



Environmental
Protection Agency

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

FILE COPY

Eval. #17

Ent. #12

RTCD 1 violation

July 13, 2012

Ms. Lisa P. Silva
6125 Urbana Road
Springfield, Ohio 45502

RE: NOV/RTC Navistar Inc. OHD049645120

Dear Ms. Silva:

On June 22 2012, I conducted an inspection of Navistar Inc. 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. In the absence of Tim McDaniel, you represented Navistar with the assistance of Tom Dever.

We began by discussing your processes and wastes. We also discussed pollution prevention activities. See the attached "Process Description Summary" for my understanding of your processes. I determined that Navistar is a large quantity generator (LQG) of hazardous waste. My physical inspection included the waste storage and generation areas as detailed in the checklists. We returned to your office for a review of records. Subsequent to the inspection, we exchanged emails regarding the time frame for closure of two hazardous waste tanks.

I found the following violation of Ohio's Used Oil Rules:

Used oil containers must be labeled with the words "used oil": OAC 3745-279-22(C)(1) requires that containers used to manage used oil must be labeled or clearly marked with the words "used oil." The rule does not allow alternate wording.

Five 55-gallon steel drums managed in the Drum Yard were marked "bad ATF."

☞ When we discovered the improperly labeled containers, you immediately contacted the appropriate employees and asked them to re-mark the drums. Before the inspection was concluded, the drums were properly marked. There are no further actions required by you to be returned to compliance.

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I have enclosed a "Process Summary Sheet," a used oil checklist, a LQG checklist, an LDR checklist, a lead-acid battery checklist, and a universal waste 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 remaining in compliance with the rules of Ohio EPA.

Sincerely,



Tom Ontko
Hazardous Waste Inspector
Division of Materials and Waste Management

Enclosures

cc: Tim McDaniel, EHS Manager, Navistar Inc.

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.

TO\bp

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

CESQG: =100 Kg. (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	<input checked="" type="checkbox"/>
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes	<input checked="" type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes	<input checked="" type="checkbox"/>
4.	Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)]	Yes	<input checked="" type="checkbox"/>
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes	<input checked="" 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)]	No	<input checked="" 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)]	No	<input checked="" type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes	<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)?	No	<input checked="" type="checkbox"/>
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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?	No	<input checked="" type="checkbox"/>
	b. Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	No	<input checked="" type="checkbox"/>
	c. Drip pads that meet 3745-69-40 to 3745-69-45?	No	<input checked="" type="checkbox"/>
	d. Containment building that meets 3745-256-100 to 3745-256-102?	No	<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:	No	<input checked="" type="checkbox"/>
	a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	N/A	<input checked="" type="checkbox"/>
	b. Has the generator complied with special manifest requirements? [3745-52-54]	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]	N/A	<input checked="" type="checkbox"/>
	d. Has an annual report been submitted to U.S. EPA? [3745-52-56]	N/A	<input checked="" type="checkbox"/>
	e. Are export related documents being maintained on-site? [3745-52-57(A)]	N/A	<input checked="" type="checkbox"/>

MANIFEST REQUIREMENTS

12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes	<input checked="" type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes	<input checked="" type="checkbox"/>

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]

14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes	<input type="checkbox"/>
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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)]	N/A	<input type="checkbox"/>
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16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes	<input type="checkbox"/>
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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 a program in place to reduce the volume and toxicity waste they generate.

17.	If the generator received a rejected load or residue, did the generator:		
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a.	Sign item 20 of the new manifest or item 18c of the original manifest? [3745-52-23(F)(1)]	N/A	<input type="checkbox"/>
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b.	Provide the transporter a copy of the manifest? [3745-52-23(F)(2)]	N/A	<input type="checkbox"/>
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c.	Send a copy of the manifest to the designated facility that returned the shipment with 30 days after delivery of the rejected shipment? [3745-52-23(F)(3)]	N/A	<input type="checkbox"/>
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18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	N/A	<input type="checkbox"/>
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19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	N/A	<input type="checkbox"/>
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20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	N/A	<input type="checkbox"/>
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Jeff Raber does not sign manifests or prepare containers of waste for shipment but the generator's original copy and the designated facility copy is routed to him and he assumes the responsibilities of manifest tracking. Navistar has not had any manifest discrepancies.

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

21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes	<input type="checkbox"/>
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22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]	Yes	<input type="checkbox"/>
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NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]

23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Lisa performs the training. She is a PE and a CHMM.	Yes	<input type="checkbox"/>
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24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes	<input type="checkbox"/>
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25.	Does the generator provide refresher training to employees during each period from January 1 st to December 31 st and does each training occur within 15 months after the previous training? [3745-65-16(C)]	Yes	<input type="checkbox"/>
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26.	Does the generator keep records and documentation of:		
	a.	Job titles? [3745-65-16(D)(1)]	Yes
	b.	Job descriptions? [3745-65-16(D)(2)]	Yes
	c.	Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes
	d.	Completed training or job experience required? [3745-65-16(D)(4)]	Yes
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]		Yes

The personnel training program is organized so that each employee gets more-or-less identical training. There is no job-specific training. The lack of violations found is considered evidence that the training program is adequate.

Job Performed	Name of Employee	Date Trained

CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]		Yes
29.	Does the plan describe the following:		
	a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes
	b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes
	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
	d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes
	e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes

Navistar organizationally has a title 'loss prevention officer'. In addition to production duties, the loss prevention officer fills the duties of the emergency coordinator. One loss prevention officer is always on duty. Evacuation routes are posted in Plant.

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]		Yes
31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] The plan was revised in 2011> CHECK TO SEE WHY		Yes
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]		Yes

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

EMERGENCY PROCEDURES

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

34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:	
a.	Internal communications or alarm system? [3745-65-32(A)]	Yes
b.	Emergency communication device? [3745-65-32(B)] Facility is equipped with manual fire alarms and phones.	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

Navistar has fire alarms and phones. All emergency calls are initially directed to the guard who then contacts the fire department.

36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes
39.	If there is only one employee on the premises, is there immediate access to a device (eg. phone, and hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)] Employees do not work alone.	N/A
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Tom Devers is the day shift loss prevention officer and is also charged with maintaining the inspection records required in item #36. Navistar self-performs fire extinguisher inspections.	Yes

SATELLITE ACCUMULATION AREA REQUIREMENTS

43.	Does the generator ensure that satellite accumulation area(s):	
a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes
b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes
c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes
d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	N/A
e.	Containers are closed, in good condition and compatible with wastes	Yes

		stored in them? [3745-52-34(C)(1)(a)]	
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes
44.		Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	No
	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)]	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)]	N/A

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

45.		Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes
46.		Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes
47.		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

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

48.		Is the container accumulation areas(s) inspected at least once during the period from Sunday to Saturday? [3745-66-74]	Yes
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes
49.		Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes
50.		Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	N/A
51.		If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	N/A
52.		If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	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.

53.		If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] Closure of the two horizontal tanks was accomplished in 1999 and reviewed in SWDO's 2002 inspection.	
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NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes	
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes	
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes	

During the inspection, Navistar was accumulating drums of hazardous waste in the Drop Zone and in the new < 90 day storage area at the 1st Floor Paint Mix Room. The Drum Yard is currently used to manage product, used oil and non-hazardous waste. Navistar administratively inspects the Drop Zone and the Drum Yard but will defer closure of the Drum Yard until the time when the Drop Zone is closed. Inspection records were determined to be complaint.

At the time of the inspection, 28 drums of waste paint and two 375-gallon totes were accumulated in the Paint Mix Room. The oldest drum was dated 4/20/12 and all these drums were determined to be compliant.

There were 7 drums of hazardous waste present in the Drop Zone. These would have been in the process of being moved to the 1st Floor Paint Mix Room. All were determined to be compliant.

Navistar also accumulates hazardous waste in two 375-gallon (one is located in the clear coat area and the other at column B-8) totes that are soft-plumbed into the robotic paint line. I have determined that Navistar is correctly managing the totes as containers that accumulate waste. The totes are not considered to be part of the process because they are soft-plumbed and because the totes are also shipping containers. Navistar has a line on the tote label for marking the date of first waste placement and they are aware that the totes contain waste being accumulated and the 90-day clock starts at first waste placement in the totes.

Navistar manages the following wastes in containers under the SAA rules;

drum of rags to discard at column B-8

drum of solids to discard at column B-8

a drum of pig pans and solvent rags in the paint kitchen

a drum of waste aerosol cans in Dept. 92-paint touch up area

a drum of hazardous waste liquids equipped with a closing funnel in Dept. 92-paint touch up area.

All SAA drums were determined to be compliant.

Navistar labels containers of waste material using custom-made labels. Labels on containers managed under the SAA rules have two lines for dates-the first line is intended for the date of first waste placement and the second line is for when the drum is filled and the 90-day accumulation begins. The date of first waste placement is not required for SAA drums and could potentially lead to confusion over which date is being tracked (first waste placement?, date which the volume exceeds 55 gallons?). Based on my observations, I conclude that Navistar workers understand the distinction and that this system is not likely to cause any confusion.

OAC 3745-266-80 SPENT LEAD ACID BATTERIES BEING RECLAIMED

1.	Has the handler of reclaimed batteries notified Ohio EPA or US EPA of regulated waste activity?	Yes
2.	Are the handler's batteries reclaimed through regeneration (such as by electrolyte replacement)?	No
<i>NOTE: If yes, the handler is subject to OAC Chapter 3745-51 and OAC rule 3745-52-11</i>		
3.	Are the handler's batteries reclaimed other than through regeneration?	Yes
a.	If yes, does the handler:	
i.	Generate, collect, and/or transport these batteries?	Yes
ii.	Store these batteries but is not the reclaimer?	Yes
iii.	Store these batteries before reclaiming them?	No
iv.	Not store these batteries before reclaiming them?	N/A
<i>NOTE: If the answer to any question 3ai through 3aiv is "yes", the handler is subject to OAC Chapters 3745-51 and 3745-270, and OAC rule 3745-52-11. If the handler stores batteries before reclaiming them, the handler is subject to permitting requirement (e.g., general or interim standard facilities), unless when it meets the conditions in question 4 below. Complete other appropriate checklists (e.g., LDR, TSD).</i>		
4.	If the handler that does NOT have a permit and that reclaims batteries received from off-site other than through regeneration, does the handler:	
a.	Store the batteries less than 72 hours prior to entering them into the reclaiming process?	N/A
b.	Comply with the applicable requirements in 3745-51-06(C)(3) to (C)(3)(b)?	N/A
5.	Has the handler adequately evaluated all waste generated at their facility?	N/A

Navistar employees use a variety of small, battery-operated 'golf cart' vehicles to travel around the plant. I inspected one container of lead-acid batteries staged next to the SAA storage of aerosol cans in the maintenance shop, Department 80.

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

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

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

PROHIBITIONS

1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	No
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	N/A

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	
	a. If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	
	b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)] No universal waste batteries were present during the inspection. See lead-acid-battery checklist.	

UNIVERSAL WASTE PESTICIDES

8.	Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]	
9.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]	
10.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97, of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]	
11.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(B)(4)]	
12.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-14(B)(1)&(2)]	
13.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste-Pesticides" or "Waste Pesticides?" [3745-273-14(C)(1)&(2)] No universal waste pesticides were present during the inspection.	

UNIVERSAL WASTE MERCURY-CONTAINING EQUIPMENT

14.	Has mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage or damage that could cause	
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	leaks been placed in a container that is closed, structurally sound, compatible with contents of the device and lacks evidence of leakage, spillage or damage that could cause leakage and is designed to prevent escape of mercury into the environment by volatilization or any other means? [3745-273-13(C)(1)]	
15.	If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]	
	a. Remove and manage the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-13(C)(2)(a)&(b)]	
	b. Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)&(d)]	
	c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)]	
	d. Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	
	e. Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	
	f. Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-13(C)(2)(h)]	
16.	If the open original housing holding mercury is removed from a mercury-containing equipment that does not contain an ampule, does the SQUWH: [3745-273-13(C)(3)]	
	a. Immediately seal the original housing holding the mercury with an air-tight seal to prevent the release of any mercury to the environment? [3745-273-13(C)(3)(a)]	
	b. Follow all requirements for removing ampules and managing removed ampules in accordance with 3745-273-13(C)(2)? [3745-273-13(C)(3)(b)]	
17.	When removing mercury containing ampules from mercury-containing equipment or sealing mercury from its original housing if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining mercury-containing device), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-13(C)(4)(a)]	
	a. If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-13(C)(4)(b)]	
18.	Is mercury-containing equipment or containers of mercury-containing equipment labelled either "Universal Waste-Mercury-Containing Equipment" or "Waste Mercury-Containing Equipment" or "Used Mercury-Containing Equipment"? [3745-237-14(D)(1)]	
19.	Are mercury-containing thermostats or containers containing ONLY thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)"? [3745-273-14(D)(2)] No universal waste mercury-containing equipment was present during the inspection. Navistar told me that modern trucks no longer are built with mercury switches. An effort was made in the past to remove mercury switches from production equipment and Navistar believes that all such devices have been removed from the facility.	

UNIVERSAL WASTE LAMPS		
20.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]	Yes <input type="checkbox"/>
21.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes <input type="checkbox"/>
NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.		
22.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)]	Yes <input type="checkbox"/>
ACCUMULATION TIME		
23.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input type="checkbox"/>
a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	N/A <input type="checkbox"/>
NOTE: Accumulation is defined as date generated or date received from another handler.		
24.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below:	Yes <input type="checkbox"/>
EMPLOYEE TRAINING		
25.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]	Yes <input type="checkbox"/>
RESPONSE TO RELEASES		
26.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input type="checkbox"/>
27.	Is the material released characterized? [3745-273-17(B)]	N/A <input type="checkbox"/>
28.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)] Navistar reports no releases of universal waste.	N/A <input type="checkbox"/>
OFF-SITE SHIPMENTS		
NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.		
29.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input type="checkbox"/>

30.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes	
31.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	Yes	
32.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	No	
	a. If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)]	N/A	
33.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u> :	N/A	
	a. Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)]	N/A	
34.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	N/A	

EXPORTS

NOTE: Small quantity handlers that export waste to the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262 subpart H. Small quantity handlers that export waste to a foreign destination other than the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262.53, 40 CFR 262.56(a)(1) to (a)(4), (a)(6), and (b), 40 CFR 262.57, and 40 CFR 262 subpart E. [3745-273-20]

NOTE: Violations regarding exporting universal waste to foreign destinations should be referred to U.S. EPA Region 5 because the federal counterpart provisions are not delegable to states.

Navistar manages universal waste lamps in cardboard boxes which are in turn stored in metal bins located in the paint facility maintenance area. The cardboard boxes were labeled but the flaps were not closed. Since the bin doors were closed, this was determined to be compliant.

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

NOTE: 1. A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

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

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	No
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	N/A

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
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	No

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
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	N/A

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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No halogenated solvents are used at Navistar. I did not ask to see the results of halogen analysis.

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

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
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil	N/A

	generators?	
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	N/A
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>		
GENERATOR TRANSPORTATION		
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	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>		
COLLECTION CENTERS AND AGGREGATION POINTS		
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	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 Navistar manages used oil in 55-gallon steel drums. The drums are transported to the Drop Zone and then pumped into a horizontal above-grade tank. The tank was compliant with the used oil rules. Six drums in the drum yard were marked with the words "bad ATF". The proper wording was marked on the containers before I left. The inspection letter cited the violation and also returned Navistar to compliance.

**GENERATOR LDR CHECKLIST
DOES NOT APPLY TO CESQGS**

GENERAL REQUIREMENTS

1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07(A)(7)]	Yes	<input type="checkbox"/>
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not,	N/A	<input type="checkbox"/>
a.	Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)]	N/A	<input type="checkbox"/>

NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).

3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]	Yes	<input type="checkbox"/>
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]	Yes	<input type="checkbox"/>
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,	Yes	<input type="checkbox"/>
a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]	Yes	<input type="checkbox"/>

FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.

6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]	Yes	<input type="checkbox"/>
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NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.

NOTE: Written documentation of this determination is not required.

7.	Did the generator treat his HW /soil on-site <u>to meet</u> the LDR treatment standard?	No	<input type="checkbox"/>
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NOTE: If "Yes" see question #16.

8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)]	Yes	<input type="checkbox"/>
a.	If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include:	N/A	<input type="checkbox"/>
i.	Applicable HW codes?	N/A	<input type="checkbox"/>
ii.	Manifest number of the first shipment to the TSD?	N/A	<input type="checkbox"/>
iii.	A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination.?"	N/A	<input type="checkbox"/>
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]	Yes	<input type="checkbox"/>
10.	Does the generator have a copy of the LDR notification form/notice on file? [3745-270-07(A)(2)]	Yes	<input type="checkbox"/>
a.	Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes	<input type="checkbox"/>

NOTIFICATION FORM

11.	Does the LDR Notification form contain the following information:	<input type="checkbox"/>
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	a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]	Yes	
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes	
	c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes	
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]	Yes	
NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.				
	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes	
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories				
	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes	
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.				
	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes	
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.				
PROHIBITED DILUTION				
12.	Is the HW treated by burning? If "No" go to #15.		No	
13.	Is the HW a metal-bearing HW?		N/A	
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.				
14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless one of the following conditions apply. [3745-270-03(c)]		
	i.	Contains > 1% TOC?	N/A	
	ii.	Contains organic constituents or cyanide at levels greater than the UTS levels?	N/A	
	iii.	Is made up of combustible material e.g., paper, wood, plastic?	N/A	
	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	N/A	
	v.	Co-generated with a HW that must be combusted?	N/A	
	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	N/A	
15.	Was the HW treated by wastewater treatment?		No	
	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	N/A	
NOTE: If "Yes", HW is improperly being treated by dilution.				
	b.	Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC?	N/A	
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	N/A	

NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].

NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.

GENERATOR TREATMENT

16.	Does the generator treat to meet LDRs on-site?		No
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?		No
	If "Yes"...complete the rest of the checklist. If "No"...stop...you are done.		
a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]		N/A
b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]		N/A
c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]		N/A
d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]		N/A
e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]		N/A
f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]		N/A
NOTIFICATION FORM FOR GENERATOR TREATMENT			
17.	a.	Contains all information in #11 a-g above and	N/A
	b.	If the treated HW/soil is listed.....notification contains the following certification statement: "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."	N/A
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:	
	i.	Prepare a one-time notification? [3745-270-09 (D)]	N/A
	ii.	Maintain a copy of the notice onsite? [3745-270-09(D)]	N/A
	iii.	Include in the notification: [3745-270-09(D)]	N/A
		1. Name & address of receiving landfill?	N/A
		2. Description of HW when generated?	N/A
		3. HW code when generated?	N/A
		4. Treatability group when generated?	N/A
		5. Underlying hazardous constituents present when generated?	N/A
	iv.	Contain the certification statement as required by 3745-270-07(B)(4)?	N/A

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name:		Facility Type: LQG		Date of Inspection:		EPA ID #:	
Navistar Inc.				June 22, 2012		OHD049645120	
Waste Generated				On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation <small>(container, tank, etc) and location of waste accumulation area</small>	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities	
1	spent aerosol cans	cans are intact and not punctured D001					
2	paint debris	stirrers, paper cups, small paint filters, etc determined to be non-hazardous					
3	paint line residuals, line flushes, left over colors	D001, F003, F005		Nexio	distilled solvent returned for re-use		
4	cleaning wipes wetted with isopropyl alcohol		pre-treatment part of paint line managed under SAA rules at column 8				

5	lab packs						
6	punctured one-gallon empty paint cans	non-hazardous, RCRA empty			recycled for scrap metal		
7							
8							
9							

REMARKS-GENERAL INFORMATION

General Process Information: Navistar assembles over-the-road trucks in two buildings-the Assembly Plant and the Paint Facility. Navistar has a main assembly line which is fed by three sub-lines-- axle, engine and CAS lines. The engine and axle lines more or less feed the main line with components built elsewhere. For the purposes of this inspection, the majority of relevant processes occur in the Cab Assembly & Stamping sub line. This facility assembles and paints cabs for trucks built here and cabs are also shipped to other Navistar locations.

Painting operations are performed in a 4-step sequence-pretreat, primer, sealer and topcoat. Rinses in the pre-treatment process generates the bulk of the flows to the pre-treatment system. Paints are formulated elsewhere and shipped to Navistar in 'pots' which hook up directly into the robotic paint lines. Line flushes between colors are plumbed straight into 375 gallon totes which also serve as shipping containers.

Touch up painting also occurs in Department 92 at the end of the Assembly line

Nexio reclaims 'D538 solvent' off-site and it is returned to Navistar for re-use. D538 is low-flash and the paint is being properly

managed per OAC 3745-51-02(C)(3) as a spent material that is being reclaimed. This is the by far the largest waste stream generated- 344, 867 in CY 2010 and 412353 pounds in CY2009

Almost all of the wastes generated at this facility are paint related. Navistar manages containers in the Drum yard located behind the Plant not far from the tank farm. The Drum Yard previously was used for management of containers of hazardous waste but hazardous waste is now managed in the 1st Floor Paint Mix Room, Adjacent to the Drum Yard is the Drop Zone where drums are initially staged before being placed in longer-term storage. The six steel drums of 'bad ATF' (see Used Oil Checklist) were staged in the Drum Yard. Four horizontal tanks located in the Tank Farm have been used to manage wastes. Two tanks are empty but they previously held hazardous waste. Navistar has documentation of how they were decontaminated. A third tank is used to managed used ethylene glycol. The fourth horizontal tank was used to manage used oil. It was compliant. In addition to the waste tanks, the tank farm also contains product tanks.

Navistar accumulates hazardous waste in the following locations;

1st Floor Paint Mix Room

Drum Drop Zone

B-8 column 375-gallon tote

clear coat 375-gallon tote

All of the hazardous waste liquids mentioned in this report are D538 solvent recycled by Nexio. Navistar schedules waste pick-up weekly.

Navistar recycles empty one-gallon paint buckets. The empty buckets are punctured and managed in large metal wire bins.

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information: Navistar was provided information about P2 activities at the last inspection. Navistar has tried to switch to a non-hazardous aqueous paint but switched back to a urethane paint.

Would this facility be interested in a P2 assessment? Yes*_____ No X

*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 or www.epa.state.oh.us/ocapp/ocapp.html

Other: