



State of Ohio Environmental Protection Agency

Northeast District Office



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

February 27, 2008

Lisa Wagoner  
Golden Aluminum Extrusion  
1000 University St., NE  
Warren, OH 44483

**RE: GOLDEN ALUMINUM EXTRUSION, OHD 004 168 837  
TRUMBULL COUNTY, NOTICE OF VIOLATION/RETURN TO COMPLIANCE**

Dear Ms. Wagoner:

On February 7, 2008, Ohio EPA Division of Hazardous Waste Management, represented by Edward D'Amato and Robert Almquist, inspected Golden Aluminum Extrusion (GAE) for compliance with Ohio hazardous waste laws and regulations found in Chapters 3734 of the Ohio Revised Code (ORC) and 3745 of the Ohio Administrative Code (OAC).

You represented GAE during the inspection.

This letter will explain the violations we found, other general concerns we have, and what you need to do to respond to them. We found the following violations. In order to correct them you must do the following and send me all requested information **within 30 days** of the date of this letter:

**1. Required Equipment (Communication Device)  
OAC 3745-65-32(B)**

*A device, such as a telephone (immediately available at the scene of operations), or a hand-held two-way radio, capable of summoning emergency assistance*

At the time of the inspection, there was no communication device for the hazardous waste accumulation area near the paint line that met the requirements of this rule. You explained that there was a telephone located near the area, but following a recent replacement of the telephone system throughout the facility, this phone had not yet been replaced.

This violation was abated on February 8, 2008 when you e-mailed a photograph showing that a telephone had been installed.

**2. Labeling of Hazardous Waste Containers  
OAC 3745-52-34 (A)(3)**

*While being accumulated...on site, each container and tank is labeled or marked clearly with the words 'Hazardous Waste'*

Until 2007, GAE had been sending its spent caustic to Clean Harbors for use as a substitute for a commercial chemical product. You explained that for the past few months, Clean Harbors was unable to use all of caustic GAE generates which has forced you to dispose of some of the material as a hazardous waste. Whenever the tank is used to accumulate hazardous waste, it must be labeled per this rule. It was not labeled at the inspection. This violation was abated at the time of the inspection when a label was applied.

You explained that you have found an additional customer for the spent caustic that will allow GAE to send 100% of the material off-site as a substitute for a commercial chemical product. Please be advised that whenever less than 100% of the material can be managed this way, the tank must be labeled.

Ohio EPA has the following suggestions to help your facility reduce waste and costs. You are under no obligation to implement them:

1. GAE should re-evaluate the potential of powder coating to replace the conventional paints currently being used. Over the past several years, the quality and durability of powder coatings have advanced considerably. Below is some information to help you get started on your research:

Products Finishing Online has several articles on the superiority of powder coating over traditional finishes:

<http://www.pfonline.com/powder/index.html>

Case Studies:

<http://www.pfonline.com/articles/99sum02.html>

Knaack Aluminum Case Study

<http://www.powdercoating.org/media/casestudies/knaack.htm>

John Deere, Harley Davidson and more-

<http://www.powdercoating.org/media/casestudies/index.htm>

2. GAE is currently disposing of aerosol cans as hazardous waste. Provided the cans meet the definition of "empty" as defined in OAC rule 3745-51-07, the cans may be recycled. OAC 3745-51-07 states that any hazardous waste residues remaining in an **empty** container are not subject to regulation. To be considered empty, all wastes must be removed by using the practices commonly employed to remove material from that type of container, e.g., pouring, pumping, or aspirating; and
  - a. no more than 2.5 centimeters of residue remain on the bottom of the container  
OR;

- b. no more than 3% by weight of the total capacity of the container remains in the container or inner liner of the container is less than equal to one hundred ten gallons in size OR;
- c. no more than 0.3% percent by weight of the total capacity of the container remains in the container or inner liner if the container is greater than one hundred ten gallons in size.

If you have determined that the cans meet the criteria in this rule, you do not need to manage empty cans as a waste. Please note that scrap metal recyclers usually require that the cans be punctured. Several aerosol can puncturing devices are commercially available and are easily found on the internet.

- 3. GAE has been disposing of used leather gloves as a hazardous waste due to chromium content derived from the tanning of the leather. On July 9, 2007, Ohio EPA issued a regulatory interpretation stating that leather gloves meet the conditional exclusion from being a hazardous waste in OAC rule 3745-51-04(B)(6), which provides that a waste exhibiting the characteristic of toxicity for chromium that is exclusively or nearly exclusively trivalent chromium, and that is managed in a non-oxidizing environment, is not a hazardous waste. If GAE can demonstrate that its used leather gloves meet this exclusion, they may be managed as a non-hazardous waste. Enclosed is a copy of the letter explaining the interpretation.
- 4. GAE maintains a temperature of approximately 200 °F in its caustic die-cleaning tanks. An operating temperature 170 °F may produce less sludge while providing equal performance. Furthermore, the tanks are uninsulated. Insulating the tanks (if possible) could save GAE money on energy costs.

Also, GAE may want to research the potential of an evacuated tube solar-thermal heating system for the tanks which would likely be able to provide all of the heating needs during daylight hours on sunny days, and up to ½ of heating needs on cloudy days, even during the winter. Such systems are normally designed to work in tandem with your conventional heating system. Solar heating systems are eligible for state and/or federal incentives. Payback times are usually 3-6 years.

- 5. Ohio EPA recommends that GAE have an energy assessment of its facility. The US Department of Energy has an energy assessment program. More information can be found at:

<http://www1.eere.energy.gov/industry/saveenergynow/assessments.html>

The Ohio Department of Development, Office of Energy Efficiency can also assist. More information can be found at:

<http://www.odod.state.oh.us/cdd/oeec/services.htm>

GOLDEN ALUMINUM EXTRUSION  
FEBRUARY 27, 2008  
PAGE - 4 -

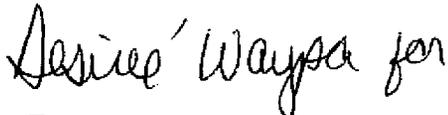
You may be able to reduce operating costs with waste minimization/pollution prevention practices. The Ohio EPA offers pollution prevention assessments to help you decide which practices would benefit your operations. If you would like to have a pollution prevention assessment, or would like more information, please contact Adrienne LaFavre at (330) 963-1250. The Office of Compliance Assistance and Pollution Prevention website at: <http://www.epa.state.oh.us/ocapp/ocappmain.html> is also a good source of information.

Enclosed are copies of the checklists used for the inspection.

Failure to list specific deficiencies in this communication does not relieve Golden Aluminum Extrusion from the responsibility of complying with all applicable Ohio EPA laws and regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Please feel free to contact me at (330) 963-1170 if you have any questions.

Sincerely,



Edward J. D'Amato  
Environmental Specialist  
Division of Hazardous Waste Management

EJD:ddw

Enclosures

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

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: <u>OH 004 168 837</u>								
3. Site Name	Name: <u>Golden Aluminum Extrusion</u>					Website: (Optional)			
4. Site Location Information	Street Address: <u>1000 University Dr</u>								
	City, Town, or Village: <u>Warren</u>					State: <u>OH</u>			
	County Name: <u>Trumbull</u>					Zip Code: <u>44030</u>			
5. Site Land Type (check only one)	<input type="checkbox"/> 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	
6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	<u>331319</u>								
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: <del>XXXX</del> <u>Lisa</u>			MI:		Last Name: <del>XXXX</del> <u>Wagoner</u>			
	Phone Number: <u>(330) 372-2300</u>				Phone Number Extension:				
	E-Mail Address: <u>Lisa.Wagoner@Gaextrusion.com</u>								
	Fax Number: <u>(330) 372 2104</u>				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: <del>XXXX</del>					Date Became Owner (mm/dd/yyyy):			
	<input type="checkbox"/> Owner Type:	<input type="checkbox"/> 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
	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):			
	<input type="checkbox"/> Owner Type:	<input type="checkbox"/> 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
	Street or P.O. Box:								
	City, Town or Village:					Operator Phone #:			
	State:			Country:			Zip Code:		
9. Violations Cited?	<u>Yes</u>								
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				<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 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))	
	<b>Managed</b>	<input 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 RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.			
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.			
<b>Announced</b>		<b>No</b>	<b>Additional Facility Representatives:</b>
<b>Tanks</b>	Yes	<input checked="" type="checkbox"/>	<b>Other Comments:</b>
<b>Containers</b>	Yes		
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Ed D'Amato		Robert Almgais	2/7/08
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)

LARGE QUANTITY GENERATOR REQUIREMENTS  
 COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

Golden Aluminum  
Extrusions

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  No  N/A
2. Are records of waste determination being kept for at least 3 years? [3745-52-40(C)] Yes  No  N/A
3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes  No  N/A
4. Were annual reports filed with Ohio EPA on or before March 1<sup>st</sup>? [3745-52-41(A)] Yes  No  N/A
5. Are annual reports kept on file for at least 3 years? [3745-52-40(B)] Yes  No  N/A
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  No  N/A
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  No  N/A
8. Does the generator accumulate hazardous waste? Yes  No  N/A

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  No  N/A

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  No  N/A
- b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? Yes  No  N/A
- c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes  No  N/A
- d. Containment building that meets 3745-256-100 to 3745-256-102? Yes  No  N/A

NOTE: Complete appropriate checklist for each unit.

[Facility Name/Inspection Date]

[ID number]

LQG

Page 1 of 7

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

- 11 Does the generator export hazardous waste? If so: Yes  No  N/A
- a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] Yes  No  N/A
- b. Has the generator complied with special manifest requirements? [3745-52-54] Yes  No  N/A
- c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] Yes  No  N/A
- d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes  No  N/A
- e. Are export related documents being maintained on-site? [3745-52-57(A)] Yes  No  N/A

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

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these

situations items (21) through (35) must also be 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  No  N/A

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  No  N/A

- 16 Have the manifests been signed by the generator and initial transporter? [3745-52-23(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 public 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 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:
  - 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 communications or alarm system? [3745-65-32(A)] Yes  No  N/A

- b. Emergency communication device? [3745-65-32(B)] *Not for < 90-day area by paint line.* 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  *not for < 90-day area by paint line*
- 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 a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes  No  N/A
- d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes  No  N/A
- e. Containers are closed, in good condition and compatible with wastes stored in them?[3745-52-34(C)(1)(a)] Yes  No  N/A
- f. 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

[Facility Name/Inspection Date]

[ID number]

LQG

Page 5 of 7

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. Yes  No  N/A

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

[Facility Name/Inspection Date]

[ID number]

LQG

Page 6 of 7

- 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

[Facility Name/Inspection Date]

[ID number]

LQG

Page 7 of 7

