



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

Encl. 002

Encl. 002

RTC'd 1 violation

April 25, 2012

Mr. Joe Olding  
American Fan  
2933 Symmes Road  
Fairfield, OH 45014

**RE: NOV/PARTIAL RTC SQG American Fan OHD050659010**

Dear Mr. Olding:

On April 17, 2012, I conducted an inspection of American Fan. The purpose of the inspection was to determine your compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). As is our standard practice, I did not schedule my inspection in advance.

We began by discussing your processes and wastes. We also discussed pollution prevention activities. The physical inspection included the paint booth, the storage areas for used oil and the outdoor hazardous waste storage area. We determined that American Fan is acting as a small quantity generator (SQG) of hazardous waste. See the attached Process Description Summary for my understanding of your processes and how I determined your generator status.

I found the following violation of Ohio's hazardous waste rules:

**Information Must be Posted Next to the Telephone:** OAC 3745-52-34(D)(5)(b) requires that small quantity generators post the name and telephone number of the emergency coordinator, the location of fire extinguishers, fire alarms (if present) and spill control materials and the telephone number of the fire department unless you have a direct alarm. Telephone lists are posted by all the phones in your facility, but they do not provide the required information.

To be returned to compliance, create the required signs and post them by all the phones. Be sure the signs provide the required information. Please email me an electronic file of the signs within 30 days of your receipt of this letter.

**Testing and Maintaining Emergency Equipment:** OAC 3745-65-33 requires all communication and emergency equipment be tested and maintained as necessary to assure operation in time of emergency. The testing must be recorded in a log or summary.

Southwest District Office  
401 East Fifth Street  
Dayton, OH 45402-2911

937 | 285 6357  
937 | 285 6249 (fax)  
www.epa.ohio.gov

Mr. Joe Olding  
American Fan  
April 25, 2012  
Page 2

American Fan maintains records of fire sprinkler testing and fire extinguisher testing. No inspection records were maintained for absorbents and containers used to respond to the release of liquid paint or for equipment used to respond to a spill of cured paint solids.

☞ To be returned to compliance, you will need to devise and implement a plan to test and inspect the emergency equipment that would be used to respond to a release (including a fire) of hazardous waste. Your list will include items like fire extinguishers, fire alarms, sprinklers, paging and emergency communication equipment and spill cleanup items such as over-pack drums, absorbents, booms, etc. I include this list as a starting set of suggestions. You should develop a list specific to your internal spill response procedures. You should follow manufacturer's testing intervals (or shelf-life recommendations) where appropriate. For fire equipment, you should choose inspection frequencies consistent with local code or fire department guidelines.

The rules clearly state that the inspections should be recorded, but you do not have to keep redundant records. Maintaining these records electronically has been considered to be compliant. It is also appropriate for you to incorporate the inspection of emergency equipment into any existing inspections such as house-keeping inspections or safety inspections.

Thirty days after you receive this letter, I will schedule a return visit to your facility to check your progress in returning to compliance.

**Inspection of Area Where Waste is Stored:** OAC 3745-66-74 requires that areas where wastes are stored be inspected weekly for indications of leaks or deteriorated containers. The inspection must be recorded in a log or summary. You told me that American Fan performs regular inspections, but you do not keep a record.

☞ Develop and implement an inspection strategy. Begin with items 31 through 37 of the SQG checklist. I suggest developing a checklist that covers those items. Make sure there is adequate aisle space around the drums to allow for unobstructed movement of emergency or spill control equipment (as required by OAC 3745-65-35). Other checklists that have been determined to be compliant have included a space to mark the inspector's initials, the inspection date (required), whether the drum labels are visible (or hidden); whether ice, snow or vegetation interfere either with your ability to inspect the area or respond to a release.

Thirty days after you receive this letter, I will schedule a return to your facility to check your progress in returning to compliance.

**Used Oil Containers and Tanks Must Be Labeled with the Words Used Oil:** OAC 3745-279-22(C) requires that generators who store used oil in containers clearly mark the container with the words "used oil". The label on the used oil drum was descriptive of the contents, but it did not bear the words "used oil".

Mr. Joe Olding  
American Fan  
April 25, 2012  
Page 3

☞ Before we left the area, the proper wording was marked on the drum. No further actions are required by you to be returned to compliance.

### **Labeling Containers Managed Under SAA Rules**

Satellite accumulation area (SAA) rules allow containers to be managed under reduced standards. SAA containers can be labeled with any descriptive words you choose. They are not required to be labeled as hazardous waste. There is no specific time restriction. The rules allow you to accumulate up to 55 gallons of hazardous waste. Once the drum is full, the generator has three days to move the container to the generator storage area and manage the drum under the standards applicable to containers being accumulated. See items 31 through 37 on the enclosed SQG checklist for those standards.

There are two requirements for dating drums. Drums should be marked with the date they are filled. The SQG then has three days to move the drum to the accumulation area. Once the waste is being accumulated, the original date should be crossed out, the hazardous waste label should be affixed, and the drum should be marked with that date. The SQG now has 180 days to manifest the drum to a permitted facility. I should mention that all containers of hazardous waste must be closed except when adding or removing waste.

I have enclosed a process summary sheet, a used oil checklist, a universal waste checklist and a SQG checklist. Please contact me at (937) 285-6090 if you have any questions or if I can assist you in any way in understanding and following the rules of the Ohio EPA.

Sincerely,



Tom Ontko  
Hazardous Waste Inspector  
Division of Materials and Waste Management

TO/tf

Enclosures

ec: George Strobel, Ohio EPA  
Robyn Winstead, Ohio EPA

### **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.

**PROCESS, WASTE, P2 SUMMARY SHEET**

<b>Facility Name:</b> American Fan		<b>Facility Type:</b> SQG		<b>Date of Inspection:</b> April 17, 2012		<b>EPA ID #:</b> OHD050659010	
<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 applic.	<b>QTY Generated per Month, Type of Accumulation</b> (container, tank, etc) and location of waste accumulation area	<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	painting	pourable paint liquids D001, F003, F005			Clean Harbors		
2	painting	cured 2- component paint solids F003			" " "		
3	powder coating parts	no waste generated					
4	air pollution filters from paint booth	filter elements clogged w/ dry paint—tested as non-hazardous			" " "		
5	used oil				" " "		

6	universal waste lamps				" " "		
7							
8							

**REMARKS-GENERAL INFORMATION**

**General Process Information:**

American Fan fabricates a wide-variety of fans for industrial uses. Processes include fabricating, laser cutting, some machining and painting. The painting process generates the 3 waste streams noted above. AF uses two types of paint-a standard liquid paint and a 2-component paint that has a limited useful life after it is mixed. Waste paints of both types are poured as wastes into steel drums managed under the SAA rules near the paint booth. The liquid waste is manifested as D001, F003 and F005. The two-component paint cures to a monolithic solid mass and is manifested as F003 for residual xylene.

American Fan is very close to the cut-off between CESQG and SQG status. in CY 10, American Fan shipped 6 drums of paint liquids. In CY 11, 5 drums of waste liquid paint and 1 drum of paint solids. Assuming a specific gravity of 1, this equates to an average of (6 drums X 55 gal/drum X 8.3 pounds/gallon)/12 months = 230 pounds/mo. which is barely more than the 100kg (220 pounds) maximum allowed for a CESQG. Joe agreed that it was appropriate not to quibble and to consider that American Fan is acting as a SQG of hazardous waste.

**Regulatory/Enforcement History** (if applicable): American Fan notified as a SQG in 1986. RCRAInfo notes a CEI was performed in the 1980s but no search was made in dead files for the inspection records.

**Additional P2 remarks and information:** The use of powder coating is being evaluated for many of the parts currently being painted.

Would this facility be interested in a P2 assessment? Yes\* \_\_\_\_\_ No \_\_\_\_\_

\*If yes, refer promptly to your district P2 coordinator. Office of Compliance Assistance and Pollution Prevention – 1-800-329-7518 or [p2mail@epa.state.oh.us](mailto:p2mail@epa.state.oh.us) or [www.epa.state.oh.us/ocapp/ocapp.html](http://www.epa.state.oh.us/ocapp/ocapp.html)

## Links

**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/bustr/bustr/PublicInquiry.asp](https://www.comapps.ohio.gov/sfm/fire_apps/bustr/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/bustr/bustr/SearchByCounty.asp](https://www.comapps.ohio.gov/sfm/fire_apps/bustr/bustr/SearchByCounty.asp).*

**PROHIBITIONS**

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	No
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a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	N/A
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*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)]	No
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3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	No
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*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,	No
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a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	N/A
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*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)]	N/A
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*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)]	No
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7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes
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8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	No
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9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	
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a.	Stopped the release?	N/A
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b.	Contained the release?	N/A
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c.	Cleaned up and properly managed the used oil and other materials?	N/A
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d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	N/A
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**ON-SITE BURNING IN SPACE HEATER**

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	No
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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?	N/A
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b.	Is the heater designed to have a maximum capacity of not more that	N/A
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	0.5 million BTU per hour?	
c.	Are the combustion gases from heater vented to the ambient air?	N/A
<i>NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).</i>		
<b>GENERATOR TRANSPORTATION</b>		
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes
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]	N/A
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	N/A
<i>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).</i>		
<b>COLLECTION CENTERS AND AGGREGATION POINTS</b>		
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]	N/A
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	N/A
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	N/A
<i>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.</i>		

**Remark—Item #8 Clean Harbors is subcontracted for the disposition of hazardous waste, universal waste and used oil. Clean Harbors provides pre-printed labels for 55-gallon steel drums used to manage used oil. The labels use descriptive terms for AFs oil, but the labels do not contain the words 'used oil'. Before we left, the proper markings were applied with a paint stick. This was cited as an NOV/RTC.**

**Remark—Item #9 American Fan reported no releases of used oil.**

**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: safety glasses

**GENERAL REQUIREMENTS**

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes
2.	Has the generator obtained a U.S. EPA I.D. number? [3745-52-12]	Yes <input type="checkbox"/>
3.	Has the generator transported or caused to be transported hazardous waste to <b>other</b> than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)]	No
4.	Has the generator disposed of hazardous waste <b>on-site without a permit</b> or at another facility <b>other</b> than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)]	No
5.	Does the generator accumulate hazardous waste?	Yes

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

6.	Has the generator accumulated hazardous wastes in excess of (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)]	No
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**NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]**

7.	Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)]	No
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**NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.**

8.	Does the generator treat hazardous waste in a:	
	a. Container that meets 3745-66-70 to 3745-66-77?	N/A
	b. Tank that meets 3745-66-101?	N/A
	c. Drip pads that meet 3745-69-40 to 3745-69-45?	N/A
	d. Containment building that meets 3745-256-100 to 3745-256-102?	N/A

**American Fan does not treat hazardous waste**

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

**MANIFEST REQUIREMENTS**

9.	Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)(1)]	Yes
10.	Are wastes reclaimed under a contractual agreement? If so: [3745-52-0(E)]	No
	a. Does the contractual agreement specify the type of waste and frequency of shipment?	N/A
	b. Is the transport vehicle owned and operated by the reclaimer?	N/A
	c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement?	N/A

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

11.	Have items 1 through 20 of each manifest been completed? [3745-52-20(A)(1)] & [3745-52-27(A)]	Yes
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*NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be complete. [3745-52-20(A)(1)]*

12.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes
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*NOTE: The generator may designate on the manifest one alternative facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]*

13.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	N/A
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14.	Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)]	Yes
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*NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.*

15.	If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? [3745-52-42(B)]	N/A
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16.	Are signed copies of all manifests being retained for at least three years? [3745-52-40]	Yes
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*NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.*

**PREPAREDNESS AND PREVENTION**

17.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)]	Yes
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18.	Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]	
a.	Name and telephone number of emergency coordinator?	No
b.	Location of fire and spill control equipment, and, if present, fire alarm(s)?	No
c.	Telephone number of local fire department?	No

19.	Are employees familiar with waste handling and emergency procedures? [3745-52-34(D)(5)(c)]	Yes
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20.	Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)]	N/A
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21.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31]	Yes
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22.	Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:	
a.	Internal Alarm system? [3745-65-32(A)]	Yes
b.	Emergency communication device? [3745-65-32(B)]	Yes
c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]?	Yes
d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes

23.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes
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a.	Are inspections recorded in a log or summary? [3745-65-33]	No
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24.	Do personnel have immediate access to an internal alarm or emergency	Yes
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	communication device when handling hazardous waste ( <i>unless the device is not required under OAC 3745-65-32</i> )? [3745-65-34(A)]	
25.	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 ( <i>unless not required under OAC 3745-65-32</i> )? [3745-65-34(B)]	N/A
26.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes
27.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)]	Yes
28.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	N/A
<b>SATELLITE ACCUMULATION AREA REQUIREMENTS</b>		
29.	Does the generator ensure that satellite accumulation area(s):	
	a. Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	f. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
30.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>American Fan maintains two drums (waste liquid paint, waste #1 in process summary sheet and cured paint solids, waste #2) under the SAA rules at the paint booth. The drums had the standard hazardous waste label and were not dated. Both drums were equipped with funnels with lids that latch shut.</b>		
<b>USE AND MANAGEMENT OF CONTAINERS</b>		
31.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(D)(4)]	Yes
32.	Is the accumulation date on each container? [3745-52-34(D)(4)]	Yes
33.	Are hazardous wastes stored in containers which are:	
	a. Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes
	b. In good condition? [3745-66-71]	Yes
	c. Compatible with wastes stored in them? [3745-66-72]	Yes
	d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes
<b>NOTE: Record location on process summary sheets and photograph the area.</b>		
34.	Is the container accumulation area(s) inspected at least weekly? [3745-66-	Yes

	74] Per ORC§1.44(A) "Week" means seven(7) consecutive days.	
	a. Are inspections recorded in a log or summary? [3745-66-74]	No
35.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	N/A
36.	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)]	N/A
37.	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)]	N/A
<i>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.</i>		
<b>PRE-TRANSPORT REQUIREMENTS</b>		
38.	Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes
39.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes
40.	Before off-site transportation, does the generator placard <u>or</u> offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes

**Note items #15 and #16—Joe maintains signed generator copies of manifests. His records did not included the designated facility copy for all the manifests we looked at. Apparently, the designated facility copy is routed internally to accounting in order to authorize paying the bill.**

**Not having a robust system in place to match the original generator copy with the returned designated facility copy is not strictly a violation of the OAC. It was not cited as a violation in the inspection letter. However, this deficiency could lead to a violation of OAC 3745-52-42(B) which requires a generator to notify Ohio EPA if the designated facility copy is not returned within 60 days. I discussed this with Joe and suggested he make changes to the paperwork flow to track the manifest copies.**

**Note item #18— Violation cited.**

**Note item #20—Facility has not had a fire or spill.**

**Note item #23a—Violation cited.**

**Note item #25—American Fan accumulates hazardous waste outdoors on a concrete pad also used to store empty drums and non-hazardous waste.**

**Note item # 26—Two 55-gallon steel drums of hazardous waste were being managed in the outdoor accumulation area. This area is also used to manage empty drums, drums of non-hazardous waste**