



State of Ohio Environmental Protection Agency

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P.O. Box 1049
Columbus, OH 43216-1049

June 30, 2008

Mr. Richard Eichler
Taylor's Industrial Services, LLC
820 West Marion Road
Mt. Gilead, OH 43338

Re: Taylor's Industrial Services, LLC
TSD Facility - SQG
OHD071641633
Morrow County, CDO
Notice of Violation

Dear Mr. Eichler:

On June 9, 2008, Ohio EPA conducted a hazardous waste compliance evaluation inspection (CEI) at the Taylor's Industrial Services, LLC (Taylor's) facility located at 820 West Marion Road in Mt. Gilead, Ohio. The CEI was conducted to determine Taylor's compliance with Ohio's hazardous waste, used oil, and universal waste laws and/or rules as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC) respectively. Taylor's was represented by you and Ohio EPA was represented by Chris Bulinski and me.

As a result of the CEI, it has been determined that at this time Taylor's has violated the following laws and rules:

- (1) ORC 3734.02(E) & (F), Treatment, Storage, Disposal:** No person shall establish or operate a hazardous waste facility and/or shall store, treat, or dispose of hazardous waste without an Ohio hazardous waste facility installation and operation permit.

During the inspection, it was determined that Taylor's generated at least ¼ of a 55-gallon container of hazardous paint waste per month (3, 55-gallon containers per year). There were at least twenty-one (21) 55-gallon containers filled with hazardous paint waste at the time of the CEI. It was reported that Taylor's had been operating from this location since calendar year 2001 and had never shipped any hazardous paint waste off-site since operations began. Due to the quantity of hazardous paint waste generated and length of time in accumulation, Taylor's would be considered to have the status of at least a small quantity generator (SQG) of hazardous waste with an accumulation time of well over the established regulatory time of 180 days, or 270 days under special transportation circumstances. Thus, Taylor's would also be considered to have the status of a treatment, storage, and/or disposal (TSD) facility of hazardous waste, due to the lengthy storage of hazardous wastes.

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

At the time of the CEI, you were instructed to have the hazardous paint waste shipped off-site for management/disposal immediately. Upon shipment of these hazardous wastes, please forward copies of the associated hazardous waste manifest(s) to this office for review.

Since Taylor's violated ORC 3734.02 (E) and (F), Taylor's 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 the Taylor's begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

- (2) **OAC Rule 3745-52-11, Hazardous Waste Determination:** Any person who generates a waste in the State of Ohio must determine if that waste is a hazardous waste.

At the time of the CEI, at least four (4) 55-gallon containers of a grease and solvent waste were being managed with the containers of hazardous paint wastes. These wastes had not been formally designated as hazardous wastes, but were believed to be hazardous due to the presumed use of the same solvents used with the hazardous paint wastes. Also, spent fluorescent bulbs were placed against chain link fencing prior to crushing them in a device that remains open to the ambient air. Some of the bulbs had green tips and some did not.

The grease and solvent wastes and the spent fluorescent light bulbs must immediately be fully evaluated and managed accordingly prior to off-site shipment. When the wastes determinations are completed, please forward documents associated with the determinations to this office for review.

- (3) **OAC Rule 3745-52-34(C)(1)(a), Accumulation Time of Hazardous Waste:** A container holding hazardous waste must always be closed, except when adding or removing the hazardous wastes.

The hazardous waste satellite accumulation container was not closed at the time of the CEI. No hazardous wastes were being added or removed from the container at this time. An open-topped funnel was removed from the large bung hole and both the large and small holes were closed with the appropriate sized bungs. A funnel with a self-closing lid was suggested.

Please provide a description of the method(s) to be implemented by Taylor's to assure the hazardous waste satellite container remains closed when not adding or removing wastes.

- (4) **OAC Rule 3745-52-34(D)(4), Accumulation Time of Hazardous Waste:** A small quantity generator may accumulate hazardous waste for a period of 180 days or less (270 days or less under special transportation circumstances) without an Ohio hazardous waste installation and operation permit, provided that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

None of the containers of hazardous paint wastes had the accumulation start dates marked on them visible for inspection. These hazardous wastes had reportedly been generated beginning with satellite accumulation and then transferred to the hazardous waste accumulation area. Hazardous paint waste accumulation began in calendar year 2001, the time Taylor's began operations at this facility.

When the quantity of hazardous waste accumulating in the satellite area reaches fifty-five (55) gallons, the container should be dated and moved to the hazardous waste accumulation area within three (3) days. Please provide a description of the method(s) to be implemented by Taylor's to assure the hazardous waste satellite container, and any other container of hazardous waste generated, is appropriately marked with the accumulation start date.

- (5) **OAC Rule 3745-65-35, Required Aisle Space:** A facility owner or operator shall maintain adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operation in an emergency, unless aisle space is not needed for any of the above-mentioned purposes.

The containers of hazardous paint waste were randomly placed in a room in no specific order, with other wastes/products mingled throughout. Taylor's did not have adequate spacing to allow for unobstructed movement of emergency equipment and/or to allow for adequate inspection of the containers.

Adequate aisle spacing must be immediately provided for at least the containers of hazardous paint wastes, until they are shipped off-site for management and/or disposal. Please provide a description of the method(s) to be implemented by Taylor's to assure the adequate aisle space is maintained in the hazardous waste accumulation area.

- (6) **OAC Rule 3745-66-74, Inspections:** A facility owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The owner or operator must record inspections in an inspection log or summary.

It was reported that, only recently, inspections of the hazardous waste container storage area were completed with the help of a consultant. These inspections were not formally recorded in a log or summary.

Until the containers of hazardous wastes are shipped off-site for management/disposal, weekly inspections of the container storage area must be completed. These inspections must be recorded in an inspection log or summary. Please provide a description of the method(s) to be implemented by Taylor's to assure the hazardous waste container storage area is inspected when necessary.

Please provide all requested information to this office for review within thirty (30) days of receipt of this letter.

Other Concerns:

On the day of the CEI, a waste pile located outside of the fenced area at the rear of the immediate facility property was viewed. A review Ohio EPA records from 1988-89 indicate that a large soil pile was created on the site from removal of a "safety solvent" tank. The "safety solvent" contained various chlorinated and non-chlorinated compounds. A smaller pile was located within the immediate facility fencing, but is no longer present. These records also indicated that the waste pile(s) was created to await analyses in regards to determining appropriate management/disposal of the waste soils. Please provide a detailed description of Taylor's intended actions in regard to future management of this waste pile(s) and any adversely effect area(s).

Also, Taylor's was an operator of the former HPM Plant #1 facility in Mt. Gilead. Taylor's filed State of Ohio Emergency Response Commission reports and was subject to Ohio's Cessation of Regulated Operations (CRO) program. When Taylor's informed Ohio EPA of their intentions to leave the Plant #1 facility, all required obligations, forms, and documentation were presented to Taylor's associated with appropriate product/waste management and filings stipulated by the CRO rules. Although Taylor's was informed of their responsibilities regarding CRO, Taylor's failed to act as stipulated by these rules.

Mr. Richard Eichler
Taylor's Industrial Services, LLC
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Because of the seriousness of these violations and concerns, Taylor's is being referred to the Central Office Enforcement Section for consideration of escalated enforcement.

Enclosed you will find a copy of the inspection checklists completed. Should you have any questions, please feel free to call me at 614-728-5037. You can find copies of the rules and other information on the division's web page at: <http://www.epa.state.oh.us/dhwm/>.

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

Respectfully,



Randy Sheldon
Environmental Specialist
Division of Hazardous Waste Management
Central District Office

Enclosures

c: Todd Anderson, Legal
Harry Sarvis, DHWM/CO
Kristina Durnell, DHWM/CO
DHWM, CDO File

RS/nsm NOV1

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

For Ohio EPA use only

E-mail this completed form to kristina.durnell@epa.state.oh.us
or mail it to Kristina Durnell, Central Office

Site EPA ID No.	EPA ID Number: OHD071641633								
Site Name	Name: Taylor's Industrial Services, LLC				Website: (Optional)				
Site Location Information	Street Address: 820 West Marion Road								
	City, Town, or Village: Mt. Gilead				State: OH				
	County Name: Morrow				Zip Code: 43338				
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 type="checkbox"/>	Other <input type="checkbox"/>	
NAICS code(s) www.census.gov/epcd/www/naics.html									
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Richard			MI:	Last Name: Eichler				
	Phone Number: 419-946-0222				Phone Number Extension:				
	E-Mail Address: reichler@hpmamerica.com								
	Fax Number: 419-946-2473				Fax Number Extension:				
	Street or P.O. Box: 820 West Marion Road								
	City, Town or Village: Mt. Gilead				State: OH		Country: USA		Zip Code: 43338
	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: Taylor's Property Management LLC				Date Became Owner (mm/dd/yyyy): 10/02/2003			
Owner Type:		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 type="checkbox"/>	Other <input type="checkbox"/>
Street or P.O. Box: 820 Marion Road									
City, Town or Village: Mt. Gilead				Owner Phone #: 419-946-0222					
State: OH				Country: USA		Zip Code: 43338			
Name of Site's Operator: Taylor's Industrial Services LLC				Date Became Operator (mm/dd/yyyy): 07/00/2001					
Owner Type:		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 type="checkbox"/>	Other <input type="checkbox"/>
Street or P.O. Box: 820 Marion Road									
City, Town or Village: Mt. Gilead				Operator Phone #: 419-946-0222					
State: OH				Country: USA		Zip Code: 43338			
Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
Type of Generator									
<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)									
Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Underground Injection Control Facility				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input checked="" type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste									

Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply))		
<input checked="" 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)		
Managed		Used Oil Activities (Indicate Type(s) of Activity(ies))
Batteries	<input type="checkbox"/>	<input checked="" type="checkbox"/> Used Oil Generator <input type="checkbox"/> Used Oil Transporter
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility <input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner
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.		
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:
Tanks	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Other Comments: Facility is normally a CESQG, but stored quantities of hazardous paint wastes to be a SQG and over regulatory time limits, so also a TSD facility. To date, has not shipped any hazardous waste off-site since beginning operations in July 2001.
Containers	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
R. Sheldon	C. Bulinski	6/9/2008 9:30 am
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 – COMPLAINT INVESTIGATION

General Facility Information

Taylor's Industrial Services, LLC HPM Division (Taylor) is located at 820 West Marion Road, Mt. Gilead, Ohio 43338. The HPM Division was founded in Mt. Gilead in 1877 as a maker of apple presses. The current operations consist of over 85 acres with 350,000 sq. ft. of manufacturing space which includes 250,000 sq. ft. of temperature controlled space. This facility ((FKA) HPM Plant #2) was issued hazardous waste identification number OHD071641633 as a large quantity generator (LQG) of hazardous wastes. Richard (Rick) Eichler is the facility representative for Taylor. It was reported that HPM ceased operations sometime in 1999, as indicated by prior annual report filings. It was reported that Taylor began operations at this facility in July/August 2001. Current manufacturing operations result in the production of injection molding machines, extrusion machines, die casting machines, and more recently electricity producing windmills. Taylor also provides global support for the HPM Division installed machine base for injection molding, extrusion, and die cast lines. It was reported that current production is approximately 15 machines per year, which is down from approximately 350 machines per year during the height of HPM's production. It was reported that Taylor owns and operates the Marion Road facility, property, and equipment and that Taylor had formerly owned only the equipment/contents while only operating at the Lincoln Avenue facility (Plant #1).

Hazardous Waste Generator/Facility Status

An update of the hazardous waste identification number and generator status needs to be completed. Mr. Richard Eichler should be listed as the facility contact at telephone number 419-949-2314. Based on the current hazardous waste generation (~ 1/4 to 1/3 of a 55-gallon container per month of paint waste coded D001, D035, F003, F005), Taylor would be a conditionally exempt small quantity generator (CESQG) of hazardous wastes. Periodically, some heavy grease/oils and associated cleaning solvents, which are also presumed to be listed hazardous wastes, from equipment maintenance are generated. It was reported that no hazardous wastes have been shipped off-site for disposal since Taylor began operations at this facility in calendar year 2001. There are currently ~25 55-gallon containers of hazardous waste (~21 drums containing D001, D035, F003, F005 coded hazardous waste and ~4 drums of greases/oils containing "thinner" which is presumed to be the same thinner/solvents that contains listed wastes as used for the paints) located on the northeast side of the hazardous waste accumulation room which is near the east end of the main building behind the paint booths (see photographs). It was reported that due to a recent Human Resources change within the company, Taylor has only recently characterized and placed hazardous waste labels on the various containers of waste, although there were no accumulation start dates listed on the labels. The paint wastes consist of a two-part epoxy paint and the associated solvents

(thinners and spray gun/pot cleaning solvents) which reportedly form a semi-solid hazardous waste and are heavier than water, based on a physical container survey. A conservative calculation of only paint waste generation per year would be estimated to be 2.5 55-gallon drums per year. At this rate of generation, it would have taken Taylor approximately 2 years to reach 1,000 pounds (2,200 kgs) of hazardous waste in accumulation, which would make Taylor a small quantity generator that could accumulate hazardous waste of up to 180 days, or possibly 270 days dependant on the transportation circumstances. Again, Taylor has not shipped any hazardous waste off-site for disposal since it began operations in 2001. It is believed that Taylor is currently operating as an unpermitted treatment, storage, and/or disposal (TSD) facility, due to the quantity of waste and length of time in accumulation.

Manufacturing Processes and Associated Waste Generation and Management

There are currently 3 paint booths that can be used for various painting jobs. It was reported that approximately 1/4 to 1/3 of a 55-gallon container of paint associated hazardous wastes are generated each month. Two-part epoxy paints and associated paint thinners and spray gun/pot cleaning solvents are used. A 55-gallon satellite container for the paint wastes is located in the southwest corner of the waste accumulation room. Although labeled, the satellite container was not closed and waste was not being added or removed from the container at the time (see photographs). Approximately 21 55-gallon containers of D001, D035, F003, F005 coded hazardous wastes were located on the northeast side of the room. These containers had no accumulation start dates listed on the labels. It was reported that, due to a Human Resources Change, a consultant has only recently been hired to help with characterization and management of these containers of hazardous waste. It was reported that the container hazardous waste accumulation area is now inspected with the help of the consultant, but not on a weekly basis, and the emergency equipment (red fire phones throughout the facility and spill kit in accumulation area) is inspected on a monthly basis. Neither of these required inspections were recorded in a log or summary that could be provided for our review.

During production equipment maintenance, heavy greases and/or oils (i.e., gear boxes), which become contaminated with cleaning solvents/thinner, are periodically generated. As these containers of waste were accumulating with the labeled hazardous waste containers, they were presumed to contain the same solvents/thinner used for the paints that contain listed wastes. These containers were simply marked "oil/thinner." Approximately 4 55-gallon containers of these listed hazardous wastes are located with the hazardous paint wastes.

Metal parts, screws, augers, etc. are machined at this facility as a part of the manufacturing of the various finished equipment produced. A water-based synthetic coolant is used for the machining operations. Water and coolant are consistently added to and filtered in a system consisting of 3 tanks. When the

coolant becomes too contaminated, it is sent to Clean Waters Ltd. for management. The elemental filters (no containing cover) are drained and placed within the regular trash. Approximately 4,000 gallons of the oily water is shipped off-site every 45-60 days. No disposal/management documentation was provided at the time of the inspection, but management of the oily water was confirmed by Mr. Bob Meadows of Clean Waters Ltd.

Hydraulic oils are also used in the production machines. The hydraulic oils go through a filtration and recycling process. The filters associated with this recycling process are elemental filters (no confining cover) and are drained into a "sucker buggy" prior to disposal with the regular trash. The drained fluids are then placed into the hydraulic oil recycling system and then re-used.

Metal shavings, old machines and tools, and any other scrap metals are taken to Simms Bros. for recycling.

Cardboard and wood are taken by Allied Waste for recycling, while Allied Waste also manages the regular trash generated at the facility.

Plating is jobbed out to Tri-County Hard Chrome.

It was reported that Taylor washes their own shop rags and that the City of Mt. Gilead has no problem with this activity and the subsequent discharge to the associated WWTP.

It was reported that 2 contained PCB transformers remain in use at the facility.

Saw dust is used to clean oil spills and is disposed with the regular trash.

Spent fluorescent light bulbs have been crushed/broken into a self-constructed device with the contents placed into the regular trash (see photographs). The self-constructed device has an opening to the ambient air.

General Topics

In the late 1980s and early 1990s ChemTech (environmental consultants) removed at least a single "Safety Solvent" tank which was partially located beneath the building and stockpiled the soils in 2 locations at the rear of the property. The analytical reports from the soils excavated from the tank removal had both chlorinated and non-chlorinated solvents detected. The largest pile of these soils still remains on-site, north of the fence line just east of the rail road tracks, and the whereabouts of the other pile is not known by this writer at this time.

A complaint was forwarded from US EPA alleging improper disposal of hydraulic fluid and coolant behind company property. It was verified that approximately

4,000 gallons of this waste stream have been sent off-site for disposal to Clean Waters Ltd. about every 45-60 days since at least January 2006. It was reported that at least 30 acres of Taylor property are located beyond the current facility fencing. Not all of this property was reviewed on this day. This back property is very overgrown with limited paths and/or roadways. With the verification of off-site shipments and management of the oily waste water by Clean Water Ltd. and upon review of the hydraulic fluid recycling conducted by Taylor, it is believed that the complaint would not require any further action.

**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] **The grease and solvent mixed waste was not adequately evaluated at the time of the CEI. The type of solvent used was not known for sure. Spent fluorescent bulbs have not been evaluated and are crushed prior to disposal with the regular trash.** Yes No N/A
2. Has the generator obtained a U.S. EPA I.D. number? [3745-52-12] Yes No N/A
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 No N/A
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 No N/A
5. Does the generator accumulate hazardous waste? Yes No N/A

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 in excess of (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)] **At least 21 55-gallon containers of hazardous paint wastes were in accumulation. Approximately ¼ container is generated each month and no hazardous waste has been shipped off-site since operations began in 2001.** Yes No N/A

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)] **See comment in item 6. The specific gravity/weight of the paint wastes and the grease with solvent waste, if the mixture is hazardous waste, are not known.** Yes No N/A

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: **Generator does not treat hazardous wastes.**
- a. Container that meets 3745-66-70 to 3745-66-77? Yes No N/A
- b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? Yes No N/A
- c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A
- d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

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)] **See comment in item 6.** Yes No N/A
10. Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)] Yes No N/A
- a. Does the contractual agreement specify the type of waste and frequency of shipment? Yes No N/A
- b. Is the transport vehicle owned and operated by the reclaimer? Yes No N/A
- c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? Yes No N/A

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

11. Have items 1 through 20 of each manifest been completed?[3745-52-20(A)] **See comment in item 6.** 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)] **See comment in item 6.** 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)] **See comment in item 6.** Yes No N/A

14. Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)] **See comment in item 6.** 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)] **See comment in item 6.** Yes No N/A

16. Are signed copies of all manifests being retained for at least three years? [3745-52-40] **See comment in item 6.** 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? **Red fire telephones connected directly with the fire department are throughout the facility.** Yes No N/A
- b. Location of fire and spill control equipment, and, if present, fire alarm(s) **See comment in 18.a.** 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]? **Reported that inspections were completed monthly with assistance from an outside contractor, but no documentation was provided.** 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] **There was not adequate aisle space between containers of waste and/or to allow easy access to the spill associated equipment/container.** 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)] **No emergency authority has declined services to the facility.** 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)]. **Satellite container was not closed.** 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: Yes No N/A
- a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes No N/A
- b. Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] **No accumulation dates were marked on the containers of hazardous paint wastes, see item 32. Less than 55-gallons were in the satellite area.** 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)] **No containers of hazardous paint waste were marked with the accumulation start date.** Yes No N/A
33. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A
- b. In good condition? [3745-66-71] Yes No N/A
- c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A

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

34. Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven (7) consecutive days. **It was reported, that most recently a consultant was helping with management of the hazardous paint wastes.** Yes No N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] **No documentation was provided during the CEI.** 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)] **Not all wastes have been evaluated, but it is not believed that any would be incompatible.** 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)] **No hazardous wastes have been shipped or prepared for shipping off-site.** Yes No N/A
39. Does each container \leq 100 gallons have a completed hazardous waste label? [3745-52-32(B)] **See comment in item 38.** 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] **See comment in item 38.** Yes No N/A

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - 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# 1

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# 1

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE LAMPS

3. Does the SQUWH 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# 1

4. 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# 1

5. 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

6. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes ___ No ___ N/A ___ RMK# 1
- 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# 1

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

7. 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# 1
- 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# 1
- 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# 1
- 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# 1
- 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# 1
- 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# 1
- 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# 1

EMPLOYEE TRAINING

8. 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# 1

RESPONSE TO RELEASES

9. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes ___ No N/A ___ RMK# 1
10. Is the material released characterized? [3745-273-17(B)] Yes ___ No N/A ___ RMK# 1
11. 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# 1

OFF-SITE SHIPMENTS

NOTE: *If a SQUWH self-transport waste, then they must comply with the Universal Waste transporter requirements.*

12. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes ___ No N/A ___ RMK# 1

NOTE: *SQUWHs are prohibited to send waste to any other facility.*

13. 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# 1
14. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes ___ No N/A ___ RMK# 1
15. 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# 1

- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes ___ No N/A ___ RMK# 1
16. 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: Yes ___ No N/A ___ RMK# 1
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes ___ No ___ N/A ___ RMK# 1
- 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# 1
17. 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# 1
18. 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# 1

EXPORTS

19. Is waste being sent to a foreign destination? If so: Yes ___ No X 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 X 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 X 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 X RMK# ___

REMARKS

1. Spent fluorescent light bulbs, some green tipped some not, were being accumulated in the facility maintenance shop area by leaning them against the fencing. The spent bulbs would then be placed into a lamp crushing device. The entry point for the bulbs remains open to the ambient air. The crushed bulbs would remain in this device until it would be emptied into the regular trash. No specific time period was associated with the emptying of the device. Bulb evaluation(s) need to be completed prior to completion of checklist.