste J9-2124 is an ignitable waste (D001) and waste TN-5413 is the listed hazardous waste F005 since the material is 18% toluene. 4. Super Agitene is used in parts washers in these buildings and throughout the facility. Waste super agitene is an ignitable hazardous waste (D001). 5. Old solvent based paint may be discarded. In 2006, Sauder generated 3,065 gallons; 27,585 pounds; 12,524 kg; or about 1,044 kg/month.
4. Paint and Solvent Soaked Rags (F005): Approximately 100 pounds was generated in 2006. This one time waste was from the cleanup of a large painting job. It was generated in the Barrel Room of the Saturation Department. The same type of solvent mixtures mentioned above were used.
5. Solvent Soaked Rags and Debris (D001): This waste is generated in the Sauder Street Plant, buildings B01 and B02. The debris includes mop heads from cleaning the floor around Eversheen Line in the Saturation Department of the Sauder Street Plant. Rags are used to clean the Eversheen Line and coater lines. In 2006, Sauder generated 4,474 pounds; 2,031 kg; or about 169 kg/month.
6. Solid Chromium Waste from Leather Lamination Process (D007): This is scrap leather and particle board. In 2006, Sauder generated 3,000 pounds; 1,362 kg; or about 114 kg/month. It comes from the Technical Center (B013). A very small product line is desks with leather laminated tops. This waste is the leather and wood trim. Sauder may want to contact Jeff Mayhugh, OEPA, DHWM at 614-644-2950 to determine how it can evaluate this waste for the valency of its chromium content. If the chromium is exclusively or nearly exclusively trivalent, the waste would not be hazardous. See OAC Rule 3745-51-04(B)(6).

7. SRC Systems Nox Catalyst (P120): This waste has been characterized by Sauder as the hazardous waste P120, due to the presence of vanadium pentoxide in the catalyst. It comes from the Co-Gen Power Plant (B011). Approximately 1800 pounds is generated when it is changed out. Sauder reported that they do not expect any other contaminants to be present in the catalyst. This waste is not an off-spec chemical product, etc. Rather it is a spent material. Therefore, it is not the listed waste P120. If it has no hazardous waste characteristic, from contamination, it is not hazardous waste. During my inspection I provided information about a vanadium recycler in Ohio. Sauder may want to make contact with this company to arrange for the next shipment of the catalyst.
8. Waste Acetone (F003): Acetone is used to clean the Eversheen Line. The liquid waste is accumulated in a satellite accumulation container behind the line. When it is full, it is taken to the Barrel Room where there is a still. Sauder has not been counting this volume of liquid waste acetone. However, Sauder reports that it recycles waste acetone regularly. There are some still bottoms generated from the use of the still.
9. Universal Waste Lamps: Fluorescent lamps and other bulbs are generated throughout the facility.
10. Universal Waste Batteries: Fork lift batteries and other batteries are generated throughout the facility.
11. Used Oil: Used oil is collected in 55-gallon drums throughout the facility.

Aerosol cans that are recycled are not a hazardous waste. However, since most of the materials in the cans are ignitable, the liquid recovered is at least an ignitable hazardous waste (D001). The cans are taken to the Safety Building accumulation area and punctured and drained with their drum top unit there.

P2 activities at the facility include the following:

1. Metal banding is collected and recycled.
2. Waste wood is ground into saw dust and sold for fuel.
3. Foam wedges are accumulated carefully and returned to Archbold Container Company.
4. Shrink wrap plastic is bundled and recycled.
5. Pallets are reused and ground into saw dust and sold for fuel, when damaged.
6. Cardboard is baled and recycled.
7. Metal shavings are recycled.

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I found the following violations of Ohio's hazardous waste laws. In order to correct these violations, you must do the following and send me the required information, **within 30 days** of your receipt of this letter:

1. **Unpermitted Hazardous Waste Treatment, Storage or Disposal
ORC 3734.02(E)&(F)**

No person shall **store**, treat, or dispose of hazardous waste identified or listed under this chapter and rules adopted under it, regardless of whether generated on or off the premises where the waste is stored, treated, or disposed of, or transport or cause to be transported any hazardous waste identified or listed under this chapter and rules adopted under it to any other premises, except at or to any of the following: (1) A hazardous waste facility operating under a permit issued in accordance with this chapter; (2) A facility in another state operating under a license or permit issued in accordance with the "Resource Conservation and Recovery Act of 1976" 90 Stat. 2806, 42 U.S.C.A. 6921, as amended.

Sauder has established an unpermitted hazardous waste storage facility by: storing hazardous waste in its Safety Building from facilities that are not contiguous. This has occurred for years. **Sauder must immediately cease the storage of hazardous waste from non-contiguous facilities unless Sauder can transport its hazardous waste from Buildings B013 and B06 across Barre Road and down company owned Sauder Street while controlling access to both ends of Sauder Street**. Sauder must provide documentation that describes the procedures that will be taken, immediately, to ensure that unpermitted storage does not happen again.

Since Sauder has violated ORC 3734.02(E) & (F) by becoming an unpermitted storage facility (TSD), it is subject to OAC Rules 3745-55-10 through 3745-55-48 and 3745-55-97. Therefore, you may be required to close the storage area. A closure plan describes the steps necessary to investigate the extent of contamination and to clean up all contamination found.

Sauder also is subject to all applicable general facility standards found in OAC Chapters 3745-54 and 55 until such time as Sauder has demonstrated that it has ceased operations as an unpermitted storage facility. Additionally, at any time, Ohio EPA may assert its right to have Sauder begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

**2. Satellite Accumulation Labeling
OAC Rule 3745-52-34(C)(1)(b)**

A generator must mark his satellite accumulation containers with the words "Hazardous Waste" or with other words that identify the contents of the containers.

Sauder did not label or mark two satellite accumulation containers in this manner. Specifically, it did not label the acid catalyst accumulation drum in the wash station of the Myers Road Building (B012) and a drum of waste acetone in Saturation Department, behind the Eversheen Line, in the Sauder Street Building (B02).

**3. Container Accumulation Date
OAC Rule 3745-52-34(A)(2)**

The date upon which each period of accumulation and/or treatment begins must be clearly marked and visible for inspection on each container.

Sauder did not mark one 55-gallon drum of spent Super Agitene (D001) in the container accumulation room of the Safety Building (B09) and one 55-gallon drum of spent acetone (F003) in the Mix Room of the Sauder Street Building (B02) with the date in which its period of accumulation began. In order to correct this violation, Sauder must properly mark these containers and submit photographic documentation that they have been properly marked.

**4. Container Labeling
OAC Rule 3745-52-34(A)(3)**

While being accumulated on-site, each container must be labeled or marked clearly with the words "Hazardous Waste".

Sauder did not label or mark one 55-gallon drum of waste Super Agitene (D001) in the container accumulation room of the Safety Building (B09) and one 55-gallon drum of spent acetone (F003) in the Mix Room of the Sauder Street Building (B02) with the words "Hazardous Waste". In order to correct this violation, Sauder must properly mark these containers and submit photographic documentation that they have been properly marked.

5. Container Inspections
OAC Rule 3745-66-74

The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The owner or operator must record inspections in an inspection log or summary. For purposes of compliance with this rule, weekly means every seven days.

Sauder failed to conduct and record any inspections for, at least, the tote accumulation areas in the Myers Road Building (B012) and Sauder Street Building (B01) and the container accumulation area of the Mix Room in the Sauder Street Building (B02). Furthermore, Sauder failed to conduct and record an inspection of the container accumulation room in the Safety Building (B09) every seven days, on at least eleven occasions. In order to correct this violation, Sauder must conduct and record an inspection of each container of hazardous waste, every seven days, and submit to me a copy of the inspection log or summary for at least a four week period.

6. Job Titles
OAC Rule 3745-65-16(D)(1)

The owner or operator must maintain the following documents and records at the facility: (1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.

Sauder did not have a document that listed the name of each employee with a job title related to hazardous waste management. In order to correct this violation, Sauder must submit written job titles.

7. Job Descriptions
OAC Rule 3745-65-16(D)(2)

The owner or operator must maintain the following documents and records at the facility: (2) A written job description for each position at the facility related to hazardous waste management. The description must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position.

Sauder did not have a document that explained the job descriptions for each position at the facility related to hazardous waste management. In order to correct this violation, Sauder must submit written job descriptions.

**8. Description of Training
OAC Rule 3745-65-16(D)(3)**

The owner or operator must maintain the following documents and records at the facility: (3) A written description of the type and amount of both introductory and continuing training that will be given to each person with a job title related to hazardous waste management.

Sauder did not have a document that described the type and amount of training given to each employee with a job title related to hazardous waste management. In order to correct this violation, Sauder must submit a description of the training it will provide. The training plan must include a statement that training will be given to new employees or persons filling a new position with a job title related to hazardous waste management within six months of filling that position and then annually thereafter.

**9. Training Provided - New Employees
OAC Rule 3745-65-16(B)**

Facility personnel must successfully complete the training program within six months after the date they are hired.

Sauder has not provided the initial training that is required by these rules. Many employees at the facility generate or handle hazardous waste. Sauder did not train all employees involved with the generation and management of hazardous waste and all employees that need to know about the contingency plan.

In order to correct this violation, Sauder must provide its hazardous waste training program for every new or newly assigned employee with a job title related to hazardous waste management, and submit the records that document that each employee has completed the training.

**10. Training Provided - Annual Refresher
OAC Rule 3745-65-16(C)**

Facility personnel must take part in an annual review of the initial training.

Sauder has not provided the annual training that is required by this rule. For purposes of compliance with this rule, annual means every 365 days. Many employees at the facility generate or handle hazardous waste. Sauder did not train all employees involved with the generation and management of hazardous waste and all employees that need to know about the contingency plan.

In order to correct this violation, Sauder must provide its hazardous waste training program for every employee with a job title related to hazardous waste management, and submit the records that document that each employee has completed the training.

**11. Training Documentation
OAC Rule 3745-65-16(D)(4)**

The owner or operator must maintain the following documents and records at the facility: (4) Records that document that the training or job experience required has been given to, and completed by, facility personnel.

Sauder has not properly maintained records that document that training has been performed, according to the above cited rules. In order to correct this violation, Sauder must provide its hazardous waste training program for every employee with a job title related to hazardous waste management, and submit the records that document that each employee has completed the training, and maintain these records.

12. Contingency Plan, OAC Rules 3745-65-51(A) and (B); 3745-65-52(A), (B), (C), (D), (E) and (F); 3745-65-53(A) and (B); and 3745-65-55: Each owner or operator shall have a contingency plan for the facility. The contingency plan shall be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. The plan must be implemented immediately if there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. The plan must describe the actions personnel will take during an emergency, describe arrangements with responders, list the emergency contact and related information, list emergency equipment, and include an evacuation plan. A copy of the contingency plan must be maintained at the facility and submitted to entities that may be required to provide emergency services.

Sauder has violated all the applicable rules associated with the contingency plan requirements, as follows:

- (a) 3745-65-51(A) - The facility does not have a contingency plan.
- (b) 3745-65-51(B) - By not having a contingency plan, the facility is unable to implement such a plan during a fire, explosion, or release of hazardous waste.

- (c) 3745-65-52(A) - The facility does not have a contingency plan that describes the actions facility personnel must take.
- (d) 3745-65-52(C) - The facility does not have a contingency plan that describes the arrangements agreed to by local police departments, fire departments, hospitals, contractors, Ohio EPA, and local emergency responders.
- (e) 3745-65-52(D) - The facility does not have a contingency plan that lists the names, addresses, and phone numbers of persons qualified to act as emergency coordinator.
- (f) 3745-65-52(E) - The facility does not have a contingency plan that lists the emergency equipment, including its location, physical description and a brief outline of capabilities.
- (g) 3745-65-52(F) - The facility does not have a contingency plan that includes an evacuation plan.
- (h) 3745-65-53(A) - The facility does not maintain a contingency plan.
- (i) 3745-65-53(B) - The facility has not submitted a copy of the contingency plan to all local police departments, fire departments, hospitals, and Ohio EPA and local emergency response teams, that may be requested to provide emergency services.

In order to correct these violations, Sauder must prepare a contingency plan and submit a copy to me for review. The plan must include all of the elements required above. Sauder must maintain the plan at the facility and submit a copy of the plan to agencies or organizations that may be required to provide emergency services. The contingency plan must demonstrate compliance with these rules.

13. Testing and Maintenance of Equipment
OAC Rule 3745-65-33

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 ensure its proper operation in time of emergency. The owner or operator must record the inspections in a log or summary.

Sauder failed to test or inspect the spill control and decontamination equipment required for the facility. Sauder also failed to record this inspection in a log or summary. In order to correct this violation, Sauder must conduct the required inspection, explain the frequency of future inspections and submit a copy(s) of the inspection report.

14. Universal Waste Labeling - Batteries
OAC Rule 3745-273-34(A)

Universal waste batteries (i.e., each battery), or a container or tank in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste - Batteries", or "Waste Batteries", or "Used Batteries".

Sauder did not properly label at least six Universal Waste Batteries, in the Sauder Street facility battery station, or the container they were placed on, with one of the required phrases. In order to correct this violation, Sauder must properly label each Universal Waste Battery or the container they are placed on and submit photographic documentation that this has been done.

15. Universal Waste Labeling - Lamps
OAC Rule 3745-273-34(E)

Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with any one of the following phrases: "Universal Waste-Lamps", or "Waste Lamps" or "Used Lamps".

Sauder did not properly label all of its lamps or containers or packages of lamps with one of the required phrases. In order to correct this violation, Sauder must properly label each lamp, or container, or package and submit photographic documentation that this has been done.

16. Accumulation Time for Universal Waste Batteries and Lamps
OAC Rule 3745-273-35(C)

A large quantity handler of universal waste shall be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

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Sauder was not able to demonstrate the length of time the universal waste batteries and lamps were accumulated. There were no dates on the lamps at the Sauder Street facility, in the Compressor Room of the Brush Creek facility and in the Safety Building. There were no dates on the batteries in the Sauder Street facility battery station. In order to correct this violation, Sauder must place a date on each battery or lamp, or on the container they are placed on or in, with the earliest date that a battery or lamp is placed on or in the container. Sauder must submit photographic documentation that this has been done.

**17. Universal Waste Employee Training
OAC Rule 3745-273-36**

A large quantity handler of universal waste shall ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relative to their responsibilities during normal facility operations and emergencies.

Sauder has not ensured that all employees are thoroughly familiar with proper waste handling and emergency procedures. In order to correct this violation, Sauder must describe, through a training outline, how it will thoroughly familiarize (train) its universal waste lamp and battery handlers in proper handling and emergency procedures. Sauder must submit some form of documentation demonstrating that this training has been accomplished. The training must also include compliance with all rules for the handling of universal waste batteries and lamps and the corrective actions for all violations of universal waste rules, cited above.

Please be aware that incandescent, fluorescent, metal halide, neon, high-intensity discharge, high-pressure sodium and mercury-vapor lamps could be hazardous waste when discarded. Fluorescent lamps may contain up to 40 milligrams (mg) of mercury, depending on the brand and manufacturer. Lamps may also contain lead and cadmium. Many lamps exhibit a characteristic of toxicity for heavy metals when disposed. During the inspection, I gave you a copy of the following document to assist you in properly managing your spent lamps: Universal Waste Rules for Handlers of Lamps. I have also enclosed a copy of Computer, Fluorescent Lamp and Ballast Recyclers. I recommend that you review these documents carefully and contact me if you have any questions. The first document describes the rules you must follow in order to manage lamps as a universal waste.

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As a used oil generator you are required to: store used oil in containers or aboveground tanks that are in good condition (no severe rusting, apparent structural defects or deterioration) and not leaking. Containers, aboveground tanks and fill pipes for underground tanks must be labeled with the words "Used Oil." If leaks are detected, the generator must: stop the release; contain the release; clean up and manage properly the released used oil and other materials related to the release; and, if necessary, repair or replace any leaking containers or tanks prior to returning them to service. During the inspection I gave you copies of the following used oil fact sheets: The Regulation of Used Oil: Used Oil Generators and Used Oil Recyclers. Please review these carefully and contact me immediately if you have any questions.

I have one **General Concern**: One drum labeled PCB containing waste was observed in the Safety Building. Sauder should immediately contact US EPA and ask about storage requirements for this type of waste.

You may be able to reduce the waste your business generates. If you find ways to recycle, reduce or altogether eliminate the amount of waste that your business generates, you may be able to reduce your treatment and disposal costs and you may possibly reduce your regulatory requirements. During the inspection I gave you copies of the following fact sheets: Pollution Prevention Opportunities, a worksheet that can help you recognize opportunities for reducing waste and conserving energy at your business, Fluorescent Lamps: What You Should Know, Battery Recyclers/Brokers & Disposal Facilities and Management of Electronic Waste From Business. Please review this information and contact me if you have any questions.

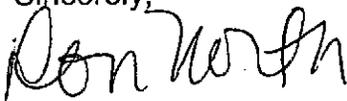
In order to assist you with waste evaluation determinations I left the following documents: Managing Your Hazardous Waste, the June 9, 2006, letter from Ohio EPA regarding the evaluation of spent rags and Ohio's Hazardous Waste Notifier Newsletter including a discussion on the evaluation of spent rags.

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste and used oil 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.

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Ohio EPA considers these violations to be serious violations, ones for which further enforcement action may be taken. Enclosed you will find a copy of the inspection checklists that I completed during the inspection. If you have any questions about my inspection, or this letter, please feel free to call me at (419) 373-3074. You can find copies of the rules and other information about used oil and hazardous waste management 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>.

Sincerely,



Don North
District Representative
Division of Hazardous Waste Management

/csl

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
NWDO, DHWM, Fulton County, Sauder Woodworking File

ec: Don North, DHWM, NWDO

NOTICE:

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

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

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

For Ohio EPA use only

2. Site EPA ID No. EPA ID Number:

Name: *Sauder Woodworking Company* Website (optional):

Street Address: *502 Middle Street*

City, Town, or Village: *Archbold* State: *OH*

County Name: *Fulton* Zip Code: *43502*

5. Site Land Type (check only one)

Private	County	District	Federal	Indian	Municipal	State	Other
<input type="checkbox"/>							

6. NAICS code(s) www.census.gov/epcd/www/naics.html

A. B.

C. D.

First Name: *Craig* MI: *L.* Last Name: *Drewes*

Phone Number: *(419) 446-3297* Phone Number Extension:

E-Mail Address:

Fax Number: *(419) 446-3695* Fax Number Extension:

Street or P.O. Box:

City, Town or Village:

State: Country: Zip Code:

8. 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.

A. Name of Site's Legal Owner: Date Became Owner (mm/dd/yyyy):

Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Street or P.O. Box:

City, Town, or Village: Owner Phone #:

State: Country: Zip Code:

B. Name of Site's Operator: Date Became Operator (mm/dd/yyyy):

Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Street or P.O. Box:

City, Town, or Village: Operator Phone #:

State: Country: Zip Code:

Regulations Cited: Yes No

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

Not Regulated

A. Hazardous Waste Activities
 (choose only one of the following categories)

<input type="checkbox"/>	UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/>	3. Treater, Storer or Disposer of Hazardous Waste
<input checked="" type="checkbox"/>	a. Large Quantity Generator (LQG):	<input type="checkbox"/>	4. Recycler of Hazardous Waste
<input type="checkbox"/>	b. Small Quantity Generator (SQG)	<input type="checkbox"/>	5. Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/>	c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/>	a. Small Quantity On-site Burner Exemption
<input type="checkbox"/>	d. United States Importer of Hazardous Waste	<input type="checkbox"/>	b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/>	e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/>	6. Underground Injection Control Facility

B. Universal Waste Activities		C. Used Oil Activities	
<input type="checkbox"/>	1. Small Quantity Handler of Universal Waste (Indicate types of universal waste generated and/or accumulated (check all boxes that apply):	<input checked="" type="checkbox"/>	1. Used Oil Generator
<input checked="" type="checkbox"/>	2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more).	<input type="checkbox"/>	2. Used Oil Transporter Indicate Type(s) of Activity(ies)
<input type="checkbox"/>	3. Destination Facility for Universal Waste (Check all boxes below that apply for each of the three types of facilities above.)	<input type="checkbox"/>	Transporter
		<input type="checkbox"/>	Transfer Facility
		<input type="checkbox"/>	3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)
		<input type="checkbox"/>	Processor
		<input type="checkbox"/>	Re-refiner
		<input type="checkbox"/>	4. Off-Specification Used Oil Burner
		<input type="checkbox"/>	5. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)
		<input type="checkbox"/>	a. Marketer Who Directs Shipment of Off- Specification Oil
		<input type="checkbox"/>	b. Used Oil to Off-Specification Used Oil Burner

	Generated	Accumulated
A. Batteries	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
D. Lamps	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your 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.

--	--	--	--	--	--	--

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

Y / N	Announced ?	Additional Facility Representatives:
Y / N	Tanks?	Other comments: <i>This facility consists of several contiguous buildings.</i>
Y / N	Containers?	

13	Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm-dd-yyyy) (HH:MM)
	<i>Don North</i>		<i>3-13 + 3-16-07</i>

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 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)

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: *ABC Manufacturing Co.*

Facility Type: *LQG/SQG/CESQG/TSD*

EPA ID#: *123456789*

Description of Waste				On-Site Management			Off-Site Management	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, etc)</small>	Waste Generated <small>(e.g. sludge, spent solvent, ash, etc)</small>	EPA Waste Code	QTY Generated per Month	Type of Accumulation/Storage <small>(e.g. container, tank, etc)</small>	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Waste Location <small>(Include map if possible)</small>	Name, state, and type of activity occurring at the facility.	P2 Activities
1. <i>Painting</i>	<i>Paint sludge</i>	<i>D001</i>	<i>100 lbs</i>	<i>Drum</i>	<i>None</i>			
2. <i>Grinding</i>	<i>Grinding dust</i>	<i>D001</i>	<i>500 lbs</i>	<i>Container</i>	<i>None</i>			
3. <i>Welding</i>	<i>Weld slag</i>	<i>D002</i>	<i>1000 lbs</i>	<i>Container</i>	<i>None</i>			
4. <i>Drum cleaning</i>	<i>Drum solvent</i>	<i>D001</i>	<i>100 lbs</i>	<i>Container</i>	<i>None</i>			
5. <i>Machine cleaning</i>	<i>Machine solvent</i>	<i>D001</i>	<i>100 lbs</i>	<i>Container</i>	<i>None</i>			

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

Sawder created an unpermitted storage facility by storing HW from B013 + B06 in the Safety Building when they are not contiguous properties. [Facility Name/Inspection Date] LQG/February 2007
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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.

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date Trained</u>

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

[Facility Name/Inspection Date]

[ID number]

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- d. Do not exceed one quart of acute 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)] *Age line not labeled or dated.* 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 *NO inspection or record for Myers Pl. Facility*
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
- 48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes No N/A
- 49. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes No N/A
- 50. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] Yes No N/A
- 51. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] Yes No N/A

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

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

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

PRE-TRANSPORT REQUIREMENTS

- 53. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes No N/A
- 54. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A
- 55. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes No N/A

LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] (possibly also cite 3745-52-11) **If so:**

Yes No N/A RMK#

a. **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-270-07(A)(6)]

Yes No N/A RMK#

b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-270-07(A)(6)]

Yes No N/A RMK#

2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] (possibly also cite 3745-52-11)

Yes No N/A RMK#

3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1]

Yes No N/A RMK#

4. Does the generator generate a characteristic hazardous waste? **If so:**

Yes No N/A RMK#

a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)]

Yes No N/A RMK#

NOTE: *If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] **If so:**

Yes No N/A RMK#

a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)]

Yes No N/A RMK#

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*

6. Has the generator **correctly** determined if restricted wastes meet or exceed treatment standards? [3745-270-07(A)(1)]

Yes No N/A ___RMK#___

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03]

Yes No N/A ___RMK#___

NOTE: *A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (§402 of CWA), that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater.*[3745-270-03(B)]

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)]

Yes No ___ N/A RMK#___

Note: In other words, is combustion a legitimate treatment method

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)]

Yes No N/A ___RMK#___

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] **If so:**

Yes ___ No ___ N/A RMK#___

a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05]

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] If so:

Yes ___ No ___ N/A RMK# ___

a. The facility can land dispose of the waste. [3745-270-06]

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment?
If so:

Yes ___ No N/A ___ RMK# ___

a. Has the facility complied with 3745-270-04?

Yes ___ No N/A RMK# ___

REMARKS

NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1? [3745-270-07(A)(2)] Yes No N/A RMK#
14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1? [3745-270-07(A)(3)] Yes No N/A RMK#
15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1? [3745-270-07(A)(4)] Yes No N/A RMK#
16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1? [3745-270-07(A)(9)] Yes No N/A RMK#
17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] **If so:** Yes No N/A RMK#
- a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes No N/A RMK#

NOTE: Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit. (See 270-07(A)(7))

18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)] Yes No N/A RMK#

REMARKS

GENERATORS TREATING HAZARDOUS WASTE

USED OIL INSPECTION CHECKLIST (Long Version)

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes ___ No N/A ___ RMK# ___
Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes ___ No N/A RMK# ___
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No N/A ___ RMK# ___
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes ___ No N/A RMK# ___

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes ___ No N/A RMK# ___
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes ___ No N/A RMK# ___
6. Does the generator only store used oil in tanks, containers; or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes No N/A ___ RMK# ___
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No N/A ___ RMK# ___
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes No N/A ___ RMK# ___
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes ___ No N/A RMK# ___
- b. Contained the release? Yes ___ No N/A ___ RMK# ___
- c. Cleaned up and properly managed the used oil and other materials? Yes ___ No N/A ___ RMK# ___
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A ___ RMK# ___
10. *No releases observed*
Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] if so: Yes ___ No N/A ___ RMK# ___

a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?

Yes No N/A RMK# _____

b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?

Yes No N/A RMK# _____

c. Are the combustion gases from heater vented to the ambient air?

Yes No N/A RMK# _____

11. Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24]

Yes No N/A RMK# _____

Hauled by Safety-Kleen

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]

Yes No N/A RMK# _____

13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]

Yes No N/A RMK# _____

14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]

Yes No N/A RMK# _____

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11]

Yes No N/A RMK# _____

REMARKS

LARGE 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

GENERAL REQUIREMENTS

1. Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)] Yes No N/A RMK#

PROHIBITIONS

2. Did the LQUWH dispose of universal waste? [3845-273-31(A)] Yes No N/A RMK#
3. Did the LQUWH dilute or treat universal waste, except when responding to releases or by managing specific wastes as provided in OAC 3745-273-33? [3745-273-31(B)] Yes No N/A RMK#

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES:

4. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)] Yes No N/A RMK#
5. If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? Yes No N/A RMK#
6. Does the LQUWH 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. Regenerate used batteries? Yes No N/A RMK#
 - e. Disassemble them into individual batteries or cells? Yes No N/A RMK#
 - f. Remove batteries from consumer products? Yes No N/A RMK#
 - g. Remove the electrolyte from the battery? Yes No N/A RMK#

If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-33(A)(2)]

Yes No N/A RMK#

7. If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)(3)]

Yes No N/A RMK#

a. If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)]

Yes No N/A RMK#

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)]

Yes No N/A RMK#

8. Are the battery(ies) or container(s) of batteries located with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-34(A)]

Yes No N/A RMK#

UNIVERSAL WASTE LAMPS

9. Does the LQUHW 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? [3745-273-33(D)(1)]

Yes No N/A RMK#

10. 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 constituents to the environment? [3745-273-33(D)(2)]

Yes No N/A RMK#

1. According to the facility, I observed fiber containers for this purpose in the Safety Building storage area.

11.

Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamps?" [3745-273-34(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.

12. **ACCUMULATION TIME**

Is the waste accumulated for less than one year? [3745-273-35(A)]

Yes No ___ N/A ___ RMK# ___

a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on handler to demonstrate) [3745-273-35(B)]

Yes ___ No N/A RMK# ___

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

13.

Has the length of time the universal waste has been accumulated documented by one of the following: [3745-273-35(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? [3745-273-35(C)(1)]

Yes ___ No ___ N/A ___ RMK# ___

b. Marking or labeling the individual item of universal waste with the date that it became a waste or was received? [3745-273-35(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? [3745-273-35(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? [3745-273-35(C)(4)]

Yes ___ No ___ N/A ___ RMK# ___

e. Placing the universal waste in a specific accumulation area and identifying the earliest that any universal waste in the area became a waste or was received? [3745-273-35(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 is received? [3745-273-35(C)(6)]

Yes ___ No N/A ___ RMK# ___

EMPLOYEE TRAINING

14. Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36]

Yes ___ No N/A ___ RMK# ___

RESPONSE TO RELEASES

15. Were releases of universal waste and other residues immediately contained? [3745-273-37(A)]

Yes No N/A ___ RMK# ___

16. Was the released material characterized? [3745-273-37(B)]

Yes No N/A ___ RMK# ___

17. If the released material was a hazardous waste, was it managed as required in OAC 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) [3745-273-37(C)]

Yes ___ No N/A RMK# ___

OFF-SITE SHIPMENTS

NOTE: *If a LQUWH self-transportes wastes, then the handler must comply with the Universal Waste transporter requirements.*

18. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)]

Yes No N/A ___ RMK# ___

NOTE: *LQUWHs are prohibited to send waste to any other facility.*

19. 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? [3745-273-38(C)]

Yes No N/A ___ RMK# ___

20. Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)]

Yes No N/A ___ RMK# ___

21. 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? [3745-273-38(E)(1)]

b. Agree to where shipment will be sent? [3745-273-38(E)(2)]

Yes ___ No N/A RMK# ___

Yes ___ No ___ N/A ___ RMK# ___

Yes ___ No ___ N/A ___ RMK# ___

22. If a handler rejects a partial or full load from another handler, does the receiver handler contact the originating handler and discuss one of the following:

a. Sending the waste back to originating handler? [3745-273-38(F)(1)]

b. Sending the shipment to a destination facility? [3745-273-38(F)(2)]

Yes ___ No N/A RMK# ___

Yes ___ No ___ N/A ___ RMK# ___

Yes ___ No ___ N/A ___ RMK# ___

23. If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)]

Yes ___ No N/A RMK# ___

24. If the handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-38(H)]

Yes ___ No N/A RMK# ___

TRACKING UNIVERSAL WASTE SHIPMENTS

25. Are universal waste received from another handler? If so: Yes ___ No N/A ___ RMK# ___
a. Is a record of each shipment kept? [3745-273-39(A)] Yes ___ No N/A RMK# ___

NOTE: *This record can be in the form of a log, invoice, manifest, bill of lading, or other shipping document. This also applies to question No. 35(a).*

26. Does the record include the following:
a. Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)] Yes ___ No N/A RMK# ___
b. Quantity of each type of universal waste? [3745-273-39(A)(2)] Yes ___ No N/A RMK# ___
c. Date received? [3745-273-39(A)(3)] Yes ___ No N/A RMK# ___
27. Is universal waste shipped to another handler? If so: Yes No ___ N/A ___ RMK# ___
a. Is a record of each shipment kept? [3745-273-39(B)] Yes No N/A ___ RMK# ___

28. Does the record include the following?
a. Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)] Yes No N/A ___ RMK# ___
b. Quantity of each type of universal waste? [3745-273-39(B)(2)] Yes ___ No N/A ___ RMK# ___
c. Date shipped? [3745-273-39(B)(3)] Yes ___ No N/A ___ RMK# ___
29. Are records kept for three years? [3745-273-39(C)(1)(2)] Yes No N/A ___ RMK# ___

EXPORTS

30. Is waste being sent to a foreign destination? If so: Yes ___ No N/A ___ RMK# ___
a. Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56 and 3745-52-57? [3745-273-40(A)] Yes ___ No N/A RMK# ___

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA "Acknowledgment of Consent" 3745-52-50 to -52-57? [3745-273-40(B)]

Yes ___ No N/A RMK# ___

c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)]

Yes ___ No N/A RMK# ___

REMARKS