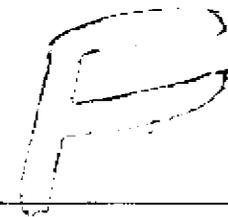




State of Ohio Environmental Protection Agency

Northeast District Office



2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

April 22, 2008

RE: GUARANTEED FINISHING UNLIMITED, INC.
CUYAHOGA COUNTY
OHD 107 109 563
EPISODIC LQG, CEI NOTICE OF VIOLATION

Mr. Bill Kozak Jr.
3200 W. 121st Street
Cleveland, OH 44111-1700

Dear Mr. Kozak:

On March 21, 2008, the Ohio EPA conducted a compliance evaluation inspection (CEI), of Guaranteed Finishing Unlimited (GFU) in Cleveland, to determine GFU's compliance with Ohio's hazardous waste laws and regulations as found in the Ohio Revised Code and the Ohio Administrative Code ("ORC" and "OAC" respectively). GFU was represented by you and I represented the Ohio EPA.

GFU is a zinc plating company providing service to the appliance, medical and nuclear commercial and industrial customers. No stamping, grinding, cutting or painting operations are performed.

The Ohio EPA's compliance inspection included a walk through inspection of the facility operations and a review of written documentation. At the time of the inspection GFU was conducting a tank clean-out. This is done generally on an annual basis and makes you an episodic large quantity generator (LQG). In addition, there were about 40 partial and some full drums that you identified as hazardous waste that you were going to process into the roll-off container that was onsite for your tank clean-out. In general it appears that GFU operations appear be a small quantity generator (SQG) aside from episodic events. Based on this inspection as an LQG, Ohio EPA has determined that GFU is in **violation** of at least the following state hazardous waste regulations:

Personnel Training

- 1) **OAC Rule 3745-65-16(A)(1-3), (B), (C), (D)(1-4) and (E), Personnel Training.** Facility personnel must complete training on hazardous waste management procedures.

GFU failed to comply with the personnel training requirements of this rule.

GFU must immediately provide this training as required to meet the LQG requirements and submit documentation (i.e., copy of the training sign-in sheets) to this office for review.

Contingency Plan

- 2) **OAC Rules 3745-65-51(A) and (B); 3745-65-52 (A), (B), (C), (D), (E) and (F); 3745-65-53(A) and (B); and 3745-65-55, Contingency Plan.** A facility must have a contingency plan which will be implemented during an emergency. The contingency plan must describe the actions personnel will take during an emergency, describe arrangements with responders, list the emergency contact and related information, list emergency equipment, and include an evacuation plan. A copy of the contingency plan must be maintained at the facility and submitted to entities that may be required to provide emergency services.

A facility must have a designated emergency coordinator who is familiar with all aspects of the contingency plan, be available to respond to an emergency and have the authority to commit the resources needed to implement a contingency plan.

GFU has violated all the applicable rules associated with the contingency plan requirements by having not prepared such a contingency plan.

GFU must prepare a contingency plan for meeting the LQG requirements. This plan must include all components to demonstrate compliance with this rule. GFU must maintain a contingency plan at its facility and submit such plan to agencies or organizations that may be required to provide emergency services during the periods of time when GFU is a LQG. GFU must designate an emergency coordinator and identify this person in its contingency plan. The contingency plan must demonstrate compliance with this rule when GFU is a LQG.

Preparedness and Prevention

- 3) **OAC 3745-65-32 (A)(B)(C), Required Equipment:** All facilities shall be equipped with the following: spill control equipment, decontamination equipment and an internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel.

GFU failed to have the above needed equipment at the generator accumulation area including appropriate spill control equipment for both liquid and solid wastes such as pigs, booms, neutralization materials and decontamination equipment.

Please provide Ohio EPA with a list of emergency equipment provided at the generator hazardous waste storage area(s) appropriate to the wastes managed including communication, alarm, spill control and decontamination equipment. These requirements also apply to SGQs.

- 4) **OAC 3745-65-33, Testing and Maintenance of Equipment:** All facility communication or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment shall be tested and maintained to assure proper operation in time of emergency. These tests must be documented in a log or summary.

GFU failed to have emergency equipment inspection records.

GFU must develop a log for recording inspections of all emergency equipment and commence these inspections immediately. GFU may inspect by a method or frequency that insures the emergency equipment is ready and available at all times. GFU must submit a copy of the latest completed inspection. An example container/equipment inspection form is enclosed. The inspection form provided can be adapted to meet your needs. This requirement also applies to SGQs.

- 5) **OAC 3745-65-35, Required aisle space:** The owner or operator shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment. GFU areas of hazardous waste drum storage failed to allow access.

The aisle space requirement also applies to SGQs. Provide a photograph that demonstrates adequate aisle space is provided.

Containers

- 6) **OAC 3745-52-34(A)(3), Hazardous waste container labeling:** While being accumulated and/or treated on-site, each hazardous waste container and tank must be labeled or marked clearly with the words "Hazardous Waste" and visible for inspection on each container.

GFU failed to label as "Hazardous Waste" the following containers:

- About forty five (45) unlabeled 55-gallon drums reported to contain hazardous waste clean-out sludge from plating baths and tanks. Several of these drums also contained fluids.
- An unlabeled roll-off container of hazardous waste D006 and D007 sludge for an episodic clean-out event from plating tanks.
- A second hazardous waste drum area with five (5) unlabeled 55-gallon drums north of the hazardous waste roll-off.

To return to compliance, GFU must properly label all hazardous waste containers and provide photographs that show the labeling violation has been corrected. During the inspection, GFU did label the hazardous waste roll-off and the drums located near the roll-off. GFU must also provide sign-in sheets that show the employees have been trained in procedures for labeling hazardous waste containers. As an SQG you also are required to label all hazardous waste containers.

- 7) **OAC 3745-52-34(A)(2), Hazardous waste container dating:** While being accumulated and/or treated on-site, each hazardous waste container and tank must be labeled or marked clearly with the ... date accumulation began clearly marked and visible for inspection on each container.

GFU failed to date all of its hazardous waste containers as follows:

- About forty five (45) unlabeled 55-gallon drums reported to contain hazardous waste clean-out sludge from plating baths and tanks. Several of these drums also contained fluids.
- An unlabeled roll-off container of hazardous waste D006 and D007 sludge for an episodic clean-out event from plating tanks.
- A second hazardous waste drum area with five (5) unlabeled 55-gallon drums north of the hazardous waste roll-off.

GFU must properly date all hazardous waste containers and provide photographs that show the dating violation has been corrected. Submit in writing the procedures that have been implemented to insure future compliance with this regulation. GFU must also provide sign-in sheets that show employees have been trained in procedures for dating hazardous waste containers. As an SQG you are required to date all hazardous waste containers.

- 8) **OAC Rule 3745-66-73(A) and (B), Management of Containers:** A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. A container holding hazardous waste shall not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.

GFU violated rules:

- (a) 3745-66-73(A) - GFU had about forty two (42) open poly drums that you reported were a hazardous waste in the south and west side of the facility.
- (b) 3745-66-73(B) - Many of these hazardous waste drums were stored in a manner which could cause a leak or spillage when handled.

GFU shall secure lids on the open containers, especially those containing fluids. The facility must arrange drums in the area to provide access and eliminate the potential that certain drums may fall over and leak when handled. The facility must submit photographic documentation to demonstrate compliance with this rule. GFU must also provide sign-in sheets that show employees have been trained in procedures for keeping hazardous waste containers closed. As an SQG you are also required to keep closed all hazardous waste containers.

- 9) **OAC 3745-66-74, Inspections:** The owner or operator shall inspect areas where containers are stored at least weekly, looking for leaks and deterioration caused by corrosion or other factors. The owner or operator shall record inspections in an inspection log or summary.

GFU failed to inspect and record the inspections in a log or summary.

Please provide inspection records for at least three weeks to demonstrate inspections are now being performed. An example of an inspection checklist is enclosed and also found at the following link: <http://www.epa.state.oh.us/dhwm/pdf/sqglog.PDF>.

Unpermitted Hazardous Waste Storage

- 10) **ORC §3734.02(E) and (F):** GFU established an unpermitted hazardous waste storage facility by storing hazardous wastes without a permit. The hazardous waste storage exceeded 90 days and included the following areas:

- 1) Hazardous Waste drum storage area in the southwest building corner, where approximately 40 drums were reported to be hazardous waste and consisting of D002, D006 and D007 sludge and fluid wastes.
- 2) Hazardous drum stored in an area of the south central building area by a roll-off where 5 drums of hazardous sludge and fluid wastes were located.

GFU must immediately send off all accumulated hazardous waste and provide Toxicity Characteristic Leaching Procedure (TCLP) analytical data representative of all wastes and a signed Return to Generator copy of the Uniform Hazardous Waste Manifests (UHW) that show all the accumulated hazardous waste has been properly shipped offsite. You must include documentation and photos that show that all of this hazardous waste has been removed and the unpermitted storage areas properly cleaned. You may reference the Closure Plan Review Guidance (CPRG) for generator closure found at: <http://www.epa.state.oh.us/dhwm/cprg/Correctionsto2006CPRG.pdf>.

GFU violated ORC §3734.02(E) and (F), and is subject to all applicable general facility standards found in OAC chapters 3745-54 and 55. The Ohio EPA may assert its right to have GFU begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

Used Oil Management

- 11) **Used Oil Storage Requirements for Generators (Labels), OAC 3745-279-22(C):** GFU failed to properly label its storage tank and one container of used oil per the rule.

This violation was abated when the containers were labeled as "used oil".

CONCERNS and COMMENTS

Based on the CEI, Ohio EPA also has the following concerns and comments:

- A) A table of various DHWM recordkeeping requirements is enclosed and also at: <http://www.epa.state.oh.us/dhwm/pdf/RecordKeepingRequirementsTable.pdf>.
- B) There appears to have been a former hazardous waste generator storage area located just east of Rack #2. In regard to closure of this area, there is a closure performance standard that must be met in lieu of using weekly inspection records as these have not been maintained during LQG episodes. This generator closure performance standard is cited in the Closure Plan Review Guidance (CPRG) revised 2007 and found at: <http://www.epa.state.oh.us/dhwm/cprg/Correctionsto2006CPRG.pdf>.
- C) There were several areas being, or in need of clean out or removal. These include the Rack #2, Barrel #3 lines and the compressor room area. These efforts might best be accomplished and completed during your episodic LQG event. Appurtenances destined for recycling in a manner that will destroy residual contamination (e.g. scrap metal recycling) need not be thoroughly decontaminated. However, the appurtenances, pipes, tanks, etc. must be rendered useless (cut into sections) when recycled or disposed. It is recommended you maintain a record of disposal, recycling and sale or transfer of site equipment and wastes. Please provide an update of the status of these areas.
- D) Spent fluorescent lamps were seen at two locations. The lamps observed appeared to be nonhazardous as indicated by the green ends or green printing. This tends to indicate that these lamps may be considered non-hazardous waste due to their mercury or metals content. Other fluorescent and high intensity lamps that were observed in use may be considered a hazardous waste when disposed. Prior to disposal of lamps as a solid waste you must insure that manufacturer's data or test characterization results show the lamps to be non-hazardous. You may choose to manage all lamps as a universal waste, sending them to be recycled.

Spent lamps that are recycled are not subject to the hazardous waste rules. Management as universal waste requires the lamps be placed in a container, kept closed and dated and properly labeled as a universal waste. Refer to the following enclosed guidance, "Universal Waste Rules for Handlers of Lamps": [http://www.epa.state.oh.us/dhwm/pdf/Universal Waste Rules for Handlers of Lamps.pdf](http://www.epa.state.oh.us/dhwm/pdf/Universal%20Waste%20Rules%20for%20Handlers%20of%20Lamps.pdf). A list of facilities that accept fluorescent lamps is enclosed and also found at: <http://www.epa.state.oh.us/dhwm/pdf/comp.lamp.ballast.list.pdf>. A list of facilities licensed to receive hazardous waste is enclosed and found at: <http://www.epa.state.oh.us/dhwm/pdf/acceptingq.pdf>.

APRIL 22, 2008

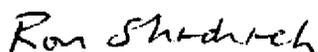
PAGE - 6 -

- E) The Ohio EPA encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image by implementing pollution prevention programs. More information about pollution prevention, including fact sheets and U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92/088) may be obtained by contacting the Ohio EPA Pollution Prevention Section at (614) 644-3469 or online at: <http://www.epa.state.oh.us/ocapp/ocapp.html>.
- F) The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. We encourage you to sign-up for this free service. You can find more information at the following Web link: <http://www.epa.state.oh.us/dhwm/listserv.html>. You can find copies of the rules and other information on the DHWM's web page at: <http://www.epa.state.oh.us/dhwm>.

Be advised that any instances of non-compliance can continue as subjects of pending or future enforcement actions.

Please respond to this letter in writing **within 30 days** of the date of this letter by providing the information requested above. Should you have any questions or require additional information, you may contact me at (330) 963-1146 or at ron.shadrach@epa.state.oh.us.

Sincerely,



Ronald J. Shadrach
Division of Hazardous Waste Management

RJS:ddw

Enclosures

cc: Harry Sarvis, DHWM, CO
ec: Frank Popotnik, DHWM, NEDO

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.

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

For Ohio EPA use only

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

2. Site EPA ID No.	EPA ID Number: OHD 107 109 563									
3. Site Name	Name: Guaranteed Finishing Unlimited, Inc.				Website: (Optional)					
4. Site Location Information	Street Address: 3200 W. 121St.									
	City, Town, or Village: Cleveland				State: OH					
	County Name: Cuyahoga				Zip Code: 44111-1700					
5. 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"/>		
6. NAICS code(s) www.census.gov/epcd/www/naics.html										
7. Facility Representative Additional names can be recorded in Number 12 Only provide address information if it is different than the site address	First Name: Bill			MI:	Last Name: Kozak Jr.					
	Phone Number: 216-252-8200				Phone Number Extension:					
	E-Mail Address:									
	Fax Number: 216-252-4784				Fax Number Extension:					
	Street or P.O. Box:									
	City, Town or Village:				State:		Country:		Zip Code:	
8. 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: William Kozak Sr.				Date Became Owner (mm/dd/yyyy):					
	Owner Type:	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"/>	
	Street or P.O. Box:									
	City, Town or Village:				Owner Phone #:		State:		Country:	Zip Code:
	Name of Site's Operator:				Date Became Operator (mm/dd/yyyy):					
	Owner Type:	Private <input 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"/>	
	Street or P.O. Box:									
	City, Town or Village:				Operator Phone #:		State:		Country:	Zip Code:
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No									
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)										
<input type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator						
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste						
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator						
<input type="checkbox"/> Small Quantity Generator (SQG)										
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace						
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste				<input type="checkbox"/> Small Quantity On-Site Burner Exemption						
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption						
<input type="checkbox"/> Underground Injection Control Facility										

10B. 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"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	
<input type="checkbox"/> Destination Facility for Universal Waste			
Check all boxes below that apply for each of the three types of facilities above		10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
	Managed	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
11. 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 if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRA info source record, you do not need to list them all. Instead just indicate the date of the most recent source record.			
D002	D006	D007	
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.			
Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments: Episodic LQG that was LQG during CEI.
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Ron Shadrach, DHWM, NEDO			3/21/2008 10:15
14. OPTIONAL CERTIFICATION: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.			
Signature of Owner, Operator, or an Authorized Representative		Name and Title (Print)	Date (mm/dd/yyyy)

**LA 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 x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

- | | | | |
|---|---|--|---|
| 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 2. 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 type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" 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 checked="" 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 checked="" 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)] | | | |
| a. Container that meets 3745-66-70 to 3745-66-77? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input 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)] | 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)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

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

- | | | | |
|--|---|-----------------------------|------------------------------|
| 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"/> |
|--|---|-----------------------------|------------------------------|

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)].

- | | | | |
|---|------------------------------|-----------------------------|---|
| 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? [3745-52-2(A)(1) & (2)] Yes No N/A

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.

17. 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 No N/A

18. 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 No N/A

19. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes No N/A

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

PERSONNEL TRAINING

20. 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 No N/A

21. 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 No N/A

22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A

23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes No N/A

24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A

25. Does the generator keep records and documentation of:
- a. Job titles [3745-65-16D(1)]? Yes No N/A
 - b. Job descriptions [3745-65-16D(2)]? Yes No N/A
 - c. Type and amount of training given to each person [3745-65-16D(3)]? Yes No N/A
 - d. Completed training or job experience required [3745-65-16D(4)]? Yes No N/A

26. 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 No N/A

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

27. 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 No N/A

28. 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 No N/A
 - b. Arrangements with emergency authorities [3745-65-52(C)]. Yes No N/A
 - 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 No N/A

- d. A list of all emergency equipment including: location, a physical description and a brief outline of capabilities? [3745-65-52(E)] Yes No N/A
- e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes No N/A

NOTE: If the facility already has a "Spill Prevention, Control and Counter measures 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)]

- 29. 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 No N/A
- 30. 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 No N/A
- 31. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes No N/A

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

- 32. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes No N/A
 - a. Was the contingency plan implemented? [3745-65-51(B)] Yes No N/A
 - b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes No N/A
 - c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes No N/A

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.

PREPAREDNESS AND PREVENTION

- 33. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes No N/A
- 34. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:
 - a. Internal alarm system? [3745-65-32(A)] Yes No N/A
 - b. Emergency communication device? [3745-65-32(B)] Yes No N/A
 - c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes No N/A
 - d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes No N/A

NOTE: Verify that the equipment is listed in the contingency plan.

- 35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes No N/A
- 36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A
- 37. 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 No N/A
- 38. If there is only one employee on the premises, is there immediate access to a device (ex.phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] Yes No N/A
- 39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
- 40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes No N/A
- 41. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes No N/A

SATELLITE ACCUMULATION AREA REQUIREMENTS

- 42. Does the generator ensure that satellite accumulation area(s):
 - a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes No N/A
 - b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes No N/A

- c. Do not exceed one quart of acute hazardous waste at any one time? [3745-52-34(C)(1)] Yes No N/A
- d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes No N/A
- e. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
- 43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:
 - a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes No N/A
 - b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes No N/A
 - c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

- 44. Has the generator marked containers with the words "Hazardous Waste"? [3745-52-34(A)(3)] Yes No N/A
- 45. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No N/A
- 46. Are hazardous wastes stored in containers which are:
 - a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A
 - b. In good condition? [3745-66-71] Yes No N/A
 - c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A
 - d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

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

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

- 52. 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 No N/A

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

- 53. 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 No N/A
- 54. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A
- 55. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes No N/A

USED OIL INSPECTION CHECKLIST (Short Version)

NOTE: *This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.*

PROHIBITIONS

- 1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes ___ No N/A ___ RMK# ___

Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes ___ No N/A RMK# ___
- 2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No N/A ___ RMK# ___
- 3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes ___ No N/A RMK# ___

USED OIL GENERATOR STANDARDS

- 4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes ___ No N/A RMK# ___
- 5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes ___ No N/A RMK# ___
- 6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes No N/A ___ RMK# ___
- 7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No N/A ___ RMK# ___
- 8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes ___ No N/A ___ RMK# ___
- 9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
 - a. Stopped the release? Yes ___ No N/A RMK# ___
 - b. Contained the release? Yes ___ No N/A RMK# ___

- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A RMK#
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A RMK#
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes No N/A RMK#
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes No N/A RMK#
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A RMK#
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A RMK#
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes No N/A RMK#

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes No N/A RMK#
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes No N/A RMK#
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes No N/A RMK#

WASTE EVALUATION

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

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REMARKS

1. Two containers for used oil were not labeled per the rule. The violation was abated during the inspection when the containers were labeled "used oil".

Process, Waste, and Pollution Prevention Summary for: Facility Name, Guaranteed Finishing Unlimited, Inc.						
ID #, Status, date inspection – OHD 107 109 563, March 21, 2008						
#	Process generating the waste	Waste details Qty.	On-site management	Off-site management	Current pollution prevention	Possible pollution prevention
1	WWT	Filter cake – non haz, non F006. 20 cyd/mos. <i>NO D006 per BK</i>	Covered roll-off container	Transported by Enviroserve to Geneva solid waste landfill		
2	Tank and plating bath clean out, fluids and sludges	D002, D006 , D007 solids and sludges 20 cyd/year	Fluids generally treated in WWT system. Bath cleanout in drums. Episodic tank cleanout in roll-off.	Envirite <i>Each load treated could find for CR.</i>	Removes debris, parts, scrap, fluids	
3	Parts washer	Mineral spirits 7 gal/ 2 mos. Non RCRA	none	Service by Kwik Kleen		Use of filter to clean and extend life
4	cardboard	packaging	Bale in packer	Former PCA facility takes		Better collection
5	Oily rags		Washed onsite - reused	Discharges to sanitary		

6	Lamps	D008 potential	Observed spent lamps appeared nonhaz. Need management program for others	NEO Disposal/Recyclers list provided		Recycle all lamps as UW.
7	Used Oil	Vehicle fluids & equipment hydraulics	Tank and 55-gal. drum	Rice Oil		
8						
9						
10						