



State of Ohio Environmental Protection Agency

Southeast District Office

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Lee Fisher, Lieutenant Governor
Laura H. Powell, Acting Director

January 19, 2007

**ATHENS COUNTY
GENERAL FILE
(AMBASSADOR LAUNDRIES INC.)
DHWM/SEDO
OHD017516089**

Mr. Michael Downard
Ambassador Laundries Inc.
15 W. Stimson Avenue
Athens, Ohio 45670

Dear Mr. Downard:

On January 4, 2007, Jim Michnowicz and I inspected Ambassador Laundries Inc. facility in Athens, Ohio to determine Ambassador's 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). This letter will explain the violations found and what you need to do to correct the violations.

The following violations of Ohio's hazardous waste laws were identified during the inspection. 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) **OAC Rule 3745-52-34(D)(5)(c), Waste Handling:** Small Quantity Generators of hazardous waste must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to the their responsibilities during normal facility operation and emergencies.

Based on the conditions at the facility, employees did not appear to be familiar with proper waste handling procedures. At the time of the inspection, I observed hazardous waste separator water being stored in open containers which were full to within ½ to 1 inch of the top of the container. These containers were located in the pathway of a doorway to an adjacent room. The containers would have spilled easily if they were bumped by workers walking between the two rooms. Hazardous waste was also being stored in containers, such as a kitty litter pail, that would not normally be used to hold hazardous waste. These containers were not labeled as hazardous waste so it would not be readily apparent to others working in the facility that the containers held a hazardous waste. This generally careless management indicates that the employees operating the dry cleaning machine do not know how to properly handle hazardous waste.

In order to return to compliance with this rule, Ambassador must take action to see that all employees who work with the dry cleaning equipment are familiar with proper waste handling procedures. Please provide a written response detailing how you have met this requirement and the date on which employees were made familiar with proper waste handling procedures.

- (2) **OAC Rule 3745-65-31, Maintenance and Operation of Facility:** Facilities shall be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to the air, soil, or surface water which could threaten human health or the environment.

As described in the violation above, Ambassador was storing hazardous waste in open containers that could have easily spilled and caused a release of hazardous waste.

On January 11, 2007, Ohio EPA received your letter which contained pictures of the improvements made in the storage conditions of your hazardous waste. These pictures demonstrated that the problem of open containers and containers being stored in traffic areas had been corrected. Ambassador is returned to compliance with this rule.

- (3) **OAC Rule 3745-65-35, Required Aisle Space:** The owner or operator shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operation in an emergency.

At the time of the inspection, the hazardous waste storage area did not have aisle space. I observed that the drums of hazardous waste were crowded together with one another and with other facility supplies and equipment, so that unobstructed movement in the area was not possible.

On January 11, 2007, Ohio EPA received your letter which contained pictures of the hazardous waste storage area. The pictures indicated that some of the containers has been moved and stacked, however, there is still insufficient aisle space to meet the rule requirements. Please correct this problem and submit a photo which shows that aisle space has been made in the storage area.

- (4) **OAC Rule 3745-52-34(C)(1)(a), Accumulation Time of Hazardous Waste:** A generator may accumulate as much as 55 gallons of hazardous waste in containers at or near the point of generation, which is under the control of the operator of the process generating the waste, provided that, the containers are closed, in good condition and compatible with the wastes stored in them.

At the time of the inspection, Ambassador was accumulating separator water at the dry cleaning machine in two 5-gallon containers that were open, in violation of this rule.

On January 11, 2007, Ohio EPA received your letter which contained pictures of the changes you made to the separator water accumulation point. The separator water is now being collected in a container that is closed, except for an opening just large enough for the pipe that discharges the waste. The pictures also show that the second open 5-gallon pail is no longer being used for hazardous waste accumulation. Ambassador is returned to compliance with this rule.

- (5) **OAC Rule 3745-52-34(C)(1)(b), Accumulation Time of Hazardous Waste:** A generator may accumulate as much as 55 gallons of hazardous waste in containers at or near the point of generation, which is under the control of the operator of the process generating the waste, provided that, the containers are marked with the words "Hazardous Waste" or other words that identify the contents of the containers.

At the time of the inspection, Ambassador was accumulating separator water at the dry cleaning machine in two 5-gallon containers. These containers were not marked to identify their contents.

On January 11, 2007, Ohio EPA received your letter which contained pictures of the changes you made to the separator water accumulation point. The separator water is now being collected in a container that is labeled with the words "Hazardous Waste." Ambassador is returned to compliance with this rule.

- (6) **OAC Rule 3745-52-34(D)(4) and 3745-52-34(A)(3), Use and Management of Containers:** Small Quantity Generators of hazardous waste may accumulate hazardous waste on-site for 180 days provided that they follow the provisions of OAC Rule 3745-52-34(A)(3). This rule requires the containers of hazardous waste to be clearly marked with the words "Hazardous Waste."

At the time of the inspection, containers of hazardous waste in the hazardous waste storage area were not marked with the words "Hazardous Waste."

On January 11, 2007, Ohio EPA received your letter which contained pictures of the changes you made to the hazardous waste storage area. The pictures showed that all the containers were labeled with the words "Hazardous Waste." Ambassador is returned to compliance with this rule.

- (7) **OAC Rule 3745-52-34(D)(4) and 3745-52-34(A)(2), Use and Management of Containers:** Small Quantity Generators of hazardous waste may accumulate hazardous waste on-site for 180 days provided that they follow the provisions of OAC Rule 3745-52-34(A)(2). This rule requires the generator to clearly mark their containers of hazardous waste with the date on which the accumulation of waste in the container began. The date on each container must be visible for inspection.

At the time of the inspection, containers of hazardous waste in the hazardous waste storage area were not marked with the accumulation start date.

In order to return to compliance with this rule, Ambassador must mark the accumulation start date on each container of hazardous waste being stored at the facility. Please demonstrate your compliance with this rule by submitting a photo of the hazardous waste containers showing that they have been dated. Also provide documentation of how Ambassador will ensure containers containing hazardous waste will be properly labeled in the future.

- (8) **OAC Rule 3745-66-73(A), Management of Containers:** A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

At the time of the inspection, I observed a spent dry cleaning filter, which is a hazardous waste, being stored in an open container. Ambassador also was storing hazardous waste separator water in a drum with a lid that was not secured, in an open 2-gallon jug, and in an open 5-gallon pail.

On January 11, 2007, Ohio EPA received your letter which contained pictures of the changes you made to the hazardous waste storage area. The pictures showed that all the containers storing hazardous waste had been closed. Ambassador is returned to compliance with this rule.

- (9) **OAC Rule 3745-66-74, Inspections:** Areas where containers are stored must be inspected at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The inspections must be recorded in a log or summary. Please note that "weekly" is defined as at least every 7 days.

During our inspection, we reviewed the inspection logs for your hazardous waste storage area. The last inspection that had been logged was done on December 1, 2006, indicating that it had been 34 days since the area had been inspected.

The logs that had been completed were marked to indicate that aisle space was being maintained and that all containers were closed, labeled, dated, and stored and handled in a manner to prevent spills. Our observations of the storage area indicated the opposite, as detailed in the descriptions of the above violations. Considering the amount of hazardous waste in the storage and the length of time since Safety Kleen's last pickup of your waste, it seems likely that the violations we observed had been going on much longer than since December 1, 2006. This leads us to conclude that even though inspections of the storage area were being logged, actual observation of the storage area was not done when the logs were filled out.

Please respond in writing stating how you will ensure that inspections of the container storage area are done weekly, logged, and based on actual observations of the storage area.

Mr. Michael Downard
Ambassador Laundries Inc.
January 19, 2007
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Enclosed you will find a copy of the checklists completed during the inspection. Should you have any questions, please feel free to call me at (740) 380-5248. You can find copies of the hazardous waste rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm/>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/opp/asstserv.html>.

Sincerely,



Elizabeth A. Herron
Environmental Specialist
Division of Hazardous Waste Management

EH/mlm

Enclosures

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 appropriate regulations.

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

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

For Ohio EPA use only

2. Site EPA ID No.	EPA ID Number: OHD017516089							
3. Site Name	Name: Ambassador Laundries Inc.						Website (optional):	
4. Site Location Information	Street Address: 15 W Stimson Avenue							
	City, Town, or Village: Athens				State: OH			
	County Name: Athens				Zip Code: 45701			
5. Site Land Type (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other
	<input checked="" type="checkbox"/>							
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A.			B.				
	C.			D.				
7. Facility Representative: Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	First Name: Michael			MI:	Last Name: Downard			
	Phone Number: 740 593-6788				Phone Number Extension:			
	E-Mail Address:							
	Fax Number:				Fax Number Extension:			
	Street or P.O. Box:							
	City, Town or Village:							
	State:			Country:			Zip Code:	
	A. Name of Site's Legal Owner:			Date Became Owner (mm/dd/yyyy):				
Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
Street or P.O. Box:								
City, Town, or Village:				Owner Phone #:				
State:			Country:		Zip Code:			
B. Name of Site's Operator:			Date Became Operator (mm/dd/yyyy):					
Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
Street or P.O. Box:								
City, Town, or Village:				Operator Phone #:				
State:			Country:		Zip Code:			
9. Violations Cited?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No				
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)								
<input type="checkbox"/>	Not Regulated							

A. Hazardous Waste Activities

(choose only one of the following categories)

UNKNOWN: Cited for violation of 3745-52-11

a. Large Quantity Generator (LQG):

b. Small Quantity Generator (SQG)

c. Conditionally Exempt Small Quantity Generator

d. United States Importer of Hazardous Waste

e. Mixed Waste (hazardous and radioactive) Generator

3. Treater, Storer or Disposer of Hazardous Waste

4. Recycler of Hazardous Waste

5. Exempt Boiler and/or Industrial Furnace

a. Small Quantity On-site Burner Exemption

b. Smelting, Melting, Refining Furnace Exemption

6. Underground Injection Control Facility

B. Universal Waste Activities

1. Small Quantity Handler of Universal Waste

(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):

2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more).

3. Destination Facility for Universal Waste

(Check all boxes below that apply for each of the three types of facilities above.)

	Generated	Accumulated
A. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
D. Lamps	<input type="checkbox"/>	<input type="checkbox"/>

C. Used Oil Activities

1. Used Oil Generator

2. Used Oil Transporter Indicate Type(s) of Activity(ies)

Transporter

Transfer Facility

3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)

Processor

Re-refiner

4. Off-Specification Used Oil Burner

5. Used Oil Fuel Marketer -

Indicate Type(s) of Activity(ies)

a. Marketer Who Directs Shipment of Off- Specification Oil

b. Used Oil to Off-Specification Used Oil Burner

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

D007	D039	D040	F002			
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12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

No	Announced ?	Additional Facility Representatives:
No	Tanks?	Other comments:
Yes	Containers?	

13.

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
Elizabeth Herron	Jim Michnowicz	01-04-06 10 AM - 11:30 AM

14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of owner, operator, or an authorized representative	Name and Title (Print)	Date (mm-dd-yyyy)

PROCESS DESCRIPTION - WASTE ACTIVITIES SUMMARY

Facility Name: Ambassador Laundries Inc.

Facility Type: SQG

EPA ID#: OHD 017 516 089

Description of Waste				On-Site Management			Off-Site Management	P2 Activities	
Process/Activity Generating Waste	Waste Generated	EPA Waste Code	QTY per Month	Type of Accumulation/ Storage	On-Site Treatment	Waste Location	Name, location, how managed		
1	Dry cleaning	Spent filters	D007 D039 D040 F002	Range of 98 to 147 pounds	drums	NA	To the left just inside the door way behind the dry cleaning machine	Safety-Kleen Hebron, OH recycled	recycled
2	Dry cleaning	Separator water, still bottoms and lint from the dry cleaning machine	D007 D039 D040 F002	Range of 132 - 198 pounds	drums	NA	To the left just inside the door way behind the dry cleaning machine	Safety-Kleen Hebron, OH recycled	recycled

GENERAL INFORMATION

Process Description:

Ambassador Laundries Inc. operates coin laundry, commercial laundry and dry cleaning business in Athens, Ohio. They also have a store in Marietta which is just a drop off location for laundry that is cleaned at their Athens location.

Regulatory History:

Ambassador Laundries Inc. was last inspected for compliance with Ohio's hazardous waste laws on August 22, 2001.

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

CESQG: < 100 Kg. (approximately 25-30 gallons) of waste in a calendar month

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. Has the generator obtained a U.S. EPA I.D. number? [3745-52-12] Yes No N/A
3. Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)] Yes No N/A
4. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)] Yes No N/A
5. Does the generator accumulate hazardous waste? Yes No N/A

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

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

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

7. Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)] Yes No N/A

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

8. Does the generator treat hazardous waste in a:
- 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) and Yes No N/A
- c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A

NOTE: Complete appropriate checklist for each unit.

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

MANIFEST REQUIREMENTS

9. Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)] Yes No N/A
10. Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)] Yes_ No N/A_
- a. Does the contractual agreement specify the type of waste and frequency of shipment? Yes_ No N/A
- b. Is the transport vehicle owned and operated by the reclaimer? Yes_ No N/A
- c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? Yes_ No N/A

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

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

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

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

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

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

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

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

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

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

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

PREPAREDNESS AND PREVENTION

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

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

a. Name and telephone number of emergency coordinator? Yes No N/A_

b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes No N/A_

c. Telephone number of local fire department? Yes No N/A_

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

Employees did not appear to be familiar with waste handling procedures since hazardous waste was being stored in open containers in an area where they could have easily been spilled. Waste was being stored in whatever odd containers they had around, such as kitty litter pails.

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

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

The facility had two 5-gallon pails of separator water that were full to within 1/2 - 1 inch of the top. These containers were open and could have easily been spilled if bumped. One of these two containers was in the pathway of the doorway to an adjacent room. The second was collecting separator water from the dry cleaning machine and could have overflowed if more separator water was discharged. See photographs in file.

22. Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:

a Internal Alarm system? [3745-65-32(A)] Yes_ No N/A

b Emergency communication device? [3745-65-32(B)] Yes No N/A_

c Portable fire control, spill control and decon equipment? [3745-65-32(C)]? Yes No N/A_

d Water of adequate volume/pressure? [3745-65-32(D)] Yes No N/A_

Hi-Vac does not have spill control or suction equipment near the satellite accumulation area or the drum storage area.

23. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency [3745-65-33] Yes No N/A
24. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A
25. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)] Yes No N/A
- There is a telephone in the hazardous waste storage area.
26. If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32?) [3745-65-34(B)] Yes No N/A
27. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
- The hazardous waste storage area was cluttered. There was no aisle space. All the containers would have had to be removed to get to the containers in the back. See photos of inspection in the file.*
28. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes No N/A
29. 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

30. 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 one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes No N/A
- d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. Yes No N/A
- Containers at the dry cleaning machine holding the separator water were open. See photos of inspection in the file.*
- e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A

Containers at the dry cleaning machine holding separator water were not marked to identify their contents. One of the containers holding waste was a kitty litter pail. See inspection photos in the file.

31. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes__ No N/A__
- a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes__ No N/A
- b. Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] 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

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

32. Has the generator marked containers with the words "Hazardous Waste" [3745-52-34(D)(4)] Yes__ No N/A__
None of the containers in the hazardous waste storage area were marked.
33. Is the accumulation date on each container? [3745-52-34(D)(4)] Yes__ No N/A__
None of the containers in the hazardous waste storage area were marked with accumulation dates.
34. Are hazardous wastes stored in containers which are: Yes__ No N/A__
- 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__

A spent dry cleaning filter was being stored in an open container. Hazardous waste separator water was stored in a drum with a lid that was not secured, in an open 2-gallon jug, and in an open 5-gallon pail.

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

35. Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days. Yes__ No N/A__
Inspections had not been done since 12/01/06. Answers on inspection log did not match the actual conditions of the storage area.
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A__
36. 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
37. 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

38. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B) ? [3745-66-77(B)] Yes_ No N/A

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

PRE-TRANSPORT REQUIREMENTS

39. Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes_ No N/A

No hazardous waste was being prepared for transport at the time of the inspection.

40. Does each container \leq 100 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes_ No N/A

41. 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

LDR CHECKLIST

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
- 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
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes No N/A
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
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
4. Does the generator generate a characteristic hazardous waste? If so: Yes No N/A
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes No N/A

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
- 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

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

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

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

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

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

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

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

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

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

- a. Has the facility complied with 3745-270-04? Yes_ No N/A

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

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

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

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

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_

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

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_



Figure 1: Picture of two full containers of waste separator water located behind the dry cleaning machine. The separator water discharge pipe is visible in the upper right of the square container.

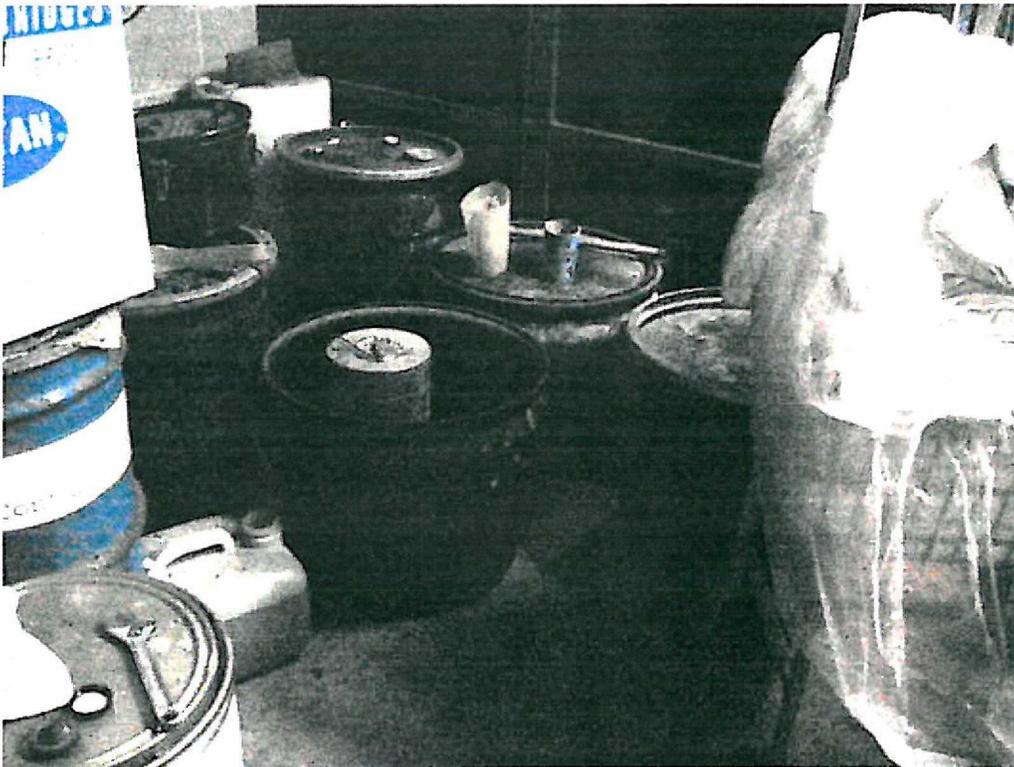


Figure 2: Hazardous waste storage area. The four black drums (two metal, two plastic) with lids on all were full of hazardous waste. The black plastic open top drum in the center of the picture contained a spent filter. Small white jug (center left) contained hazardous waste.

Athens County
Ambassador Laundries, Inc.
01/04/07 – Photographer: Elizabeth Herron

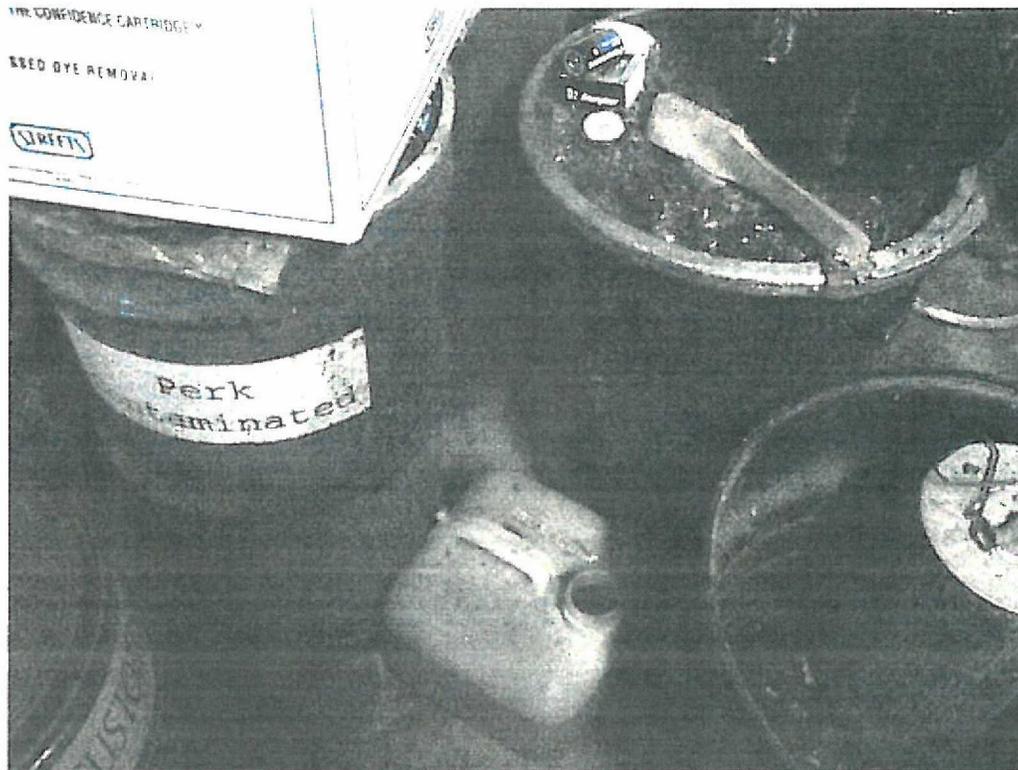


Figure 3: Close up view of hazardous waste storage area.



Figure 4: Close up view of hazardous waste storage area. Lid on the drum in the far right of the picture was not secured.