



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8451 FAX: (419) 352-8488
www.epa.state.oh.us

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

Re: Life Star Rescue, Inc.
Hazardous Waste Inspection
Notice of Violation /
Partial Return to Compliance
Van Wert County

April 26, 2007

Mr. Kevin Arnold, Production Manager
Life Star Rescue, Inc.
1171 Production Drive
Van Wert, Ohio 45891

Dear Mr. Arnold:

Thank you and Mr. Lyle Halstead for accompanying me during the Ohio Environmental Protection Agency's (Ohio EPA's) April 3, 2007, hazardous waste compliance evaluation inspection of your facility located at the above address. I inspected Life Star Rescue, Inc. (LSRI) 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. LSRI was operating as a conditionally exempt small quantity generator of hazardous waste at the time of this inspection.

LSRI is a large-scale auto body work shop dedicated to repairing ambulances. LSRI generates hazardous paint related waste from their painting operation. LSRI operates two paint booths at its facility. In addition, LSRI manages spent bulbs as universal waste.

During this inspection, I found the following violations of Ohio's hazardous waste laws:

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.

LSRI did not properly evaluate the spent paint booth filters.

To abate this violation, LSRI must take representative samples of the spent booth filters from both paint booths. The samples shall be analyzed for Resource Conservation and Recovery Act (RCRA) metals except mercury (OAC Rule 3745-51-24). LSRI 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 at 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 (NWDO), prior to disposal.

2. **OAC Rule 3745-273-14(E): Universal Waste - 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)."

LSRI failed to label the spent fluorescent lamps storage containers. At the time of the inspection, LSRI properly labeled the containers. *This violation was abated.*

3. **OAC Rule 3745-273-13(D)(1): Universal Waste - Storage Containers**

A small quantity handler of universal waste must contain any lamps in containers or packages that are structurally sound, adequate to prevent breakage and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

LSRI failed to keep the universal waste lamps container closed. At the time of the inspection, LSRI closed the universal waste lamps container. *This violation was abated.*

Mr. Kevin Arnold
April 26, 2007
Page Three

As we discussed during the inspection, you may be able to find other ways to reduce the waste your company generates. If you would like more information on pollution prevention, you can visit the Ohio EPA's pollution prevention website at the following web address: <http://www.epa.state.oh.us/ocapp/sb/index.html>. If you find additional ways to recycle, reduce or altogether eliminate the amount of waste that your company generates, you may be able to reduce treatment and disposal costs. In addition, you may possibly reduce your regulatory requirements.

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.

Should you have any questions, please feel free to contact me at (419)373-3015.

Sincerely,



Edgar V. Pulido
Division of Hazardous Waste Management

/cs

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
~~DHWM, NWDO File: Van Wert County - General~~

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> |
|--|

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 X 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 X 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 X 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 X 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 X 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 X 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 X N/A ___ RMK# 1

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 X 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# 2

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)] Yes No N/A RMK#

- 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 X 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 X No N/A ___ RMK# ___

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]

Yes X No N/A ___ RMK# ___

15. Is the material released characterized? [3745-273-17(B)]

Yes X No N/A ___ RMK# ___

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 X 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 X 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 X 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 X 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&2 - Life Star Rescue, Inc. Failed to keep waste lamps containers closed and labeled. These violations were abated during the inspection.

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:

3. Site Name Name: Life Star Rescue, Inc. Website (optional): <http://www.lifestarrescue.com>

4. Site Location Information
 Street Address: 1171 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 |
| X | | | | | | | |

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: Kevin MI: Last Name: Arnold
 Phone Number: 419-238-1459 Phone Number Extension: 113
 E-Mail Address: Karnold@lifestarrescue.com
 Fax Number: 419-238-1479 Fax Number Extension:
 Street or P.O. Box:
 City, Town or Village:
 State: Country: Zip Code:

8. Legal Owner and Operator of the Site List
 Additional Owners and/or Operators in the Comment Section or on another copy of this form page.

A. Name of Site's Legal Owner: Dan Schuck Date Became Owner (mm/dd/yyyy):
 Owner Type: Mark with an X

| | | | | | | | |
|---------|--------|----------|---------|--------|-----------|-------|-------|
| Private | County | District | Federal | Indian | Municipal | State | Other |
| X | | | | | | | |

Street or P.O. Box:
 City, Town, or Village: Owner Phone #:
 State: Country: Zip Code:

B. Name of Site's Operator: Date Became Operator (mm/dd/yyyy):
 Operator Type: Mark with an X

| | | | | | | | |
|---------|--------|----------|---------|--------|-----------|-------|-------|
| Private | County | District | 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 checked="" type="checkbox"/> | <input checked="" 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 | F005, F003 | D035 | | | |
|------|------------|------|--|--|--|

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 (419)373-3082 | 4/3/2007, 1:00 PM |
|-------------------------|---------------------------|-------------------|

14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

| | | |
|---|------------------------|-------------------|
| Signature of owner, operator, or an authorized representative | Name and Title (Print) | Date (mm-dd-yyyy) |
| | | |

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS

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 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 <u> X </u> No __ N/A __ RMK# |
| 3. Would the company be interested in receiving additional information from Ohio EPA about P2? | __ Yes <u> X </u> No __ N/A __ RMK# |
| 4. Did you give the company information about P2 during the inspection? | __ Yes <u> X </u> 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

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION

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

GENERATOR CLASSIFICATION

2. Does the generator produce ≤ 100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes X No ___ N/A ___ RMK# ___

NOTE: *If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.*

NOTE: *To convert from gallons to pounds:*

Amount in gallons x Specific Gravity x 8.345 = Amount in pounds

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3745-51-05(G)(3)] Yes X No ___ N/A ___ RMK# ___

REMARKS

1 - Life Star Rescue, Inc. failed to evaluate their spent booth filters.