



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

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www.epa.state.oh.us

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

Re: Braun Industries, Inc.
Van Wert County
Hazardous Waste Inspection
Notice of Violation/Partial Return to Compliance
OHR 000 109 686

April 18, 2007

Ms. Connie Johnson, HR Coordinator
Braun Industries, Inc.
1170 Production Drive
Van Wert, Ohio 45891

Dear Ms. Johnson:

Thank you and Steve Wasserman for accompanying Amber Hicks and me during the Ohio Environmental Protection Agency's (Ohio EPA's) April 2, 2007, hazardous waste compliance evaluation inspection of Braun Industries, Inc. (BI) located at the address stated above. We inspected BI 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 these violations.

BI manufactures ambulances in a 76,000-square-foot state-of-the-art facility. Manufacturing activities that generate hazardous waste include auto body painting and solvent recovery (F003, F005, D035, D006, D007, D008). BI manages spent light bulbs as universal waste. At the time of this inspection, BI was operating as a small quantity generator of hazardous waste.

During the inspection, I provided you with the following material: a U.S. EPA document entitled Fluorescent Lamps, April 2000.

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: Waste Evaluation**

Any person who generates a waste, as defined in Rule 3745-51-02 of the administrative code, must determine if that waste is a hazardous waste.

BI did not properly evaluate the spent paint booth filters.

To abate this violation, BI must take representative samples of the spent booth filter from both paint booths. The samples shall be analyzed for Resource Conservation and Recovery Act (RCRA) metals except mercury (OAC Rule 3745-51-24). BI may run total concentrations for the RCRA metals as a screening tool. If concentrations are detected for the RCRA metals at or above regulatory limits, a Toxicity Characteristic Leaching Procedure (TCLP) may be required to ensure these constituents are not present above Ohio EPA regulatory levels.

Ohio EPA will use the analytical data you provide, in addition to other documentation, to make regulatory decisions concerning the wastes tested. The data you submit should be reviewed using a data review process, referred to as data validation, to confirm the validity of your data prior to submission. Data validation includes a review of the following components: laboratory test methods, laboratory data completeness, documentation of holding time(s), chain(s) of custody, and quality assurance/quality control (QA/QC) data. To confirm the validity of your data, you may use Ohio EPA's tier 1 data validation plan review form which can be obtained from Ohio EPA's web page: http://www.epa.state.oh.us/dhwm/tier_i_data_validation_manual.html.

Ohio EPA may request the documentation needed to confirm the validity of the data submitted.

You must notify me at least 5 - 7 working days prior to the sampling event date so that a representative from Ohio EPA can be present to observe the sampling and to split samples, if necessary. Please submit a brief narrative of the sampling event which includes: sampling techniques used to obtain the sample and a description of how this sample was determined to be a representative sample of the waste tested.

Please note if the material is hazardous, it must be properly disposed of or recycled. A copy of the analytical waste disposal documentation and EPA waste codes applicable to the waste must be submitted to me at the Ohio EPA, Northwest District Office prior to disposal.

2. **OAC Rule 3745-52-34(C)(1)(b): Satellite Accumulation of Hazardous Waste**

A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste provided he/she mark the containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

BI failed to properly label a satellite container of hazardous waste in the paint mixing room.

BI labeled the container during this inspection. This violation was abated.

3. **OAC Rule 3745-52-34(D)(4): Use and Management of Containers**

A small quantity generator of hazardous waste may for 180 days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site provided that the generation date of the waste is clearly marked on the container.

BI failed to date a full 55-gallon drum of hazardous waste that was being stored in the 180-day hazardous waste accumulation area.

BI dated the container during this inspection. This violation was abated.

4. **OAC Rule 3745-273-14(E): Labeling of Lamp Storage Container**

A small quantity handler of universal waste must label the container or package in which such lamps are contained with one of the following phrases: "Universal Waste Lamp(s)," "Waste Lamp(s)" or "Used Lamp(s)."

Ms. Connie Johnson
April 18, 2007
Page Three

BI failed to properly label the spent fluorescent lamps storage containers.

At the time of the inspection, BI properly labeled the containers. This violation was abated.

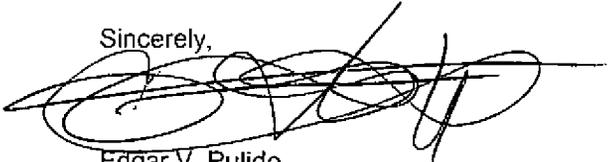
The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign up for this free service. You can find more information at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

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. BI is currently recycling scrap, paper and plastic. Ohio EPA has helpful information about pollution prevention at the following web address:
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: Braun Industries, Inc.~~

ec: Ed Pulido, DHWM, NWDO

<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>

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: OHR 000 109 686							
3. Site Name	Name: Braun Industries, Inc.						Website (optional):	
4. Site Location Information	Street Address: 1170 Production Drive							
	City, Town, or Village: Van Wert				State: OH			
	County Name: Van Wert				Zip Code: 45891			
5. Site Land Type (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other
	<input checked="" type="checkbox"/>							
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A. 336211			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: Connie		MI:	Last Name: Johnson				
	Phone Number: 419-232-7053				Phone Number Extension:			
	E-Mail Address: email-connie@braunambulances.com							
	Fax Number: 419-232-7066				Fax Number Extension:			
	Street or P.O. Box:							
	City, Town or Village:							
	State: Ohio		Country:			Zip Code:		
	8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	A. Name of Site's Legal Owner:			Date Became Owner (mm/dd/yyyy):			
Braun Industries Incorporated								
Owner Type: Mark with an X		Private	County	District	Federal	Municipal	State	Other
		<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):					
Same as owner								
Operator Type: Mark with an X		Private	County	District	Federal	Indian	Municipal	State
	<input checked="" type="checkbox"/>							
Street or P.O. Box: Same as location								
City, Town, or Village:			Operator Phone #:					
State:			Country:		Zip Code:			
9. Violations Cited?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No				
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)								
<input type="checkbox"/>	Not Regulated							

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

A. Hazardous Waste Activities

<input type="checkbox"/>	UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/>	4. Recycler of Hazardous Waste
<input type="checkbox"/>	a. Large Quantity Generator (LQG):	<input type="checkbox"/>	5. Exempt Boiler and/or Industrial Furnace
<input checked="" type="checkbox"/>	b. Small Quantity Generator (SQG)	<input type="checkbox"/>	a. Small Quantity On-site Burner Exemption
<input type="checkbox"/>	c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/>	b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/>	d. United States Importer of Hazardous Waste	<input type="checkbox"/>	6. Underground Injection Control Facility
<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"/>	1. Used Oil Generator
<input type="checkbox"/>	2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more).	<input type="checkbox"/>	2. Used Oil Transporter Indicate Type(s) of Activity(ies)
<input type="checkbox"/>	3. Destination Facility for Universal Waste (Check all boxes below that apply for each of the three types of facilities above.)	<input type="checkbox"/>	Transporter
		<input type="checkbox"/>	Transfer Facility
		<input type="checkbox"/>	3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)
		<input type="checkbox"/>	Processor
		<input type="checkbox"/>	Re-refiner
	Generated Accumulated	<input type="checkbox"/>	4. Off-Specification Used Oil Burner
	A. Batteries	<input type="checkbox"/>	5. Used Oil Fuel Marketer -
	B. Pesticides	<input type="checkbox"/>	Indicate Type(s) of Activity(ies)
	C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
	D. Lamps	<input checked="" type="checkbox"/>	a. Marketer Who Directs Shipment of Off-Specification Oil
		<input checked="" type="checkbox"/>	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	D001, F003, F005	D035, D005, D006	D007, D008		
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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 Pulido (419)373-3015	Amber Hicks	04/3/2006 10:12 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: Braun Industries Incorporated Facility Type: LQG/SQG/CESQG/TSD EPA ID#: OHR 000 109 686

Description of Waste				On-Site Management			Off-Site Management		
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	Waste Generated (e.g. sludge, spent solvent, ash, etc)	EPA Waste Code	QTY Generated per Month	Type of Accumulation/Storage (e.g. container, tank, etc)	Type of On-Site Treatment (recycle, wwt, etc)	Waste Location (Include map if possible)	Name, state, and type of activity occurring at the facility.	P2 Activities	
1	Ambulance painting	Paint related waste	D001 F003 F005 D035	2-5	55-gallon drums	NA	Satellite drum/180 days storage area	Safety-Kleen Greenbrier, TN TND000645770	NA
2	Solvent recycling	waste solids	F003 F005 D035	<1	Drum	NA	Paint storage area	Safety-Kleen Greenbrier, TN TND000645770	NA
3	Maintenance	Waste light bulbs	NA	NA - one time a year all bulbs are replaced	Box	NA	Back Wall	Safety-Kleen Greenbrier, TN TND000645770	--

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 N/A ___ RMK# ___
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 N/A ___ RMK# ___

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes ___ No N/A RMK# ___
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes No N/A ___ RMK# ___
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes No ___ N/A ___ RMK# ___
- b. Mix battery types in one container? Yes ___ No N/A ___ RMK# ___
- c. Discharge batteries to remove the electric charge? Yes ___ No N/A ___ RMK# ___
- d. Regenerated used batteries? Yes ___ No ___ N/A RMK# ___
- e. Disassemble them into individual batteries or cells? Yes ___ No N/A ___ RMK# ___
- f. Remove batteries from consumer products? Yes ___ No N/A ___ RMK# ___

g. Remove the electrolyte from the battery?

Yes ___ No N/A ___ RMK# ___

If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)?
[3745-273-13(A)(2)]

Yes No ___ N/A RMK# ___

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 N/A RMK# ___

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 N/A RMK# ___

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 N/A RMK# ___

7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]

Yes No N/A ___ RMK# ___

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)]

Yes No N/A ___ RMK# ___

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 N/A ___ RMK# ___

10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)] Yes ___ No N/A ___ RMK# 1

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

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes No ___ N/A ___ RMK# ___
- 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 N/A RMK# ___

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

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes No N/A ___ RMK# ___
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes No ___ N/A ___ RMK# ___
- 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 ___ N/A RMK# ___
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes ___ No ___ N/A RMK# ___
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes ___ No ___ N/A RMK# ___

- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)]
- 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 ___ N/A RMK# ___

Yes No ___ N/A ___ RMK# ___

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]

Yes No N/A ___ RMK# ___

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]
15. Is the material released characterized? [3745-273-17(B)]
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 N/A RMK# 2

Yes ___ No N/A RMK# ___

Yes ___ No N/A RMK# ___

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 N/A ___ RMK# ___

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 N/A RMK# ___

19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No N/A RMK#
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 N/A RMK#
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes No N/A RMK#
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 N/A RMK#
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes No N/A RMK#
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 N/A RMK#
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 N/A RMK#

EXPORTS

24. Is waste being sent to a foreign destination? If so: Yes No N/A RMK#
- 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 N/A RMK#
- 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 -52-57? [3745-273-20(B)] Yes No N/A RMK#

c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]

Yes ___ No N/A RMK# ___

REMARKS

- #1 - Braun labeled the containers of spent light bulbs during the inspection.
- #2 - Braun has not experienced a release to date.

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: Yes__No N/A RMK#__
- 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 Table1? [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# ___

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?

- Solvents
- Paint related wastes
- Industrial process wastes (sludges, slags, contaminated wastes waters, etc.)
- Contaminated oils/hydraulic fluids
- Off-spec chemicals
- Shop rags
- Other (specify):
- Waste water
- Solid waste (paper, plastic, metal, wood, blasting material)
- Air emissions
- Energy use
- Fluorescent light bulbs
- 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 N/A ___ RMK#
3. Would the company be interested in receiving additional information from Ohio EPA about P2? Yes ___ No N/A ___ RMK#
4. Did you give the company information about P2 during the inspection? Yes 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# 1

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

1- Braun failed to evaluate spent paint boot filters.

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#

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

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# 2

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# 3

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

2 - Braun failed to label the paint waste satellite drum in the paint mixing room. The drum was labeled during the inspection.

3 - Brain failed to date a full drum of hazardous waste in the 180-day storage area.

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, r 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