



Environmental
Protection Agency

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

Robyn - File copy
Eval. \$\$\$
Ent. \$\$\$
2 violations RTZ'd

November 22, 2011

Re: **OHD004253878**
Cincinnati Incorporated
SQG/Used Oil Generator
Hamilton County
Notice of Violation/Return to Compliance

Mr. Keith Roth
Cincinnati Incorporated
Box 11111
Cincinnati, OH 45211

Dear Mr. Roth:

On November 2, 2011, Ohio EPA conducted a compliance evaluation inspection (CEI) at 7420 Kilby Rd. in Harrison. Cincinnati Incorporated (CI) is identified as a large quantity generator in Ohio EPA's records. On the date of my inspection, CI was a used oil generator and small quantity generator (SQG) of hazardous waste.

I represented the Ohio EPA. You represented CI during Ohio EPA's November 2, 2011 CEI. I inspected CI 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).

During my CEI, I found the following violations of Ohio's hazardous waste laws:

1. **OAC Rule 3745-279-22(C), Used Oil Storage Requirements for Generators:** Containers used to stored used oil at generator facilities must be labeled with the words "Used Oil".

CI failed to label used oil totes with the words "Used Oil". They were labeled as "waste oil" during my November 2, 2011 CEI.

In a November 9, 2011 e-mail, you sent me pictures showing that the totes are now labeled with the words "Used Oil". This action **corrected** the above violation.

2. **OAC Rule 3745-66-74, Inspections:** The hazardous waste container accumulation area(s) must be inspected at least weekly.

During the November 2, 2011 CEI, a gap existed in the weekly inspections between November 10, 2010 & November 24, 2010, July 13, 2011 & July 26, 2011 and September 7, 2011 & September 20, 2011. The gap between December 22, 2010 & January 5, 2011 was due to plant shutdown during the holiday season.

Southwest District Office
401 East Fifth Street
Dayton, OH 45402-2911

937 | 285 6357
937 | 285 6249 (fax)
www.epa.ohio.gov

Mr. Keith Roth
November 22, 2011
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This violation is **corrected** since weekly inspections resumed after the last gap in September 2011.

However, Ohio EPA would like CI to prepare a plan to prevent gaps from occurring in future weekly inspections. **Please submit this plan to Ohio EPA for my review within 30 days upon your receipt of this letter.**

As we discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce or eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs as well as regulatory requirements. After the inspection, I e-mailed you information about solvent distillation units.

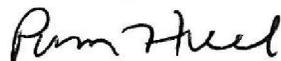
Additionally, the Ohio Department of Development's Office of Energy Efficiency may be able to help with energy efficiency issues. Their website is at: <http://www.development.ohio.gov/cdd/oeef/>

If you'd like to receive updates relating to hazardous waste activities (or other environmental programs) in Ohio, you can find more information and sign up for this free service at the following Web link:
http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage

Enclosed is a copy of the checklists that I completed as a result of the inspection. You can find Ohio's hazardous waste rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>

Should you have any questions, please feel free to call me at (937) 285-6091.

Sincerely,



Pam Hull
District Representative
Division of Materials and Waste Management
Enclosure

ec: George Strobel, SWDO-DMWM
Robyn Fox, SWDO-DMWM/SWDO Facility File
Facility File: Cincinnati, Inc., SQG, OHD004253878, Hamilton County

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.

PH/bp

Send to Central Office <input checked="" type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE 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.

Site EPA ID No.	EPA ID Number: OHD004253878	
Site Name	Name: Cincinnati, Inc.	Website: www.e-ci.com (Optional)
Site Location Information	Street Address: 7420 Kilby Rd	
	City, Town, or Village: Harrison	State: OH
	County Name: Hamilton	Zip Code: 45030
Site Land Type (check only one)	Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	
NAICS code(s) www.census.gov/epcd/www/naics.html	333513	

Facility Representative	First Name: Keith	MI:	Last Name: Roth
Additional names can be recorded in number 12	Title:		
	Phone Number: 513-367-7354	Phone Number Extension:	
	E-Mail Address: keith.roth@e-ci.com		
Only provide address information if it is different than the site address	Fax Number: 513-367-7406	Fax Number Extension:	
	Street or P.O. Box: Box 11111		
	City, Town or Village: Cincinnati		
	State: OH	Zip Code: 45211	

Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Cincinnati, Inc.		Date Became Owner (mm/dd/yyyy): 05/05/1952	
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>
	Street or P.O. Box: 7420 Kilby Rd.			
	City, Town or Village: Harrison		Owner Phone #: 513-367-7354	
	State: OH		Country: USA	Zip Code: 45030
	Name of Site's Operator: Cincinnati, Inc.		Date Became Operator (mm/dd/yyyy): 05/05/1952	
	Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>
	Street or P.O. Box: 7420 Kilby Rd.			
	City, Town or Village: Harrison		Operator Phone #: 513-367-7354	
	State: OH		Country: USA	Zip Code: 45030

VIOLATIONS CITED?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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TYPE OF HANDLER - MARK "X" AS APPROPRIATE		
<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). <i>Check the box for the applicable generator status and provide a comment.</i>	<input type="checkbox"/> Large Quantity Generator (LQG) <input checked="" type="checkbox"/> Small Quantity Generator (SQG) <input type="checkbox"/> Conditionally Exempt Small Quantity Generator <input type="checkbox"/> U.S. Importer of Hazardous Waste <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)	
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Hazardous Waste Transfer Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility
<input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Receives Hazardous Waste from Off-site

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY))	
<input type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES
<input type="checkbox"/> Batteries
<input type="checkbox"/> Pesticides
<input type="checkbox"/> Mercury containing equipment
<input type="checkbox"/> Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))
<input checked="" type="checkbox"/> Used Oil Generator
<input type="checkbox"/> Used Oil Transporter
<input type="checkbox"/> Used Oil Transfer Facility
<input type="checkbox"/> Used Oil Processor
<input type="checkbox"/> Used Oil Re-refiner
<input type="checkbox"/> Off-Specification Used Oil Burner
<input type="checkbox"/> Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil
<input type="checkbox"/> 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.

<input type="checkbox"/> College or University
<input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
<input type="checkbox"/> 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.

REFER	TO	2010	ANNUAL	REPORT	CODES	INFO
COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.						
Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:			
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No				
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No				

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Pam Hull		11/2/2011

Comments:

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

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

Safety Equipment Used:

GENERAL REQUIREMENTS

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

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

6.	Has the generator accumulated hazardous wastes in excess of (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]

7.	Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.

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

NOTE: Complete appropriate checklist for each unit.

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

MANIFEST REQUIREMENTS

9.	Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)(1)]- Mineral Spirits are sent to Crystal Clean under their reuse program (considered a product)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	Are wastes reclaimed under a contractual agreement? If so: [3745-52-0(E)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Does the contractual agreement specify the type of waste and frequency of shipment?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. Is the transport vehicle owned and operated by the reclaimer?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

	c.	Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.			
11.		Have items 1 through 20 of each manifest been completed? [3745-52-20(A)(1)] & [3745-52-27(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be complete. [3745-52-20(A)(1)]			
12.		Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternative facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]			
13.		If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.		Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.			
15.		If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? [3745-52-42(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.		Are signed copies of all manifests being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.			
PREPAREDNESS AND PREVENTION			
17.		Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)]- Cincinnati Inc. (CI) has a contingency plan in place that they train employees on once a year. This supersedes this requirement. Will advise them on this SQG requirement if they choose to do this instead and/or in addition to the contingency plan.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.		Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]	
	a.	Name and telephone number of emergency coordinator?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	Location of fire and spill control equipment, and, if present, fire alarm(s)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c.	Telephone number of local fire department?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
19.		Are employees familiar with waste handling and emergency procedures? [3745-52-34(D)(5)(c)] Employees at CI receive annual haz waste & contingency plan training	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.		Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
21.		Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.		Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:	

	a.	Internal Alarm system? [3745-65-32(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
23.		Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a.	Are inspections recorded in a log or summary? [3745-65-33]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.		Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (<i>unless the device is not required under OAC 3745-65-32</i>)? [3745-65-34(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
25.		If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance (<i>unless not required under OAC 3745-65-32</i>)? [3745-65-34(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
26.		Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
27.		Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
28.		Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
SATELLITE ACCUMULATION AREA REQUIREMENTS			
29.		Does the generator ensure that satellite accumulation area(s):	
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	f.	Containers are marked with the words "Hazardous Waste" <u>or</u> other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
30.		Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.			
USE AND MANAGEMENT OF CONTAINERS			
31.		Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(D)(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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

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

34.	Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days. A gap existed in the weekly inspections between 11/10/10 & 11/24/10, 7/13/11 & 7/26/11 and 9/7/11 & 9/20/11. The gap between 12/22/10 & 1/5/11 was due to plant shutdown during the holiday season. This violation is corrected since weekly inspections resumed after the last gap in September 2011.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
35.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
36.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
37.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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

PRE-TRANSPORT REQUIREMENTS

38.	Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
39.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
40.	Before off-site transportation, does the generator placard <u>or</u> offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**LDR CHECKLIST-Evaluated LDR associated with manifest # 000501085VES dated
7/22/11 for D001, D018, F003, F005 waste)**

GENERAL LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] If so: Yes No ___ N/A ___ RMK# ___
- a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)] Yes ___ No ___ N/A RMK# ___
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes No ___ N/A ___ RMK# ___
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] Yes No ___ N/A ___ RMK# ___
3. Has the generator determined the correct treatability group(s) (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes No ___ N/A ___ RMK# ___
4. Does the generator generate a characteristic hazardous waste? If so: Yes No ___ N/A ___ RMK# ___
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes No ___ N/A ___ RMK# ___

NOTE: If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so: Yes No ___ N/A ___ RMK# ___
- a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes ___ No ___ N/A ___ RMK# 1

NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]

6. Has the generator correctly determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)]

Yes No N/A RMK# 1

NOTE: *Wastes with EPA hazardous waste numbers K174 and K175 (chlorinated aliphatic wastes) have specific requirements in rule 3745-270-33. Waste with EPA hazardous waste numbers K176, K177 and K178 (inorganic chemical wastes) have specific requirements in rule 3745-270-36.*

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] Yes No N/A RMK#

NOTE: *A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit ('402 of CWA), that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under '307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater.[3745-270-03(B)]*

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] Yes No N/A RMK#

NOTE: *In other words, is combustion a legitimate treatment method.*

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes No N/A RMK#

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] If so: Yes No N/A RMK#

- a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05] Yes No N/A RMK#

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] If so: Yes No N/A RMK#

- a. The facility can land dispose of the waste. [3745-270-06] Yes No N/A RMK#

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? Yes ___ No N/A ___ RMK# ___
If so:

a. Has the facility complied with 3745-270-04? Yes ___ No ___ N/A RMK# ___

REMARKS

1. LDR Form Identified this is restricted waste that requires treatment to applicable standards

NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator=s waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)] Yes No ___ N/A ___ RMK# ___

14. If a generators= waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)] Yes ___ No ___ N/A RMK# ___

15. If a generators= waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)] Yes ___ No ___ N/A RMK# ___

16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)] Yes ___ No ___ N/A RMK# ___

17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so: Yes ___ No N/A ___ RMK# ___

a. Is a one-time notice placed in the facility=s file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes ___ No ___ N/A RMK# ___

NOTE: Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit.(See 270-07(A)(7))

18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)] Yes No ___ N/A ___ RMK# ___

REMARKS

GENERATORS TREATING HAZARDOUS WASTE

1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? Yes ___ No N/A ___ RMK# ___
2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)]
a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] Yes ___ No ___ N/A RMK# ___
b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes ___ No ___ N/A RMK# ___
3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes ___ No ___ N/A RMK# ___
4. Has the generator followed their WAP [3745-270-07(A)(5)]? Yes ___ No ___ N/A RMK# ___
5. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes ___ No ___ N/A RMK# ___

NOTE: If the waste is a characteristic waste, which has been treated to render it non hazardous and subsequently sent to a solid waste landfill, proceed to question 7 & 8.

6. Has the generator sent a notification and certification with the initial shipment of waste?[3745-270-07(A)(5)(c)] Yes ___ No ___ N/A RMK# ___
7. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] Yes ___ No ___ N/A RMK# ___
8. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the Yes ___ No ___ N/A RMK# ___

following:

- a. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes ___ No ___ N/A RMK# ___
- b. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)] Yes ___ No ___ N/A RMK# ___

NOTE: *If the waste will be treated and monitored for all UHCs then they do not need to be listed on the notice.*

9. Has the process/operation generating the waste or the solid waste landfill facility changed? If so: Yes ___ No N/A ___ RMK# ___
- a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] Yes ___ No ___ N/A RMK# ___
- b. Has the director been notified of such changes? [3745-270-09(D)] Yes ___ No ___ N/A RMK# ___

NOTE: *The director need only be notified on an annual basis but no later than December 31.*

10. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: Yes ___ No ___ N/A RMK# ___
- a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49 (C)] Yes ___ No ___ N/A RMK# ___
11. Does each notification/certification form completed, contain the information found in Table1? [3745-270-07(A)(3)] Yes ___ No ___ N/A RMK# ___

NOTE: *If the waste will be treated and monitored for all constituents, there is no need to put them all on the LDR notice.*

REMARKS

HAZARDOUS DEBRIS

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)?
 Yes ___ No N/A ___ RMK# ___
2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.)
 Yes ___ No ___ N/A RMK# ___
3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so:
 Yes ___ No ___ N/A RMK# ___
- a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)]
 Yes ___ No ___ N/A RMK# ___

NOTE: If immobilization has been used in a treatment train, it must be the last treatment technology used.

4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so:
 Yes ___ No ___ N/A RMK# ___
- a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)]
 Yes ___ No ___ N/A RMK# ___
5. Is the waste a PCB waste under 40 CFR Part 761? If so:
 Yes ___ No N/A ___ RMK# ___
- a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)]
 Yes ___ No ___ N/A RMK# ___
6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)]
 Yes ___ No ___ N/A RMK# ___
7. Does the owner/operator of a treatment facility that claims the debris is excluded from regulation as a hazardous waste under 3745-51-03(F)(1) maintain the following information?
 Yes ___ No ___ N/A RMK# ___
- a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)]
 Yes ___ No ___ N/A RMK# ___
- b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)]
 Yes ___ No ___ N/A RMK# ___
- c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)]
 Yes ___ No ___ N/A RMK# ___

8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F)(1) have the following information? [3745-270-07(D)(3)]
 Yes ___ No ___ N/A RMK# ___
- a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)]
 Yes ___ No ___ N/A RMK# ___
- b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)]
 Yes ___ No ___ N/A RMK# ___
- c. Technology used from Table 1? [3745-270-07(D)(1)(c)]
 Yes ___ No ___ N/A RMK# ___
9. Has the above notification been sent to the director? [3745-270-07(D)(1)]
 Yes ___ No ___ N/A RMK# ___

REMARKS

TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13? [3745-270-07(B)]
 Yes ___ No ___ N/A RMK# ___
2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)]
 Yes ___ No ___ N/A RMK# ___

Note: *No further notification is necessary until such time that the waste changes or the receiving facility changes.*

3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07? [3745-270-07(B)(3)]
 Yes ___ No ___ N/A RMK# ___
4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so:**
- a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)]
5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? **If so:**
- a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)], excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)]
 Yes ___ No ___ N/A RMK# ___
- b. Has the treatment facility (recycler) sent a certification found in

3745-270-07(B)(4)[3745-270-07(B)(6)]

Yes ___ No ___ N/A X RMK# ___

c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)]

Yes ___ No ___ N/A X RMK# ___

6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)]

Yes ___ No ___ N/A X RMK# ___

7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have:

a. Copies of all notices and certifications required in 3745-270?

Yes ___ No ___ N/A X RMK# ___

b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49?

Yes ___ No ___ N/A X RMK# ___

c. The testing frequency specified in the facility's WAP and have they followed the protocol?

Yes ___ No ___ N/A X RMK# ___

REMARKS

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Cincinnati, Inc. Facility Type: SQG Date of Inspection: 11/2/11 EPA ID#: OHD004253878

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1 Painting of automation systems	Paint waste D001, D018, F003, F005	~800 #/month		Veolia, OH TSD	Sends mineral spirits to Crystal Clean's Reuse Program	Sent info about solvent distillation via e-mail on 11/7/11.

REMARKS & GENERAL INFORMATION

General Process Information:

Per their webpage, Cincinnati Inc. produces lasers, press brakes, and shears.

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:

WASTE ACCUMULATION PROCEDURE

1. No More than One 55 Gallon Drum of Each Waste May Be Present in Any Accumulation Area.
2. Drums Must Remain Closed Except When Waste Product is Being Added.
3. When Drum is Full, Contact Maintenance Supervisor, Ext. 888 or Safety Manager, Ext. 854 For Removal.
4. Do Not Leave Open Tanks/Containers, Shop Towels, ETC. in Accumulation Area.
5. Drum Must be Moved to Storage Pad Within 72 Hours When Drum is Full.

11/2/11 CEI
Cincinnati, Inc.
7420 Kilby Rd., Harrison OH
Satellite Accumulation area
for paint waste

4. Do Not Leave Open Pails, Containers, Shop Towels,
ETC. in Accumulation Area.
5. Drum Must Be Moved To Storage Pad Within 72
Hours When Drum is Full.



11/2/11 CEI
Cincinnati, Inc
7420 Kilby Rd., Harrison OH
Satellite Accumulation area
for paint waste, view of drum
with closed bung

Crystal Clean Parts Washer Service

PRODUCT REUSE PROGRAM

YOUR PARTS CLEANER WAS SERVICED WITH CRYSTAL CLEAN CC140+ SOLVENTS.
REFER TO MSDS SUPPLIED BY CRYSTAL CLEAN PARTS WASHER SERVICE.

PRECAUTIONS

- Caution** combustible material. Keep away from sparks, open flame or heat.
- Use** in well ventilated areas. vapors are heavier than air.
- Do not** smoke, drink or eat in work area.
- May cause** irritation. Avoid repeated or prolonged contact with skin. Wear rubber gloves, safety glasses and protective clothing.
- Avoid** repeated or prolonged breathing of vapors.

Chemical Emergency Spill Call

CRYSTAL CLEAN
Telephone 1-800-827-7622

For more information please read the material
MSDS supplied to you and your com-
pany by Crystal Clean Parts Washer Service.

FIRST AID

- Skin Contact** Remove saturated clothing immediately. Repeated exposure can cause rash or absorption into skin. If Skin contact is made, wash thoroughly with soap and water.
- Eye Contact** Flush eyes with large amounts of water for at least 15 minutes and seek medical attention immediately.
- If Swallowed** Do not induce vomiting. Drink large amounts of water or milk and seek medical attention immediately
- Dizziness or Unconsciousness** Remove person to fresh air immediately and seek immediate medical attention.

PLEASE LIMIT SOLIDS AND OILS

DO NOT PLACE ANY MATERIAL IN
THIS DRUM INCLUDING ANY OF
THE FOLLOWING:

WASTE PAINTS
CHLORINATED SOLVENTS
WASTE CHEMICALS

NOTICE

Ensure that the following operating
requirements are met.

- Close the cover whenever articles are not being handled in the degreaser.
- Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- Store used solvent only in covered containers and prohibit the disposal or transfer of used solvent in any manner in which greater than twenty percent (20%) of the used solvent by weight could evaporate.

Crystal Clean Parts Washer Service

11/2/11 CEI
Cincinnati, Inc.
7420 Kilby Rd., Harrison OH
Parts washer associated with
Crystal Clean's Reuse Program