Environmental
Protection Agency

Governor
Lt. Governor
Director

December 29, 2011

RE: H. C. STARCK, INC.
CUYAHOGA COUNTY
OHD 986 999 258
CESQG, NOV/RTC

Gary J. Nied
Manager, HSEQ/ICS
H. C. Starck, Inc.
21801 Tungsten Rd.
Euclid, OH 44117

Dear Mr. Nied:

On December 19, 2011, I as a representative of the Ohio EPA Division of Materials and Waste Management, conducted a compliance inspection of the H. C. Starck, Inc. (H. C. Starck) facility located at 21801 Tungsten Rd., Euclid, for compliance with Ohio's hazardous waste and used oil regulations. You represented H. C. Starck during the inspection. You also provided additional information via email subsequent to the on-site inspection.

The facility consists of one main building with parking lots and a detached Oil Storage building. The facility fabricates tungsten and molybdenum metal products from ingots. Processes utilized include:

- Hot and cold rolling mills;
- Pickling line with acid and caustic washes;
- Furnaces for leveling and annealing;
- Molding followed by sintering furnaces to produce shaped pieces; and,
- Cutting metal to size with grinding machines, band saw and shears.

No hazardous waste was observed during the inspection; apparently no hazardous wastes are routinely produced at this facility.

Several spent materials that exhibit a characteristic of a hazardous waste that are used without reclaiming are routinely produced. These materials are not classified as wastes and include:

- Spent hydrofluoric acid (HF) and nitric acid mixture generated from the pickling line. This stream is recycled at Agmet.
- Spent sulfuric acid and nitric acid mixture, called mixed acid, generated from the pickling line. This stream is used to neutralize wastewater in an on-site wastewater treatment unit.
- Spent caustic generated from the pickling line. This stream is used to neutralize wastewater in an on-site wastewater treatment unit.

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087-1924

330 | 963 1200
330 | 487 0769 (fax)
www.epa.ohio.gov

Metal scraps and metal-bearing wastes (e.g., sludges and filter cakes) that do not exhibit a characteristic of a hazardous waste are recycled for metal recovery. The facility generates used oil that is recycled and used lamps that are managed as universal waste.

No hazardous waste was observed during the inspection; however I observed a solvent that could be a hazardous waste in the future. The facility uses mineral spirits with a flash point of 105°F to wipe metal during the production process. Rags are moistened with the solvent and are then used for wiping. Used rags are sent to a commercial laundry. No free liquids are present on the used rags. Consequently these rags are not hazardous waste. However, if any 105°F flash point mineral spirits should be used as a solvent and collected as a liquid, the used solvent would be a hazardous waste.

The inspection included a review of the facility's operations, as well as waste management practices and documentation. H. C. Starck was inspected for the requirements of a conditionally exempt small quantity generator (CESQG) of hazardous waste because the facility generates less than 220 pounds of hazardous waste in a calendar month and did not have more than 6,000 kilograms of hazardous waste on site at one time.

Based on observations made during the facility walk-through and inspection, Ohio EPA has determined that H. C. Starck has violated the following state used oil and universal waste regulations:

1. **OAC 3745-273-14(E) Small Quantity Handler Must Label the Unit Holding Universal Waste Lamps**

The facility generates used lamps which it manages as universal waste and is classified as a small quantity handler of universal waste. One box of used four foot fluorescent lamps was present in the maintenance area in the basement. OAC 3745-273-14(E) requires that this container be labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)". The facility was not in compliance with this rule as no labels or marking with any of these words were observed on the box.

The box was marked as required by the rule during the inspection.

This action abated this violation. In the future all universal waste lamps should be managed in accordance with the universal waste rules. You indicated during the inspection that the facility would switch to another vendor that supplies pre-labeled containers.

2. **OAC 3745-279-22(C)(1) Used Oil Containers Must Be Labelled With The Words "Used Oil"**

One 55 gallon drum of used oil was present in the maintenance area in the basement at the time of the inspection. The drum was not labelled or marked with the words "Used Oil". The drum was marked with the words "Used Oil" during the inspection.

Marking the container during the inspection abated this violation. No further action regarding this violation is necessary at this time. In the future all containers holding used oil should be marked with the words "Used Oil".

Enclosed you will find a copy of the checklist completed during the December 19, 2011 inspection.

**Other Information**

The Division of Materials and Waste Management has created an electronic news service to provide you with updates related to hazardous waste activities 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 .

Should you have any questions regarding this letter, please contact me at (330) 963-1165.

Sincerely,

Neil J. Wasilk
Environmental Specialist
Division of Materials and Waste Management

Enclosure

NJW:ddw

cc: Marlene Kinney, Ohio EPA, DMWM, NEDO
ec: Natalie Oryshkewych, Ohio EPA, DMWM, NEDO
Nyall McKenna, Ohio EPA, DMWM, NEDO
Jeff Mayhugh, Ohio EPA, DMWM, CO

| Send to Central Office ☒ | Ohio Environmental Protection Agency<br>**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: **OHD 986 999 258** | | | | | | | |
| **Site Name** | Name: **H. C. Starck, Inc.** | | | | Website: (Optional) | | | |
| **Site Location Information** | Street Address: **21801 Tungsten Rd.** | | | | | | | |
| | City, Town, or Village: **Euclid** | | | | State: OH | | | |
| | County Name: **CUYAHOGA** | | | | Zip Code: **44117** | | | |
| **Site Land Type** (check only one) | Private ☒ | County ☐ | District ☐ | Federal ☐ | Indian ☐ | Municipal ☐ | State ☐ | Other ☐ |
| **NAICS code(s)** www.census.gov/epcd/www/naics.html | | | | | | | | |

| | | | |
|---|---|---|---|
| **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: **Gary** | MI: **J.** | Last Name: **Nied** |
| | Title: **Manager, HSEQ/ICS** | | |
| | Phone Number: **216-6692-4408** | | Phone Number Extension: |
| | E-Mail Address: **gary.nied@hcstarck.com** | | |
| | Fax Number: | | Fax Number Extension: |
| | Street or P.O. Box: | | |
| | City, Town or Village: | | |
| | State: | | Zip Code: |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| **Legal Owner And Operator of the Site.** List Additional Owners and/or Operators in the Comment Section or on another copy of this form page | Name of Site's Legal Owner: | | | | Date Became Owner (mm/dd/yyyy): | | | | |
| | Owner Type: | Private ☒ | County ☐ | District ☐ | Federal ☐ | Indian ☐ | Municipal ☐ | State ☐ | Other ☐ |
| | Street or P.O. Box: | | | | | | | | |
| | City, Town or Village: | | | | Owner Phone #: | | | | |
| | State: | | | | Country: | | Zip Code: | | |
| | Name of Site's Operator: | | | | Date Became Operator (mm/dd/yyyy): | | | | |
| | Operator Type: | Private ☐ | County ☐ | District ☐ | Federal ☐ | Indian ☐ | Municipal ☐ | State ☐ | Other ☐ |
| | Street or P.O. Box: | | | | | | | | |
| | City, Town or Village: | | | | Operator Phone #: | | | | |
| | State: | | | | Country | | Zip Code: | | |

**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**

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) |
|---|---|---|
| **N. Wasilk** | | **12/19/2011 10:00 a.m.** |

***Comments:***

Revised 09.05.10

**Hazardous Waste**
**Process Description**

Facility:

OHD 986 999 258

H. C. Starck, Inc.
21801 Tungsten Rd.
Euclid, OH 44117

Facility consists of one main building with parking lots and a detached Oil Storage building.

Apparently no routine generation of hazardous waste at this time. Largest former hazardous waste stream was a spent HF and H2SO4 acid from the pickling line; this stream is now sent to Agmet for re-use without reclaiming.

The facility's business is fabricating molybdenum (moly) and tungsten from ingots and cladding copper and nickel (cladding is a very small part of the business).

Fabricating processes include:
-Storage of tungsten and moly ingots
-Hot and cold rolling mills for rolling tungsten and moly ingots; reduce thickness and lengthen. Can roll down to foil thickness. Cladding is bonded to moly plate in Mill 3.
-Pickling line composed of two acid tanks and one caustic line with water rinse tanks between acid and caustic tanks.
-Leveling furnace to relax and level tungsten and moly. Natural gas fired.
-Annealing furnaces (at least 3) to reduce stress in rolled metal. All mills and furnaces except No. 2 Mill use hydrogen to maintain a reducing atmosphere.
-Molding of powdered metals followed by treatment in sintering furnaces to produce shaped pieces;
-Grinding machines, band saw and shears to cut material to size. Water jet cutter has been moved to other building.

Spent materials generated include:

-Spent hydrofluoric acid (HF) and nitric acid generated from the pickling line. This stream is recycled for use in an industrial process without reclaiming at Agmet per manifest used for shipments. A tank for this spent material is in the lower level of the building.
-Spent sulfuric acid and nitric acid, called mixed acid, generated from the pickling line. This stream is used to neutralize wastewater in the on-site wastewater treatment unit. A tank for this spent material is in the lower level of the building.
-Spent caustic (NaOH) generated from the pickling line. This stream is used to neutralize wastewater in the on-site wastewater treatment unit. A tank for this spent material is in the lower level of the building.

-Pickling rinse waters and facility wastewaters are collected, pH adjusted, filtered in a filter press and processed in an evaporation unit. Filtered solids are recycled for metals recovery. Concentrated distillate from the evaporator is processed in the wastewater treatment unit.
-Wastewater treatment unit treats non-contact cooling water, wash water and distillate from the evaporator; polymer and flocculating agent are added; generates cake of filtered solids which is recycled for metals recovery and water to the NEORSD.
-Filtered sludge is collected on traveling filter paper from filtering of machining coolant; it is recycled for metals recovery.
-Spent machining coolant, generated about once per year, is also recycled for metals recovery.
-Used oil is accumulated in drums and then in a 550 gallon tanks located outdoors and in 300 gallon totes in the oil house building. B.B.N Recycling picks up used oil. Sources of used oil include rolling machines and hydraulic oil.
-Spent solvent from parts washers using Safety Kleen mineral spirits solvent with a flash point of 160°F. Spent solvent is managed as a non-haz waste by Safety Kleen.
-Spent fluorescent lamps are managed as universal waste through Hukill.
-Used computers are recycled through Hukill.

Facility employees only do small painting project; use latex paints.

Used fluorescent lamps are managed as universal waste.

Used oil is collected in 55 gallon drums and then transferred to either totes in the Oil House or to a used oil tank. A 550 gallon used oil tank is located outdoors.

H. C. STARCK

## CONDITIONALLY EXEMPT 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:

| | | | |
|---|---|---|---|
| **WASTE EVALUATION** | | | |
| 1. | Have all wastes generated at the facility been adequately evaluated? [3745-52-11] | | Yes ☑ No ☐ N/A ☐ |
| **GENERATOR CLASSIFICATION** | | | |
| 2. | Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] | | Yes ☑ No ☐ N/A ☐ |
| *NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). **If so**, complete the Small Quantity Generator Requirements checklist.* | | | |
| **OFF-SITE SHIPMENT OF HAZARDOUS WASTE** | | | |
| 3. | Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] | | Yes ☑ No ☐ N/A ☐ |
| **TREATMENT OF HAZARDOUS WASTE** | | | |
| 4. | Does the generator treat hazardous waste in a: | | |
| | a. | Container that meets 3745-66-70 to 3745-66-77? | Yes ☐ No ☐ N/A ☑ |
| | b. | Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? | Yes ☐ No ☐ N/A ☑ |
| | c. | Drip pads that meet 3745-69-40 to 3745-69-45? | Yes ☐ No ☐ N/A ☑ |
| | d. | Containment building that meets 3745-256-100 to 3745-256-102? | Yes ☐ No ☐ N/A ☑ |
| *NOTE: Complete appropriate checklist for each unit.* | | | |
| *NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.* | | | |
| *NOTE: If waste is treated to meet LDRs, use LDR checklist.* | | | |
| **MIX HAZARDOUS WASTE WITH USED OIL** | | | |
| 5. | Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so: | | Yes ☐ No ☐ N/A ☑ |
| | a. | Does the CESQG manage the mixture in accordance with 3745-279-21? | Yes ☐ No ☐ N/A ☑ |

H.C. STARCK

## 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** | NO. U.W. BATTERIES OBSERVED | |
| 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 ☐ NO RELEASES OBSERVED |

*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 ☑ |

| | | | |
|---|---|---|---|
| **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: SHIPPING RECORDS | | 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** NO RELEASES OBSERVED | | | |
| 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 ☐ |

| | | | |
|---|---|---|---|
| | 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 ☑ |

H. C STARCK

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

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

| | | | |
|---|---|---|---|
| **PROHIBITIONS** | | | |
| 1. | Does the generator manage used oil in a surface impoundment or waste pile? If yes: | | Yes ☐ No ☑ N/A ☐ |
| | a. | Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] | Yes ☐ No ☐ N/A ☑ |
| *NOTE: For example, used oil contaminated scrap metal stored in a pile.* | | | |
| 2. | Is used oil used as a dust suppressant? [3745-279-12(B)] | | Yes ☐ No ☑ N/A ☐ |
| 3. | Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? | | Yes ☐ No ☐ N/A ☑ |
| *NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).* | | | |
| **GENERATOR STANDARDS** | | | |
| 4. | Does the generator mix hazardous waste with used oil? If so, | | Yes ☐ No ☑ N/A ☐ |
| | a. | Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] | Yes ☐ No ☐ N/A ☑ |
| *NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.* | | | |
| 5. | Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] | | Yes ☐ No ☐ N/A ☑ |
| *NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.* | | | |
| 6. | Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] | | Yes ☑ No ☐ N/A ☐ |
| 7. | Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] | | Yes ☑ No ☐ N/A ☐ |
| 8. | Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] | | Yes ☐ No ☑ N/A ☐ |
| 9. | Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] NO RELEASES OBSERVED | | Yes ☐ No ☐ N/A ☐ |
| | a. | Stopped the release? | Yes ☐ No ☐ N/A ☐ |
| | b. | Contained the release? | Yes ☐ No ☐ N/A ☐ |
| | c. | Cleaned up and properly managed the used oil and other materials? | Yes ☐ No ☐ N/A ☐ |
| | d. | Repaired or replaced the containers or tanks prior to returning them to service, if necessary? | Yes ☐ No ☐ N/A ☐ |
| **ON-SITE BURNING IN SPACE HEATER** | | | |
| 10. | Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: | | |
| | a. | Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? | Yes ☐ No ☐ N/A ☑ |

| | | | |
|---|---|---|---|
| | b. | Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour? | Yes ☐ No ☐ N/A ☑ |
| | c. | Are the combustion gases from heater vented to the ambient air? | Yes ☐ No ☐ N/A ☑ |
| *NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).* | | | |
| **GENERATOR TRANSPORTATION** | | | |
| 11. | | Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? | Yes ☑ No ☐ N/A ☐ |
| 12. | | If the generator self-transports used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] | |
| | a. | Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24] | Yes ☐ No ☐ N/A ☑ |
| | b. | Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24] | Yes ☐ No ☐ N/A ☑ |
| *NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).* | | | |
| **COLLECTION CENTERS AND AGGREGATION POINTS** | | | |
| 13. | | Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] | Yes ☐ No ☐ N/A ☑ |
| 14. | | Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] | Yes ☐ No ☐ N/A ☑ |
| 15. | | Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] | Yes ☐ No ☐ N/A ☑ |
| *NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.* | | | |