

January 5, 2011

Mr. Bill Kerns  
Mr. Ron Stamberger  
Henkel Consumer Adhesives, Inc.  
7405 Production Drive  
Mentor, OH 44060

**RE: HENKEL CONSUMER ADHESIVES, INC.; OHD 002 947 604; LAKE COUNTY;  
COMPLIANCE EVALUATION INSPECTION; CONDITIONAL EXEMPT SMALL  
QUANTITY GENERATOR; LARGE QUANTITY GENERATOR>CESQG  
NOTICE OF VIOLATION/RETURN TO COMPLIANCE**

Dear Mr. Kerns:

Thank you and Mr. Stamberger for accompanying Ms. Sherry Slone and me during our November 29, 2010 inspection of Henkel Consumer Adhesive, Inc. (Henkel) in Mentor Ohio. We inspected Henkel to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and hazardous waste rules as found in Chapter 3745. of the Ohio Administrative Code (OAC). Our inspection included a review of company operations in the plant as well as written records and documentation maintained by the facility.

Henkel purchased Ohio Sealants, Inc. (OSI) in 2005. The facility manufactures adhesives and sealants for the construction and home repair industries. This facility also serves as a distribution center for the company. Based on the review of records, it appears the facility is currently a conditionally exempt small quantity generator (CESQG). The checklists used during the inspection have been included with this letter.

The following violations were noted.

**1. Used Oil - Container Labeling - OAC rule 3745-279-22(C),**

In accordance with **OAC rule 3745-279-22 (C)**, all containers of used oil must be labeled or clearly marked with the words, "Used Oil".

(a). We observed one fifty five gallon metal drum and one five gallon pail in the facility's compressor room. Both contained used oil and neither were labeled or clearly marked with the words, "Used Oil". **The violation was abated during the inspection.**

(b). While inspecting the rack storage north of the maintenance area, we observed one five gallon pail that was approximately 1/3 full of used oil. The container was not labeled or clearly marked with the words, "Used Oil". **The violation was abated during the inspection** when the used oil was transferred to a labeled used oil container in the maintenance area.

(c). Outside, on the south side of the building, Ohio EPA observed five, fifty five gallon drums that were closed and on pallets. At the time of the inspection, the contents of the drums were unknown. In an e-mail received December 2, 2010, Mr. Ron Stamberger informed me the drums contained used oil from the decommissioning of equipment on-site. Mr. Stamberger stated the drums had been properly labeled and moved inside the building. **This violation has been abated; no further action required.**

**2. OAC rule 3745-273-13(D) and 14(E). Universal Waste-Containers.**

A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound and adequate to prevent breakage...such containers must be kept closed....; and

Each universal waste lamp or a container or package in which such lamps are contained, must be labeled or marked clearly with the words: "Universal Waste-Lamp(s)"

Spent or used fluorescent bulbs were stored on the second level, above the facility's laboratory. We found the bulbs to be in containers that were adequate to prevent breakage, however, the containers were not closed and were not labeled in accordance with OAC rule 3745-273-14(E). **The violation was abated during the inspection.**

**COMMENT:**

Based on our review of records, it appears your parts cleaner (profile Q20071126A59) is being conservatively managed as a hazardous waste. The material safety data sheet (MSDS) did not indicate it would need to be managed as a hazardous waste. We suggest you get a new profile for this waste stream.

All of the violations cited have been adequately addressed and no further action or information is needed at this time. Should you have any questions, feel free to contact me at (330) 963-1279.

Sincerely,

  
Patricia M. Natali  
Environmental Specialist  
Division of Hazardous Waste Management

PMN:ddw  
Enclosure

cc: Mr. Timothy Viskocil, Plant Manager  
ec: Frank Popotnik, DHWM, NEDO  
Natalie Oryshkewych, DHWM, NEDO  
Harry Sarvis, DHWM, CO

**NOTICE:** Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

**Information provided during the inspections:**

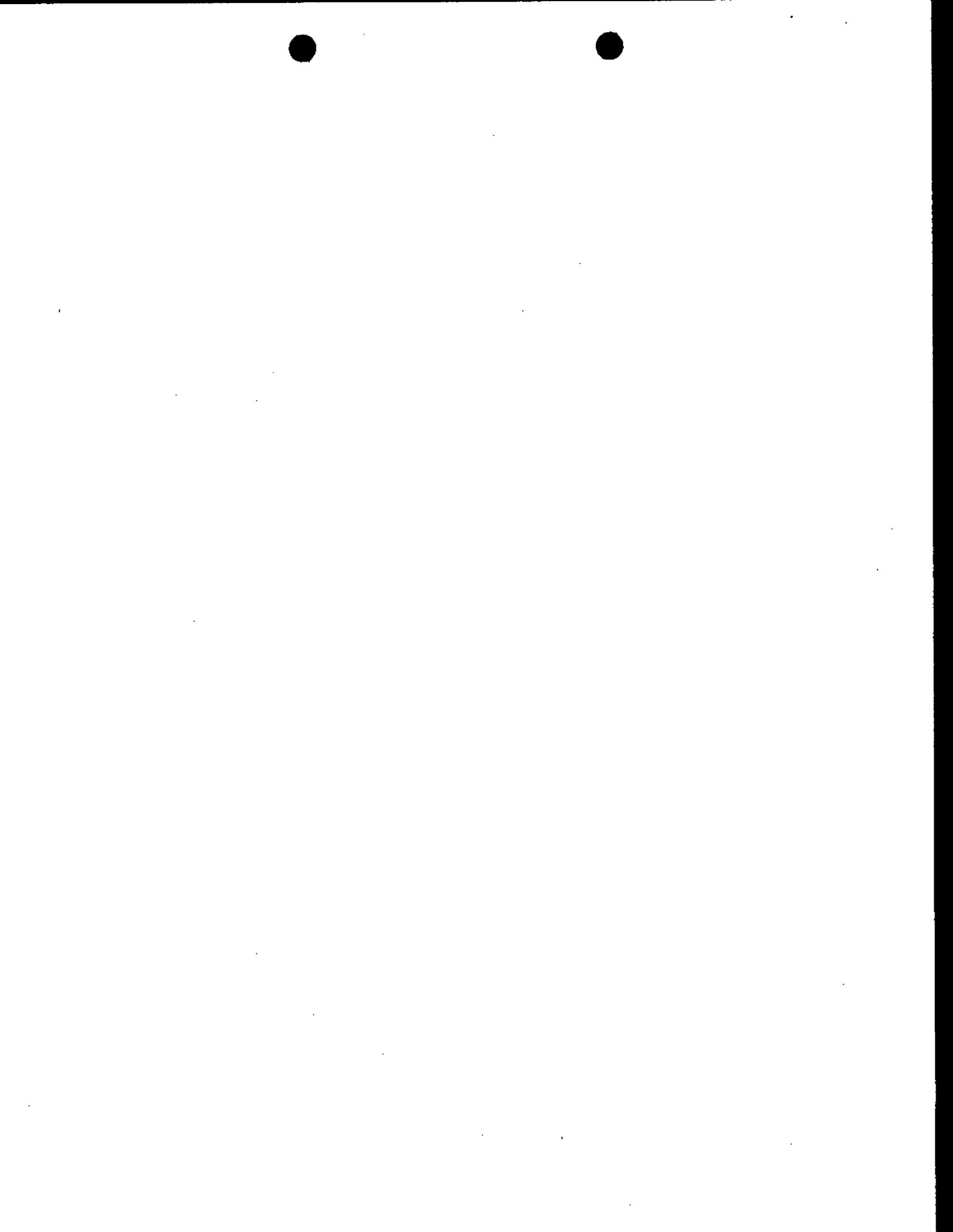
- Universal Waste Handler Requirements
- Hazardous Waste Generator Requirements Summary Table
- Hazardous Waste Generator Recordkeeping Requirement Table
- Small Quantity and Large Quantity Generator Inspection Checklists

**Websites of Interest:**

- Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides compliance and pollution prevention assistance on environmental issues (including sources of funding) related to air, land, and water. <http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/ocapp>
- ENERGY STAR is a government-backed program helping businesses and individuals protect the environment through superior energy efficiency. Their website is at: <http://www.energystar.gov/>
- The Clean Air Resource Center offers help in understanding EPA air quality requirements. In addition, if your business is required to purchase new equipment, they can offer better-cost financing with special tax incentives. Their phone number is 800-225-5051 and website is <http://www.ohioairquality.org/>
- You can find copies of the regulations and other information on the Division of Hazardous Waste Management web page at <http://epa.ohio.gov/dhwm>.



Send to Central Office <input checked="" type="checkbox"/>	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE</b> <b>IDENTIFICATION/VERIFICATION FORM</b>		For Ohio EPA use only
Completed verification forms required to be submitted to CO should be e-mailed to <a href="mailto:paula.canter@epa.state.oh.us">paula.canter@epa.state.oh.us</a> .			
<b>Site EPA ID No.</b> <b>Site Name</b>	EPA ID Number: <b>OHD 002 947 604</b> Name: <b>Henkel Consumer Adhesives, Inc.</b>		Website: <b>www.henkelna.com</b> (Optional)
<b>Site Location Information</b>	Street Address: <b>7405 Production Drive</b>		State: <b>OH</b>
<b>Site Land Type</b> (check only one)	City, Town, or Village: <b>Mentor</b>	County Name: <b>Lake</b>	Zip Code: <b>44060</b>
<b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>
<b>Facility Representative</b>	First Name: <b>Robert</b>	MI: <b>W.</b>	Last Name: <b>Kern</b>
Additional names can be recorded in number 12	Title: <b>Director, SHE</b>		Phone Number Extension:
Only provide address information if it is different than the site address	Phone Number: <b>440.205.3933</b>		E-Mail Address: <b>bill.kern@us.henkel.com</b>
	Fax Number: <b>440.974.8774</b>		Fax Number Extension:
	Street or P.O. Box: <b>same as above</b>		City, Town or Village:
	State:		Zip Code:
<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: <b>Henkel Corporation</b>		Date Became Owner (mm/dd/yyyy): <b>October 2005</b>
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>
	Street or P.O. Box:	District <input type="checkbox"/>	Federal <input type="checkbox"/>
	City, Town or Village:	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>
	State:	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: <b>32150 Just Imagine Drive</b>		Owner Phone #: <b>440.937.7000</b>
	City, Town or Village: <b>Avon</b>		Country: <b>USA</b>
	State: <b>OH</b>		Zip Code: <b>44011-1355</b>
	Name of Site's Operator: <b>Henkel Corporation</b>		Date Became Operator (mm/dd/yyyy): <b>October 2005</b>
	Operator Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>
	Street or P.O. Box:	District <input type="checkbox"/>	Federal <input type="checkbox"/>
	City, Town or Village:	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>
	State:	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: <b>32150 Just Imagine Drive</b>		Operator Phone #: <b>440.937.7000</b>
	City, Town or Village: <b>Avon</b>		Country: <b>USA</b>
	State: <b>OH</b>		Zip Code: <b>44011-1355</b>
<b>VIOLATIONS CITED?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No			
<b>TYPE OF HANDLER - MARK "X" AS APPROPRIATE</b>			
<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11		<input type="checkbox"/> Large Quantity Generator (LQG)
	<input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). <i>Check the box for the applicable generator status and provide a comment.</i>		<input type="checkbox"/> Small Quantity Generator (SQG)
			<input checked="" 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<br>(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.

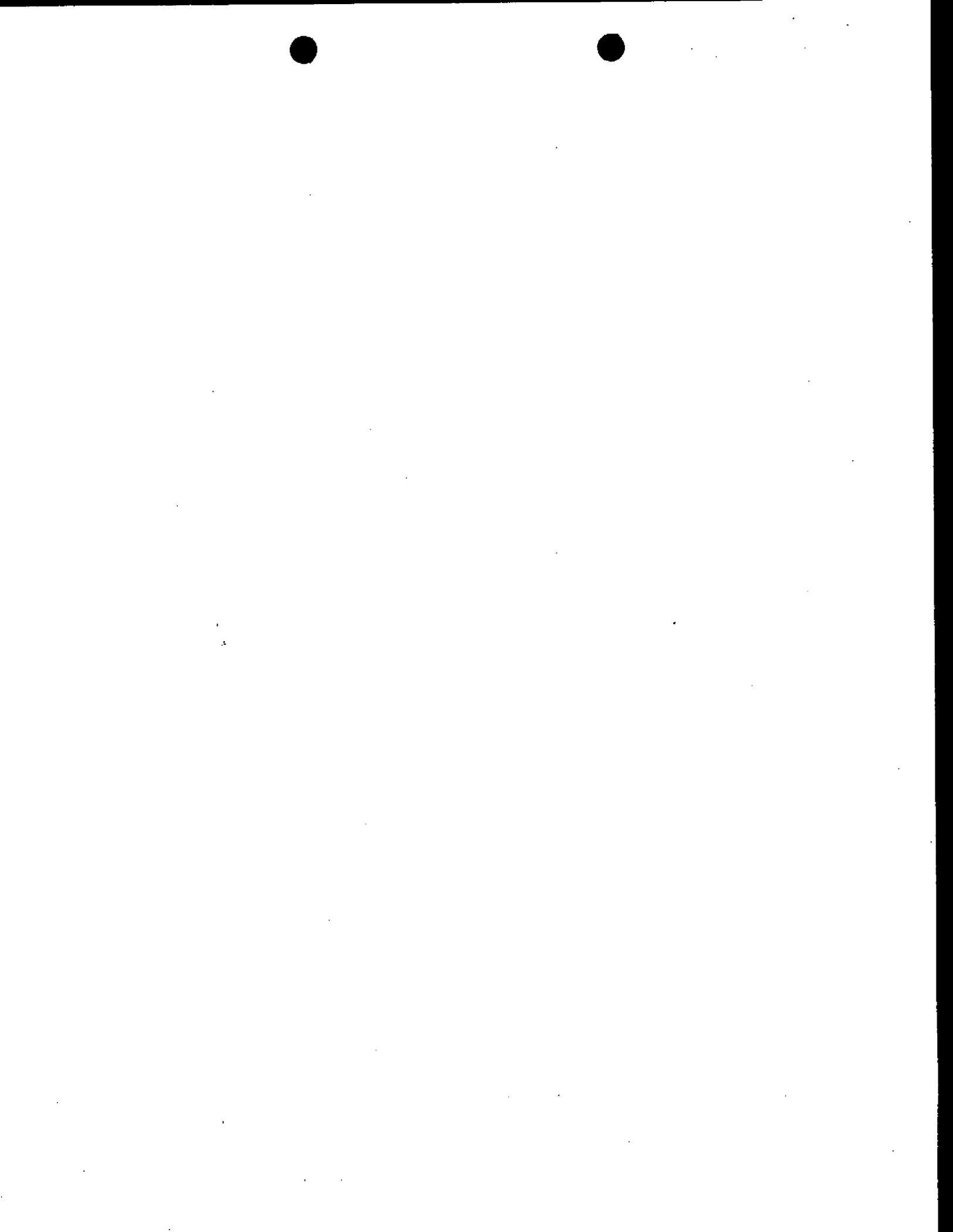
D001                      D002

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

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:	<b>Ronald A. Stamberger</b>
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Patricia Natali	Sherry Slone	November 29, 2010

**Comments:**  
 Facility in data base as a LQG, during time of inspection, they were a CESQG.



**PROCESS, WASTE, P2 SUMMARY SHEET**

Facility Name: Henkel Consumer Adhesives, Inc. Facility Type: CESQG Date of Inspection: 11/29/10 EPA ID#: OHD 002 947 604

<b>Waste Generated</b>			<b>On or Off-Site Management</b>		<b>P2 Activities</b>	
<b>Process/Activity Generating Waste</b> (e.g. plating bath, machining baghouse, painting, general maintenance, etc)	<b>Waste Description</b> (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applicable	<b>QTY Generated per Month, Type of Accumulation (container, tank, etc.) and location of waste accumulation area</b>	<b>Type of On-Site Treatment</b> (recycle, wwt, etc.)	<b>Name, state, and type of activity occurring at the off-site facility</b>	<b>Current P2 Activities</b>	<b>P2 Opportunities</b>
1 Machine maintenance	Used oil	20 gal.; five gal pail in maintenance shop; 55 gal metal drum in compressor room	Recycle	American Ultra-Specialties	Reuse	None
2 Product (latex based adhesives and sealants) storage	Latex based products that have exceeded their shelf life	Variable amount generated monthly; product dried out & put in with solid waste	None	Disposal with commercial solid waste stream	None	Better inventory control
3 Product and customer returns-contact cement & Formica contact cement	Solvent based products that have exceeded their shelf life	Variable amount generated monthly; materials stored in Customer Return Area prior to shipment off-site; Waste codes: D001	None	ChemTron Avon, OH OHD066060609	None	Better inventory control
4 Product (solvent based adhesives and sealants) storage	Solvent based products that have exceeded their shelf life	Variable amount generated monthly; material stored in Customer Return Area	Rework product into production line	None	Reuses	None
5 Product and customer returns	Aerosol cans	Variable amount generated monthly; stored in Customer Return Area; D001	None	ChemTron Avon, OH OHD066060609	None	None

6	Product and customer returns	Waste Naval Jelly	Variable amount generated monthly; stored in Customer Return Area; D002	None	ChemTron Avon, OH OHD066060609	None	None
7	Cleaning parts and equipment	Parts cleaning solution	< 50 gal/yr; stored in 55 DM near the parts washers; D001	Reuse till spent	ChemTron Avon, OH OHD066060609	Reuse	Company looking into non-hazardous solvent
8	Battery replacement for tools	Batteries-lithium & nickel cadmium - universal waste	Variable amount generated; in pail in maintenance shop	Recycle	ChemTron Avon, OH OHD066060609	Recycle	None
9	Replacement of spent bulbs	Spent bulbs, mostly fluorescent, universal waste	Variable amount generated; stored in fiber boxes, 2 <sup>nd</sup> floor above the lab	Recycle	ChemTron Avon, OH OHD066060609	Recycle	None
10	Discard mercury thermometers from lab	Spent mercury thermometers-universal waste	Variable amount generated; stored in pails in the maintenance shop	Recycle	ChemTron Avon, OH OHD066060609	Recycle	Investigate possible non mercury thermometer
11	Clean out of vats used in production of latex based product in Weir pit	Wastewater removed from Weir pit; non-hazardous	Variable amount generated; wastewater stored in pit near the Vat Cleaning station; pit usually cleaned out once a year	None	Waste Management, Inc.	None	None
12	Laboratory testing	Solvent based products, mineral spirits, and solvent for cleaning - flammable	Variable amount generated; 5 gal satellite accumulation in lab	Reuse, added to product during reworking	None	Reuse	None
13	Parts washers	Cleaning solution; non hazardous	70 gal/every other month; stored in parts washers	Recycle	Safety Kleen Brunswick, OH OHD000720987	Recycle	None

## REMARKS – GENERAL INFORMATION

**General Process Information:** Henkel purchased Ohio Sealants, Inc. (OSI) in 2005. Henkel manufactures adhesives and sealants for the construction and home repair industries. The Mentor facility manufactures mostly solvent based products and serves as a distribution center. An on-site lab conducts testing for adhesive strength, how to prevent sag in product, and formulation of product with respect to color. The company mixes rubbers, powders, resins, and solvents in large mixing vats in their Mixing Rooms. Color pigments may be added to the batch prior to being transferred to an automated area. In this area, a filling machine dispenses the product into tubes and caps are added. The tubes are then boxed, stacked, and put into storage until shipped out for distribution.

When working with solvent based materials, coloring vats are not cleaned out; instead a "clean-out batch" is added to the vat. This material incorporates the residual of the last batch into the new batch. Henkel manufactures a roof flashing product they describe as a "catch-all"; many of the solvent based materials that would be discarded, can be reclaimed in this product. Out dated consumer products and customer returns that cannot be reworked back into the manufacturing process are kept in the Return Area until sufficient quantity is generated for shipment off-site. At that time, the product is discarded and shipped out as hazardous waste. The hazardous waste storage area inspection log showed inspections conducted on a weekly basis, even when waste is not being stored. At the time of the inspection, the log indicated no waste stored in the area since October 2010. American Ultra-Specialties picks up 500 gallons of used oil at a time, refines it and returns it to Henkel for their internal use. The facility recycles cardboard, plastic wrap and wood pallets.

**Regulatory/Enforcement History (if applicable):** n/a

**Additional P2 remarks and information:** Left an OCAPP brochure with Adrienne LaFavre's card. They are interested in a visit by Adrienne.

**Other:** The facility has a Title V permit and a NPDES permit; they file reports with TRI.



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

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

Safety Equipment Used:

**WASTE EVALUATION**

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes  No  N/A

**GENERATOR CLASSIFICATION**

2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes  No  N/A

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

**OFF-SITE SHIPMENT OF HAZARDOUS WASTE**

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes  No  N/A

**TREATMENT OF HAZARDOUS WASTE**

4. Does the generator treat hazardous waste in a: No

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 the CESQG conducts treatment they are subject to the LQG requirements.

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

**MIX HAZARDOUS WASTE WITH USED OIL**

5. Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:

a.	Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
----	---	------------------------------	--	------------------------------

Henkel Consumer Adhesives, Inc / 11/29/10

[Facility Name/Inspection Date]

[ID number]

OHD 002 947 604

CESQG/February 2009

Page 1 of 1



**SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS**

**Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more**

**Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less**

**PROHIBITIONS**

1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <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**

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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" type="checkbox"/>

**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"/>
-----	--	------------------------------	--	------------------------------

#8 & #10 abated during inspection

Henkel Consumer Adhesives  
11/29/10 OHD 002 947 604



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)] (this change makes it like the LQUWH checklist)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Accumulation is defined as date generated or date received from another handler.</i>		
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>Invoices of bulbs sent to Chemtron</i>	Yes <input checked="" 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		
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 checked="" type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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 checked="" type="checkbox"/>
OFF-SITE SHIPMENTS		
<i>NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.</i>		
17.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] <i>Chemtron</i>	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)] (this change makes it like the LQUWH checklist)	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)] (this change makes it like the LQUWH checklist)	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"/>

*Henkel Consumer Adhesives*  
*11/29/10 OHO 002 947 604*



**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 checked="" 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"/>

Heykel Consumer Adhesives  
11/29/10 OHD 002 947 604



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

*NOTE: 1. 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.*

*2. Inspectors can check BUSTR's web-site at [https://www.comapps.ohio.gov/sfm/fire\\_apps/bust/bustr/PublicInquiry.asp](https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp) to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at:*

*[https://www.comapps.ohio.gov/sfm/fire\\_apps/bust/bustr/SearchByCounty.asp](https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp).*

**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.*

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 checked="" 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 checked="" 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 checked="" 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 checked="" 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"/>

8. - Abatted during inspection.

*Henkel Consumer Adhesive  
OHD 002 947 604  
11/29/10*

ON-SITE BURNING IN SPACE HEATER		
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <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 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 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#? [3745-279-24] <i>American UltraSpecialties</i>	Yes <input checked="" 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]	
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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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 type="checkbox"/> N/A <input checked="" 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 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 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.

*Henkel Consumer Adhesives*  
*OHIO 002 947 604.*  
*11/29/10*