Ohio | Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Eighth Floor Promotions
OHR 000 119 776
Mercer County
Hazardous Waste
**Notice of Violation**

September 14, 2011

Ms. Lisa Hicks
Eighth Floor Promotions
One Visions Parkway
Celina, Ohio 45822

Dear Ms. Hicks:

Thank you for accompanying me during Ohio EPA's August 31, 2011, compliance evaluation inspection (CEI) of Eighth Floor Promotions (EFP) located at One Visions Parkway, in Celina, Ohio. We were also accompanied by Mr. Cody Leugers and Mr. Randy Latimer of EFP. I inspected EFP to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). My inspection included observations of facility operations and a review of written documentation. This letter will explain the violations I found and what you need to do to correct the violations.

EFP is a high quality designer, manufacturer and decorator of corporate recognition awards. Processes performed at the facility include: sand etch, laser etch, metal etch, screenprint, engraving and full spectrum imprint. Materials used to manufacture the awards include, glass, wood, marble, acrylic and metal plate.

The etch process involves the following steps:

1. Prepare Negative: The metal plates are coated with a light-sensitive film. The film is exposed to 60 units of light and the faint image to be etched can be seen. A hot concentrate developer solution removes the burned areas. The plate is now ready for etching. Approximately 10 gallons of developer waste is generated every 3 weeks and it is mostly water.

2. Prep and Polish Station: A mixture of 3 gallons water and 3 liters of nitric acid is added to a small tub. The metal plates are dipped in the solution four or five times. Approximately 3 gallons of waste is generated each day from this operation.

3. Etcher Prep: Metal plates are dipped in a solution of gum arabic and nitric acid in a small tub.

4. Primary Etcher: The primary etching machine contains about 80 gallons of solution. The solution is 67% nitric acid that is diluted at 37 liters in 250 gallons of water. This solution also contains a special oil that controls the etch process. The valve etch oil is a corrosive buffer that dulls the nitric acid etch, creating a smoother edge to the etching. This oil spoils after a short time and the solution must be changed. The plates are suspended in the unit and once the lid is closed, the agitators splash the plates with the etching solution. The plates remain in the unit for about 10-15 minutes. The acid-resistant coating or film covers most of the plate, and only the areas where the film was removed in the developer step are etched. Zinc accumulates in the bath. There are two etch tanks used for different purposes: one is for basic etching and the other is for a textured

etch. The etch tank is dumped about 2-3 times per week and the texture tank is dumped once per month.

5. Re-polish Station: The plates are dipped in the same solution as in step number two (above). This step removes the oil that is found in the primary etch tanks.

6. Paint: In this step they spray on a resistant paint/ink to create a texture effect. The paint is applied with a gun, but there is no cleanup step.

7. Texture Station: A solution in a tub is used to create depth or antiquing. Only nitric acid without the oil is used, since the oil spoils.

8. Descum: A caustic solution (NaOH) in a tub is used to remove excess paint and blue coating. Every 2-3 weeks, after the paint has built up in the tub, the caustic is dumped.

9. Pavchrome Copper Colorant: A solution in a tub is used to give some plates a copper color.

10. Chromatic Solution: This solution is applied in a tub. It is used to make the final paint application adhere better. A plate soaks for about two minutes in the solution. Every 2-3 weeks the solution is dumped and replaced.

11. Rinse: The plates are rinsed with water and detergent. This rinse water is dumped every 2-3 days since the oil from the etchers will contaminate it.

12. Finishing: Plates are spray painted (gun), sanded (belt sander), cut and assembled. They are now ready for packaging.

All of these waste streams flow to one of two sumps, are comingled, and are pumped into one of two 1500-gallon aboveground tanks in the etch room.

At the time of my inspection, EFP was operating as a hazardous waste large quantity generator. EFP does not generate used oil. Most shop rags are laundered by VanDyne Crotty. EFP generates the following hazardous and universal wastes:

1. Nitric Acid Waste (D002 & D007): This waste is generated from the metal etch process. Every Friday the primary etch machine must be emptied and the solution becomes waste. The oil in the solution will spoil before workers return on Monday. It may be necessary to empty the solution 1-2 more times during the week. The texture machine is emptied once a month, usually. This waste stream also includes rinse water, descum waste, waste chromatic solution, and the other wastes described in the etch process listed above. The waste is accumulated in two 1500-gallon aboveground storage tanks. In 2010, EFP generated 32,450 gallons of this waste, 270,309 pounds or 122,720 kg (10,227 kg/month) and shipped the waste to Vickery Environmental, Inc. in Vickery, Ohio. **On September 8, 2011, Lisa Hicks informed me that the pH for the two tanks was determined to be 1.24 and 0.8. The pH for the wash sump was found to be 1.1 and the pH for the etch sump was 0.16.**

2. Paint Related Waste (F003 & F005): A small amount of painting is done with spray guns. These guns are cleaned with a lacquer thinner that contains toluene, acetone, and other organic compounds and has a flash point of 3°F. Paint that is old or miscolored may be added to this waste stream. The waste is accumulated in a satellite accumulation drum in the etch department.

In 2010, EFP generated 111 gallons of this waste and shipped it to EQ Detroit, Inc. in Detroit, Michigan.

3. Universal Waste Lamps: Spent fluorescent lamps are generated at the facility and are recycled off-site through Dickman Supply, Inc. and Lighting Resources, LLC.

OAC Rule 3745-51-07(A)(1) states, in part, that "Any hazardous waste remaining in an empty container, as defined in paragraph (B) of this rule, is not subject to regulation under rules 3745-50-40 to 3745-50-66 or Chapters 3745-51, 3745-52, 3745-53, 3745-54 to 3745-57, 3745-65 to 3745-69, 3745-205, 3745-256, or 3745-270 of the Administrative Code or to the requirement to notify Ohio EPA or U.S. EPA of regulated waste activity."

OAC Rule 3745-51-07(B)(1) states, in part, that "A container is empty if: all wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping and aspirating; and no more than 2.5 centimeters (one inch) of residue remain on the bottom of the container." Therefore, the empty containers at EFP are not hazardous waste.

OAC Rule 3745-51-22 states, in part, that "A waste exhibits the characteristic of corrosivity if a representative sample of the waste has either of the following properties: It is aqueous and has a pH less than or equal to two or greater than or equal to 12.5, as determined by a pH meter using method 9040 in SW-846 or it is a liquid and corrodes steel..." Therefore, dry rags would not have the characteristic of corrosivity. However, EFP must ensure that the rags do not possess any other characteristics of hazardous waste (such as toxicity due to RCRA heavy metals).

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

A generator must determine whether its waste is hazardous by first determining if the waste is listed as a hazardous waste in rules 3745-51-30 to 3745-51-35; by testing the waste according to the methods set forth in rules 3745-51-20 to 3745-51-24; or by applying knowledge of the hazardous characteristic of the waste in light of the materials or the processes used. EFP failed to adequately evaluate all its waste properly, according to this rule.

In order to abate this violation, you must immediately evaluate the following wastes, in accordance with the requirements of Ohio Administrative Code Rule 3745-52-11 and this letter:

A. Negative Preparation Waste: **EFP has not determined the TCLP concentration of the RCRA heavy metals.**

B. Prep and Polish Station Waste: **EFP has not determined the TCLP concentration of the RCRA heavy metals and the pH of this waste.**

C. Etcher Prep Waste: **EFP has not determined the TCLP concentration of the RCRA heavy metals and the pH of this waste.**

D. Primary Etcher Waste: **EFP has not determined the TCLP concentration of the RCRA heavy metals and the pH of this waste.**

E. Re-polish Station Waste: **EFP has not determined the TCLP concentration of the RCRA heavy metals and the pH of this waste.**

F. Texture Station Waste: **EFP has not determined the TCLP concentration of the RCRA heavy metals and the pH of this waste.**

G. Descum Waste: **EFP has not determined the TCLP concentration of the RCRA heavy metals and the pH of this waste.**

H. Pavchrome Copper Colorant Waste: **EFP has not determined the TCLP concentration of the RCRA heavy metals and the pH of this waste.**

I. Chromatic Solution: **EFP has not determined the TCLP concentration of the RCRA heavy metals and the pH of this waste.**

J. Rinse: **EFP has not determined the TCLP concentration of the RCRA heavy metals and the pH of this waste.**

K. Tank System Waste: **EFP has not determined the TCLP concentration of the RCRA heavy metals.**

L. Paint Related Waste: On its hazardous waste manifests, EFP lists the waste code D001 for its paint related waste. **However, according to the Material Safety Data Sheet, this waste is the listed hazardous waste F003 & F005, due to the presence of toluene and acetone (and other organic compounds). EFP must revise all its records (manifests, contingency plan, etc.) to reflect this.**

M. Screen Wash Waste: At the time of my inspection there was some confusion regarding this waste. EFP was managing it as a hazardous waste, but it was not known what characteristics it was hazardous for. Apparently the old screen wash was F003 but the product was changed at some point. A review of the new MSDS was inconclusive since valuable information is missing from the document. Approximately 30-35 gallons of this waste is removed from the screen wash machine every two months. **EFP must be able to accurately demonstrate the characteristics of this waste. It must determine, at least, the flash point and pH.**

N. Lint Free Rag Waste: **EFP has not determined the concentration of TCLP VOCs (volatile organic compounds) in this waste.**

You must obtain a representative sample of the waste at the facility, according to OAC Rule 3745-51-20. You must evaluate all samples, through laboratory analysis, for at least the Toxicity Characteristic Leaching Procedure (TCLP) metals and pH for most of the waste. You must submit the results of the laboratory analyses to Ohio EPA as soon as they are available. **EFP will need to give Ohio EPA a five-day advance notice of sampling activities, in order for an inspector to make arrangements to view the sampling.** After Ohio EPA reviews your analytical results, I will inform you of any other violations in a separate letter.

**2. Land Disposal Restriction – Evaluation**
**OAC Rule 3745-270-07(A)(1)**

A generator of a hazardous waste must determine if the waste has to be treated before it can be land disposed. This is done by demonstrating if the hazardous waste meets the treatment standards in rule 3745-270-40, 3745-270-45, or 3745-270-49 of the Administrative Code. This determination can be made concurrently with the hazardous waste determination required in rule 3745-52-11 of the Administrative Code, in either of two ways: by testing the waste, or by using knowledge of the waste.

On its hazardous waste manifests and land disposal restriction form, EFP lists the waste code D001 for its paint related waste. However, according to the Material Safety Data Sheet, this waste is the listed hazardous waste F003 & F005, due to the presence of toluene and acetone (and other organic compounds). To abate this violation, EFP must properly complete the land disposal restriction form, list all the applicable hazardous waste numbers, and submit a copy of the completed form.

**3. Land Disposal Restriction – Written Notice**
**OAC Rule 3745-270-07(A)(2)**

If the waste does not meet the treatment standards, with the initial shipment of waste to each treatment or storage facility, the generator must send a one-time written notice to each treatment or storage facility receiving the waste, and place a copy in the generator's files. The notice must include (in part) the EPA hazardous waste numbers.

EFP does not include the proper EPA hazardous waste numbers for the paint waste on the land disposal restriction form. To abate this violation, EFP must properly complete the land disposal restriction form, list all the applicable hazardous waste numbers, and submit a copy of the completed form.

**4. Personnel Training - Instruction**
**OAC Rule 3745-65-16(A)(2)**

The training program must include instruction which teaches facility personnel hazardous waste management procedures, including contingency plan implementation, relevant to the positions in which they are employed.

The outline I observed was too general and provided no detail. EFP must submit a more detailed training outline. The outline should include, at least, a description of all the hazardous waste at the facility, the method for managing the waste, use of the manifest, use and management of containers and tanks, inspection of containers and tanks, and the elements and implementation of the contingency plan. The training program at EFP does not include sufficient or accurate instruction for hazardous waste management procedures and contingency plan implementation. There is significant confusion regarding the evaluation of the waste at the facility. This must be corrected (see violation number one above). The contingency plan must be revised to reflect the proper description for all the hazardous waste generated at the facility. Container and tank system inspections have not been performed properly. (See violations 9, 10, and 11 below.) All personnel responsible for container and tank system inspections must receive this required training. This information must be presented to all employees that generate, move or manage

hazardous waste at the facility or who supervise employees that generate, move or manage hazardous waste at the facility.

To abate this violation, EFP must submit the revised written description of its training program. EFP may want to submit the revised training program to Ohio EPA for review and approval before it provides the training to the appropriate employees. In this way, you could avoid having to repeat the presentation.

5. **Personnel Training - Emergencies**
**OAC Rule 3745-65-16(A)(3)**

At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems

Not all personnel knew where the emergency equipment was at the time of my inspection. Steve Temple has been replaced as an emergency coordinator and the new emergency coordinator must receive all relevant training. The contingency plan needs to be revised and presented to all employees that generate, move or manage hazardous waste at the facility or who supervise employees that generate, move or manage hazardous waste at the facility.

To abate this violation, EFP must submit documentation demonstrating that all necessary employees have received the proper training. EFP may want to submit the revised training program to Ohio EPA for review and approval before it provides the training to the appropriate employees. In this way, you could avoid having to repeat the presentation.

6. **Personnel Training – Annual Review**
**OAC Rule 3745-65-16(C)**

Facility personnel must take part in an annual review of the initial training required by this rule.

This training was not provided for, at least: 1. Chuck Rammnel, 2. the new emergency coordinator (that replaced Steve Temple), 3. Mike, the other operator in the etch room and 4. Randy Latimer, Production Supervisor. Furthermore, EFP must provide the name of all employees with the following job titles and documentation that they have received the required training: H.W. Coordinator, H.W. Assistant Coordinator, H.W. Clerical Coordinator, Emergency Coordinator and Emergency Assistant.

To abate this violation, EFP must evaluate all its waste according to violation number one, revise its contingency plan and provide the required training to all employees that generate, move or manage hazardous waste at the facility or who supervise employees that generate, move or manage hazardous waste at the facility. EFP must submit documentation demonstrating that all necessary employees have received the proper training. EFP may want to submit the revised training program to Ohio EPA for review and approval before it provides the training to the appropriate employees. In this way, you could avoid having to repeat the presentation.

**7. Personnel Training – Description**
**OAC Rule 3745-65-16(D)(3)**

The training program must include a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position related to hazardous waste management.

To abate this violation, EFP must submit a list of all employees that generate, move or manage hazardous waste at the facility or who supervise employees that generate, move or manage hazardous waste at the facility and the specific training (type and amount) that will be provided to them. EFP may want to submit the revised training program to Ohio EPA for review and approval before it provides the training to the appropriate employees. In this way, you could avoid having to repeat the presentation.

**8. Contingency Plan – Actions**
**OAC Rule 3745-65-52(A)**

The contingency plan must describe the actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

There is significant confusion regarding the evaluation of the waste at the facility. Therefore, personnel may not know what to do about spills of wastes not described in the contingency plan. The plan must be revised to include a description of all the hazardous waste identified at the facility and the proper response to releases of each.

To abate this violation, once EFP has completed an evaluation of its waste, it must revise its contingency plan to include the new waste descriptions, where necessary, and the associated emergency actions and submit a copy of the revised plan.

**9. Contingency Plan – Emergency Coordinators**
**OAC Rule 3745-65-52(D)**

The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and this list must be kept up to date.

Steve Temple has been replaced as an emergency coordinator. His name and information must be removed from the contingency plan; his replacement must be named and the new emergency coordinator's address and phone numbers listed in the revised contingency plan. To abate this violation, EFP must submit a copy of the revised page of the contingency plan.

**10. Contingency Plan – Revisions**
**OAC Rule 3745-65-54**

The contingency plan must be reviewed, and immediately amended, if necessary, whenever: the facility changes - in its design, construction, operation, maintenance, or other circumstances – in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency or the list of emergency coordinators changes.

Steve Temple has been replaced as an emergency coordinator. His name and information must be removed from the contingency plan; his replacement must be named and the new emergency coordinator's address and phone numbers listed in the revised contingency plan. There is significant confusion regarding the evaluation of the waste at the facility. Therefore, personnel may not know what to do about spills of wastes not described in the contingency plan. The plan must be revised to include a description of all the hazardous waste identified at the facility (see violation number 1) and the proper response to releases of each. To abate this violation, EFP must revise the contingency plan to include this new information and submit a copy of the revised contingency plan.

**11. Testing and Maintenance of Equipment**
**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.

EFP does not perform a periodic check of its spill control and fire protection equipment and does not record the results of such a check in a log or summary. EFP must perform and record such a check immediately. The log should describe the equipment and its location, the condition or quantity of the equipment, the inspector and the date of the inspection. EFP must explain the inspection frequency for the spill control equipment, complete the inspection and submit a copy of the most recent inspection log.

**12. Container Inspection**
**OAC Rule 3745-66-74**

The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion and other factors. The owner or operator must record inspections in an inspection log or summary. The log should include, at least, the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs.

EFP does not perform and record an inspection of areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion and other factors. To abate this violation, EFP must immediately begin to inspect its container storage area, at least weekly, and submit copies of the inspection log for the most recent four-week period.

**13. Tank Inspections**
**OAC Rule 3745-66-95(B)(1), (B)(2) & (B)(3)**

The owner or operator must inspect, where present, at least once each operating day: (1) overfill/spill control equipment to ensure that it is in good working order; (2) the aboveground portions of the tank system, including ancillary equipment (piping, pumps and sumps), to detect releases of waste; and (3) the construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures to detect erosion or signs of releases of hazardous waste.

EFP violated the rules as follows:

(a) 3745-66-95(B)(1) - EFP does not conduct a daily inspection of the overfill/spill control equipment. It conducts no inspections on the weekends, during holidays and occasionally during other extended periods. Furthermore, the inspection log does not clearly indicate that the inspections include observations of the above components.

(b) 3745-66-95(B)(2) – EFP does not conduct a daily inspection of the aboveground portions of the tank system, including ancillary equipment (piping, pumps and sumps), to detect releases of waste. It conducts no inspections on the weekends, during holidays and occasionally during other extended periods. Furthermore, the inspection log does not clearly indicate that the inspections include observations of the above components.

(c) 3745-66-95(B)(3) – EFP does not conduct a daily inspection of the construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures to detect erosion or signs of releases of hazardous waste. It conducts no inspections on the weekends, during holidays and occasionally during other extended periods. Furthermore, the inspection log does not clearly indicate that the inspections include observations of the above components.

Therefore, to abate these violations, EFP must revise its inspection log to state clearly what observations are made and submit copies of the log that demonstrate that inspections are conducted daily, for the most recent four-week period.

Please be aware that incandescent, fluorescent, metal halide, neon, high-intensity discharge, high-pressure sodium and mercury-vapor lamps could be hazardous waste when discarded. Fluorescent lamps may contain up to 40 milligrams (mg) of mercury, depending on the brand and manufacturer. Lamps may also contain lead and cadmium. Many lamps exhibit a characteristic of toxicity for heavy metals when disposed. I have enclosed copies of the following documents to assist you in properly managing your spent lamps: Fluorescent Lamps: What You Should Know and Computer, Fluorescent Lamp and Ballast Recyclers. I recommend that you review these documents carefully and contact me if you have any questions. The first document describes the rules you must follow in order to manage lamps as a universal waste.

You may be able to further reduce the waste your company generates. If you find ways to recycle, reduce or altogether eliminate the amount of waste that your company generates you may be able to reduce your treatment and disposal costs and you may possibly reduce your regulatory requirements. I have enclosed copies of Pollution Prevention Opportunities, a worksheet that can help you recognize opportunities for reducing waste and conserving energy at your business, and the fact sheet Management of Electronic Waste from Businesses. Please review this information and contact me if you have any questions.

**I encourage you to schedule a pollution prevention assessment for your business because there are often many opportunities for businesses like yours to reduce waste and save money.** It may be possible to segregate the etch wastes so that any non-hazardous waste streams are diverted to your industrial sewers. It may also be possible to pH adjust the waste and divert it to your industrial sewers. If you wish to talk about an assessment or if you have other questions about pollution prevention, please feel free to contact the Office of Compliance Assistance and Pollution Prevention (OCAPP) at (614) 644-3469. There is no charge for an assessment.

The Division of Materials and Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign up for this free service. You can find more information at the following Web link: http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage. Please feel free to share this information with your colleagues.

Enclosed you will find copies of all checklists completed during the inspection. If you have any questions, please feel free to contact me at (419) 373-3074. You can find copies of the rules and other information on the division's web page at http://www.epa.ohio.gov. Ohio EPA also has helpful information about pollution prevention at http://www.epa.ohio.gov/ocapp.

Sincerely,

Don North
District Representative
Division of Materials and Waste Management

/cs

pc: Colleen Weaver, DMWM, NWDO
Cindy Lohrbach, DMWM, NWDO
DMWM-HW, NWDO File: Mercer County, Eighth Floor Promotions File

ec: Don North, DMWM, 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.

| Send to Central Office ☒ | Ohio Environmental Protection Agency<br>**RCRA SUBTITLE C SITE**<br>**IDENTIFICATION/VERIFICATION FORM** | For Ohio EPA use only |
|---|---|---|

Completed verification forms required to be submitted to CO should be e-mailed to brad.hauser@epa.state.oh.us.

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|---|---|---|---|---|---|---|---|---|
| **Site EPA ID No.**<br>**Site Name** | EPA ID Number: **OHR000119776**<br>Name: **Eighth Floor Promotions** | | | | | | Website: (Optional) | |
| **Site Location Information** | Street Address: **One Visions Parkway** | | | | | | | |
| | City, Town, or Village: **Celina** | | | | | | State: OH | |
| | County Name: **Mercer** | | | | | | Zip Code: **45822** | |
| **Site Land Type** (check only one) | Private ☒ | County ☐ | District ☐ | Federal ☐ | Indian ☐ | Municipal ☐ | State ☐ | Other ☐ |
| **NAICS code(s)** www.census.gov/epcd/www/naics.html | **423990** | | | | | | | |

| | | | |
|---|---|---|---|
| **Facility Representative**<br>Additional names can be recorded in number 12<br>Only provide address information if it is different than the site address | First Name: **Lisa** | MI: **M** | Last Name: **Hicks** |
| | Title: **HR Manager** | | |
| | Phone Number: **419-586-6433** | | Phone Number Extension: **115** |
| | E-Mail Address: **1hicks@efpmail.com** | | |
| | Fax Number: **216-274-9389** | | Fax Number Extension: |
| | Street or P.O. Box: | | |
| | City, Town or Village: | | |
| | State: | | Zip Code: |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| **Legal Owner And Operator of the Site.**<br>List Additional Owners and/or Operators in the Comment Section or on another copy of this form page | Name of Site's Legal Owner: **Kent Paxson** | | | | Date Became Owner (mm/dd/yyyy): **11/27/1995** | | | |
| | Owner Type: | Private ☒ | County ☐ | District ☐ | Federal ☐ | Indian ☐ | Municipal ☐ | State ☐ | Other ☐ |
| | Street or P.O. Box: **One Visions Parkway** | | | | | | | |
| | City, Town or Village: **Celina** | | | | Owner Phone #: **419-586-6433** | | | |
| | State: **Ohio** | | | | Country: **USA** | | Zip Code: **45822** | |
| | Name of Site's Operator: **Kent Paxson** | | | | Date Became Operator (mm/dd/yyyy): **01/01/2007** | | | |
| | Operator Type: | Private ☒ | County ☐ | District ☐ | Federal ☐ | Indian ☐ | Municipal ☐ | State ☐ | Other ☐ |
| | Street or P.O. Box: **One Visions Parkway** | | | | | | | |
| | City, Town or Village: **Celina** | | | | Operator Phone #: **419-586-6433** | | | |
| | State: **Ohio** | | | | Country**USA** | | Zip Code: **45822** | |

**VIOLATIONS CITED?** ☒ Yes ☐ No

**TYPE OF HANDLER - MARK "X" AS APPROPRIATE**

| | | |
|---|---|---|
| ☐ Not a HW Generator | ☐ UNKNOWN: Cited for violation of 3745-52-11 | ☒ Large Quantity Generator (LQG) |
| | ☐ Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). *Check the box for the applicable generator status and provide a comment.* | ☐ Small Quantity Generator (SQG) |
| | | ☐ Conditionally Exempt Small Quantity Generator |
| | | ☐ U.S. Importer of Hazardous Waste |
| | | ☐ Mixed Waste (Hazardous and Radioactive) Generator |

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

- ☐ Hazardous Waste Transporter
- ☐ Hazardous Waste Transfer Facility
- ☐ Treater, Storer or Disposer of Hazardous Waste
- ☐ Recycler of Hazardous Waste
- ☐ 72-Hour Recycler
- ☐ Exempt Boiler and/or Industrial Furnace
  - ☐ Small Quantity On-Site Burner Exemption
  - ☐ Smelting, Melting, Refining Furnace Exemption
- ☐ Underground Injection Control Facility
- ☐ Receives Hazardous Waste from Off-site

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY)

- ☒ Small Quantity Handler of Universal Waste
- ☐ Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)
- ☐ Destination Facility for Universal Waste

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

- ☐ Batteries
- ☐ Pesticides
- ☐ Mercury containing equipment
- ☒ Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S)

- ☐ Used Oil Generator
- ☐ Used Oil Transporter
- ☐ Used Oil Transfer Facility
- ☐ Used Oil Processor
- ☐ Used Oil Re-refiner
- ☐ Off-Specification Used Oil Burner
- ☐ Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil
- ☐ Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

**Eligible Academic Entities with Laboratories:** Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

- ☐ College or University
- ☐ Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
- ☐ Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

**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 or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

**D002 F003 F005 D007**

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

| | | | |
|---|---|---|---|
| Announced | ☐ Yes | ☒ No | Additional Facility Representatives: |
| Tanks | ☒ Yes | ☐ No | |
| Containers | ☒ Yes | ☐ No | |

| Name of Inspector(s) | Name of Inspector(s) | Date of Inspection/Time (mm/dd/yyyy) (hh:mm) |
|---|---|---|
| **Don North** | | **08/31/2011** |

**Comments:**

Revised 09.05.10

# PROCESS, WASTE, P2 SUMMARY SHEET

**Facility Name:** Eighth Floor Promotions **Facility Type:** ☒LQG ☐SQG ☐CESQG ☐TSD **Date of Inspection:** 8-31-11 **EPA ID#:** OHR000119776

| *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 | Contaminated solutions from metal etching process | Nitric Acid Etch Waste<br>D002<br>D007 | Approximately 3000 gallons | None | Vickery Environmental Inc.<br>Vickery, Ohio<br>OHD020273819<br>Deep well injection | | |
| 2 | Cleanup of paint spray guns | Paint related Waste<br>F003<br>F005 | Approximately 10 gallons | None | EQ Detroit Inc.<br>Detroit, Michigan<br>MID980991566 | | |
| 3 | Facility lighting | Universal Waste Lamps | Few | None | Lighting Resources, LLC<br>Ontario, California<br>Recycling | Recycled | |
| 4 | Plate preparation | Waste developer | 10 gallons/3 weeks | None | Vickery Environmental Inc.<br>Vickery, Ohio<br>OHD020273819 | | |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | | | | Deep well injection | | |
| 5 | Plate preparation | Polish station waste | 3 gallons/day | None | Vickery Environmental Inc.<br>Vickery, Ohio<br>OHD020273819<br>Deep well injection | | |
| 6 | Plate preparation | Re-polish station waste | Very small amount | None | Vickery Environmental Inc.<br>Vickery, Ohio<br>OHD020273819<br>Deep well injection | | |
| 7 | Plate etching | Texture station waste | Very small amount | None | Vickery Environmental Inc.<br>Vickery, Ohio<br>OHD020273819<br>Deep well injection | | |
| 8 | Plate etching | Descum waste | 10 gallons/3 weeks | None | Vickery Environmental Inc.<br>Vickery, Ohio<br>OHD020273819<br>Deep well injection | | |
| 9 | Plate finishing | Chromatic solution waste | 10 gallons/3 weeks | None | Vickery Environmental Inc.<br>Vickery, Ohio<br>OHD020273819<br>Deep well injection | | |

## REMARKSBGENERAL INFORMATION

**General Process Information:**

**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:**

## LARGE QUANTITY GENERATOR REQUIREMENTS
## COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

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 ☐ | No ☒ | N/A ☐ | | | |
| 2. | Are records of waste determination being kept for at least 3 years? [3745-52-40(C)] | | Yes ☒ | No ☐ | N/A ☐ | | | |
| 3. | Has the generator obtained a U.S. EPA identification number? [3745-52-12] | | Yes ☒ | No ☐ | N/A ☐ | | | |
| 4. | Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] | | Yes ☒ | No ☐ | N/A ☐ | | | |
| 5. | Are annual reports kept on file for at least 3 years? [3745-52-40(B)] | | Yes ☒ | No ☐ | N/A ☐ | | | |
| 6. | 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 ☐ | | | |
| 7. | Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)] | | Yes ☐ | No ☒ | N/A ☐ | | | |
| 8. | Does the generator accumulate hazardous waste? | | Yes ☒ | No ☐ | N/A ☐ | | | |
| *NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.* | | | | | | | | |
| 9. | Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)? | | Yes ☐ | No ☒ | N/A ☐ | | | |
| *NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).* | | | | | | | | |
| 10. | Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)] | | | | | | | |
| | a. | Container that meets 3745-66-70 to 3745-66-77? | Yes ☐ | No ☐ | N/A ☒ | | | |
| | b. | Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)? **Nitric acid etch waste is comingled with rinse waters and other etch type wastes in two 1500 gallon above ground tanks.** | 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.* | | | | | | | | |
| 11. | Does the generator export hazardous waste? If so: | | Yes ☐ | No ☒ | N/A ☐ | | | |
| | a. | Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] | Yes ☐ | No ☐ | N/A ☒ | | | |
| | b. | Has the generator complied with special manifest requirements? [3745-52-54] | Yes ☐ | No ☐ | N/A ☒ | | | |
| | c. | For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] | Yes ☐ | No ☐ | N/A ☒ | | | |
| | d. | Has an annual report been submitted to U.S. EPA? [3745-52-56] | Yes ☐ | No ☐ | N/A ☒ | | | |

| | | | |
|---|---|---|---|
| | e. | Are export related documents being maintained on-site? [3745-52-57(A)] | Yes ☐ No ☐ N/A ☒ |
| **MANIFEST REQUIREMENTS** | | | |
| 12. | | Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)] | Yes ☒ No ☐ N/A ☐ |
| 13. | | Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(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 completed. [3745-52-20(A)(1)]* | | | |
| 14. | | 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 alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]* | | | |
| 15. | | If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] | Yes ☐ No ☐ N/A ☒ |
| 16. | | Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(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 a program in place to reduce the volume and toxicity waste they generate.* | | | |
| 17. | | If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)] | Yes ☐ No ☐ N/A ☒ |
| 18. | | If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] | Yes ☐ No ☐ N/A ☒ |
| 19. | | If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] | Yes ☐ No ☐ N/A ☒ |
| 20. | | Are signed copies of all manifests and any exception reports 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.* | | | |
| **PERSONNEL TRAINING** | | | |
| 21. | | Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] **EFP has a training program but it is not complete or acceptable. There is significant confusion regarding the characteristics of the waste at the facility.** | Yes ☐ No ☒ N/A ☐ |
| 22. | | Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)] **Not all personnel knew where the emergency equipment was at the time of my inspection. The contingency plan needs to be revised and presented.** | Yes ☐ No ☒ N/A ☐ |
| *NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]* | | | |
| 23. | | Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] | Yes ☒ No ☐ N/A ☐ |

| | | | |
|---|---|---|---|
| 24. | Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] | | Yes ☒ No ☐ N/A ☐ |
| 25. | Does the generator provide annual refresher training to employees? [3745-65-16(C)] **Not provided for at least Chuck Rammnel, the new emergency coordinator and the other operator in the etch room.** | | Yes ☐ No ☒ N/A ☐ |
| 26. | Does the generator keep records and documentation of: | | |
| | a. | Job titles? [3745-65-16(D)(1)] | Yes ☒ No ☐ N/A ☐ |
| | b. | Job descriptions? [3745-65-16(D)(2)] | Yes ☒ No ☐ N/A ☐ |
| | c. | Type and amount of training given to each person? [3745-65-16(D)(3)] **The type and amount of training must be documented more thoroughly. The outline I observed was too general and provided no detail.** | Yes ☐ No ☒ N/A ☐ |
| | d. | Completed training or job experience required? [3745-65-16(D)(4)] | Yes ☒ No ☐ N/A ☐ |
| 27. | Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] | | Yes ☒ No ☐ N/A ☐ |

*NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the -job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.*

| Job Performed | Name of Employee | Date Trained |
|---|---|---|
| | | |
| | | |
| | | |

**CONTINGENCY PLAN**

| | | | |
|---|---|---|---|
| 28. | Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] | | Yes ☒ No ☐ N/A ☐ |
| 29. | Does the plan describe the following: | | |
| | a. | Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)] **There is significant confusion regarding the characteristics of the waste at the facility. Therefore, personnel may not know what to do about spills of wastes not described in the contingency plan.** | Yes ☐ No ☒ N/A ☐ |
| | b. | Arrangements with emergency authorities? [3745-65-52(C)] | Yes ☒ No ☐ N/A ☐ |
| | c. | A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] | Yes ☐ No ☒ N/A ☐ |
| | d. | A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] | Yes ☒ No ☐ N/A ☐ |
| | e. | An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] | Yes ☒ No ☐ N/A ☐ |

*NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]*

| | | | |
|---|---|---|---|
| 30. | Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)] | | Yes ☒ No ☐ N/A ☐ |

| | | | |
|---|---|---|---|
| 31. | | Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] | Yes ☐ No ☒ N/A ☐ |
| 32. | | Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] | Yes ☒ No ☐ N/A ☐ |
| *NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.* | | | |
| **EMERGENCY PROCEDURES** | | | |
| 33. | | Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: | Yes ☐ No ☒ N/A ☐ |
| | a. | Was the contingency plan implemented? [3745-65-51(B)] | Yes ☐ No ☐ N/A ☒ |
| | b. | Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? | Yes ☐ No ☐ N/A ☒ |
| | c. | Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)? | Yes ☐ No ☐ N/A ☒ |
| *NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.* | | | |
| **PREPAREDNESS AND PREVENTION** | | | |
| 34. | | Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] | Yes ☒ No ☐ N/A ☐ |
| 35. | | Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: | |
| | a. | Internal communications or 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 ☐ |
| *NOTE: Verify that the equipment is listed in the contingency plan.* | | | |
| 36. | | Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] | Yes ☐ No ☒ N/A ☐ |
| 37. | | Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] | Yes ☐ No ☒ N/A ☐ |
| 38. | | Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] | Yes ☒ No ☐ N/A ☐ |
| 39. | | If there is only one employee on the premises, is there immediate access to a device (eg., 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 ☒ |
| 40. | | Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] | Yes ☒ No ☐ N/A ☐ |
| 41. | | Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] | Yes ☒ No ☐ N/A ☐ |
| 42. | | 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** | | | |

| | | | |
|---|---|---|---|
| 43. | 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 words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] | Yes ☒ No ☐ N/A ☐ |
| 44. | 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 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 then 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 IN <90 DAY ACCUMULATION AREAS** | | | |
| 45. | Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] **No full containers at the time of my inspection.** | | Yes ☐ No ☐ N/A ☒ |
| 46. | Is the accumulation date on each container? [3745-52-34(A)(2)] | | Yes ☐ No ☐ N/A ☒ |
| 47. | 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, photograph the area, and record on facility map.* | | | |
| 48. | Is the container accumulation areas(s) inspected weekly? [3745-66-74] | | Yes ☐ No ☒ N/A ☐ |
| | a. | Are inspections recorded in a log or summary? [3745-66-74] | Yes ☐ No ☒ N/A ☐ |
| *NOTE: "Week" means 7 consecutive days per ORC§1.44(A).* | | | |
| 49. | Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] | | Yes ☒ No ☐ N/A ☐ |
| 50. | 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 ☒ |
| 51. | 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 ☒ |

| | | |
|---|---|---|
| 52. | 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.* | | |
| 53. | If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] | Yes ☐ No ☐ N/A ☒ |
| *NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]* | | |
| **PRE-TRANSPORT REQUIREMENTS** | | |
| 54. | Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] | Yes ☒ No ☐ N/A ☐ |
| 55. | Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)] | Yes ☒ No ☐ N/A ☐ |
| 56. | 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 ☐ |
| *NOTE: Continue with the generator LDR requirements on the next page.* | | |

| GENERATOR LDR REQUIREMENTS | | | | |
|---|---|---|---|---|
| *NOTE: This LDR checklist does not include the requirements for generators that treat to meet LDR standards. If the generator treats, the inspector should use the stand-alone Generator LDR checklist instead of this checklist.* | | | | |
| **GENERAL REQUIREMENTS** | | | | |
| 1. | If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07(A)(7)] | | | Yes ☐ No ☐ N/A ☒ |
| 2. | Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not, **Not for the paint waste.** | | | Yes ☐ No ☒ N/A ☐ |
| | a. | Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)] | | Yes ☒ No ☐ N/A ☐ |
| *NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).* | | | | |
| 3. | Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)] | | | Yes ☒ No ☐ N/A ☐ |
| 4. | Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)] | | | Yes ☒ No ☐ N/A ☐ |
| 5. | Does the generator generate a listed HW that exhibits a characteristic? If yes, | | | Yes ☒ No ☐ N/A ☐ |
| | a. | Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)] | | Yes ☒ No ☐ N/A ☐ |
| *FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.* | | | | |
| 6. | Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)] | | | Yes ☒ No ☐ N/A ☐ |
| *NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.* | | | | |
| *NOTE: Written documentation of this determination is not required.* | | | | |
| 7. | Did the generator treat his HW /soil on-site to meet the LDR treatment standard? | | | Yes ☐ No ☒ N/A ☐ |
| *NOTE: If "Yes" see question #16.* | | | | |
| 8. | Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)] | | | Yes ☒ No ☐ N/A ☐ |
| | a. | If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include: | | Yes ☐ No ☐ N/A ☒ |
| | | i | Applicable HW codes? | Yes ☐ No ☐ N/A ☒ |
| | | ii | Manifest number of the first shipment to the TSD? | Yes ☐ No ☐ N/A ☒ |
| | | iii | A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination."? | Yes ☐ No ☐ N/A ☒ |
| 9. | Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)] | | | Yes ☐ No ☐ N/A ☒ |
| 10. | Does the generator have a copy of the LDR notification form/notice on file? | | | Yes ☐ No ☐ N/A ☒ |

| | | | | |
|---|---|---|---|---|
| | [3745-270-07(A)(2)] | | | |
| | a. | Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)] | | Yes ☐ No ☐ N/A ☒ |
| **NOTIFICATION FORM** | | | | |
| 11. | Does the LDR Notification form contain the following information: | | | |
| | a. | Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)] | | Yes ☒ No ☐ N/A ☐ |
| | b. | Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)] **Not for the paint waste.** | | Yes ☐ No ☒ N/A ☐ |
| | c. | A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)] | | Yes ☒ No ☐ N/A ☐ |
| | d. | A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)] | | Yes ☒ No ☐ N/A ☐ |
| *NOTE: A wastewater contains <1% by wt. total suspended solids (TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.* | | | | |
| | e. | Designation of the waste subcategory when applicable? [3745-270-07(A)(2)] | | Yes ☒ No ☐ N/A ☐ |
| *NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories* | | | | |
| | f. | A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)] | | Yes ☒ No ☐ N/A ☐ |
| *NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.* | | | | |
| | g. | If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)] | | Yes ☒ No ☐ N/A ☐ |
| *NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.* | | | | |
| **PROHIBITED DILUTION** | | | | |
| 12. | Is the HW treated by burning?<br><br>If "No" go to #15. | | | Yes ☐ No ☐ N/A ☒ |
| 13. | Is the HW a metal-bearing HW? | | | Yes ☒ No ☐ N/A ☐ |
| *NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs is given in the Appendix to 3745-270-03.* | | | | |
| 14. | a. | Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless **one** of the following conditions apply. [3745-270-03(c)] | | |
| | | i. | Contains > 1% TOC? | Yes ☐ No ☐ N/A ☒ |
| | | ii. | Contains organic constituents or cyanide at levels greater than the UTS levels? | Yes ☐ No ☐ N/A ☒ |
| | | iii. | Is made up of combustible material e.g., paper, wood, plastic? | Yes ☐ No ☐ N/A ☒ |
| | | iv. | Has a reasonable heating value (e.g., > 5000 Btu)? | Yes ☐ No ☐ N/A ☒ |
| | | v. | Co-generated with a HW that must be combusted? | Yes ☐ No ☐ N/A ☒ |
| | b. | If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution? | | Yes ☐ No ☐ N/A ☒ |
| 15. | Was the HW treated by wastewater treatment? | | | Yes ☐ No ☒ N/A ☐ |

| | | | |
|---|---|---|---|
| | a. | Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)] | Yes ☐ No ☐ N/A ☒ |
| *NOTE: If "Yes", HW is improperly being treated by dilution.* | | | |
| | b. | Does the waste carry the D001 code and contain ≥10% TOC? | Yes ☐ No ☐ N/A ☒ |
| | c. | Does the wastewater treatment process include a process to separate/recover the organic phase of the waste? | Yes ☐ No ☐ N/A ☒ |
| *NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].* | | | |
| *NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.* | | | |

| LQG TANK SYSTEM REQUIREMENTS (OAC rule 3745-52-34(A) and OAC rules 3745-66-90 through 3745-66-100) | | | |
|---|---|---|---|
| (Please refer to the rules before or while completing this checklist.) | | | |
| 1. | Is each tank clearly labeled/marked with the words "Hazardous Waste?" [3745-52-34(A)(3)] **According to Lisa Hicks, the two sumps are also labeled.** | | Yes ☒ No ☐ N/A ☐ |
| **TANK SYSTEM – GENERAL OPERATING REQUIREMENTS** | | | |
| 2. | Does the o/o follow the general operating requirements below: | | |
| | a. | Does the o/o prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail? [3745-66-94(A)] | Yes ☒ No ☐ N/A ☐ |
| | b. | Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)? [3745-66-94(B)] **Each tank is equipped with a visual level indicator.** | Yes ☒ No ☐ N/A ☐ |
| | c. | If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96? [3745-66-94(C)] | Yes ☐ No ☐ N/A ☒ |
| **TANK SYSTEM – INSPECTION REQUIREMENTS** | | | |
| 3. | Has the o/o documented the inspections required in 3745-66-95, in the operating record, including inspection of the following: | | |
| | a. | Data from leak detection equipment each operating day? [3745-66-95(A)] **The two tanks are made of FRP and are double walled. They are located inside the etch room and surrounded by secondary containment on the floor.** | Yes ☐ No ☐ N/A ☒ |
| | b. | Spill control equipment each operating day? [3745-66-95(B)(1)] | Yes ☐ No ☒ N/A ☐ |
| | c. | Above ground portion of tank each operating day? [3745-66-95(B)(2)] **Inspections not performed and recorded each day that there is waste in the tanks.** | Yes ☐ No ☒ N/A ☐ |
| | d. | Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste each operating day? [3745-66-95(B)(3)] | Yes ☐ No ☒ N/A ☐ |
| *NOTE: "Each operating day" is each day that the tank system is being used to manage (store or treat) hazardous waste.* | | | |
| 4. | For tank systems using leak detection systems to alert facility personnel to leaks or implementing established workplace practices to ensure leaks are promptly identified, has the o/o documented: [3745-66-95(C)] | | Yes ☐ No ☐ N/A ☒ |
| | a. | Inspections of spill control equipment weekly? | Yes ☐ No ☐ N/A ☒ |
| | b. | Inspections of above ground portion of tank weekly? | Yes ☐ No ☐ N/A ☒ |
| | c. | Inspections of construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste weekly? | Yes ☐ No ☐ N/A ☒ |
| | d. | Use of the alternate inspection schedule, including a description of the established workplace practices at the facility? | Yes ☐ No ☐ N/A ☒ |
| 5. | For ancillary equipment NOT provided with secondary containment, has the o/o documented inspections of such equipment each operating day? [3745-66-95(E)] **All piping is run over the secondary containment system on the floor of the etch room.** | | Yes ☐ No ☐ N/A ☒ |
| 6. | Where applicable, did the o/o inspect the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(F)(1)] | | Yes ☐ No ☐ N/A ☒ |
| 7. | Where applicable, did the o/o inspect all sources of impressed current at least bi-monthly? [3745-66-95(F)(2)] | | Yes ☐ No ☐ N/A ☒ |

| | | | |
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| **TANK SYSTEM CLOSURE REQUIREMENTS** | | | |
| 8. | If the o/o has closed a <90 day tank, was closure completed in accordance with OAC 3745-66-97 (except for paragraph C)? | | Yes ☐ No ☐ N/A ☒ |
| **TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES** | | | |
| 9. | For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with one of the following: [3745-66-98(A)] | | Yes ☐ No ☐ N/A ☒ |
| | a. | Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-66-17(B)? [3745-66-98(A)]; or | Yes ☐ No ☐ N/A ☒ |
| | b. | Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A)]; or | Yes ☐ No ☐ N/A ☒ |
| | c. | The tank is used solely for emergencies? [3745-66-98(A)] | Yes ☐ No ☐ N/A ☒ |
| 10. | If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (2008)? [3745-66-98(B)] | | Yes ☐ No ☐ N/A ☒ |
| 11. | Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material? [3745-66-99(A) and/or (B)] | | Yes ☐ No ☒ N/A ☐ |
| | a. | **If so,** have the requirements of 3745-65-17(B) been met? [3745-66-99(A) and/or (B)] | Yes ☐ No ☐ N/A ☒ |
| **TANK SYSTEM – WASTE ANALYSIS REQUIREMENTS** | | | |
| 12. | In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-100] | | Yes ☐ No ☐ N/A ☒ |
| | a. | Conducted waste analysis and trial treatment or storage tests? [3745-66-100(A)]; **OR** | Yes ☐ No ☐ N/A ☒ |
| | b. | Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-100(B)] | Yes ☐ No ☐ N/A ☒ |
| **TANK SYSTEMS REQUIREMENTS** | | | |
| 13. | Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)] **The written assessment consists of documents in the file dated March 23, 2004, April 21, 2004, June 23, 2004, August 1, 2005, February 15, 2006, and October 3, 2006.** | | Yes ☒ No ☐ N/A ☐ |
| *NOTE: You should review the file to see if the written assessment has been previously reviewed and what the results were.* | | | |
| 14. | Does the written assessment include the following: [3745-66-92(A)] | | |
| | a. | Certification by a qualified professional engineer? [3745-66-92(A)] | Yes ☒ No ☐ N/A ☐ |
| | b. | Consideration of the design standards of the system? [3745-66-92(A)] | Yes ☒ No ☐ N/A ☐ |
| | c. | Consideration of the hazardous characteristics of the waste(s)? [3745-66-92(A)] | Yes ☒ No ☐ N/A ☐ |
| | d. | An evaluation by a corrosion expert (only if the external system/components are metal and in contact with soil or water)? [3745-66-92(A)] | Yes ☐ No ☐ N/A ☒ |
| | e. | A determination of design and operational measures that will be | Yes ☐ No ☐ N/A ☒ |

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| | | needed to protect the tank system from potential damage (only for underground tank components)? [3745-66-92(A)] | |
| | f. | Design considerations to ensure that the tank foundations will maintain the load of a full tank? [3745-66-92(A)] | Yes ☒ No ☐ N/A ☐ |
| | g. | Design considerations for anchoring the unit to prevent floatation (only for tanks situated in a seismic fault zone or saturated zone)? [3745-66-92(A)] | Yes ☐ No ☐ N/A ☒ |
| | h. | Design considerations to ensure that the tank system will withstand the effects of frost heave (only for underground tank systems)? [3745-66-92(A)] | Yes ☐ No ☐ N/A ☒ |
| *NOTE: CO-DHWM Engineering staff are available to assist you with evaluation of the written assessment.* | | | |
| 15. | Are there written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)] **The installation was inspected and supervised by QEI on April 20, 2004, May 3, 2004 and May 12, 2004.** | | Yes ☒ No ☐ N/A ☐ |
| | Do the written statements address all of the following: | | |
| | a. | Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)] | Yes ☒ No ☐ N/A ☐ |
| | b. | Statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)] | Yes ☐ No ☐ N/A ☒ |
| | c. | Proper backfilling? [3745-66-92(C)] | Yes ☐ No ☐ N/A ☒ |
| | d. | Tightness test; if the tank system was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)] | Yes ☒ No ☐ N/A ☐ |
| | e. | Proper support and protection of ancillary equipment? [3745-66-92(E)] | Yes ☒ No ☐ N/A ☐ |
| | f. | Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)] | Yes ☐ No ☐ N/A ☒ |
| **SECONDARY CONTAINMENT** | | | |
| 16. | Has secondary containment been provided? [3745-66-93(A)] **The tanks are double walled and made of cross-linked polyethylene. The floor is equipped with secondary containment consisting of structural FRP angles lagged to the floor with a capacity of 795 gallons. The containment is coated with a high performance polymer liner compound to serve as a chemical resistant barrier. The piping runs above the floor over this containment system.** | | Yes ☒ No ☐ N/A ☐ |
| *NOTE: Secondary containment must be provided for tank systems that store or treat materials that become hazardous wastes within two years after the hazardous waste listing, or when the system has reached 15 years of age, whichever comes later. [3745-66-92(A)(2)]* | | | |
| 17. | Is secondary containment one of the following: | | Yes ☒ No ☐ N/A ☐ |
| | a. | An <u>External Liner</u>? [3745-66-93(E)(1)] If so... **The secondary containment system on the floor is a liner type. However, since the tanks are double walled this containment system was not designed to contain 100% of the capacity of the largest tank (which is 1500 gallons). In other words the tanks already have secondary containment.** | Yes ☒ No ☐ N/A ☐ |
| | | i. Is liner designed or operated to contain 100% of the capacity of the largest tank? | Yes ☐ No ☐ N/A ☒ |
| | | ii. Is liner designed and operated to prevent run-on and infiltration <u>or</u> the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm? **The tank system and secondary containment system is inside the etch room.** | Yes ☒ No ☐ N/A ☐ |

| | | | | |
|---|---|---|---|---|
| | | iii. | Is liner free of cracks and gaps? | Yes ☒ No ☐ N/A ☐ |
| | | iv. | Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release? | Yes ☒ No ☐ N/A ☐ |
| | | v. | Are chemically resistant water stops in place at all points? *(concrete liners only)* **The system is inside the etch room.** | Yes ☐ No ☐ N/A ☒ |
| | | vi. | Is there a compatible interior coating or lining to prevent migration of waste into the concrete? (concrete liners only) | Yes ☒ No ☐ N/A ☐ |
| | b. | **Vault System?** [3745-66-93(E)(2)] If so, | | Yes ☐ No ☒ N/A ☐ |
| | | i. | Is vault system designed to contain 100% of the capacity in the largest tank? | Yes ☐ No ☐ N/A ☒ |
| | | ii. | Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? | Yes ☐ No ☐ N/A ☒ |
| | | iii. | Are chemically resistant water stops in place at all points? | Yes ☐ No ☐ N/A ☒ |
| | | iv. | Is there a compatible interior coating to prevent migration into the concrete? | Yes ☐ No ☐ N/A ☒ |
| | | v. | For **ignitable or reactive waste**: Is the vault system provided with means to prevent (or alternatively "protect against") the formation or ignition of vapors? | Yes ☐ No ☐ N/A ☒ |
| | | vi. | Is vault system provided with an exterior moisture barrier? | Yes ☐ No ☐ N/A ☒ |
| | c. | **Double-Walled Tank?** [3745-66-93(E)(3)] If so, **The tanks are double walled and made of cross-linked polyethylene.** | | Yes ☒ No ☐ N/A ☐ |
| | | i. | Is double-walled tank designed as an integral structure to contain any release from the inner tank? | Yes ☒ No ☐ N/A ☐ |
| | | ii. | **If metal**, are the primary tank interior and outer shell exterior surfaces protected from corrosion? | Yes ☐ No ☐ N/A ☒ |
| | | iii. | Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time? **In this case the double walled tanks are inside the facility in the etch room which is continuously occupied, except for weekends. The floor surrounding the tanks is equipped with a secondary containment system which facility personnel can observe or inspect for indications of a release all week long.** | Yes ☒ No ☐ N/A ☐ |
| | d. | **An Equivalent Device?** As described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D)&(E)] | | Yes ☐ No ☐ N/A ☒ |
| **SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION** | | | | |
| 18. | Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, groundwater, or surface water and is it capable of detecting and collecting releases and accumulated liquids? [3745-66-93(B)(1)&(2)] | | | Yes ☒ No ☐ N/A ☐ |
| 19. | Does the secondary containment system meet the following minimum requirements of [3745-66-93(C)]: | | | |
| | a. | Constructed or lined with compatible materials of sufficient strength to prevent failure? [3745-66-93(C)(1)] **The design of the system was evaluated by Mr. Kiet Chung and Dennis Deniro of Ohio EPA.** | | Yes ☒ No ☐ N/A ☐ |
| | b. | Placed on a foundation or base capable of providing support? [3745-66-93(C)(2)] | | Yes ☒ No ☐ N/A ☐ |
| | c. | Provided with a leak detection system designed/operated to detect | | Yes ☒ No ☐ N/A ☐ |

| | | | |
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| | | failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time? [3745-66-93(C)(3)] **See comment for question 17.c.iii above.** | |
| | d. | Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? [3745-66-93(C)(4)] | Yes ☒ No ☐ N/A ☐ |
| | e. | Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner? [3745-66-93(C)(4)] **EFP has not reported any spills or releases from the tank system.** | Yes ☐ No ☐ N/A ☒ |
| **ANCILLARY EQUIPMENT REQUIREMENTS** | | | |
| 20. | Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)? **Piping is above the floor in the etch room and located over the secondary containment system on the floor.** | | Yes ☒ No ☐ N/A ☐ |
| | **If not**, is the ancillary equipment one of the following: [3745-66-93(F)] | | |
| | a. | Above ground piping (exclusive of flanges, joints, valves and connections) that is inspected daily? | Yes ☐ No ☐ N/A ☒ |
| | b. | Welded flanges, welded joints and/or welded connections that is inspected daily? | Yes ☐ No ☐ N/A ☒ |
| | c. | Sealless or magnetic coupling pumps and/or sealless valves? | Yes ☐ No ☐ N/A ☒ |
| | d. | Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown and/or loss of pressure-actuated shut-off devices) that is inspected daily? | Yes ☐ No ☐ N/A ☒ |
| **TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE** | | | |
| 21. | Has there been a leak or spill from any tank system or has any tank system been found unfit for use? **If so**, did the o/o: | | Yes ☐ No ☒ N/A ☐ |
| *NOTE: If the tank is found to be unfit for use, inspector should explain why.* | | | |
| | a. | Immediately cease flow of material into tank and investigate the cause of the release? [3745-66-96(A)] | Yes ☐ No ☐ N/A ☒ |
| | b. | Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time? [3745-66-96(B)(1)] | Yes ☐ No ☐ N/A ☒ |
| | c. | Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment? [3745-66-96(B)(2)] | Yes ☐ No ☐ N/A ☒ |
| | d. | For a visible release to the environment, immediately conduct a visual inspection of the release? [3745-66-96(C)] | Yes ☐ No ☐ N/A ☒ |
| | e. | For a visible release to the environment, prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C)] | Yes ☐ No ☐ N/A ☒ |
| | f. | For a visible release to the environment, properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)] | Yes ☐ No ☐ N/A ☒ |
| | g. | Report any release to the environment to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)] | Yes ☐ No ☐ N/A ☒ |
| | h. | For a release to the environment, submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)] | Yes ☐ No ☐ N/A ☒ |
| | i. | Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)(2)] | Yes ☐ No ☐ N/A ☒ |
| | j. | For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)] | Yes ☐ No ☐ N/A ☒ |

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|---|---|---|---|
| *NOTE: The requirements noted in 20.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.* | | | |
| 22. | In the event that the repairs to the tank system were major (e.g., replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from a qualified professional engineer attesting that the repaired unit is capable of handing hazardous waste? [3745-66-96(F)] | | Yes ☐ No ☐ N/A ☒ |
| 23. | Was a copy of the certification submitted to the director within seven days after returning the system to use? [3745-66-96(F)] | | Yes ☐ No ☐ N/A ☒ |
| 24. | If the o/o was unable to repair and return the unit to service as described in 20.a through 20.e, was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)] | | Yes ☐ No ☐ N/A ☒ |
| 25. | Does the o/o have a tank system **with a variance from secondary containment** from which a release has occurred but has not migrated beyond the zone of engineering control? **If so,** | | Yes ☐ No ☐ N/A ☒ |
| | a. | Has the o/o complied with 3745-66-96(A) through (F), except (D), and decontaminated soils? [3745-66-93(G)(3)] | Yes ☐ No ☐ N/A ☒ |
| | b. | If soils cannot be decontaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)] | Yes ☐ No ☐ N/A ☒ |
| 26. | Does the o/o have a tank system **with a variance from secondary containment** from which a release occurred and has migrated from the zone of engineering control? **If so,** | | Yes ☐ No ☐ N/A ☒ |
| | a. | Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)] | Yes ☐ No ☐ N/A ☒ |
| | b. | If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(4)] | Yes ☐ No ☐ N/A ☒ |

| SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS – BATTERIES AND LAMPS | | | |
|---|---|---|---|
| ***Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more*** | | | |
| ***Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less*** | | | |
| **PROHIBITIONS** | | | |
| 1. | Did the SQUWH dispose of universal waste? [3745-273-11(A)] | Yes ☐ No ☒ N/A ☐ | |
| 2. | Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)] | Yes ☐ No ☐ N/A ☒ | |
| **WASTE MANAGEMENT AND LABELING/MARKING** | | | |
| **UNIVERSAL WASTE BATTERIES** | | | |
| 3. | Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] | Yes ☐ No ☐ N/A ☒ | |
| 4. | If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] | Yes ☐ No ☐ N/A ☒ | |
| 5. | Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)] | Yes ☐ No ☐ N/A ☒ | |
| 6. | If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)] | Yes ☐ No ☐ N/A ☒ | |
| | a. If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] | Yes ☐ No ☐ N/A ☒ | |
| | b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] | Yes ☐ No ☐ N/A ☒ | |
| 7. | Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)] | Yes ☐ No ☐ N/A ☒ | |
| **UNIVERSAL WASTE LAMPS** | | | |
| 8. | Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and 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 ☐ | |
| 9. | Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] | Yes ☐ No ☐ N/A ☒ | |
| *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 rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.* | | | |
| 10. | Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)] | Yes ☒ No ☐ N/A ☐ | |

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| **ACCUMULATION TIME** | | | |
| 11. | Is the waste accumulated for less than one year? [3745-273-15(A)] | | Yes ☒ No ☐ N/A ☐ |
| | a. | If not, is 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 ☒ |
| *NOTE: Accumulation is defined as date generated or date received from another handler.* | | | |
| 12. | Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)]<br><br>If yes, describe below: | | Yes ☒ No ☐ N/A ☐ |
| **EMPLOYEE TRAINING** | | | |
| 13. | Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] | | Yes ☒ No ☐ N/A ☐ |
| **RESPONSE TO RELEASES** | | | |
| 14. | Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] | | Yes ☐ No ☐ N/A ☒ |
| 15. | Is the material released characterized? [3745-273-17(B)] | | Yes ☐ No ☐ N/A ☒ |
| 16. | If the material released is a hazardous waste, was 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 OAC Chapter 3745-52) [3745-273-17(B)] | | Yes ☐ No ☐ N/A ☒ |
| **OFF-SITE SHIPMENTS** | | | |
| *NOTE: If a SQUWH self-transports waste, then the handler must comply with the Universal Waste transporter requirements.* | | | |
| 17. | Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] | | Yes ☒ No ☐ N/A ☐ |
| 18. | Is the handler aware of DOT requirements for packaging and shipping?<br><br>If no, make aware of 49 CFR 171-180. | | Yes ☒ No ☐ N/A ☐ |
| 19. | Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)] | | Yes ☒ No ☐ N/A ☐ |
| 20. | Has the originating handler ever had an off-site shipment rejected by another handler or destination facility? | | Yes ☐ No ☒ N/A ☐ |
| | a. | If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)] | Yes ☐ No ☐ N/A ☒ |
| 21. | If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u>: | | Yes ☐ No ☐ N/A ☒ |
| | a. | Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)] | Yes ☐ No ☐ N/A ☒ |
| 22. | If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] | | Yes ☐ No ☐ N/A ☒ |
| **EXPORTS** | | | |
| 23. | Is waste being sent to a foreign destination? If so: | | Yes ☐ No ☒ N/A ☐ |

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|---|---|---|---|
| | a. | Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] | Yes ☐ No ☐ N/A ☒ |
| | b. | Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)] | Yes ☐ No ☐ N/A ☒ |
| | c. | Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] | Yes ☐ No ☐ N/A ☒ |