



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6480  
www.epa.state.oh.us

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

April 24, 2007

**WASHINGTON COUNTY  
INTERNATIONAL CONVERTER  
DHWM/SEDO  
OHD005000336**

Mr. Keith Bishop  
Product Development Engineer  
International Converter  
721 Farson Street  
Belpre, OH 45714

Dear Mr. Bishop:

On April 11, and April 17, 2007, Ohio EPA inspected International Converter's (IC) Belpre facility to determine 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). During the inspections, I also helped you identify ways to prevent pollution by reducing waste. This letter will explain the violations I found, what you need to do to correct the violations, other general concerns I have, and what you need to do to respond to the general concerns.

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) **OAC Rule 3745-52-11, Hazardous Waste Determination:** Any person who generates a waste 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.

Approximately 43 old fifty-five gallon steel drums were located behind the plant building. Some of the drums were empty; however, others were partially full. International Converter must evaluate the contents of the partially full drums by taking representative samples of the drums for laboratory testing, and forward the results to Ohio EPA. International Converter may use appropriate process knowledge to evaluate the wastes (i.e., MSDS sheets or other product information, employee knowledge) only if available, and the information is sufficient to determine the contents of the drums.

- (2) **OAC Rule 3745-65-33, Testing and Maintenance of Equipment:** All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment must be tested and maintained, as necessary to assure its proper operation in time of emergency and recorded in a log or summary.

IC does not test and maintain the above noted emergency equipment, in violation of this rule. IC must make sure all tests are properly conducted and recorded. To document a return to compliance with this rule, IC shall submit a completed emergency equipment inspection checklist to my attention at this office. Attached is an example weekly inspection log that you can use.

- (3) **OAC Rule 3745-66-74, Inspections:** The owner or operator must conduct weekly inspections of hazardous waste drums and record these inspections in an inspection log or summary.

IC does not conduct weekly inspections of hazardous waste drums, in violation of this rule. IC must make sure all inspections are properly conducted and recorded. To document a return to compliance with this rule, IC shall submit two weeks worth of complete drum inspection checklists to my attention at this office. Attached is an example weekly inspection log that you can use.

- (4) **OAC Rule 3745-279-22(C)(1), Used Oil Storage Requirements for Generators:** Containers, aboveground tanks, and fill pipes used for underground tanks must be labeled or marked "Used Oil."

Several 55-gallon drums were not labeled "used oil", in violation of this rule. However, International Converter personnel labeled the drums during the April 11<sup>th</sup> inspection, to return to compliance with this rule. No further action is necessary.

#### GENERAL COMMENTS

- a) As we discussed during the inspection, IC should designate an area at the plant for storage of hazardous waste drums. As a small quantity generator, IC has 180 days to accumulate hazardous waste on-site before shipment off-site to a treatment, storage, and disposal (TSD) facility.
- b) Ohio EPA observed two areas outside the plant where ink staining was evident on the ground surface; one area was outside the ink room at the loading dock where a solid waste dumpster was located, and the other was on the opposite side of the plant where a sump pump had backed up. As we discussed, a sample of the stained materials needs to be collected and analyzed to determine if the material is a hazardous waste. Also, the stained soils need to be dug up and disposed of accordingly. IC should investigate the cause of this problem and make the necessary corrections to avoid this situation in the future.
- c) During the inspection, we discussed the topic of fluorescent light bulbs. Fluorescent bulbs contain mercury and the lamps can potentially exhibit the characteristic of toxicity for mercury or other metals when disposed, rendering them a hazardous waste. As the bulbs need to be changed in the future, Ohio EPA recommends that the bulbs be recycled in lieu of disposing of them as a hazardous waste. The bulbs should not be crushed; rather, spent bulbs should be placed in a box or other suitable container. Enclosed is a fact sheet concerning fluorescent bulbs, along with a listing of fluorescent bulb recyclers for your information.

- d) Numerous full 55-gallon drums of isopropyl alcohol outside the plant were in rusty condition. Ohio EPA recommends that IC use the drums for their intended purpose, and develop an inventory control system to avoid storage of numerous drums in the future.
- e) During the inspection, we discussed IC's regulatory status as a generator of hazardous waste. Based on a review of IC's hazardous waste records, IC is a small quantity generator; however, there were certain months in 2006 when IC was very close to large quantity generator status. IC should closely monitor their monthly waste generation amounts so that you know which generator category IC falls under and which regulations apply to the facility.

As discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce, or altogether eliminate the amount of waste that your company generates, you may be able to reduce treatment and disposal costs, and you may possibly reduce your regulatory requirements. The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You may benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. You can find more information about pollution prevention, including fact sheets, at the following web address: <http://www.epa.state.oh.us/ocapp/recycle.html>. If you would like to be considered for an in-depth on-site pollution prevention assessment, or if you would like more information about pollution prevention assessments, please contact me.

Enclosed, you will find a copy of the checklists that were completed during the inspection. Should you have any questions, please feel free to contact me at (740) 380-5288. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,



Scott N. Bergreen  
Environmental Specialist  
Division of Hazardous Waste Management

SNB/mlm

**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 <a href="mailto:tammy.mcconnell@epa.state.oh.us">tammy.mcconnell@epa.state.oh.us</a> or mail it to Tammy McConnell, Central Office	<b>Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM</b>		For Ohio EPA use only																			
2. Site EPA ID No.	EPA ID Number: OHD005000336																					
3. Site Name	Name: International Converter		Website (optional:)																			
4. Site Location Information	Street Address: 721 Farson Street																					
	City, Town, or Village: Belpre	State: OH																				
	County Name: Washington	Zip Code: 45714																				
5. Site Land Type (check only one)	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 12.5%;">Private</td> <td style="width: 12.5%;">County</td> <td style="width: 12.5%;">District</td> <td style="width: 12.5%;">Federal</td> <td style="width: 12.5%;">Indian</td> <td style="width: 12.5%;">Municipal</td> <td style="width: 12.5%;">State</td> <td style="width: 12.5%;">Other</td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/></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	<input checked="" type="checkbox"/>									
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6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	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: Keith		MI:	Last Name: Wooley																		
	Phone Number: (740) 423-5400			Phone Number Extension:																		
	E-Mail Address: kwooley@ici-laminating.com																					
	Fax Number: (740) 423-5799			Fax Number Extension:																		
	Street or P.O. Box: 721 Farson Street																					
	City, Town or Village: Belpre																					
	State: OH		Country: USA		Zip Code: 45714																	
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%; border-collapse: collapse;"> <tr> <td style="width: 12.5%;">Private</td> <td style="width: 12.5%;">County</td> <td style="width: 12.5%;">District</td> <td style="width: 12.5%;">Federal</td> <td style="width: 12.5%;">Indian</td> <td style="width: 12.5%;">Municipal</td> <td style="width: 12.5%;">State</td> <td style="width: 12.5%;">Other</td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/></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	<input checked="" type="checkbox"/>							
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	<input checked="" 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):																			
	International Converter.																					
	Operator Type: Mark with an X	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 12.5%;">Private</td> <td style="width: 12.5%;">County</td> <td style="width: 12.5%;">District</td> <td style="width: 12.5%;">Federal</td> <td style="width: 12.5%;">Indian</td> <td style="width: 12.5%;">Municipal</td> <td style="width: 12.5%;">State</td> <td style="width: 12.5%;">Other</td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/></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	<input checked="" type="checkbox"/>							
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<input checked="" type="checkbox"/>																						
Street or P.O. Box: 721 Farson Street																						
City, Town, or Village: Belpre		Operator Phone #: (740) 423-5400																				
State: OH		Country: USA	Zip Code: 45714																			
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																						

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

A. Hazardous Waste Activities	
(choose only one of the following categories)	<input type="checkbox"/> 3. Treater, Storer or Disposer of Hazardous Waste <input type="checkbox"/> 4. Recycler of Hazardous Waste <input type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace <input type="checkbox"/> a. Small Quantity On-site Burner Exemption <input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption <input type="checkbox"/> 6. Underground Injection Control Facility <input type="checkbox"/> 7. Hazardous Waste Transporter
<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	
<input type="checkbox"/> a. Large Quantity Generator (LQG):	
<input type="checkbox"/> b. Small Quantity Generator (SQG)	
<input type="checkbox"/> c. Conditionally Exempt Small Quantity Generator	
<input type="checkbox"/> d. United States Importer of Hazardous Waste	
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	

B. Universal Waste Activities	C. Used Oil Activities															
<input checked="" type="checkbox"/> 1. Small Quantity Handler of Universal Waste (Indicate types of universal waste generated and/or accumulated (check all boxes that apply): <input type="checkbox"/> 2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more). <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 checked="" type="checkbox"/> 1. Used Oil Generator <input type="checkbox"/> 2. Used Oil Transporter Indicate Type(s) of Activity(ies) <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															
<table border="1"> <thead> <tr> <th></th> <th>Generated</th> <th>Accumulated</th> </tr> </thead> <tbody> <tr> <td>A. Batteries</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>B. Pesticides</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>C. Thermostats</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>D. Lamps</td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </tbody> </table>		Generated	Accumulated	A. Batteries	<input type="checkbox"/>	<input 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 type="checkbox"/>	
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C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>														
D. Lamps	<input checked="" type="checkbox"/>	<input 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.

D001						
------	--	--	--	--	--	--

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

N	Announced?	Additional Facility Representatives:	Mr. Keith Bishop, Mr. Brian Williams
Y	Tanks?	Other comments:	
Y	Containers?		

13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
Scott Bergreen		April 11, 2007 9:30 am - 12:15 pm

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, WASTE, P2 SUMMARY SHEET

**Facility Name:** International Converter

**Facility Type:** SQG

**Date of Inspection:** 4/11/07

**EPA ID#:** OHD005000336

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1 Laboratory Testing	Spent Rags Contaminated w/ MEK - D001/F005	< 5 pounds/month, Safety Containers, Laboratory	N/A	Safety Kleen	Significantly reduced MEK use plant-wide	
2 L-3 Cleaning	Spent solvent sludge - D001	Varies, 55 gallon drums, L-3 line	N/A	Safety Kleen		
3 Maintenance	Parts Washer Solvent - D001/D039	Varies, Containers, Ink Room	N/A	Safety Kleen	IC not using parts washer any longer	
4 Maintenance	Used Oil/Absorbents	Varies, 55 gallon drums, Throughout Plant	N/A	Safety Kleen		
5 Cleaning ink/glue pans	Wastewater/ sludge - NonHaz	Varies, 2200 gallon tank, Outside Ink Room	N/A	EnviroTank Clean		

## REMARKS-GENERAL INFORMATION

### **General Process Information:**

International Converter's (IC's) Belpre Plant produces a wide range of foil, laminating and converting products in a variety of gauges (thicknesses) and tempers. IC's process entails laminating, perforating, rewinding, embossing, sheeting, and cutting operations. The majority of IC's products are used as insulation foil for the construction business. Other uses for IC's products include ground wood labels for beer label substrates and candy wrappers, caul stock (finishing and release membranes for wall panels, tabletops and cabinets), and miscellaneous packaging (stock for composite cans and liners, bag stock, gift wrap, greeting cards, and folding cartons). IC uses mainly water based inks, glues, and coatings in the production process, however, one production line (Line L-3) still uses solvents in production and for cleanup operations. The facility does use small amounts of methyl ethyl ketone (MEK) in the lab to clean the coating off the foil laminates during product testing procedures. MEK use in other areas of the plant has been replaced with a non-hazardous solvent alternative (Desolv 338). IC cleans water-based ink and glue pans in the "ink room" using a combination of Citrikleen, a biodegradable water-based solvent, and a high pH liquid. The wastewater from this process is conveyed to a 2,200 gallon aboveground tank outside the ink room. The contents of this tank are pumped out on a regular basis by EnviroTank Clean of Belpre. IC generates used oils from maintenance activities performed on various equipment at the plant.

### **Regulatory/Enforcement History:**

Director's Final Findings & Orders (DFFO's) were issued to International Converter Inc. (ICI). By Ohio EPA on November 4, 1991. By letter dated January 13, 1993, Ohio EPA notified ICI that it had completed and certified all obligations under these Orders.

### **Additional P2 remarks and information:**

Would this facility be interested in a P2 assessment? No

### **Other:**

International Converter is an episodic small quantity generator.

**SMALL QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

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

**GENERAL REQUIREMENTS**

- |  |   |  |                              |
|--|---|--|------------------------------|
| 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11]   | Yes <input type="checkbox"/>            | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| 2. Has the generator obtained a U.S. EPA I.D. number? [3745-52-12]   | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/>            | N/A <input type="checkbox"/> |
| 3. Has the generator transported or caused to be transported hazardous waste to <b>other</b> 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"/> |
| 4. Has the generator disposed of hazardous waste <b>on-site without a permit</b> or at another facility <b>other</b> than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)] | Yes <input type="checkbox"/>            | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| 5. Does the generator accumulate hazardous waste?  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/>            | N/A <input type="checkbox"/> |

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 <u>in excess of (180/270) days</u> without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
|--|------------------------------|--|------------------------------|

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 <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
|--|------------------------------|--|------------------------------|

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 <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.

**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 <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
|---|---|-----------------------------|------------------------------|

10. Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)] Yes  No  N/A
- a. Does the contractual agreement specify the type of waste and frequency of shipment? Yes  No  N/A
- b. Is the transport vehicle owned and operated by the reclaimer? Yes  No  N/A
- c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? Yes  No  N/A

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

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

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

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

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

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

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

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

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

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

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

### PREPAREDNESS AND PREVENTION

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

18. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]
- a. Name and telephone number of emergency coordinator? Yes  No  N/A
- b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes  No  N/A
- c. Telephone number of local fire department? Yes  No  N/A

19. Are employees familiar with waste handling and emergency procedures [3745-52-34(D)(5)(c)] Yes  No  N/A
20. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)] Yes  No  N/A
21. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31] Yes  No  N/A
22. Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:
- a. Internal Alarm system? [3745-65-32(A)] Yes  No  N/A
- b. Emergency communication device? [3745-65-32(B)] Yes  No  N/A
- c. Portable fire control, spill control and decon equipment? [3745-65-32(C)]? Yes  No  N/A
- d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes  No  N/A
23. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency?[3745-65-33]
- a. Are inspections recorded in a log or summary? [3745-65-33]? Yes  No  N/A
24. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)] Yes  No  N/A
25. If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32?) [3745-65-34(B)] Yes  No  N/A
26. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes  No  N/A
27. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes  No  N/A
28. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes  No  N/A

**SATELLITE ACCUMULATION AREA REQUIREMENTS**

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

30. Is the generator accumulating hazardous waste(s) in excess of the amounts noted 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

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

**USE AND MANAGEMENT OF CONTAINERS**

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

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

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

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

**PRE-TRANSPORT REQUIREMENTS**

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

## USED OIL INSPECTION CHECKLIST (Short Version)

**NOTE:** This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.

### 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# 2
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. Does the generator burn used oil in used 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 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#

#### 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

#2) Drums of used oil were not labeled, however, International Converter labeled them during the inspection to return to compliance.