



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: OHD 987 033 404
Crestline Paint
Richland County
Hazardous Waste
Notice of Violation

February 8, 2007

Mr. Allen Wheeler
Environmental Compliance Manager
Jay Industries, Inc.
150 East Longview Avenue
Mansfield, Ohio 44903

Re: Ohio EPA, Division of Hazardous Waste Management, Compliance Evaluation
Inspection at Crestline Paint Division, 515 Newman Street, Mansfield, Ohio.

Dear Mr. Wheeler:

Thank you for accompanying Don North, Kara Reynolds, Chris Maslo and me during the Ohio Environmental Protection Agency's (Ohio EPA's) December 12, 2006, hazardous waste compliance evaluation inspection of Crestline Paint (CP) located at 515 Newman Street, Mansfield, Ohio. Subsequently, Chris Maslo and I completed the inspection by reviewing some of the required documentation on January 4, 2007. We inspected CP to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). Pollution prevention options were also discussed during this inspection. This letter will list observations I made during the inspection, violations found, and what you need to do to correct the violations.

CP paints parts such as ashtrays and wheel covers (hub caps) for the automotive industry. The process has been automated using mostly robotic painting. The automation allowed CP to reduce the amount of hazardous waste generated and thus it went from being a large quantity generator (LQG) to a small quantity generator (SQG). The robotic painting is more efficient than manual painting, using far less paint and wasting far less paint. About 90% of the painting operations are automatic. There are two booths for manual operations at the facility.

The general process involves moving a part by a conveyance system to a paint booth. In the paint booth the part is spun and painted to get an even coat. The part is then allowed to dry, either through natural evaporation or by passing the part through a heated chamber. The emissions are controlled by a water blanket, control hood. Chemicals are added to the water to kill the paint - or cause it to flocculate. The water and paint mixture is run through a centrifuge where the water is spun out and reused and the paint is scraped out of the inside of the press and into a 55-gallon drum. The paints are solvent based, however, the company has conducted sampling analysis that has consistently shown the waste paint to be non-hazardous. The control hoods were reported to be Air Permitted.

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The liquid hazardous waste stream is mostly from paint mixing pots (D001, D035). The facility also generates a couple of solid hazardous waste streams including solvent contaminated rags (D001) and still bottoms from a butyl acetate recovery unit on site (F003). The hazardous waste is picked up and disposed of by Chemtron.

In addition, CP generates small amounts of used oil which are collected from tow motors. When full, CP transports the 55-gallon drum of used oil down the street to the company's headquarters where it is picked up by Safety-Kleen, Inc. to be recycled. CP also collects the spent fluorescent lamps which are taken to the company's headquarters where they are crushed. The resulting waste has been analyzed and it is disposed of as a solid waste.

After reviewing your hazardous waste manifests, it was noted that during the month of February 2006 CP manifested a total of ten 55-gallon drums of hazardous waste (D001, D035). You stated that you conducted a warehouse cleanup during that month and disposed of off-spec and leftover paints. You added that this was a one-time cleanup and that this is not a routine practice. Regularly you operate as a small quantity generator of hazardous waste; however, during this month you were considered a large quantity generator and as such, you must comply with all regulations that apply to a large quantity generator.

During the inspection, 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 45 days of your receipt of this letter.

The following were identified due to your status as a LQG during the month of February 2006:

Personnel Training

1. **OAC Rule 3745-65-16(A)(1-3), (B), (C), (D)(1-4) and (E) - Personnel Training - Facility personnel must complete training on hazardous waste management procedures. CP violated all the applicable requirements of this rule as follows:**
 - a. **OAC Rule 3745-65-16(A)(2) & (A)(3)(a-f):** CP did not have a personnel training program.
 - b. **OAC Rule 3745-65-16(B):** CP failed to provide evidence that new employees are trained within six months after the date of hire.
 - c. **OAC Rule 3745-65-16(C):** CP failed to provide evidence that employees were receiving annual refresher training.
 - d. **OAC Rule 3745-65-16(D):** CP failed to 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)].

- e. **OAC Rule 3745-65-16(E):** CP failed to provide evidence that records of current personnel are kept until closure of the facility and that records of former employees are kept for at least three years from the date the employee last worked at the facility.
2. **OAC Rule 3745-65-52(E): Contingency Plan** - CP failed to include a list of all emergency equipment, including: location, a physical description and brief outline of capabilities.

Violations #1 and #2 are historical in nature due to your facility's status as a LQG during the month of February 2006. During my inspection, it was difficult to determine your current generator status as it appears that your hazardous waste generation at this time is very close to the limit for SQG. Therefore, ***in order to address the above LQG violations***, please submit to me a log tracking your hazardous waste generation over a 30-day period. In addition, be advised of the requirements to submit an annual report to the Ohio EPA on or before March 1st of the following year when the LQG status was maintained [OAC Rule 3745-52-41(A)].

Please be aware that pending the information gathered by you which will provide a clear determination of your hazardous waste status, additional violations may be cited.

The following violation was identified due to your status as a SQG:

3. **OAC Rule 3745-52-34(D)(5)(c): Preparedness and Prevention**

A small quantity generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.

CP failed to provide evidence that employees are familiar with waste handling and emergency procedures.

To abate this violation, CP must submit an outline of how CP plans to familiarize employees with the above requirements and a copy of an attendance sheet documenting that employees have received this information.

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign up for this free service. You can find more information at the following web site: www.epa.state.oh.us/dhwm/listserv.html. Please feel free to share this information with your colleagues.

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As we 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 your treatment and disposal costs. Thus, you may possibly reduce your regulatory requirements. Ohio EPA has helpful information about pollution prevention at the following web site: www.epa.state.oh.us/ocapp/ocapp.html.

Enclosed, you will find a copy of the checklists that were completed during the inspection. You can find copies of the rules and other information on the division's web page at www.epa.state.oh.us/dhwm.

Should you have any questions or if I can be of assistance, please contact me at (419) 373-3015.

Sincerely,



Edgar V. Pulido
Division of Hazardous Waste Management

/cs

Enclosures

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
~~DHWM, NWDO, File - Crestline Paint~~

ec: Ed Pulido, DHWM, NWDO

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| <p>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.</p> |
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SMALL QUANTITY GENERATOR REQUIREMENTS

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

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

POLLUTION PREVENTION

Note to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention (P2) practices that the company may have initiated or attempted to initiate. The checklist is also used to:

- ◇ Facilitate P2 discussions;
- ◇ Identify barriers to P2;
- ◇ Define the P2 universe;
- ◇ Identify the need for future P2 initiatives;
- ◇ Identify partnership opportunities; and
- ◇ Link companies with better P2 resources.

As a prelude to completing this checklist the inspector should use the following list of questions as a way to initiate a dialogue concerning P2:

1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate?
2. What is the largest waste stream that you generate?
3. How important would it be to you to eliminate that waste stream?
4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have?
5. Could you use better housekeeping practices to reduce the amount of waste that you generate?

If the company responds with one of the answers below, the appropriate box should be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided in the remarks section.

1. Has the company undertaken any P2 activities to reduce the amount of waste generated? Yes No N/A RMK#

a. If so, what has the company done to minimize waste generation?

- A change in the process resulting in less waste.
- A change in the product resulting in less waste.
- Use of fewer and less toxic hazardous raw materials.
- Better operations/improved housekeeping.
- On-site recycling/reuse of hazardous materials.
- Sending waste off-site for recycling/reuse.
- Other activities (specify):

b. *If so*, what wastes have been addressed?

- | | |
|---|---|
| <ul style="list-style-type: none"><input type="checkbox"/> Solvents<input checked="" type="checkbox"/> Paint related wastes<input type="checkbox"/> Industrial process wastes (sludges, slags, contaminated wastes waters, etc.)<input type="checkbox"/> Contaminated oils/hydraulic fluids<input type="checkbox"/> Off-spec chemicals<input type="checkbox"/> Shop rags<input type="checkbox"/> Other (specify): | <ul style="list-style-type: none"><input type="checkbox"/> Waste water<input checked="" type="checkbox"/> Solid waste (paper, plastic, metal, wood, blasting material)<input type="checkbox"/> Air emissions<input type="checkbox"/> Energy use<input type="checkbox"/> Fluorescent light bulbs<input type="checkbox"/> Used batteries |
|---|---|

c. If they haven't minimized waste are there barriers that are preventing them from doing it?

- Lack of information about practical alternatives.
- Lack of capital to make process changes.
- Lack of internal management support.
- The company does not generate enough waste to consider P2.
- Other reason given (specify):

- | | |
|--|---|
| 2. Does the company plan to do P2 activities in the future? | Yes ___ No <input checked="" type="checkbox"/> N/A ___ RMK# |
| 3. Would the company be interested in receiving additional information from Ohio EPA about P2? | Yes ___ No <input checked="" type="checkbox"/> N/A ___ RMK# |
| 4. Did you give the company information about P2 during the inspection? | Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK# |

5. Would the company like a P2 assessment? Yes ___ No N/A ___ RMK#

- A. If yes, provide information that makes the company a good candidate for an assessment (i.e., known specific P2 opportunities exist, the company is willing to cooperate and commit resources to the assessment, the company fully understands DHWM's P2 assessment process, etc.)
- B. If no, list the reasons the facility representative gave for not wanting an assessment.

If the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the Pollution Prevention for Hazardous Waste Generators document and discuss it with them.

REMARKS

SMALL QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION

1. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes No N/A ___ RMK# ___

IDENTIFICATION NUMBER

2. Has the generator obtained a US EPA ID number? [3745-52-12] Yes No N/A ___ RMK# ___

ACCUMULATION OF HAZARDOUS WASTES

3. 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 ___ RMK# ___

NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34(E)]

4. Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)(F)] Yes No N/A ___ RMK# ___

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.

MANIFEST REQUIREMENTS

5. 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 ___ RMK# ___
6. Are wastes reclaimed under a contractual agreement? If so: Yes ___ No N/A ___ RMK# ___
- a. Does the contractual agreement specify the type of waste and frequency of shipment? [3745-52-20(E)(1)(a)] Yes ___ No N/A RMK# ___
- b. Is the transport vehicle owned and operated by the reclaimer? [3745-52-20(E)(1)(b)] Yes ___ No N/A RMK# ___
- c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? [3745-52-20(E)(2)] Yes ___ No N/A RMK# ___
- Note:** *Even if the waste is being reclaimed under contractual agreement, LDRs still apply. Complete LDR checklist.*
7. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes No ___ N/A ___ RMK# ___
- a. Have items 1 through 20 of each manifest been completed? [3745-52-20(A)] Yes No N/A ___ RMK# ___
- b. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] Yes No N/A ___ RMK# ___
- 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)]*
- 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)].*
8. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: Yes ___ No N/A ___ RMK# ___
- a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes ___ No N/A RMK# ___
9. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) and (2)] Yes No N/A ___ RMK# ___

10. Has the generator received a returned copy of each completed manifest within 60 days of being accepted by the transporter? If not: Yes No N/A RMK#
- a. 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 RMK#
11. Are signed copies of all manifests being retained for at least three years? [3745-52-40] Yes No N/A RMK#

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.

REMARKS

PREPAREDNESS AND PREVENTION

1. Is an emergency coordinator available at all times? [3745-52-34(D)(5)(a)] Yes No N/A RMK#
2. 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 RMK#
- b. Location of fire and spill control equipment, and, if present, fire alarm(s)? Yes No N/A RMK#
- c. Telephone number of local fire department? Yes No N/A RMK#
3. Are employees familiar with waste handling and emergency procedures? [3745-52-34(D)(5)(c)] Yes No N/A RMK# 1
4. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)] Yes No N/A RMK#
5. 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 RMK#
6. Does the generator have the following equipment at the facility if it is required due to the actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]

- a. Internal alarm system? Yes No N/A RMK#
- b. Emergency communication device? Yes No N/A RMK#
- c. Portable fire control, spill control and decon equipment? Yes No N/A RMK#
- d. Water of adequate volume/pressure? Yes No N/A RMK#
- 7. Is emergency equipment tested (inspected) to assure its proper operation in time of emergency and maintained as necessary? [3745-65-33] Yes No N/A RMK#
 - a. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A RMK#
- 8. Do personnel have immediate access to a communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34] Yes No N/A RMK#
- 9. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A RMK#
- 10. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes No N/A RMK#
 - a. 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 RMK#

REMARKS

1 - Crestline Paint failed to provide evidence that employees are familiar with waste handling and emergency procedures.

SATELLITE ACCUMULATION AREA REQUIREMENTS [3745-52-34(C)(1)]

- 1. Does the generator ensure that satellite accumulation area(s):
 - a. Are at or near a point of generation? Yes No N/A RMK#
 - b. Are under the control of the operator of the process generating the waste? Yes No N/A RMK#
 - c. Do not exceed a total of 55 gallons of hazardous waste? Yes No N/A RMK#

d. Do not exceed one quart of acutely hazardous waste at any one time?

Yes No N/A ___ RMK# ___

e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents?

Yes No N/A ___ RMK# ___

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. The inspector should refer to Guidance Document #DHWM-008, Satellite Accumulation Under Ohio Hazardous Waste Rules.*

2. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 1(c) or 1(d)? If so:

Yes ___ No N/A ___ RMK# ___

a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days?

Yes ___ No N/A RMK# ___

b. Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded?

Yes ___ No N/A RMK# ___

USE AND MANAGEMENT OF CONTAINERS

3. Has the generator marked containers with the words "Hazardous Waste" [3745-52-34(D)(4)]

Yes No N/A ___ RMK# ___

4. Is the accumulation date on each container? [3745-52-34(D)(4)]

Yes No N/A ___ RMK# ___

5. Are hazardous wastes stored in containers which are: [3745-52-34(D)(4)]

a. Closed (except when adding/removing wastes)? [3745-66-73(A)]

Yes No N/A ___ RMK# ___

b. In good condition? [3745-66-71]

Yes No N/A ___ RMK# ___

c. Compatible with wastes stored in them? [3745-66-72]

Yes No N/A ___ RMK# ___

d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]

Yes No N/A ___ RMK# ___

6. Is the container accumulation area inspected at least weekly? [3745-66-74]

Yes No N/A ___ RMK# ___

a. Are inspections recorded in a log or summary? [3745-66-74]

Yes No N/A ___ RMK# ___

7. Are containers of ignitable and/or reactive hazardous waste(s) stored away from materials that they may react with in a hazardous manner? [3745-66-77(C)]

Yes No N/A RMK#

PRE-TRANSPORT REQUIREMENTS

8. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]

Yes No N/A RMK#

9. Does each container \leq 110 gallons have a completed hazardous waste label? [3745-52-32(B)]

Yes No N/A RMK#

10. 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 RMK#

REMARKS

TANK SYSTEM REQUIREMENTS

1. Is each tank marked with the words "Hazardous Waste"? [3745-52-34(A)(3)]

Yes No N/A RMK#

TANK SYSTEM OPERATING REQUIREMENTS (OAC 3745-66-101)

2. Is the SQG complying with the following operating requirements of OAC 3745-66-101(B):

a. Is the storage and/or treatment of ignitable, reactive or incompatible waste done in accordance with precautionary measures of 3745-65-17(B)?

Yes No N/A RMK#

b. Does the SQG ensure that wastes are not placed in a tank if they could cause the tank or its inner liner to rupture, leak, corrode or fail?

Yes No N/A RMK#

c. Are uncovered tanks operated with 2 feet of freeboard?

Yes No N/A RMK#

i. *If not*, is the tank equipped with a containment structure, drainage control system, or diversion structure with a capacity that equals or exceeds the volume of the top 2 feet of the tank?

Yes No N/A RMK#

ii. *If waste is continuously added to the tank*: Is the tank equipped with a waste feed cut-off or bypass system?

Yes No N/A RMK#

TANK SYSTEM INSPECTION (OAC 3745-66-101(C))

3. Does the generator inspect the following: [3745-66-101(C)]:

a. Discharge control equipment (daily)?

Yes No N/A RMK#

b. Data from monitoring equipment (daily)?

Yes No N/A RMK#

c. The level of the waste in the tank (daily)?

Yes No N/A RMK#

d. The tanks construction material (weekly)?

Yes No N/A RMK#

e. The area surrounding the tank (weekly)?

Yes No N/A RMK#

TANK SYSTEM CLOSURE REQUIREMENTS (OAC 3745-66-101(D))

4. Upon closure of the tank did the SQG remove all hazardous waste from the tank system in compliance with OAC 3745-66-992(D)? Yes ___ No N/A ___ RMK# ___

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES (OAC 3745-66-101(E) & (F))

5. For tanks used to store ignitable or reactive wastes, has the owner/operator complied with **one of the following**: [3745-66-101(E)]
- a. Is the waste stored or treated to protect it from any materials or conditions that may cause the waste to ignite or react? [3745-66-101(E)(1)(b)] Yes ___ No ___ N/A ___ RMK# ___
- b. Is the tank used solely for emergencies? [3745-66-101(E)(1)(c)] Yes ___ No ___ N/A ___ RMK# ___
6. If ignitable or reactive waste is stored in covered tanks, are protective distances maintained between the tanks and any public streets, alleys, or adjoining property lines as required by the NFPA Flammable and Combustible Liquid Code (1977 or 1981)? [3745-66-101(E)(2)] Yes ___ No N/A ___ RMK# ___
7. Have incompatible wastes, or incompatible wastes and materials been placed into the same tank? [3745-66-101(F)] Yes ___ No ___ N/A ___ RMK# ___
- If so*, have the requirements of 3745-65-17(B) been met? Yes ___ No N/A ___ RMK# ___
8. Have hazardous wastes been placed in an unwashed tank which previously held an incompatible waste or material? [3745-66-101(F)(2)] Yes ___ No ___ N/A ___ RMK# ___
- If so*, have the requirements of 3745-65-17(B) been met? Yes ___ No N/A ___ RMK# ___

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REMARKS

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)] 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#

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

GENERATORS TREATING HAZARDOUS WASTE

1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? Yes__ No__ N/A RMK#__
2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)] Yes__ No N/A RMK#__
- a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] Yes__ No N/A RMK#__
- b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes__ No N/A RMK#__
3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes__ No N/A RMK#__
4. Has the generator followed their WAP [3745-270-07(A)(5)]? Yes__ No N/A RMK#__
5. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes__ No N/A RMK#__

NOTE: If the waste is a characteristic waste, which has been treated to render it non hazardous and subsequently sent to a solid waste landfill, proceed to question 7 & 8.

6. Has the generator sent a notification and certification with the initial shipment of waste?[3745-270-07(A)(5)(c)] Yes__ No N/A RMK#__
7. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] Yes__ No N/A RMK#__
8. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following:
- a. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes__ No N/A RMK#__

b. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)]

Yes__ No__ N/A RMK#__

NOTE: If the waste will be treated and monitored for all UHCs then they do not need to be listed on the notice.

9. Has the process/operation generating the waste or the solid waste landfill facility changed? If so:

Yes__ No__ N/A RMK#__

a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)]

Yes__ No__ N/A RMK#__

b. Has the director been notified of such changes? [3745-270-09(D)]

Yes__ No__ N/A RMK#__

NOTE: The director need only be notified on an annual basis but no later than December 31.

10. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so:

Yes__ No__ N/A RMK#__

a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49 (C)]

Yes__ No__ N/A RMK#__

11. Does each notification/certification form completed, contain the information found in Table 1? [3745-270-07(A)(3)]

Yes__ No__ N/A RMK#__

NOTE: If the waste will be treated and monitored for all constituents, there is no need to put them all on the LDR notice.

HAZARDOUS DEBRIS

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)?

Yes__ No__ N/A RMK#__

2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.)

Yes__ No__ N/A RMK#__

3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so: Yes__No__N/A RMK#__

a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)] Yes__No N/A RMK#__

NOTE: If immobilization has been used in a treatment train, it must be the last treatment technology used.

4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so: Yes__No__N/A RMK#__

a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] Yes__No N/A RMK#__

5. Is the waste a PCB waste under 40 CFR Part 761? If so: Yes__No__N/A RMK#__

a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)] Yes__No N/A RMK#__

6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)] Yes__No N/A RMK#__

7. Does the owner/operator of a treatment facility that claims the debris is excluded from regulation as a hazardous waste under 3745-51-03(F)(1) maintain the following information? Yes__No__N/A RMK#__

a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)] Yes__No N/A RMK#__

b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)] Yes__No N/A RMK#__

c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)] Yes__No N/A RMK#__

8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F)(1) have the following information? [3745-270-07(D)(3)] Yes__No__N/A RMK#__

- a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)] Yes__ No N/A RMK#__
- b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)] Yes__ No N/A RMK#__
- c. Technology used from Table 1? [3745-270-07(D)(1)(c)] Yes__ No N/A RMK#__
9. Has the above notification been sent to the director? [3745-270-07(D)(1)] Yes__ No__ N/A RMK#__

TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13? [3745-270-07(B)] Yes__ No N/A RMK#__
2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)] Yes__ No N/A RMK#__

Note: *No further notification is necessary until such time that the waste changes or the receiving facility changes.*

3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07? [3745-270-07(B)(3)] Yes__ No N/A RMK#__
4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so:** Yes__ No N/A RMK#__
- a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)] Yes__ No N/A RMK#__
5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? **If so:** Yes__ No N/A RMK#__
- a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)), excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)] Yes__ No N/A RMK#__
- b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4) [3745-270-07(B)(6)] Yes__ No N/A RMK#__

c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B))(6)]

Yes__ No N/A RMK#__

6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B))(6)]

Yes__ No N/A RMK#__

7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have:

a. Copies of all notices and certifications required in 3745-270?

Yes__ No N/A RMK#__

b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49?

Yes__ No N/A RMK#__

c. The testing frequency specified in the facility's WAP and have they followed the protocol?

Yes__ No N/A RMK#__

| | | |
|--|---|-----------------------|
| E-mail this completed form to tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office | Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM | For Ohio EPA use only |
|--|---|-----------------------|

| | |
|--------------------|--------------------------------|
| 2. Site EPA ID No. | EPA ID Number: OHD 987 033 404 |
|--------------------|--------------------------------|

| | | |
|--------------|--------------------------------|---------------------|
| 3. Site Name | Name: Crestline Paint Division | Website (optional): |
|--------------|--------------------------------|---------------------|

| | | |
|------------------------------|-----------------------------------|-----------------|
| 4. Site Location Information | Street Address: 515 Newman Street | |
| | City, Town, or Village: Mansfield | State: OH |
| | County Name: Richland | Zip Code: 44902 |

| 5. Site Land Type (check only one) | <table border="1" style="width: 100%; text-align: center;"> <tr> <th>Private</th> <th>County</th> <th>District</th> <th>Federal</th> <th>Indian</th> <th>Municipal</th> <th>State</th> <th>Other</th> </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 | | | | | | | |
|------------------------------------|--|----------|---------|----------|-----------|--------|-----------|-------|-------|---|--|--|--|--|--|--|--|
| Private | County | District | Federal | Indian | Municipal | State | Other | | | | | | | | | | |
| 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: Allen | MI: | Last Name: Wheeler | |
| | Phone Number: 419-524-3778 | | Phone Number Extension: 3127 | |
| | E-Mail Address: awheeler@jayindinc.com | | | |
| | Fax Number: 419-526-3239 | | Fax Number Extension: | |
| | Street or P.O. Box: 150 E. Longview Avenue | | | |
| | City, Town or Village: Mansfield | | | |
| | State: Ohio | | Country: 44903 | 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: Jay Industries | | Date Became Owner (mm/dd/yyyy): | | | | | | | | | | | | | | | |
|---|--|--|------------------------------------|----------------------|--------|-----------|--------|-----------|-------|-------|---|--|--|--|--|--|--|--|
| | Owner Type: Mark with an X | <table border="1" style="width: 100%; text-align: center;"> <tr> <th>Priv</th> <th>County</th> <th>Dist</th> <th>Federal</th> <th>Indian</th> <th>Municipal</th> <th>State</th> <th>Other</th> </tr> <tr> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table> | Priv | County | Dist | Federal | Indian | Municipal | State | Other | X | | | | | | | |
| | Priv | County | Dist | Federal | Indian | Municipal | State | Other | | | | | | | | | | |
| | X | | | | | | | | | | | | | | | | | |
| | Street or P.O. Box: 150 E. Longview Avenue | | | | | | | | | | | | | | | | | |
| | City, Town, or Village: Mansfield | | Owner Phone #: 419-525-3778 | | | | | | | | | | | | | | | |
| | State: Ohio | | Country: USA | Zip Code: 44903-4206 | | | | | | | | | | | | | | |
| | 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> <th>Private</th> <th>County</th> <th>Dist</th> <th>Federal</th> <th>Indian</th> <th>Municipal</th> <th>State</th> <th>Other</th> </tr> <tr> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table> | Private | County | Dist | Federal | Indian | Municipal | State | Other | X | | | | | | | |
| | Private | County | Dist | Federal | Indian | Municipal | State | Other | | | | | | | | | | |
| X | | | | | | | | | | | | | | | | | | |
| Street or P.O. Box: | | | | | | | | | | | | | | | | | | |
| City, Town, or Village: | | | Operator Phone #: | | | | | | | | | | | | | | | |
| State: | | Country: | Zip Code: | | | | | | | | | | | | | | | |

9. Violations Cited? Yes No

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

Not Regulated

A. Hazardous Waste Activities

(choose only one of the following categories)

UNKNOWN: Cited for violation of 3745-52-11

a. Large Quantity Generator (LQG):

b. Small Quantity Generator (SQG)

c. Conditionally Exempt Small Quantity Generator

d. United States Importer of Hazardous Waste

e. Mixed Waste (hazardous and radioactive) Generator

3. Treater, Storer or Disposer of Hazardous Waste

4. Recycler of Hazardous Waste

5. Exempt Boiler and/or Industrial Furnace

a. Small Quantity On-site Burner Exemption

b. Smelting, Melting, Refining Furnace Exemption

6. Underground Injection Control Facility

B. Universal Waste Activities

1. Small Quantity Handler of Universal Waste

(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):

2. Large Quantity Handler of Universal Waste

(accumulates 5,000 kg or more).

3. Destination Facility for Universal Waste

(Check all boxes below that apply for each of the three types of facilities above.)

| | 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 type="checkbox"/> | <input type="checkbox"/> |

C. Used Oil Activities

1. Used Oil Generator

2. Used Oil Transporter Indicate Type(s) of Activity(ies)

Transporter

Transfer Facility

3. Used Oil Processor and/or Re-refiner

Indicate Type(s) of Activity(ies)

Processor

Re-refiner

4. Off-Specification Used Oil Burner

5. Used Oil Fuel Marketer -

Indicate Type(s) of Activity(ies)

a. Marketer Who Directs Shipment of Off-Specification Oil

b. Used Oil to Off-Specification Used Oil Burner

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 D035 | F003 | | | | | |
|-----------|------|--|--|--|--|--|

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

| | | |
|-------|-------------|--------------------------------------|
| Y / N | Announced ? | Additional Facility Representatives: |
| Y / N | Tanks? | Other comments: |
| Y / N | Containers? | |

13. Name of Inspector(s) _____ Name of Inspector(s) _____ Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)

| | | |
|---------------------------|--|----------------------|
| Ed Palido (419)373-3015 | Don North (419)373-3074, Kara Reynolds (419) 373-3065 | 12/12/2006, 10:30 AM |
| Chris Maslo (419)373-3135 | | 01/11/2007 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) |
|---|------------------------|-------------------|
| | | |

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Crestline Paint Division

Facility Type: LQG/SQG/CESQG/TSD

EPA ID#: OHD 987 033 404

| Description of Waste | | | | On-Site Management | | | Off-Site Management | |
|---|--|----------------|-------------------------|--|---|--|--|---|
| Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, etc)</small> | Waste Generated <small>(e.g. sludge, spent solvent, ash, etc)</small> | EPA Waste Code | QTY Generated per Month | Type of Accumulation/Storage <small>(e.g. container, tank, etc)</small> | Type of On-Site Treatment <small>(recycle, wwt, etc)</small> | Waste Location <small>(Include map if possible)</small> | Name, state, and type of activity occurring at the facility. | P2 Activities |
| 1 One time warehouse cleanup of off-spec paint, and unused paints | Paint waste | D001 D035 | 10 Drums | Container | NA | 180 day hazardous waste area | Chemtrom Corporation OHD 066 060 609 | None |
| 2 Unused old paint and left over paint from paint pots | Off-spec paint | D001 D035 | 1-1.5 Drums | Container | NA | 180 day hazardous waste area | Chemtrom Corporation OHD 066 060 609 | None |
| 3 Cleaning Painting Equipment | Solvent contaminated rags | D001 | 2 Drums | Container | NA | 180 day hazardous waste area | Chemtrom Corporation OHD 066 060 609 | this rags may be considered non-hazardous |
| 4 Flushing paint lines and cleaning the paint pots | Spent Ethyl Acetate still bottoms | F003 | 1-2 Drums | Container | NA | 180 day hazardous waste area | Chemtrom Corporation OHD 066 060 609 | None |
| 5 Tow motor maintenance | Used Oil | NA | 1 Drum | Container | NA | 180 day hazardous waste area | Safety-Kleen, Inc. | Recycled |
| 6 Maintenance | Spent fluorescent lamps | NA | 1-2 units | N/A | Crushed? | In headquarters | Solid waste landfill | None |

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# ___
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# ___

C:\General Inspection & Complaint Letters\Crestline Paint\CP_Cklist_UsedOil.wpd

REMARKS