



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Bosserman Aviation Equipment, Inc.
Hazardous Waste
Wyandot County
Notice of Violation/Partial Return to
Compliance

May 1, 2008

Mr. Terry L. Bosserman
Bosserman Aviation Equipment, Inc.
2327 State Route 568
Carey, Ohio 43316

Dear Mr. Bosserman:

On April 10, 2008, Ed Pulido and I conducted a follow-up site visit at Bosserman Aviation Equipment, Inc. (Bosserman) located at 2327 State Route 568, Carey, Ohio. This visit was conducted to determine Bosserman's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC), and Ohio's hazardous waste regulations as adopted under Chapter 3745. of the Ohio Administrative Code (OAC). Bosserman was represented by Terry N. Bosserman and John Starkey. The site visit included inspection of your hazardous waste container storage area and your paint booth operations. This letter will explain the violations I found, what you need to do to correct these violations, four areas of general concern, and what you need to do to address these areas of concern.

On March 26, 2008, you and I met, at your request, at the Ohio EPA, Northwest District Office to discuss the Notice of Violation (NOV) issued to you on January 23, 2008, stemming from our January 20, 2006, complaint investigation/CEI. We discussed your options for abating the violations cited in this NOV, as well as alternatives to utilizing the F-listed solvent you use at your facility, and various other issues stemming from our investigation. At this time, you told me that you had been storing your solvent/paint waste (F003, F005), rather than distilling it, since approximately right after my last visit (in 2006). Your solvent distiller had broken and you were unable to contact the manufacturer of the machine. I asked how many drums you were storing and you stated you did not know. I also stated it was very important that we determine your generator status as you may have additional requirements since you have now been storing your hazardous waste.

I then emailed you on March 28, 2008, and April 2, 2008, asking how many drums you were storing and again reiterated that you may have additional violations/requirements based on the storage of these drums and that it was very important to know how many drums you were currently storing and what your generator status is.

I also called you on April 4, 2008, and left a message for you. You did email me back on April 1, 2008, and April 4, 2008, however, you never answered my questions pertaining to how many drums you were currently storing.

Thus, on April 10, 2008, I conducted a site visit to determine how many drums you currently had on-site. We walked to the back of your facility and observed your container storage area. You had approximately 22 drums of solvent/paint waste (F003, F005) in this area. In addition, we observed your paint mixing room.

Mr. Starkey stated that he had begun recording how much waste you generate per week. You generate approximately 15 gallons per week which would equal to approximately 60-gallons per month. Based on this, Bosserman is operating as a small quantity generator of hazardous waste [solvent/paint waste (D001, F003, F005)]. Other wastes generated include spent paint booth filters and waste paint (spillage) from the paint mixing room.

As a result of my inspection on April 10, 2008, 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. Treatment, storage, or disposal of a hazardous waste.
ORC Section 3734.02 (E) & (F)**

No person shall treat, store, or dispose of hazardous waste without a hazardous waste facility installation and operation permit.

Bosserman is storing 16, 55-gallon drums of their solvent/paint waste (F003, F005) in excess of 180 days in their container storage area outside, behind the facility.

Bosserman did not obtain a hazardous waste installation and operation permit or a permit by rule, to store hazardous waste for greater than 180 days, in violation of ORC Section 3734.02 (E) & (F).

Bosserman has a total of 22 drums in their container storage area. Sixteen drums with the date below have already exceeded 180 days:

| Dates on Drums | |
|----------------|---------|
| 10-15-07 | 9-2-07 |
| 8-15-07 | 7-2-07 |
| 6-7-07 | 5-20-07 |
| 4-12-07 | 3-15-07 |
| 2-24-07 | 1-30-07 |
| 12-17-06 | 11-2-06 |
| 10-16-06 | 9-1-06 |
| 8-12-06 | 7-16-06 |

Bosserman currently has six other drums in storage with the following dates: 4-2-08, 3-7-08, 2-14-08, 1-8-08, 12-16-07, 11-28-07. *Please note that you have approximately 20 days before the next drum (11-28-07) will exceed 180-days.*

- Bosserman must immediately have these drums picked up by a licensed transporter to a permitted hazardous waste treatment, storage, and disposal facility. Bosserman must submit to me all the hazardous waste manifests indicating this material has been properly disposed.

On April 24, 2004, you emailed me stating you would fix your still so you can recycle your spent solvent waste. As stated in my April 25, 2008, email response, you may only keep on-site the six drums listed above that have not already exceeded 180-days for recycling. In addition, you must ensure to distill those drums prior to the 180-day deadline for each drum. **The other drums that you already stored past 180-days must be sent off-site to a licensed treatment, storage, and disposal facility.**

In addition on April 24, 2008, you stated three of the drums were empty. Please state the date of the three drums listed above which were actually empty.

Since Bosserman violated ORC §3734.02(E) and (F), Bosserman is subject to all applicable general facility standards found in OAC chapters 3745-54 and 55. Additionally, at any time Ohio EPA may assert its right to have Bosserman begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

Please be advised that due to the nature of the violation, Ohio EPA may require closure pursuant to OAC rules 3745-55-11 through 3745-55-20 and OAC rules 3745-55-42 through 3745-55-47 at this site. In addition, please note that violation of ORC Section 3734.02 (E) & (F) is a serious violation of Ohio's hazardous waste laws and Bosserman may be referred to Ohio EPA's Central Office for possible escalated enforcement action.

2. Waste Evaluation. OAC Rule 3745-52-11

Any person who generates a waste must determine if that waste is a hazardous waste in accordance with the criteria for hazardous waste as set forth in Chapter 3745-51 of the Administrative Code.

A.) Bosserman has failed to evaluate the spent paint filters from the painting booth to determine if they are hazardous. Bosserman is currently disposing of this waste stream in the local landfill. Bosserman must immediately stop throwing this waste stream in the trash until a proper waste evaluation has been conducted.

To properly evaluate the above waste stream, Bosserman must do one of three options: 1) Bosserman must take a representative sample of this waste to properly evaluate this waste stream through a laboratory analysis which lists constituents present and at what concentration. Bosserman must sample the spent paint booth filters to determine the concentrations of the Resource Conservation and Recovery Act (RCRA) metals (which may be present in the materials utilized in the process) and any other regulated volatile organics that may be present based on the paint utilized (in light of the materials or the processes used) as listed in the Ohio Administrative Code Rule 3745-51-24 following the methods as outlined in U.S. EPA's SW-846. Bosserman may run total concentrations for these constituents as a screening tool. If the concentrations are detected for the constituents at or above the regulatory limit, a TCLP may be required to ensure this constituent is not present above the Ohio EPA regulatory level, or 2) Bosserman must apply generator knowledge of the hazardous characteristic(s) of the waste in light of the materials or the processes used through adequate documentation, or 3) a combination of option one and two.

- To abate this violation, Bosserman must submit the analytical information or the documentation for generator knowledge to me. Your results must document if the waste is hazardous or not and, if hazardous, whether it is restricted from land disposal. If it is hazardous, you must explain what treatment, storage, or disposal facility you will send it to. If the waste is hazardous, I will determine the status of your compliance with other hazardous waste laws and notify you of my findings in a separate letter.
- Your paint booth filters are changed approximately once every 3 weeks. In addition, please state how many paint booth filters are generated at this time.

B.) Bosserman has failed to evaluate the paint waste generated from spillage of paint in the paint mixing room into the pit in the floor. This pit contains a piece of cardboard which the paint spills onto. Bosserman is then removing this cardboard with the paint on it from the pit and throwing this in the trash. Bosserman must immediately stop throwing this waste stream in the trash until a proper waste evaluation has been conducted.

To properly evaluate the above waste stream, Bosserman must do one of three options: 1) Bosserman must take a representative sample of this waste to properly evaluate this waste stream through a laboratory analysis which lists constituents present and at what concentration. Bosserman must sample the paint waste to determine the concentrations of the RCRA metals (which may be present in the materials utilized in the process) and any other regulated volatile organics that may be present based on the paint utilized (in light of the materials or the processes used) as listed in the Ohio Administrative Code Rule 3745-51-24 following the methods as outlined in U.S. EPA's SW-846. Bosserman may run total concentrations for these constituents as a screening tool.

If the concentrations are detected for the constituents at or above the regulatory limit, a TCLP may be required to ensure this constituent is not present above the Ohio EPA regulatory level, or 2) Bosserman must apply generator knowledge of the hazardous characteristic(s) of the waste in light of the materials or the processes used through adequate documentation, or 3) a combination of option one and two.

- To abate this violation, Bosserman must submit the analytical information or the documentation for generator knowledge to me. Your results must document if the waste is hazardous or not and, if hazardous, whether it is restricted from land disposal. If it is hazardous, you must explain what treatment, storage, or disposal facility you will send it to. If the waste is hazardous, I will determine the status of your compliance with other hazardous waste laws and notify you of my findings in a separate letter.

If you perform sampling, Ohio EPA will use the 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.

Please submit a brief narrative of each sampling event which includes: process generating the waste, point in the process the sample was obtained, 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.

In addition, if sampling is performed, please notify me at least seven days prior to taking the samples so that I or an Ohio EPA representative may be present.

**3. Generator identification number.
OAC Rule 3745-52-12**

A generator must not treat, store, dispose of, transport, or offer for transportation hazardous waste without having received a U.S. EPA identification number from U.S. EPA or Ohio EPA.

Bosserman is operating as a small quantity generator of hazardous waste. They currently generate hazardous waste, but they do not have a generator identification number.

In addition, Bosserman may not have their hazardous waste transported off-site without first obtaining this number.

Bosserman must immediately apply for a generator identification number. This number can be obtained by completing a Notification of Regulated Waste Activity Form, EPA form number 9029 and submit to Ohio EPA. I have enclosed this form as well as instructions for completing the form. In addition, this form can be downloaded from the Internet at the following address:
<http://www.epa.state.oh.us/dhwm/notiform.html>. This web page also includes mailing instructions and instructions for completing the form.

To abate this violation, please submit to me either documentation that you have applied for this number or the actual number.

**4. Container Management.
OAC Rule 3745-52-34 (C) (1) (a)**

In order to avoid the need for a hazardous waste storage permit, a small quantity generator accumulating hazardous waste in a satellite accumulation container must always maintain the container in the closed position, except when it is necessary to add or remove waste.

Bosserman failed to comply with the above mentioned condition for a permit exemption at the satellite accumulation area in the paint mixing room. The paint/solvent waste satellite drum was not closed.

The drum was closed during the April 10, 2008, site visit.

This violation was abated at the time of the inspection.

**5. Hazardous Waste Label.
OAC Rule 3745-52-34 (C) (1) (b)**

All containers at or near the point of generation where wastes initially accumulate (satellite containers) must be labeled or clearly marked with the words "Hazardous Waste" or other words that identify the contents of the container.

Bosserman failed to mark the words "Hazardous Waste" or other identifying words on the satellite drum of paint/solvent waste in the paint mixing room.

A hazardous waste label was placed on the satellite container during the April 10, 2008, site visit.

This violation was abated at the time of the inspection.

**6. Hazardous Waste label for containers.
OAC 3745-52-34 (D) (4)**

A generator may accumulate hazardous waste on-site for one hundred and eighty days or less without an Ohio hazardous waste permit provided that the container is labeled or clearly marked with the words "Hazardous Waste".

All twenty-two of the drums being stored in Bosserman's container storage area were not labeled or clearly marked with the words "Hazardous Waste".

A hazardous waste label or the words "Hazardous Waste" was placed (or written) on all of the twenty-two drums during the April 10, 2008, site visit.

This violation was abated at the time of the inspection.

**7. Accumulation Time of Hazardous Waste.
OAC 3745-52-34 (D) (4)**

A generator may accumulate hazardous waste on-site for one hundred and eighty days or less without an Ohio hazardous waste permit provided that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

All twenty-two of the drums of hazardous waste being stored in Bosserman's container storage area did not have the accumulation date.

The accumulation date was written on all of the twenty-two drums during the April 10, 2008, site visit.

This violation was abated at the time of the inspection.

**8. Posted emergency information.
OAC 3745-52-34 (D) (5) (b)**

A generator must post the following emergency information by the telephone:

- ⇒ Name and telephone number of emergency coordinator.
- ⇒ Location of fire extinguishers and spill control material, and, if present, fire alarms.
- ⇒ Telephone number of the fire department, unless the facility has a direct alarm.

Bosserman did have the above information in various areas throughout the facility. However, this information was not posted at the nearest telephone to the hazardous waste container storage area (the telephone located just inside the side door which you use to walk outside to the drum storage area).

Bosserman must post all the above information by the telephone.

To abate this violation, Bosserman shall take a picture of the posted information by the telephone and send this photograph to me. *In addition please see area of concern number 1 below.*

**9. Emergency equipment inspections.
OAC Rule 3745-65-33**

All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency. The owner or operator must record the inspections in a log or summary.

Bosserman failed to conduct and record emergency equipment inspections (spill control equipment, etc.) in a log or summary.

Bosserman shall begin documenting emergency equipment inspections.

To abate this violation, Bosserman shall submit to me a copy of an inspection log documenting that emergency equipment has been inspected. *In addition please see area of concern number 4 below.*

**10. Container storage area inspections.
OAC 3745-66-74**

Container storage area must be inspected, at least weekly; looking for leaks and deterioration, and these inspections must be recorded in an inspection log or summary.

Bosserman does not inspect the container storage area weekly (defined as every seven days) for condition of containers nor does Bosserman keep an inspection log.

Bosserman shall conduct inspections weekly for the container storage area. These inspections shall be recorded in an inspection log or summary.

To abate this violation, Bosserman shall send me copies of completed inspection log sheets for three consecutive weeks.

Areas of Concern:

1. Emergency Coordinator.

You have yourself down as the emergency coordinator on the posted information throughout the facility. Since you are away from the facility quite often traveling, you may wish to consider having an alternate listed or designate an employee that is generally at the facility everyday as required in OAC Rule 3745-52-34 (D)(5)(a).

To satisfy this area of concern, please submit the name of the alternate or the designated emergency coordinator to me. Also, be sure to include this person's name on the information posted by the telephone (violation number 8 above).

2. Hazardous waste training.

On April 11, 2008, I emailed you inquiring if Bosserman provides training to familiarize employees with waste handling and emergency procedures as required in OAC Rule 3745-52-34(D)(5)(c).

To satisfy this area of concern, please submit to me the above information including what kind of training you provide to your employees as well as how you document this information.

3. Immediate access to a communication device.

On April 11, 2008, I also emailed inquiring if employees have immediate access to some type of communication device while handling hazardous waste (particularly when managing waste in the container storage area) so they can contact someone in case of an emergency as required in OAC Rule 3745-65-34(A). For example, a buddy system or walkie-talkies, etc.

To satisfy this area of concern, please submit to me information on whether your employees have immediate access to a communication device and if so, what type of device.

4. Emergency equipment.

Bosserman did have emergency equipment throughout the facility; however, there were no absorbents and/or spill control equipment in the hazardous waste container storage area as required in OAC Rule 3745-65-32(C).

Bosserman should place this type of equipment near the drum storage area so that in the case of spill or release this material is accessible.

To satisfy this area of concern, please submit documentation (photograph, etc.) that spill control equipment is accessible at the drum storage area.

Please note that Bosserman is still in violation of the following and must address the violations as listed below from the January 23, 2008, NOV:

- 1. Waste Evaluation, OAC Rule 3745-52-11**, Bosserman failed to have waste evaluation documentation for the fluorescent bulbs generated at the facility.
- 2. Waste Evaluation, OAC Rule 3745-52-11**, Bosserman has failed to evaluate the spent solvent/paint waste generated from the cleaning of paint lines to determine if additional waste codes apply to this waste stream.

Mr. Terry L. Bosserman

May 1, 2008

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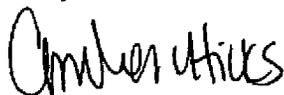
3. **Waste Evaluation, OAC Rule 3745-52-11**, Bosserman has failed to evaluate the solid waste material generated from the recycling of their spent solvent/paint waste stream in their distillation unit to determine if this waste stream is hazardous.

The Division of Hazardous Waste Management (DHWM) 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 link <http://www.epa.state.oh.us/dhwm/listserv.html>. Please feel free to share this information with your colleagues.

Please address all correspondence to Amber Hicks, Ohio EPA, 347 N. Dunbridge Road, Bowling Green, Ohio 43402. Should you have any questions, please feel free to call me at (419) 373-3082.

You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp.html>.

Sincerely,



Amber M. Hicks
Division of Hazardous Waste Management

/llr

Enclosures

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
(DHWM, NWDO File: Bosserman Aviation Equipment, Inc.)
ec: Amber Hicks, DHWM, NWDO

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

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

For Ohio EPA use only

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

| | | | | | | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|-------------------------------------|--------------------------------------|----------------------------------------------------------------------------|-----------------------------------------------------------------|---------------------------------------|----------------------------------------------|----------------------------------------------|-----------------------------------|
| 2. Site EPA ID No. | EPA ID Number: | | | | | | | | |
| 3. Site Name | Name: Bosserman Aviation Equipment, Inc. | | | | Website: www.bossermanaviationequip.com (Optional) | | | | |
| 4. Site Location Information | Street Address: 2327 SR 568 | | | | | | | | |
| | City, Town, or Village: Carey | | | | State: OH | | | | |
| | County Name: Wyandot | | | | Zip Code: 43316 | | | | |
| 5. Site Land Type (check only one) | Private <input checked="" type="checkbox"/> | County <input type="checkbox"/> | District <input type="checkbox"/> | Federal <input type="checkbox"/> | Indian <input type="checkbox"/> | Municipal <input type="checkbox"/> | State <input checked="" type="checkbox"/> | Other <input type="checkbox"/> | |
| 6. NAICS code(s) www.census.gov/epcd/www/naics.html | | | | | | | | | |
| 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: Terry | | MI: L. | | Last Name: Bosserman | | | | |
| | Phone Number: 419-396-6256 | | | | Phone Number Extension: | | | | |
| | E-Mail Address: tlboss@bossermanaviationequip.com | | | | | | | | |
| | Fax Number: 419-396-0022 | | | | Fax Number Extension: | | | | |
| | Street or P.O. Box: | | | | | | | | |
| | City, Town or Village: | | | | | | | | |
| | State: | | | | Country: USA | | 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 | Name of Site's Legal Owner: | | | | Date Became Owner (mm/dd/yyyy): | | | | |
| | Owner Type: | Private <input type="checkbox"/> | County <input type="checkbox"/> | District <input type="checkbox"/> | Federal <input type="checkbox"/> | Indian <input type="checkbox"/> | Municipal <input type="checkbox"/> | State <input checked="" type="checkbox"/> | Other <input type="checkbox"/> |
| | Street or P.O. Box: | | | | | | | | |
| | City, Town or Village: | | | | Owner Phone #: | | | | |
| | State: | | | | Country: | | Zip Code: | | |
| | Name of Site's Operator: | | | | Date Became Operator (mm/dd/yyyy): | | | | |
| | Owner Type: | Private <input type="checkbox"/> | County <input type="checkbox"/> | District <input type="checkbox"/> | Federal <input type="checkbox"/> | Indian <input type="checkbox"/> | Municipal <input type="checkbox"/> | State <input type="checkbox"/> | Other <input type="checkbox"/> |
| | Street or P.O. Box: | | | | | | | | |
| | City, Town or Village: | | | | Operator Phone #: | | | | |
| | State: | | | | Country: | | Zip Code: | | |
| 9. Violations Cited? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | | | | | | | |
| 10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes) | | | | | | | | | |
| <input type="checkbox"/> Not Regulated | | | | <input type="checkbox"/> Conditionally Exempt Small Quantity Generator | | | | | |
| <input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 | | | | <input type="checkbox"/> United States Importer of Hazardous Waste | | | | | |
| <input type="checkbox"/> Large Quantity Generator (LQG) | | | | <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator | | | | | |
| <input checked="" type="checkbox"/> Small Quantity Generator (SQG) | | | | | | | | | |
| <input type="checkbox"/> Hazardous Waste Transporter | | | | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace | | | | | |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | | | | <input type="checkbox"/> Small Quantity On-Site Burner Exemption | | | | | |
| <input type="checkbox"/> Recycler of Hazardous Waste | | | | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption | | | | | |
| <input type="checkbox"/> Underground Injection Control Facility | | | | | | | | | |

| | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|-------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| 10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply)) | | | |
| <input type="checkbox"/> Small Quantity Handler of Universal Waste | | <input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more) | |
| <input type="checkbox"/> Destination Facility for Universal Waste | | | |
| Check all boxes below that apply for each of the three types of facilities above | | 10C. Used Oil Activities (Indicate Type(s) of Activity(ies)) | |
| | Managed | <input checked="" type="checkbox"/> Used Oil Generator | <input type="checkbox"/> Off-Specification Used Oil Burner |
| Batteries | <input type="checkbox"/> | <input type="checkbox"/> Used Oil Transporter | <input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil |
| Pesticides | <input type="checkbox"/> | <input type="checkbox"/> Used Oil Transfer Facility | <input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner |
| Mercury containing equipment | <input type="checkbox"/> | <input type="checkbox"/> Used Oil Processor | |
| Lamps | <input type="checkbox"/> | <input type="checkbox"/> Used Oil Re-refiner | |
| 11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record. | | | |
| D001 | F003 | F005 | |
| 12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc. | | | |
| Announced | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Additional Facility Representatives: Terry N. Bosserman |
| Tanks | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Other Comments: This was a follow-up site visit / CEI. |
| Containers | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | |
| 13. Name of Inspector(s) | | Name of Inspector(s) | Date of Inspection/Time (mm/dd/yyyy) (hh:mm) |
| Amber Hicks | | Ed Pulido | 4/10/2008 8:50-10:32 |
| 14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. | | | |
| Signature of Owner, Operator, or an Authorized Representative | | Name and Title (Print) | Date (mm/dd/yyyy) |
| | | | |

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Bosserman Aviation Equipment, Inc. **Facility Type:** SQG **Date of Inspection:** 4-10-08 **EPA ID#:** None

| Waste Generated | | | On- or Off-Site Management | | P2 Activities | |
|-------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|-----------------------------------------------|----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|-------------------------------|
| Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc) | Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic. | QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area | Type of On-Site Treatment (recycle, wwt, etc) | Name, state, and type of activity occurring at the off-site facility. | Current P2 Activities | P2 Opportunities |
| 1 | Painting operations | paint/solvent waste (D001, F003, F005) | ~ 60 gallons | (Facility used to distill; now has just been storing)** | No off-site disposal - facility has just been storing waste.** | Return to distilling solvent. |
| 2 | Maintenance activities | Used Oil | Unknown | NA | DISC Environmental - OH | Recycled. |
| 3 | Distillation of spent solvent | Still bottoms (F005) | Unknown | Unknown how facility disposed of this material (facility no longer utilizing still).** | Unknown how facility disposed of this material (facility no longer utilizing still).** | |
| 4 | Maintenance activities | Used rags | Unknown | NA | Cintas - OH | Facility laundering rags. |

| | | | | | | | |
|---|---------------------|----------------------------------------------|----------------------------------------------------------------------------|--------------------------------------|-------------------------------------|--------------------------------------|----------------------------------------------------|
| 5 | Lightning | Fluorescent bulbs | Unknown | NA | Unknown - facility cited for 52-11. | Facility does use "green tip" bulbs. | Facility researching to find a recycling facility. |
| 6 | Painting operations | Paint booth filters | Unknown, but change ~ every 3 weeks. | Throwing in trash - cited for 52-11. | | | |
| 7 | Paint mixing | Spilled paint into pit in paint mixing room. | Spills onto a piece of cardboard in pit - clean out once or twice a month. | Throwing in trash - cited for 52-11. | | | |
| 8 | | | | | | | |
| 9 | | | | | | | |

REMARKS-GENERAL INFORMATION

General Process Information: ** Facility originally recycled all of their spent paint waste / solvent on-site. Facility never stated what happened to the still bottoms (F005) generated from the still. No records of off-site disposal available nor does the facility have U.S. EPA generator ID number. The still broke sometime soon after my visit to the site on 3-24-06. The facility then stopped distilling the solvent and simply began just storing the waste.

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.
Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other:

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

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

Safety Equipment Used:

GENERAL REQUIREMENTS

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

NOTE: If the SQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements might still apply, e.g. manifest, marking, LDR, etc.

- | | | | | | | | |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| 6. | Has the generator accumulated hazardous wastes <u>in excess of</u> (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-------------------------------------|----|--------------------------|-----|--------------------------|

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

- | | | | | | | | |
|----|---------------------------------------------------------------------------|-----|--------------------------|----|-------------------------------------|-----|--------------------------|
| 7. | Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
|----|---------------------------------------------------------------------------|-----|--------------------------|----|-------------------------------------|-----|--------------------------|

NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.

- | | | | | | | | |
|----|------------------------------------------------------------------|-----|--------------------------|----|--------------------------|-----|-------------------------------------|
| 8. | Does the generator treat hazardous waste in a: | | | | | | |
| a. | Container that meets 3745-66-70 to 3745-66-77? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| b. | Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| c. | Drip pads that meet 3745-69-40 to 3745-69-45? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| d. | Containment building that meets 3745-256-100 to 3745-256-102? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

MANIFEST REQUIREMENTS

- | | | | | | | | |
|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|--------------------------|----|--------------------------|-----|-------------------------------------|
| 9. | Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 10. | Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| a. | Does the contractual agreement specify the type of waste and frequency of shipment? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |

[Facility Name/Inspection Date]
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- b. Is the transport vehicle owned and operated by the reclaimer? Yes No N/A
- c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? Yes No N/A

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

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

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

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

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

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

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

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

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

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

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

PREPAREDNESS AND PREVENTION

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

18. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]

- a. Name and telephone number of emergency coordinator? Yes No N/A
- b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes No N/A
- c. Telephone number of local fire department? Yes No N/A

19. Are employees familiar with waste handling and emergency procedures [3745-52-34(D)(5)(c)] Yes No N/A

20. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)] Yes No N/A

21. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31] Yes No N/A

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

SATELLITE ACCUMULATION AREA REQUIREMENTS

29. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes No N/A
 - b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes No N/A
 - c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A
 - d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes No N/A
 - e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. Yes No N/A
 - f. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
30. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:
- a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes No N/A
 - b. Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes No N/A

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

USE AND MANAGEMENT OF CONTAINERS

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

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

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

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

PRE-TRANSPORT REQUIREMENTS

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

Bosserman Aviation Equipment, Inc.

SQG Check list Remarks:

#4 Unknown if facility disposed of F005 solvent distillation bottoms on-site.

9-16 – NA because facility does not have wastes taken off-site.

#19, 22(c), 24, 25 – Unable to answer – requested additional information in letter.

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS

1. Does the generator manage used oil in a surface impoundment or waste pile? If yes: Yes No N/A
- a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] Yes No N/A
2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes No N/A
3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? Yes No N/A

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil? If so, Yes No N/A
- a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] Yes No N/A

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

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

NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6. Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] Yes No N/A
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
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

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
- b. Contained the release? Yes No N/A
- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A

ON-SITE BURNING IN SPACE HEATER

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: Yes No N/A
- 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
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A

GENERATOR TRANSPORTATION

11. If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] Yes No N/A
- a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24] Yes No N/A
- b. Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24] Yes No N/A

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

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
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes No N/A
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

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.

Keyword: UsedOilChecklistforGenerators.Oct.2007.doc