



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

March 21, 2012

RE: HARRISON PAINT CO.
STARK COUNTY
OHD 004 469 896
LQG, NOV

Stephen Laizure
V.P. Operations
Harrison Paint Company
1329 Harrison Ave. SW
Canton, OH 44706

Dear Mr. Laizure:

On March 7, 2012, I as a representative of the Ohio EPA Division of Materials and Waste Management conducted a compliance inspection of the Harrison Paint Company (Harrison Paint) facility located at 1329 Harrison Ave. SW, Canton, for compliance with Ohio's hazardous waste and used oil regulations. You represented Harrison Paint during the inspection. Subsequent to the inspection, Patrick Lauber submitted additional information via e-mail.

Harrison Paint is a manufacturer of latex (water-based) and oil-based (solvent based) paints and coatings. Hazardous wastes typically produced in the production of these paints and coatings include:

- Spent solvent from equipment clean-ups and line washes from oil-based paints and coatings (D001, F003, F005);
- Waste solvent based paints (D001, D035); and,
- Waste Alkyd Millends (D001, F003, F005).

Non-routinely produced hazardous wastes have been produced from clean-outs of no longer used raw materials. The facility is also a generator of used oil and universal waste used lamps.

For the years 2009, 2010 and 2011, Harrison Paint has managed the vast majority of the spent solvent waste from the accumulation area in the warehouse by shipment to Hukill Chemical for reclamation by distillation. Hukill in turn supplies Harrison Paint with fresh solvent. Harrison Paint questioned whether these solvents were subject to regulation as hazardous waste during the entire time they were in the accumulation area.

Under the hazardous waste rules, spent solvent recycled via distillation into usable solvent is classified as reclamation of a spent material. Spent materials so reclaimed are classified as wastes, and if they are either a listed waste or characteristic waste, subject to regulation as hazardous wastes when shipped.

Harrison Paint's current practice of accumulating spent solvent as a recyclable material in anticipation of potential recycle to an asphalt blender is addressed in the hazardous waste rules under "speculative accumulation". Spent materials that are "speculatively accumulated" are wastes unless "the person accumulating the material can show that the material is potentially recyclable and has a feasible means of being recycled; and that during the calendar year, commencing January first, the amount of material that is recycled, or transferred to a different site for recycling, equals at least seventy-five per cent by weight or volume of the amount of that material accumulated at the beginning of the calendar year...." (ORC 3725-51-01(C)(8)) Harrison Paint has not demonstrated that at least 75% of the spent solvent in the accumulation area was recycled annually.

The inspection included a review of the facility's operations, as well as waste management practices and documentation. Harrison Paint was inspected for the requirements of a Large Quantity Generator (LQG). The average monthly rate of hazardous waste generation in 2011 as calculated from data reported in the Harrison Paint annual report for 2011 was 1,821 lbs./month of which 1,333 lbs./month was spent solvent.

The monthly average rates of hazardous waste generation in 2010 and 2009 as calculated from data reported in the Harrison Paint annual reports for 2010 and 2009 were 2,350 lbs./month for 2010 and 3,820 lbs./month for 2009.

Generator category (e.g., LQG, SQG, CESQG) is based on hazardous waste generated in each calendar month. (Generator category is not based on the amount of hazardous waste shipped at any one time.) While the average generation rate can be determined from the annual report, the generation rate per calendar month cannot. Because some of the waste streams are produced intermittently (e. g. waste solvent-based paints, waste alkyd millends) and were mostly shipped in the first four months of the year, it seems likely that Harrison Paint was an LQG for at least one or more months in 2011. Similarly because the average generation rate for 2010 and 2009 was greater than 2,200 lbs./month Harrison Paint had to have been an LQG for at least one or more months in 2010 and 2009.

The inspection included a review of the facility's operations, as well as waste management practices and documentation.

Based on observations made during the facility walk-through and inspection, Ohio EPA has determined that the Harrison Paint has violated the following state hazardous waste, used oil and universal waste laws and regulations:

1. ORC 3734.02(E) & (F) Facility must be permitted for treatment, storage, disposal

During the inspection, I observed approximately thirty-five 55-gallon drums of spent solvents labeled as Asphalt Diluent 9X746 in the accumulation area in the lower level of the warehouse. For the years 2009, 2010 and 2011, Harrison Paint has managed the vast majority of spent solvent waste accumulated in the accumulation area in lower level of the warehouse by shipment to Hukill Chemical for reclamation by distillation. Spent solvent recycled via distillation into usable solvent, under the hazardous waste rules is classified as reclamation of a spent material. Spent materials so reclaimed are classified as wastes, and if they are either a listed waste or characteristic waste, subject to regulation as hazardous waste. The spent solvent generated by Harrison Paint carries hazardous waste codes D001, F003 and F005.

At the time of the inspection some of the containers apparently had been on-site at Harrison Paints for more than 90 days, since the last manifested shipment of spent solvents to Hukill Chemical was on August 3, 2011. If the only hazardous waste generated by Harrison Paints since August 3, 2011 was spent solvent, conceivably Harrison Paints could have been a Small Quantity Generator (SQG) for the period between then and the inspection. However, two drums of waste paint material was shipped as hazardous waste on September 14, 2011, which depending upon when they were generated, could have resulting in Harrison Paints being an LQG.

However, even if Harrison Paint was a SQG for the months from August 2011 to the date of the inspection, it appears the 180 days maximum period allowed for shipment of SQG wastes has probably been exceeded.

During the years 2010 and 2009, shipments of spent solvents to Hukill occurred on October 4, 2010, November 19, 2009 and June 29, 2009. Consequently spent solvents appear to have been accumulated on-site for more than 90 days. Even if Harrison Paint was a Small Quantity for the months from November 19, 2009 to October 4, 2010, it appears the 180 days maximum period allowed for accumulation of SQG wastes was exceeded.

None of the containers in the accumulation area at the time of the inspection were marked with an accumulation start date or labeled as hazardous waste.

All the drums appeared to be in good condition and no leakage/spillage was evident in the area in which the drums were being accumulated.

Because hazardous waste was accumulated for more than 90 days and Harrison Paint appears to be an LQG (and for more than 180 days if Harrison Paint was an SQG) and Harrison Paint does not hold a hazardous waste installation and operation permit, Harrison Paint is the operator of an unlawful hazardous waste storage facility. Or explained from another perspective, all storage of hazardous waste requires a permit unless specifically exempted. A hazardous waste generator is exempted from the need to get a permit to accumulate (i.e., store) the waste it generates, so long as the waste is not accumulated for more than 90 days if an LQG or 180 days if an SQG. If those times are exceeded the facility immediately needs a permit that it does not have and so is the operator of an unpermitted hazardous waste storage unit.

Harrison Paint, as the operator of an unlawful (i.e., unpermitted) hazardous waste facility, is subject to regulation under all applicable final permitted facility standards found in OAC Chapters 3745-54 and 3745-55. Additionally, at any time, Ohio EPA may assert its right to have Harrison Paint begin facility-wide clean-up pursuant to the Corrective Action process under Ohio law.

In order to demonstrate abatement of this violation:

- All drums of spent solvent accumulated on-site for more than 90 days must be immediately removed from the site; and,
- Documentation, which must include a copy of the manifest(s) which accompanied the shipment(s) of waste off-site, confirming that the waste has been removed and appropriately managed must be submitted to this office within 14 days of receipt of this letter; and,
- Documentation which outlines the procedures that will be implemented by Harrison Paint to ensure that storage longer than 90 days (180 days if operating as an SQG in the future) will not recur must be submitted to this office within 14 days of receipt of this letter.

2. Content of contingency plan, OAC 3745-65-52 (A), (B) and (C):

(A) The contingency plan shall describe the actions facility personnel shall take to comply with rules 3745-65-51 and 3745-65-56 of the Administrative Code in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

(B) If the owner or operator has already prepared a "Spill Prevention, Control, and Countermeasures Plan" in accordance with 40 CFR Part 112 or 40 CFR 1510, or some other emergency or contingency plan, he need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of the hazardous waste facility interim standards chapters.

(C) The contingency plan shall describe agreements/arrangements agreed to by local police departments, fire departments, hospitals, contractors, and Ohio EPA and local emergency response teams to coordinate emergency services, pursuant to rule 3745-65-37 of the Administrative Code.

Harrison Paint has prepared and provided a "Spill Prevention, Control, and Countermeasures Plan" (SPCC Plan). That plan is primarily focused on preventing and responding to incidents involving paint products, and oils and hazardous substances used in paint production.

Amending other emergency or contingency plans, for example a SPCC Plan, to incorporate hazardous waste management provisions is a permissible approach to complying with OAC 3745-65-52, however, all the specific requirements of OAC 3745-65-52 must be addressed in the amended plan.

The Harrison Paint SPCC plan does not fully comply with all the specific requirements of OAC 3745-65-52. Specifically the plan:

- Does not state that it was intended to be the hazardous waste management contingency plan;
- Does not address the hazardous waste 90 day accumulation area in the warehouse (which should be a primary focus of the hazardous waste management contingency plan); and
- Does not include the description of agreements/arrangements agreed to by local police departments, fire departments, hospitals, contractors, and Ohio EPA and local emergency response teams to coordinate emergency services involving hazardous waste.

To comply with these requirements, Harrison Paint is required to review and amend its contingency to plan to ensure that it:

- Specifically states that the plan is the facility hazardous waste management contingency plan;
- Identifies all hazardous wastes managed and the hazardous waste 90 day accumulation area;
- Identifies response actions for fires, explosions or any unplanned releases of hazardous wastes managed in the 90 day area;
- Ensures that emergency procedures in the plan address all items listed in OAC 3745-65-56;
- Submit a copy of the contingency plan revisions or a schedule for revision of the contingency to this office within 14 days of receipt of this letter.

While not a specific requirement, addition of a new section to the contingency plan specific to hazardous waste management contingency planning with appropriate cross references to other plan sections would probably be the clearest method of complying with contingency plan regulations.

After Ohio EPA review and acceptance of the revised contingency plan, Harrison Paint must distribute the plan to the local police department, fire department and hospital identified in the plan and provide proof of such distribution to Ohio EPA.

3. OAC Rule 3745-65-16 Personnel training.

(A) (1) Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with hazardous waste rules. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (D)(3) of this rule.

(2) This program must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures, including contingency plan implementation, relevant to the positions in which they are employed.

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

- (a) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
- (b) Key parameters for automatic waste feed cut-off systems;
- (c) Communications or alarm systems;
- (d) Response to fires or explosions;
- (e) Response to ground water contamination incidents; and
- (f) Shutdown of operations.

(B) Facility personnel must successfully complete the program required in paragraph (A) of this rule within six months after January 7, 1983 or six months after the date of their employment or assignment to a facility, or to a new position at a facility, whichever is later. Employees hired after January 7, 1983 must not work in unsupervised positions until they have completed the training requirements of paragraph (A) of this rule.

(C) Facility personnel must take part in an annual review of the initial training required in paragraph (A) of this rule.

(D) The owner or operator must maintain the following documents and records at the facility:

(1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;

(2) A written job description for each position listed under paragraph (D)(1) of this rule. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;

(3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (D)(1) of this rule; and

(4) Records that document that the training or job experience required under paragraph (A), (B), and (C) of this rule has been given to, and completed by, facility personnel.

(E) Training records on current personnel must be kept until closure of the facility.

Training records on former employees must be kept for at least three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.

The only personnel training documentation provided by the facility was a certificate for Mr. Laizure for a 2009 Hazardous Waste Management course presented by Environmental Resource Center and a certificate for Mr. Marconi for a 2009 DOT Hazardous Materials Training course presented by Environmental Resource Center.

LQGs must have a formal written training program. The materials provided do not meet the regulatory requirements.

To return to compliance Harrison Paint is required to:

- Create a training plan that it meets all the requirements of OAC Rule 3745-65-16(A)(1) through (E);
- Submit a copy of the revised training plan or a schedule for revising the training plan to this office within 14 days of receipt of this letter.

After OEPA review of the program, Harrison Paint will be required to document that required training has been provided for 2012.

Please also note that in the above rule, "facility personnel" are those employees that have responsibilities for hazardous waste management and that the personnel training program only applies to facility hazardous waste management responsibilities and activities. Employees whose only hazardous waste responsibility is to place hazardous waste in a satellite accumulation container need not be part of the formal personnel training program.

4. OAC Rule 3745-52-34(A)(2) & (3) Accumulation time of hazardous waste

These rule sections allow a LQG to accumulate, for ninety days or less, hazardous waste that is generated on-site without an Ohio hazardous waste permit, provided each container in the 90 day accumulation area is labeled or marked clearly with:

- The date upon which each period of accumulation and/or treatment begins; and,
- The words "Hazardous Waste".

None of the drums of spent solvent hazardous waste in the 90 day accumulation area at the time of the inspection were marked or labeled with the start date of the accumulation period or the words "hazardous waste".

To return to compliance Harrison Paint must:

- Mark all containers of hazardous waste in the 90 day accumulation area with the words "Hazardous Waste";
- Mark all containers of hazardous waste in the 90 day accumulation area with the start date of the accumulation period; and,
- Provide photos of hazardous waste containers in the 90 day accumulation area with the words "Hazardous Waste" and accumulation start date to this office within 14 days of receipt of this letter.

Note: if Harrison Paint were to be an SQG, the same requirements would apply to the 180 day accumulation area.

5. OAC Rule 3745- 66-74 Weekly Inspections of Hazardous Waste Containers

A large quantity generator of hazardous waste is required to inspect all containers of hazardous waste in the 90 day accumulation area at least weekly and to record the inspections in a log or summary. At the time of the inspection approximately thirty-five 55-gallon drums of hazardous waste (spent solvent) were observed in the 90 day area in the warehouse. No inspection documentation forms were provided by the facility.

An example inspection log is attached for your assistance in responding to this violation.

To return to compliance the facility must:

- Prepare inspection forms for the 90 day accumulation area;
- Conduct inspections of the hazardous waste containers in the 90 day accumulation area for 2 weeks;
- Continue conducting these inspections; and,
- Submit copies of the completed inspection forms for 2 weeks to this office within 14 days of receipt of this letter.

Note: if Harrison Paint were to be an SQG, the same requirements would apply to the 180 day accumulation area.

6. OAC Rule 3745-65-33 Testing and maintenance of equipment.

This rule states, "All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency. The owner or operator must record the inspections in a log or summary."

No records of the required inspections were provided by the facility. Inspections are required for the emergency and spill response equipment for the 90 day hazardous waste accumulation area.

An example inspection log is attached for your assistance in responding to this violation.

To return to compliance Harrison Paint is required to:

- Develop an inspection log,
- Provide a completed inspection log for one inspection cycle.
- Submit the completed inspection log to this office within 14 days of receipt of this letter.

**7. OAC Rule 3745 52 34 (C)(1)(b) Satellite Accumulation of hazardous waste.
OAC Rule 3745 52 34 (C)(1)(a) Satellite Accumulation of hazardous waste.**

OAC Rule 3745 52 34 (C)(1)(b) provides "A generator may accumulate as much as fifty five gallons of hazardous waste...in containers at or near any point of generation where wastes initially accumulate...provided he:...Marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers." Containers meeting these criteria are commonly referred to as "satellite accumulation containers". OAC Rule 3745 52 34 (C)(1)(a) requires that the container be closed except when adding or removing waste.

I observed a satellite accumulation container accumulating spent solvent hazardous waste on the first floor of the manufacturing building in the filling room that was at or near the point of generation that was not marked with the words "Hazardous Waste" or with other words that identify the contents of the containers, and that was not closed (open funnel in large bung hole and small bung removed).

The container was labeled with an "Asphalt Diluent" label during the inspection. A photo was submitted by email on March 9, 2012 of the container with that label and closed along with a commitment to obtain a self-closing funnel and train employees. [The asphalt diluent label was accepted as "other words that identify the contents of the containers" for the drum when in a satellite accumulation area. This does not mean that is an appropriate classification of the contents when the drum is moved to the accumulation area in the warehouse.]

These actions abated this violation. No further action is required at this time.

8. **OAC 3745-273-14(E) Small Quantity Handler Must Label the Unit Holding Universal Waste Lamps**
OAC 3745-273-13(D)(1) Small quantity handler must contain lamps in proper containers or packaging and containers or packaging must be closed.

The facility generates used lamps that are managed as universal waste and is classified as a small quantity handler of universal waste. In the Maintenance Shop on the first floor of the manufacturing building, about eight 8 foot used lamps were leaning against the wall. On the upper floor of the warehouse one container of 4 foot used lamps were in a container that was closed but not labeled.

OAC 3745-273-13(D)(1) requires that a small quantity handler must contain lamps in proper containers or packaging and the containers or packaging must be closed. OAC 3745-273-14(E) requires that these containers be labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)".

The facility was not in compliance with these rules at the time of the inspection. On March 9, 2012 Patrick Lauber sent me an email with photographs of closed and labeled containers for the 4 foot and 8 foot lamps. These actions abated these violations. No further action is necessary at this time.

Enclosed you will find a copy of the checklists completed during the March 7, 2012 inspection.

Additional Information Request

When responding to this letter, please provide the name of the company to which the spent solvent sold for use as asphalt diluent in 2010 was sold to and specific details on how the spent solvent was actually used at that company.

Harrison Paint needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, Harrison Paint is requested to provide documentation to this office including the steps taken to abate the violations cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to neil.wasilk@epa.ohio.gov.

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, Harrison Paint is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

Submit the above requested response documentation to this office within 14 days of receipt of this letter. Response correspondence sent by the U. S. Postal Service should be sent to:

Neil Wasilk
Northeast District Office
Ohio Environmental Protection Agency
2110 East Aurora Road
Twinsburg, OH 44087

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

NJW:ddw
Enclosure

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
John Palmer, Ohio EPA, DERR, NEDO

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your facility from its obligation to comply with all applicable regulations.

| | | |
|---|---|-----------------------|
| 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: OHD004469896 | |
| Site Name | Name: HARRISON PAINT CO | Website: (Optional) |
| Site Location Information | Street Address: 1329 HARRISON AVE SW | |
| | City, Town, or Village: CANTON | State: OH |
| | County Name: STARK | Zip Code: 44706 |
| Site Land Type (check only one) | Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> | |
| NAICS code(s) www.census.gov/epcd/www/naics.html | | |

| | | | |
|---|-----------------------------------|------------------------------------|---------------------------|
| Facility Representative | First Name: Stephen | MI: | Last Name: Laizure |
| Additional names can be recorded in number 12 | Title: V.P. Operations | | |
| | Phone Number: 330-455-5125 | Phone Number Extension: 138 | |
| Only provide address information if it is different than the site address | E-Mail Address: | | |
| | 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: Patrick Lauber | | Date Became Owner (mm/dd/yyyy): 12/12/2000 | |
| | 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: 1329 HARRISON AVE SW | | | |
| | City, Town or Village: CANTON | | Owner Phone #: | |
| | State: OH | | Country: | Zip Code: 44706 |
| | Name of Site's Operator: | | Date Became Operator (mm/dd/yyyy): | |
| | Operator Type: <input 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: | | | |
| | City, Town or Village: | | Operator Phone #: | |
| | State: | Country | Zip Code: | |

| | |
|--------------------------|---|
| VIOLATIONS CITED? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
|--------------------------|---|

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 checked="" type="checkbox"/> Large Quantity Generator (LQG) <input 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 checked="" 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

- 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.

D001 F003 F005

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 | | 3/7/2012 1:45 p.m. |

Comments:

Process Flow

Facility:

OHD 004 469 896

Harrison Paint Company
1329 Harrison Ave. SW
Canton, OH 44706

Harrison Paint Company (Harrison Paint) is a manufacturer of latex and oil-based paints. No lead or chromium used in these paints.

Hazardous wastes typically produced in the production of these paints and coatings include:

- Spent solvent from equipment clean-ups and line washes from oil-based paints and coatings (D001, F003, F005);
- Waste solvent based paints (D001, D035); and,
- Waste Alkyd Millends (D001, F003, F005).

Non-routinely produced hazardous wastes have been produced from clean-outs of no longer used raw materials.

Largest volume hazardous waste stream is spent solvents. Several solvents are used but spent solvents are not segregated; all spent solvents are accumulated in the same containers. Spent solvent goes to Hukill Chemical to be reclaimed by distillation. Hukill supplies fresh solvent to Harrison Paint.

Harrison Paints manages the spent solvents in the warehouse as though they could be recycled by an asphalt blender until too many drums accumulate and it is unlikely that they will not be recycled. Then Hukill Chemical (TSDf) and/or Ashland Chemical, now Nexeo Solutions (transporter), are called. Harrison Paint manages spent solvent as asphalt diluent, rather than waste until this determination is made. Previously much of the facility's spent solvent was used as an ingredient by an asphalt product blender

Waste solvent accumulated in drums. The drum 90 day accumulation area is on the lower level in the warehouse.

American Environmental Services, Calvert City, Ky., is the TSDf used for waste paints.

Used oil is generated from air compressor oil changes, about 5 gallons per change. Used oil is recycled.

Used lamps are collected for management as universal waste.

Manufacturing is done in one building. Processing starts on third floor and process generally

works down with a lot of gravity flow. Production is split into a latex side and an oil-based side

On the oil-based side, organic solvents are used at numerous points to clean equipment. The manufacturing process typically uses a two-step rinse process to clean equipment. Previously used solvent is used to remove the bulk of the paint from equipment and then a small amount of clean solvent is used for a final cleaning. When previously used solvent gets too dirty, that drum is removed from use.

Spent solvent is collected in a satellite accumulation drum in the filling room on the first floor of the manufacturing building.

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

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: $Amount\ in\ gallons \times Specific\ Gravity \times 8.345 = Amounts\ in\ pounds.$

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. | Are records of waste determination being kept for at least 3 years? [3745-52-40(C)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 3. | Has the generator obtained a U.S. EPA identification number? [3745-52-12] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 4. | Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 5. | Are annual reports kept on file for at least 3 years? [3745-52-40(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 6. | Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 7. | Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 8. | Does the generator accumulate hazardous waste? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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

| | | |
|----|--|--|
| 9. | Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|----|--|--|

NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

| | | |
|-----|---|--|
| 10. | Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)] | <i>NOT TREATING</i> |
| | 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 3745-66-90 to 3745-66-101 except 3745-66-97(C)? | 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.

| | | |
|-----|---|--|
| 11. | Does the generator export hazardous waste? If so: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | b. Has the generator complied with special manifest requirements? [3745-52-54] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | d. Has an annual report been submitted to U.S. EPA? [3745-52-56] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

| | | |
|---|---|--|
| e. | Are export related documents being maintained on-site? [3745-52-57(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| MANIFEST REQUIREMENTS | | |
| 12. | Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 13. | 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"/> |
| <i>NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]</i> | | |
| 14. | 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"/> |
| <i>NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].</i> | | |
| 15. | If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 16. | Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 17. | If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| <i>NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.</i> | | |
| 18. | If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 19. | If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 20. | Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <i>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.</i> | | |
| PERSONNEL TRAINING | | |
| 21. | Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 22. | Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 23. | Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 24. | Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 25. | Does the generator provide annual refresher training to employees? [3745-65-16(C)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 26. | Does the generator keep records and documentation of: | |
| a. | Job titles? [3745-65-16D(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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| | | | |
|-----|----|---|---|
| | b. | Job descriptions? [3745-65-16D(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | c. | Type and amount of training given to each person? [3745-65-16D(3)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | d. | Completed training or job experience required? [3745-65-16D(4)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 27. | | Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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

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

CONTINGENCY PLAN

| | | | |
|-----|----|--|---|
| 28. | | Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <input type="checkbox"/> |
| 29. | | Does the plan describe the following: | |
| | a. | Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. | Arrangements with emergency authorities? [3745-65-52(C)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | c. | A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | d. | A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | e. | An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]

| | | | |
|-----|--|--|---|
| 30. | | Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 31. | | Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 32. | | Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES

| | | | |
|-----|----|--|--|
| 33. | | Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | a. | Was the contingency plan implemented? [3745-65-51(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | b. | Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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| | | |
|--|---|--|
| c. | Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| <p><i>NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.</i></p> | | |
| PREPAREDNESS AND PREVENTION | | |
| 34. | Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 35. | Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: | |
| a. | Internal communications or alarm system? [3745-65-32(A)] | Yes <input checked="" 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 checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| d. | Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <p><i>NOTE: Verify that the equipment is listed in the contingency plan.</i></p> | | |
| 36. | 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"/> |
| 37. | Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 38. | Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 39. | If there is only one employee on the premises, is there immediate access to a device (eg., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 40. | 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"/> |
| 41. | Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 42. | 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 | | |
| 43. | Does the generator ensure that satellite accumulation area(s): | |
| a. | Are at or near a point of generation? [3745-52-34(C)(1)] | Yes <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 type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| f. | Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 44. | Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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| | | |
|-----|---|--|
| 56. | Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] | Yes <input checked="" type="checkbox"/> No <input 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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input 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 IN <90 DAY ACCUMULATION AREAS

| | | |
|-----|--|--|
| 45. | Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 46. | Is the accumulation date on each container? [3745-52-34(A)(2)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 47. | 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, photograph the area, and record on facility map.

| | | |
|-----|---|--|
| 48. | Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. | 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 type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 49. | Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 50. | Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 51. | If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 52. | If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] | Yes <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.

| | | |
|-----|---|--|
| 53. | If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745- 66-11? [3745-52-34(A)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|-----|---|--|

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

| | | |
|-----|--|--|
| 54. | Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 55. | Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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**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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 3. | Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|----|--|--|

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. *NO USED OIL ON-SITE DURING INSPECTION*

| | | |
|----|--|---|
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 7. | Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 8. | Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 9. | Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Stopped the release? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Contained the release? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Cleaned up and properly managed the used oil and other materials? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d. | Repaired or replaced the containers or tanks prior to returning them to service, if necessary? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

ON-SITE BURNING IN SPACE HEATER

| | | |
|-----|--|--|
| 10. | Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: | <i>NO</i> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

| | | | | |
|----|--|------------------------------|-----------------------------|---|
| b. | Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| c. | Are the combustion gases from heater vented to the ambient air? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |

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 <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 12. | If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] TRANSPORTING TO CASTROL TO COSTCO | | | |
| a. | Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| b. | Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |

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 <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| 14. | Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| 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 <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |

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.

HARRISON PAINT CO.

| SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS – BATTERIES AND LAMPS | | |
|--|---|--|
| <i>Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more</i> | | |
| <i>Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less</i> | | |
| PROHIBITIONS | | |
| 1. | Did the SQUWH dispose of universal waste? [3745-273-11(A)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| WASTE MANAGEMENT AND LABELING/MARKING | | |
| UNIVERSAL WASTE BATTERIES <i>NO. U.W. BATTERIES OBSERVED</i> | | |
| 3. | Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 5. | Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>NO RELEASES OBSERVED</i> |
| 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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |

| ACCUMULATION TIME | | |
|--|---|--|
| 11. | Is the waste accumulated for less than one year? [3745-273-15(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 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)] If yes, describe below: <i>SHIPPING ANNUALLY</i> | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| RESPONSE TO RELEASES <i>NO RELEASES OBSERVED.</i> | | |
| 14. | Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 15. | Is the material released characterized? [3745-273-17(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| OFF-SITE SHIPMENTS | | |
| NOTE: If a SQUWH self-transport 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 18. | Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180. | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 20. | Has the originating handler ever had an off-site shipment rejected by another handler or destination facility? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| EXPORTS | | |
| 23. | Is waste being sent to a foreign destination? If so: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |

| | | |
|--|---|--|
| | 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

HARRISON PAINTS

GENERATOR LDR CHECKLIST DOES NOT APPLY TO CESQGS

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

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

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| | | | |
|--|--|---|--|
| 15. | Was the HW treated by wastewater treatment? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> | |
| a. | Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> | |
| <i>NOTE: If "Yes", HW is improperly being treated by dilution.</i> | | | |
| b. | Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> | |
| c. | Does the wastewater treatment process include a process to separate/recover the organic phase of the waste? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> | |
| <i>NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].</i> | | | |
| <i>NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.</i> | | | |
| GENERATOR TREATMENT | | | |
| 16. | Does the generator treat to meet LDRs on-site? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> | |
| | Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | |
| | If "Yes" ... complete the rest of the checklist. If "No" ... stop... you are done. | | |
| a. | Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | |
| b. | Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | |
| <i>NOTE: This is a laboratory analysis but it does not have to be kept by the generator.</i> | | | |
| c. | Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | |
| d. | Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | |
| e. | Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | |
| f. | Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | |
| NOTIFICATION FORM FOR GENERATOR TREATMENT | | | |
| 17. | a. | Contains all information in #11 a-g above and | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. | If the treated HW/soil is listed.....notification contains the following certification statement: "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment." | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | c. | If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator: | |
| | i. | Prepare a one-time notification? [3745-270-09 (D)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | ii. | Maintain a copy of the notice onsite? [3745-270-09(D)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | iii. | Include in the notification: [3745-270-09(D)] | |

| | | | | | | | |
|--|--|-----|---|------------------------------|-----------------------------|------------------------------|-------------------------------------|
| | | 1. | Name & address of receiving landfill? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> | <input type="checkbox"/> |
| | | 2. | Description of HW when generated? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> | <input type="checkbox"/> |
| | | 3. | HW code when generated? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> | <input type="checkbox"/> |
| | | 4. | Treatability group when generated? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> | <input type="checkbox"/> |
| | | 5. | Underlying hazardous constituents present when generated? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> | <input type="checkbox"/> |
| | | iv. | Contain the certification statement as required by 3745-270-07(B)(4)? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> | <input checked="" type="checkbox"/> |



Emergency Equipment Inspection Log OAC Rule 3745-65-33

| Inspection Item | Inspection Schedule (i.e., daily, monthly, weekly) | Date: | Date: | Date: | Date: | Date: | Date: |
|---|--|-------|-------|-------|-------|-------|-------|
| Operational Internal Alarm/Intercom, if required by 3745-65-32 | | | | | | | |
| Telephone, Radio or other Emergency Summoning Device Present and Working, if required by 3745-65-32 | | | | | | | |
| Fire Extinguishers charged and working, if required by 3745-65-32 | | | | | | | |
| Spill/Decon equipment, if required by 3745-65-32, is fully stocked | | | | | | | |
| Water of Adequate Volume and Pressure, if required by 3745-65-32 | | | | | | | |
| ER Equipment Consistent with Contingency Plan and easily Accessible | | | | | | | |
| Other | | | | | | | |
| Other | | | | | | | |
| Inspector's Name | | | | | | | |

Note: Information in the shaded area is not required by OAC rule 3745-65-33, but you are encouraged to record it, regardless.

| | | |
|--|-------|--|
| Comments/Problems/Corrective Action Required/ Date Completed | Day 1 | |
| | Day 2 | |
| | Day 3 | |
| | Day 4 | |
| | Day 5 | |
| | Day 6 | |
| | Day 7 | |



Emergency Equipment Inspection Log OAC Rule 3745-65-33

| Inspection Item | Inspection Schedule (i.e., daily, monthly, weekly) | Date: | Date: | Date: | Date: | Date: | Date: |
|---|---|-------|-------|-------|-------|-------|-------|
| Operational Internal Alarm/Intercom, if required by 3745-65-32 | | | | | | | |
| Telephone, Radio or other Emergency Summoning Device Present and Working, if required by 3745-65-32 | | | | | | | |
| Fire Extinguishers charged and working, if required by 3745-65-32 | | | | | | | |
| Spill/Decon equipment, if required by 3745-65-32, is fully stocked | | | | | | | |
| Water of Adequate Volume and Pressure, if required by 3745-65-32 | | | | | | | |
| ER Equipment Consistent with Contingency Plan and easily Accessible | | | | | | | |
| Other | | | | | | | |
| Other | | | | | | | |
| Inspector's Name | | | | | | | |

Note: Information in the shaded area is not required by OAC rule 3745-65-33, but you are encouraged to record it, regardless.

| | | |
|--|-------|--|
| Comments/Problems/Corrective Action Required/ Date Completed | Day 1 | |
| | Day 2 | |
| | Day 3 | |
| | Day 4 | |
| | Day 5 | |
| | Day 6 | |
| | Day 7 | |



LQG Container Inspection Log OAC Rule 3745-66-74

| Inspection Item | Inspection Schedule (i.e., daily, monthly, weekly) | Date: | Date: | Date: | Date: | Date: | Date: |
|---|--|-------|-------|-------|-------|-------|-------|
| Are all containers closed? | | | | | | | |
| Are containers in good condition? | Weekly | | | | | | |
| Are any containers leaking or is there evidence of a spill? | Weekly | | | | | | |
| Are containers stored/handled in a manner that would prevent leaks/spills? | Weekly | | | | | | |
| Are containers compatible with the wastes stored in them? | Weekly | | | | | | |
| Are containers labeled with the words "Hazardous Waste" and the accumulation date? | | | | | | | |
| Have any containers been stored for more than 90 days? | | | | | | | |
| Is aisle space adequate for passage of emergency equipment? | | | | | | | |
| Are incompatible wastes stored separately? | | | | | | | |
| Are containers that hold ignitable or reactive wastes stored at least 50 feet from the property line? | | | | | | | |
| Inspector's Name | | | | | | | |

Note: Information in the shaded area is not required by OAC rule 3745-66-74, but you are encouraged to record it, regardless.

| | | | | | | | |
|---|--------|--|--|--|--|--|--|
| Comments/Problems/Corrective Action Required/ Date Completed | Week 1 | | | | | | |
| | Week 2 | | | | | | |
| | Week 3 | | | | | | |
| | Week 4 | | | | | | |
| | Week 5 | | | | | | |
| | Week 6 | | | | | | |



LQG Container Inspection Log OAC Rule 3745-66-74

| Inspection Item | Inspection Schedule (i.e., daily, monthly, weekly) | Date: | Date: | Date: | Date: | Date: | Date: |
|---|--|-------|-------|-------|-------|-------|-------|
| Are all containers closed? | | | | | | | |
| Are containers in good condition? | Weekly | | | | | | |
| Are any containers leaking or is there evidence of a spill? | Weekly | | | | | | |
| Are containers stored/handled in a manner that would prevent leaks/spills? | Weekly | | | | | | |
| Are containers compatible with the wastes stored in them? | Weekly | | | | | | |
| Are containers labeled with the words "Hazardous Waste" and the accumulation date? | | | | | | | |
| Have any containers been stored for more than 90 days? | | | | | | | |
| Is aisle space adequate for passage of emergency equipment? | | | | | | | |
| Are incompatible wastes stored separately? | | | | | | | |
| Are containers that hold ignitable or reactive wastes stored at least 50 feet from the property line? | | | | | | | |
| Inspector's Name | | | | | | | |

Note: Information in the shaded area is not required by OAC rule 3745-66-74, but you are encouraged to record it, regardless.

| | | |
|---|--------|--|
| Comments/Problems/Corrective Action Required/ Date Completed | Week 1 | |
| | Week 2 | |
| | Week 3 | |
| | Week 4 | |
| | Week 5 | |
| | Week 6 | |