



State of Ohio Environmental Protection Agency

Southeast District Office

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

October 3, 2007

**MORGAN COUNTY
MAHLE ENGINE COMPONENTS USA
DHWM/SEDO
OHD9867949466**

Mr. Ron Hardesty
Mahle Engine Components USA
5130 North State Route 60
McConnelsville, Ohio 43756

Dear Mr. Hardesty:

On September 27, 2007, I inspected Mahle Engine Components USA's ("Mahle") McConnelsville facility to determine compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code and Chapter 3745. of the Ohio Administrative Code (OAC). During the inspection, we also discussed ways to prevent pollution by reducing waste. This letter will explain the violations we found, what you need to do to correct the violations, other general concerns we have, what you need to do to respond to our general concerns, and any pollution prevention opportunities we identified.

We 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 thirty days** of the date of this letter:

- (1) OAC Rule 3745-52-11, Waste Evaluation:** Any person who generates a waste in Ohio must evaluate the waste to determine if the waste is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51.

Mahle generates 27 waste streams, some of which have not been re-evaluated for seven years. Certain waste streams which are treated onsite in a waste water treatment system or sent offsite for recycling (used oils and scrap metals) do not need an updated waste evaluation since they are being recycled. Other waste streams which are managed as a D006/D008 hazardous waste do not need updated waste evaluations so long as the waste has been adequately evaluated to determine if land disposal restrictions have been met (see citation #8). However, rotoclone sludge, the contents of punctured aerosol cans of paints and lubricating oils, and filter cake from the wastewater treatment system, all of which are managed as nonhazardous wastes, should be re-evaluated.

Mahle must immediately evaluate these wastes to determine if they are a listed or characteristic waste as required by this rule, and submit an updated waste evaluation to this office for review.

- (2) **OAC Rule 3745-65-52(D), Content of Contingency Plan:** The contingency plan must list names, addresses and phone numbers of emergency coordinators. The list must be kept up to date.

Mahle failed to update the list of emergency coordinators when personnel changed at the plant. In order to abate this violation, Mahle must amend the contingency plan to include updated emergency information and submit the amended pages to this office as documentation that this has been done. Note that you must submit your amended plan to all required authorities per OAC 3745-65-53(B).

- (3) **OAC Rule 3745-65-54. Amendment of Contingency Plan:** The contingency plan must be reviewed and immediately amended, if necessary, whenever rules are revised, the plan fails, the facility changes the list of emergency coordinators changes, or the emergency equipment changes.

Mahle failed to amend the plan in response to changes in personnel who are emergency coordinators and to the new ownership at the company. In order to abate this violation, Mahle must amend the contingency plan to include updated emergency information as well as any other updates required of this rule, and submit the amended pages to this office as documentation that this has been done. Note that you must submit your amended plan to all required authorities per OAC 3745-65-53(B).

- (4) **OAC Rule 3745-52-34 C(1), Accumulation Time of Hazardous Waste:** A generator may satellite accumulate up to 55 gallons of hazardous waste at the point of generation, as long as certain conditions are met, including marking the container with the words "hazardous waste" or other words to identify the contents.

Mahle failed to label, with words identifying its contents, a satellite drum containing the contents of punctured aerosol cans of paints and penetrating oils in the process building. In order to abate this violation, Mahle must either immediately label the satellite drum as described in the paragraph above or submit a waste analysis documenting that the contents of the drum are not a hazardous waste.

- (5) **OAC Rule 3745-273-13(D)(1), Waste Management Standards for small Quantity Handlers of Universal Waste:** Lamps must be contained in packages that are structurally sound, adequate to prevent breakage and compatible with the lamps. Containers must be closed.

Mahle failed to contain a stack of spent fluorescent lamps which was located in the utility room at the plant. In order to abate this violation, Mahle must immediately contain the lamps and submit a photograph of properly contained lamps to this office.

- (6) **OAC Rule 3745-273-15(A), Accumulation Time Limits- Standards for Small Quantity Handlers of Universal Waste:** A handler may accumulate universal waste for no longer than one year unless accumulation is necessary to facilitate proper recovery, treatment or disposal.

Mahle has accumulated spent universal waste fluorescent lamps onsite since June 2, 2006, in excess of one year, without proving that the accumulation period was required to facilitate recovery. In order to abate this violation, Mahle must immediately send all lamps that have exceeded the one-year accumulation limit offsite for recycling, and submit a receipt from the recycler to this office as documentation that this has been done.

- (7) **OAC Rule 3745-273-16, Employee Training for Small Quantity Handlers of Universal Waste:** A handler shall inform all employees who handle or have responsibility for universal waste about the proper handling and emergency procedures for the waste.

Mahle failed to properly train employees on universal waste handling procedures, in that spent fluorescent lamps were not contained and had not been sent offsite for recycling in over a year. In order to abate this violation, please submit evidence that the employees responsible for these aspects of lamp management have a) received adequate training and b) are properly following through on spent lamp management procedures. Note that improper management of spent universal waste lamps is a chronic violation at your facility. Violations of regulations for spent lamp management were cited during the last (2005) inspection, as well.

- ASC
(8) **OAC Rule 1745-270-07, Testing, Tracking and Recordkeeping requirements for generators, treaters and disposal facilities:** A generator of hazardous waste must determine if the waste has to be treated before it can be land disposed.

During the inspection, Mahle was unable to provide LDR forms for review. Ohio EPA requested that the forms, when found, be faxed to this office for review. Mahle failed to submit the requested LDR forms. Therefore, Mahle has not properly evaluated its waste to determine if it can be land disposed.

In order to abate this violation, Mahle must submit land disposal restriction forms for all waste streams that are being manifested offsite, as well as recent (in the past two years unless Mahle can prove, using process knowledge, that the waste stream has not changed since the last test) analytical information for each waste stream documenting that the waste has been tested to determine the concentration of

Mr. Ron Hardesty
Mahle Engine Components USA
October 3, 2007
Page 4

hazardous constituents that it contains. Based on this information, Ohio EPA will then evaluate Mahle's compliance with land disposal restriction (LDR) regulations.

Enclosed, you will find a copy of the checklists that were completed during the inspection. Should you have any questions, feel free to contact me at (740) 380-5293. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/opp>.

Sincerely,



Donna Goodman
District Representative
Division of Hazardous Waste Management

DG/mlm

Enclosure

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.

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

For Ohio EPA use only

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

2. Site EPA ID No.	EPA ID Number: OHD986979466								
3. Site Name	Name: Mahle Engine Components USA				Website: 43756 (Optional)				
4. Site Location Information	Street Address: 5130 N. State Route 60								
	City, Town, or Village: McConnelsville				State: OH				
	County Name: Morgan				Zip Code:				
5. Site Land Type (check only one)	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
6. NAICS code(s) www.census.gov/epcd/www/naics.html	331421								
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: Ron			MI:	Last Name: Hardesty				
	Phone Number: 740-962-2040				Phone Number Extension: 230				
	E-Mail Address:								
	Fax Number:				Fax Number Extension:				
	Street or P.O. Box:								
	City, Town or Village:			State:		Country:		Zip Code:	
	Name of Site's Legal Owner: Mahle Engine Components USE							Date Became Owner (mm/dd/yyyy):	
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	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: PO Box 748								
	City, Town or Village: Morristown				Owner Phone #:				
	State: NJ				Country:		Zip Code: 43697-1000		
	Name of Site's Operator: Mahle Engine Components USA							Date Became Operator (mm/dd/yyyy): 03/09/07	
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box:								
	City, Town or Village:				Operator Phone #:				
State:				Country:		Zip Code:			
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste					
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)									
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Underground Injection Control Facility									

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))			
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste		<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	
<input type="checkbox"/> Destination Facility for Universal Waste			
Check all boxes below that apply for each of the three types of facilities above		10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
	Managed	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, 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.			
D006	D008		
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.			
Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Other Comments: Used oil tanks only
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Donna Goodman			9/24/2007 10:30 AM
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)

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] **Some wastes have not been re-evaluated for 7 years.** Yes No NA
2. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes No NA
3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] Yes No NA
4. 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 NA
5. 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 No NA
6. Does the generator accumulate hazardous waste? Yes No NA
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.
7. 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 No NA
NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G) & (H).
8. 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 No NA
 - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C) and Yes No NA
 - c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No NA
 - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No NA*NOTE: Complete appropriate checklist for each unit.
NOTE: If waste is treated to meet LDRs, use LDR checklist.*
9. Does the generator export hazardous waste? If so: Yes No NA
 - a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] Yes No NA
 - b. Has the generator complied with special manifest requirements? [3745-52-54] Yes No NA
 - c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] Yes No NA
 - d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes No NA
 - e. Are export related documents being maintained on-site? [3745-52-57(A)] Yes No NA

MANIFEST REQUIREMENTS

10. Have all hazardous wastes shipped off-site been accompanied by a manifest?
(U.S. EPA Form 8700-22) [3745-52-20(A)] Yes No NA

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

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)]

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

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)].

13. 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 No NA

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

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 of the waste they generate.

15. 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 NA

16. 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 NA

17. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes No NA

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

18. 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 NA

19. Does the personnel training program include instructions to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes No NA

20. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No NA

21. 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 NA

22. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No NA

23. Does the generator keep records including: job titles [D(1)], job descriptions [D(2)], type and amount of training given to each person [D(3)] and documentation of completed training or job experience required [D(4)]? [3745-65-16(D)] Yes No NA
24. 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 NA

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 Manifests, etc.

Job Performed

Name of Employee

Date Trained

CONTINGENCY PLAN

25. 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 NA
26. 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 NA
 - b. Arrangements with emergency authorities [3745-65-52(C)]. Yes No NA
 - 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)] **Plan has not been updated to reflect new personnel and ownership/name change.** Yes No NA
 - d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes No NA
 - e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes No NA

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)]

27. 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 NA
28. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] **Plan has not been updated to reflect new personnel and ownership/name change.** Yes No NA
29. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes No NA

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

30. Has there been a fire, explosion or release of hazardous waste or hazardous waste

constituents since the last inspection. If so:

- a. Was the contingency plan implemented? [3745-65-51(B)] Yes No NA
- b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes No NA
- 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 NA

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

31. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes No NA
32. 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 NA
- b. Emergency communication device? [3745-65-32(B)] Yes No NA
- c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes No NA
- d. Water of adequate volume/pressure? [3745-65-32(D)] Yes No NA
- NOTE: Verify that the equipment is listed in the contingency plan.*
33. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes No NA
34. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No NA
35. 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 NA
36. 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 NA
37. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No NA
38. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes No NA
39. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes No NA

SATELLITE ACCUMULATION AREA REQUIREMENTS

40. Does the generator ensure that satellite accumulation area(s): Yes No NA
- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes No NA
- b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes No NA
- c. Do not exceed one quart of acutely hazardous waste at anyone time? [3745-52-34(C)(1)] Yes No NA
- d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes No NA
- e. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] **The SAA containing spent aerosol liquids is not labeled.** Yes No NA
41. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes No NA
- 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 NA
- 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 NA
- c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No NA

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

42. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes No NA
43. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No NA
44. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No NA
- b. In good condition? [3745-66-71] Yes No NA
- c. Compatible with wastes stored in them? [3745-66-72] Yes No NA
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No NA
45. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Yes No NA
Note: Per ORCS 1.44(A) "Week" means seven (7) consecutive days.

- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No NA
46. 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 NA
47. 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 NA
48. 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 NA
49. 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 NA
- 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.*
50. 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 NA
- NOTE: Please provide a description of the unit and documentation provided by the generator 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

51. 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 NA
52. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No NA
53. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes No NA

REMARKS

**SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS
BATTERIES AND LAMPS**

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more

Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS

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

WASTE MANAGEMENT - LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3. Are batteries that show evidence of leakage spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes No NA
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the batteries, and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes No NA
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes No NA
 - b. Mix battery types in one container? Yes No NA
 - c. Discharge batteries to remove the electric charge? Yes No NA
 - d. Regenerated used batteries? Yes No NA
 - e. Disassemble them into individual batteries or cells? Yes No NA
 - f. Remove batteries from consumer products? Yes No NA
 - g. Remove the electrolyte from the battery? Yes No NA
- If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)]
6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] Yes No NA
- a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] Yes No NA
 - b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] Yes No NA

7. Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Batteries" or "Used Batteries"? [3745-273-14(A)] Yes No NA

UNIVERSAL WASTE LAMPS

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] **A stack of spent lamps in the storage room was not contained.** Yes No NA
9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes No NA
10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamps" or "Waste Lamps" or "Used Lamps"? [3745-273-14(E)] Yes No NA

NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

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

11. Is the waste accumulated for less than one year? [3745-273-15(A)] Yes No NA
If not: **The lamps were last sent offsite for recycling more than one year ago.**
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes No NA
12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes No NA
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes No NA
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes No NA
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes No NA

- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes No NA
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes No NA
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes No NA

EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] **Inadequate training has occurred as evidenced by the fact that universal waste lamps were not properly contained and had not been sent offsite for more than one year.** Yes No NA

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes No NA
15. Is the material released characterized? [3745-273-17(B)] Yes No NA
16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes No NA

OFF-SITE SHIPMENTS

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

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes No NA

NOTE: SQUWHs are prohibited to send waste to any other facility.

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes No NA
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No NA
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes No NA

- b. Agree to where the shipment will be sent?
[3745-273-18(E)(2)] Yes No NA
21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
- a. Sending the waste back to the originating handler?
[3745-273-18(F)(1)] Yes No NA
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes No NA
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes No NA
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes No NA

EXPORTS

24. Is waste being sent to a foreign destination? If so: Yes No NA
- a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes No NA
- b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to 3745-52-57? [3745-273-20(B)] Yes No NA
- c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes No NA

REMARKS

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Mahle Engine Components USA Facility Type: LQG Date of Inspection: 092407 EPA ID#: OHD986979466

Waste Generated			On- or Off-Site Management				
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility:	Current P2 Activities	P2 Opportun	
1	Welding Steel coils	non haz slag	55 gal/year in drum at welding process line		Shuman, Cleveland, OH recycled	Use of wider slabs of steel reduced # of welds by 1/3 = 1/3 reduction in slag waste	
2	Strip Washing	unevaluated sludge from monthly cleanout of washer	Varies. Piped to onsite WWTP .	WWTP (NPDES to Musking. River)		Installed flow controls on water-consuming devices	
3	Strip Washing	Used oil sludge from clean-out	500 lb/year in 4400 gal used oil tank in basement		Polar (formerly Almerican Ultra Specialites) Hudson, OH Reclaimed	Reclaimed and sent back to Mahle	
4	Etching	D006 Etch felt	5 lb/week in SAA drum in welding line and later placed in rolloff box on outdoor pad in back		Envirite Canton, OH Stabilized and landfilled		
5	Bronzing Furnaces	D006/D008 Refractory and brick	4613 lb brick/10 mos and 29712 lb refractory/10 mos in		Envirite Canton, OH Stabilized and	Segregated and evaluated but no difference in haz. constituents	

22	Maintenance	Empty aerosols (not yet evaluated)	Varies; contents satellite accumulated in drum in maint. area; cans disposed of as solid waste		Republic Waste Columbus, OH landfilled		
23	Maintenance	Scrap metal floor sweepings	Varies; 55-gal drum inside bldg		Shuman Cleveland, OH recycled	recycled	
24	Machinery	Non haz Scrap metal	200 lb/mo in hopper inside main bldg		Muskingum Iron and Metal Zanesville, OH Recycled	recycled	
25	Smelting	D008 Pit Sand	Varies; cleanout as needed; placed in rolloff box on back pad		Envirite Canton, OH Stabilized and landfilled		
26	General Plant operations	Universal Waste Spent alkaline batteries	50 gallons/year in bucket in utility room		Mercury Waste Company Roseville, MN recycled	recycled	
27	Strip Washing	D008 wastewater	15,000 gal in tanks--one-time generation when WWTP was down				

REMARKS-GENERAL INFORMATION

General Process Information:

Glacier Vandervell manufactures the raw material that is used by other companies as base stock for make engine bearings and bushings. Their process begins with welding of coils of steel in order to increase their length. A phosphate-based strip washer is used to remove oils from the steel. A channel is then rolled into the steel. Electroplating (etching) is used to coat the edge of the steel to prevent bonding. The steel is then preheated in an induction furnace and muffle furnace (30' long electric arc furnace). Alloy is applied in a bronzing furnace. The bronze is poured into the channel on the center of the steel. The furnaces and pouring pots require rebuilding twice per year or as necessary. This generates the

largest volume of waste onsite--refractory and brick. The steel is then cooled in the cooling chute by quenching in oil and water. Steel is flattened under rollers and the alloy is rough milled, sanded, cut, and recoiled. The edges of the channels are then removed in a slitter, the steel is finish milled, and finally, the product is shipped.

The company also maintains a QA QC laboratory, a wastewater treatment plant, and a machine rebuild shop at the site.

Regulatory/Enforcement History (if applicable):

Mahle Engine Components USA purchased bankrupt Dana Glacier Vandervell in March 2007. Dana Glacier Vandervell was last inspected in February 2005. On December 4, 2000, Ohio EPA responded to a complaint alleging that Dana Glacier Vandervell had released liquids containing hazardous constituents from their scrubber stack. Based on the investigation, the company was requested to sample and analyze soils surrounding the stack, remove 8 CY of Pb-contaminated soils, and confirm the area was clean. The company complied and received a no further action letter from DHWM on July 10, 2001.

Additional P2 remarks and information:

A P2 Assessment was discussed with the company as it has been during each previous inspection. The facility rep will check with the new owner to see if they will approve of an assessment.

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.

Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other: