

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

Bob Taft, Governor
Bruce Johnson, Lieutenant Governor
Joseph P. Koncelik, Director

Re: Bottomline Ink
OHR000014241
Lucas Co.
SQG - NOV

January 4, 2007

Mr. Devin Barrett
Bottomline Ink
149 Euclid Avenue
Toledo, Ohio 43605

Dear Mr. Barrett:

On November 20, 2006, Ed Pulido and I conducted an inspection of Bottomline Ink (also referenced in this letter as BI) located at 149 Euclid Avenue in Toledo, Ohio. The purpose of our inspection was to determine your 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).

Bottomline Ink provides printing services to its customers. Hazardous wastes generated include plate developer (D002) and solvent/ink sludge (D001). Fluorescent bulbs are generated and currently disposed of as solid waste. BI also has a parts washer that is serviced internally. Shop towels are laundered by Coyne Laundry. BI recycles paper.

I found the following violations of Ohio's hazardous waste laws. In order to correct this violation you must do the following and send me the required information **within 45 days** of your receipt of this letter:

1) Waste Evaluation, OAC Rule 3745-52-11:

Any person who generates a waste must determine if that waste is a hazardous waste by using generator knowledge or by testing the waste.

BI failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility.

BI must immediately cease disposing of the fluorescent bulbs as non-hazardous waste until a proper waste evaluation has been completed. Fluorescent bulbs typically contain mercury, lead or cadmium.

During our inspection, I provided you with a fact sheet regarding fluorescent lamps and a list of fluorescent lamp and ballast recyclers. Please review this information and contact me if you have any questions.

Basically, you could run analytical to determine if the bulbs contain mercury, lead, or cadmium (if you would like to continue to dispose of them) OR you can choose to handle them through the **universal waste rules by recycling**. When the bulbs are recycled as a universal waste, they are not considered a hazardous waste. You must ensure that they are recycled within one year of being generated and that you keep documentation showing this. Also, you must label the box containing the burned out bulbs (prior to recycling) with the words "universal waste."

To abate this violation, BI must submit to Ohio EPA documentation on how you plan to properly manage your fluorescent bulbs.

At the time of our inspection, you had 27 five-gallon containers of used plate developer which is your corrosive hazardous waste. Your last waste pick up by Safety Kleen was in September 2006. Based on this information, you are currently generating, on average, 45 gallons of hazardous waste per month (not including a very small amount of solvent/ink waste). This would make BI a Small Quantity Generator (SQG) of hazardous waste. I have contacted Safety Kleen and asked them to change your manifests to reflect that you are a SQG by using your U.S. EPA identification number.

2) Container Labeling, OAC 3745-52-34(A)(3):

All containers that are storing hazardous waste must be marked with the words "hazardous waste."

BI had 27 five-gallon containers of plate developer that were not labeled "hazardous waste." Also, any drums used to store hazardous waste plate developer or solvent sludge also need to be labeled "hazardous waste."

To abate this violation, BI can pour the contents of the 27 jugs into larger containers (55-gallon drums) and label them with the words hazardous waste or you can label each 5-gallon container. You must submit pictures of the labeled containers to me at this office.

3) Accumulation Date Marking, OAC 3745-52-34(A)(2):

Each container that is storing hazardous waste must have an accumulation start date on it. This means the day you move the waste into your "storage area" which is currently your basement for the solvent sludge and the upstairs for the corrosive plate waste, you must label the container with that date. As a SQG, you have 180 days to accumulate or store hazardous waste until it must be manifested off site to a permitted treatment, storage, or disposal facility such as the ones you are using.

To abate this violation, BI must properly label the containers with the date that the hazardous waste contents were put into the containers. Since your last pick up of hazardous waste was on October 3, 2006, you should ensure that all containers are off-site by April 3, 2007, so that you do not exceed the storage of 180 days. Once you have the containers dated, you must submit the pictures to me.

4) Weekly Inspections, OAC 3745-66-74: BI was not conducting weekly inspections of the hazardous waste storage area where plate developer waste was stored. At the time of our visit you did not have any solvent sludge in the basement storage, however, you would also need to inspect that storage area if/when you begin to accumulate waste there.

Weekly inspections must be completed one time every seven consecutive days checking for leaks and for deterioration or other factors. They must be conducted even if your facility is closed or on holiday break.

These inspections must be recorded in an inspection log or summary. (I have enclosed a sample inspection log you can use or you can create your own)

To abate this violation, you must submit four weeks of completed inspection logs to me.

5) Emergency Equipment Testing, OAC 3745-65-33:

BI does not conduct emergency equipment testing. Emergency equipment must be tested or inspected as necessary to ensure its proper operation in time of emergency. Any absorbent type material, fire extinguishers, gloves, protective gear, etc. that may be used in the event of emergency should be inspected. You must document this inspection. This is to make sure that the supplies, etc. are available and working if needed. There is no required frequency of inspection.

To abate this violation, you must submit to me a copy of at least one emergency equipment inspection.

6) Emergency Preparedness: Emergency Coordinator, OAC 3745-52-34(D)(5)(a), BI must designate an emergency coordinator available on-site or on-call at all times. At the time of our inspection, you indicated that this would probably be you.

To abate this violation, please let me know who will be acting as the emergency coordinator.

7) Emergency Preparedness: Posted Information, OAC 3745-52-34(D)(5)(b), BI did not have the following required information posted by a telephone in the shop area; name and phone number of emergency coordinator, location of fire and spill control equipment and telephone number of the local fire department (may be 911).

To abate this violation, please send me a photograph documenting that this information has been posted next to the telephone.

8) Emergency Preparedness: Waste Handling/Emergency Procedures, OAC 3745-52-34(D)(5)(c), BI did not familiarize employees with hazardous waste handling procedures including proper labeling, what to do in case of spill, etc.

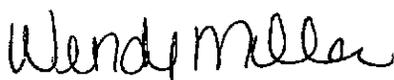
Mr. Devin Barrett
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To abate this violation, please provide a short summary of the training you provided to your employees and the names of those attending. This can be informal training and could be just a 15 minute overview of the rules that a small quantity generator must follow.

You can find copies of rules, recycling lists, fact sheets 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/opp>. I have enclosed copies of the checklists completed during the inspection.

If you have any questions, please contact me at (419) 373-3114.

Sincerely,



Wendy Miller
Division of Hazardous Waste Management

/l/r

Enclosures

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO, Lucas County File
<DHWM-NWDO File >

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

E-mail this completed form to tammy.mcconnell@pa.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: OHR000014241																				
3. Site Name	Name: Bottomline Ink		Website (optional):																		
4. Site Location Information	Street Address: 149 Euclid Avenue																				
	City, Town, or Village: Toledo	State: OH																			
	County Name: Lucas	Zip Code: 43605																			
5. Site Land Type (check only one)	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	X									
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X																					
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A.		B.																		
C.		D.																			
7. Facility Representative: Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	First Name: Devin		MI:	Last Name: Barrett																	
	Phone Number: 419-698-5000		Phone Number Extension:																		
	E-Mail Address: devinb@bottomlineink.com																				
	Fax Number: 419-698-5004		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	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other									
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	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	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other									
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Street or P.O. Box:																					
City, Town, or Village:		Operator Phone #:																			
State:		Country:		Zip Code:																	
9. Violations Cited?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No																			
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)																					
<input type="checkbox"/> Not Regulated																					

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Bottomline Ink

Facility Type: LQG/ESQG/CESQG/TSD

EPA ID#: 042000014241

Description of Waste				On-Site Management			Off-Site Management
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	Waste Generated (e.g. sludge, spent solvent, ash, etc)	EPA Waste Code	QTY Generated per Month	Type of Accumulation/Storage (e.g. container, tank, etc)	Type of On-Site Treatment (recycle, wwt, etc)	Waste Location (Include map if possible)	Name, state, and type of activity occurring at the facility.
1 wash of printing equip.	solvent sludge	D001	not since 2004	drums			Heritage Crystal Clean
2 developer (printing)	corrosive plating waste	D002	25-45g.	drums			SK
3							
4							
5							

REMARKS-GENERAL INFORMATION

General Process Information:



Regulatory/Enforcement History (if applicable):



Other:

LDR CHECKLIST

GENERAL LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] 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] 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)] (indicated as "LDR subcategories" on manifest) 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 do not meet treatment standards? [3745-270-07(A)(1)] Yes No N/A RMK# _____
see s-k notification

NOTE: Wastes with EPA hazardous waste numbers K174 and K175 (chlorinated aliphatic wastes) have specific requirements in rule 3745-270-33. Waste with EPA hazardous waste numbers K176, K177 and K178 (inorganic chemical wastes) have specific requirements in rule 3745-270-36.

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] Yes No N/A RMK#

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] Yes No N/A RMK#

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 of 3745-270-07? [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 of 3745-270-07? [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 of 3745-270-07? [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 of 3745-270-07? [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

**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
 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
** need to evaluate bulbs or begin recycling as universal waste*
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) and 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 LDR, 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)] N/A Yes No N/A
- a. Does the contractual agreement specify the type of waste and frequency of shipment? Yes No N/A
- b. Is the transport vehicle owned and operated by the reclaimer? Yes No N/A
- c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? Yes No N/A

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

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

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

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

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

13. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes No N/A
14. Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)] Yes No N/A

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

15. If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? 3745-52-42(B)] Yes No N/A
16. Are signed copies of all manifests being retained for at least three years? [3745-52-40] Yes No N/A

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

PREPAREDNESS AND PREVENTION

17. Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)] Yes No N/A
18. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]
- a. Name and telephone number of emergency coordinator? Yes No N/A
- b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes No N/A
- c. Telephone number of local fire department? Yes No N/A
19. Are employees familiar with waste handling and emergency procedures [3745-52-34(D)(5)(c)] Yes No N/A
20. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(a)] Yes No N/A
21. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31] Yes No N/A
22. Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:
- a Internal Alarm system? [3745-65-32(A)] Yes No N/A
- b Emergency communication device? [3745-65-32(B)] Yes No N/A
- c Portable fire control, spill control and decon equipment? [3745-65-32(C)]? Yes No N/A
- d Water of adequate volume/pressure? [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
24. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A
25. 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
26. 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

27. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
28. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes No N/A
29. 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

30. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes No N/A
 - b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes No N/A
 - c. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes No N/A
 - d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. Yes No N/A
 - e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
31. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes No N/A
- a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes No N/A
 - b. Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes No N/A
 - c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A

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

USE AND MANAGEMENT OF CONTAINERS

32. Has the generator marked containers with the words "Hazardous Waste" [3745-52-34(D)(4)] Yes No N/A
33. Is the accumulation date on each container? [3745-52-34(D)(4)] Yes No N/A
34. Are hazardous wastes stored in containers which are: Yes No N/A

- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A
- b. In good condition? [3745-66-71] Yes No N/A
- c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A

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

- 35. Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days. Yes No N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
- 36. 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
- 37. 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
- 38. 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

- 39. 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
- 40. Does each container \leq 100 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A
- 41. 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