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

July 27, 2012

MORGAN COUNTY
MIBA BEARINGS US LLC
DMWM/SEDO
OHD004288056

Ms. Heidi Suhoski
Miba Bearings US LLC
5037 N. State Route 60
McConnelsville, OH 43756

Dear Ms. Suhoski:

On June 6 and 11, 2012, Donna Goodman and I inspected Miba Bearings US LLC's (Miba) facility in McConnelsville, Ohio to determine Miba's 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). Our inspection included a review of company operations and written documentation.

We found the following violations of Ohio's hazardous waste laws. In order to correct these violations you must do the following and send me the required information ***within 14 days*** of your receipt of this letter:

(1) ORC § 3734.02(E) and (F), Establishing and Operating a Hazardous Waste Facility: (E) No person shall establish or operate a hazardous waste facility without a hazardous waste facility installation and operation permit. (F) No person shall dispose of hazardous waste or transport or cause hazardous waste to be transported to any other premises except to or at a hazardous waste permitted facility.

Oil filters from the vacuum pump at the Pero degreaser contain tetrachloroethylene (PCE) an F001 hazardous waste. When spent, these filters are taken to the boiler room where they are dried and then disposed of as a solid waste. By these actions, Miba has disposed of hazardous waste to the air by evaporation and caused their hazardous waste to be transported to and disposed at a facility that is not permitted to receive hazardous waste, in violation of this regulation.

Miba must immediately cease drying of the spent Pero degreaser vacuum pump oil filters. The filters must be stored in a closed container for disposal as a hazardous waste. To demonstrate your compliance, provide a photograph of the storage container that will be used and state the name of the hazardous waste facility that will receive this hazardous waste stream and the facility's management/disposal method for this waste stream.

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

(2) ***OAC Rule 3745-52-11, Waste Evaluation:*** Any person who generates a waste must evaluate the waste to determine if the waste is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51.

Miba has not adequately evaluated the following waste streams:

- Floor wash water;
- Mixture of used oil, floor wash water, and parts washer solvent;
- Oil vacuum pump filters from the Pero degreaser;
- Oil vacuum pump filters from the Synthec plasma cleaner; and
- Spent parts washer solvent - this D001 waste stream was analyzed September 17, 2008, and results indicate that the waste solvent is hazardous for lead, a D008 waste. During the inspection it was also noted that an aerosol can of brake cleaner was sitting on top of the parts washer unit. When spent, this brake cleaner would be a F001 hazardous waste. When evaluating the parts washer solvent Miba must also evaluate whether the spent solvent has been cross-contaminated with F001 from use of the brake cleaner in conjunction with the parts washer.

In order to abate this violation, Miba must evaluate each waste described above to determine if it is a listed or characteristic hazardous waste, and submit the evaluations to this office for review.

(3) ***OAC Rule 3745-52-20(A)(1), Manifest - General Requirements:*** A generator who transports, or offers for transport a hazardous waste for offsite treatment, storage, or disposal, or a treatment, storage, and disposal facility who offers for transport a rejected hazardous waste load, must prepare a manifest ("OMB" control number 2050-0039), on U.S. EPA form 8700-22, and if necessary, U.S. EPA form 8700-22A (the continuation sheet), according to the instructions included in the appendix to 40 CFR Part 262.

Miba has violated this rule in the following ways:

Miba generates a casting mix waste that was characterized as D008 hazardous waste until sampling in May 2009 revealed that it was also hazardous for D006. Manifests in 2010 and 2011 for the casting mix did not report the D006 hazardous waste code. Therefore, Miba did not prepare the manifest for this waste according to the instructions included in the appendix to 40 CFR Part 262, as required by this rule. In 2012 Miba began including the D006 waste code on the manifest, returning Miba to compliance with this rule.

Oil filters from the vacuum pump at the Pero degreaser contain tetrachloroethylene (PCE) an F001 hazardous waste. When spent these filters are taken to the boiler room where they are dried and then disposed of as a solid waste. This waste has been offered for transport to an off-site disposal facility without a manifest.

In order to return to compliance, Miba must demonstrate to Ohio EPA that off-site shipments of spent oil filters from the vacuum pump at the Pero degreaser are sent with a manifest.

(4) ***OAC Rule 3745-52-34(A)(2), Accumulation Time of Hazardous Waste:*** A generator may, for ninety days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit, provided that the date upon which each period of accumulation and/or treatment begins is clearly marked and visible for inspection on each container.

At the time of the inspection, Miba was storing filters from the plating area, which are hazardous D006/D008 waste, in the DI building in a hopper that was not marked with an accumulation date.

In order to return to compliance, Miba must immediately label the container used to store the plating filters with the accumulation date. To demonstrate your compliance, provide a photograph of the properly labeled container.

(5) ***OAC Rule 3745-52-34(A)(3), Accumulation Time of Hazardous Waste:*** A generator may, for ninety days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit, provided that while being accumulated and/or treated on-site, each container and tank is labeled or marked clearly with the words "Hazardous Waste."

At the time of the inspection, Miba was storing filters from the plating area, which are hazardous D006/D008 waste, in the DI building in a hopper not labeled with the words "Hazardous Waste."

In order to return to compliance, Miba must immediately label the container used to store the plating filters with the words "Hazardous Waste." To demonstrate your compliance, provide a photograph of the properly labeled container.

(6) ***OAC Rule 3745-52-34(C)(1), Accumulation Time of Hazardous Waste:*** A generator may accumulate as much as fifty-five gallons of hazardous waste or one quart of acutely hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste.

The tip hopper for D008 floor washing debris was not under the control of the operator.

In order to return to compliance with this rule, Miba must change the management of their floor washing debris tip hopper so that it is under the control of the operator. This could be accomplished by having the operator lock the hopper. To demonstrate your compliance, provide a written response stating what changes have been made to keep the tip hopper under control of the operator and, if appropriate, provide a photograph to document management of the tip hopper.

(7) ***OAC Rule 3745-52-34(C)(1)(a), Accumulation Time of Hazardous Waste:*** A generator may accumulate as much as fifty-five gallons of hazardous waste or one quart of acutely hazardous waste in containers at or near any point of generation where wastes initially accumulate, provided he complies with OAC Rule 3745-66-73. This rule states that a container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

Miba was accumulating the following wastes in open containers: D008 floor washing debris, in the casting area a waste labeled "dross/slag", and in the plating area filter tubes.

In order to return to compliance with this rule Miba must immediately begin storing their floor washing debris, dross/slag, and plating area filter tubes in closed containers. To demonstrate your compliance, submit photographs of the closed storage containers to this office.

(8) ***OAC Rule 3745-52-34(C)(1)(b), Accumulation Time of Hazardous Waste:*** A generator may accumulate as much as fifty-five gallons of hazardous waste or one quart of acutely hazardous waste in containers at or near any point of generation where wastes initially accumulate, provided he marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

The tip hopper for D008 floor washing debris was not marked with the words "Hazardous Waste" or other words identifying its contents. In the casting area there was a satellite accumulation container labeled "dross/slag only." This label did not accurately identify the actual contents of the container which included gloves, plastic, bronze, and other materials.

In order to return to compliance with this rule, Miba must mark the floor washing debris tip hopper and the casting area satellite accumulation container with the words "Hazardous Waste" or other words identifying its contents. To demonstrate your compliance, submit photographs of the properly labeled containers to this office.

(9) ***OAC Rule 3745-65-16(A)(2), Personnel Training:*** Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Chapters 3745-65 to 3745-69 and 3745-256 of the Administrative Code. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (D)(3) of this rule.

This rule requires that personnel have training that teaches them to perform their job in a way that ensures the facility's compliance with the requirements of OAC Rules 3745-65 to 3745-69. In that set of rules Miba has violations of OAC Rules 3745-65-33, 3745-65-52(A), 3745-65-52(C), 3745-65-52(D), 3745-65-52(E), 3745-65-52(F), 3745-65-53(B), 3745-66-73(A), 3745-66-74, and 3745-66-95(B). These ten violations strongly indicate that that there is a deficiency in Miba's employee training.

In order to return to compliance, Miba must retrain all employees having job duties related to the violations identified. Training should focus on the ten violations of the OAC Rules named above. Provide documentation describing and demonstrating that the retraining has been completed.

(10) ***OAC Rule 3745-65-33, Testing and Maintenance of Equipment:*** All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency. The owner or operator must record the inspections in a log or summary.

Miba does a monthly check of fire extinguishers and eyewash stations. Miba does not have a record of testing and maintaining their alarm systems, or spill control and decontamination equipment as necessary to assure its proper operation in time of emergency.

In order to return to compliance with this rule, Miba must immediately begin testing and maintaining their alarm systems, and their spill control and decontamination equipment as necessary to assure its proper operation in time of emergency. The equipment inspections must be recorded in a log. All emergency equipment listed in the contingency plan (once the contingency plan has been revised to include a list of emergency equipment) should be inspected. To demonstrate your compliance, provide a copy of the equipment inspection log and provide a written response stating how often the inspections will be conducted.

(11) ***OAC Rule 3745-65-52(A), Content of Contingency Plan:*** The contingency plan must describe the actions facility personnel must take to comply with rules 3745-65-51 and 3745-65-56 of the Administrative Code in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

The contingency plan does not describe the actions that facility personnel must take in response to fires or explosions. In addition, the contingency plan does not fully describe the actions that facility personnel must take to comply with OAC Rule 3745-65-56. For example, on page 14 of the plan, plant management is directed to report discharges of a harmful quantity of oil to Ohio EPA. The plan does not indicate that notification requirements apply to releases of hazardous waste. This does not meet the standard for notification detailed in 3745-65-56(A). Which states *"Whenever there is an emergency situation consisting of imminent or actual harm or hazard to human health or the environment, the emergency coordinator (or his designee when the emergency coordinator is on call) must immediately: (1) Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and (2) Notify the Ohio EPA emergency response team by use of its twenty-four hour toll free telephone number- 1-800-282-9378."*

In order to return to compliance with this rule, Miba must revise the contingency plan to describe the actions facility personnel must take to comply with rules 3745-65-51 and 3745-65-56 of the Administrative Code in response to fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. To demonstrate your compliance, provide a copy of the revised contingency plan.

(12) ***OAC Rule 3745-65-52(C), Content of Contingency Plan:*** The contingency plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and Ohio EPA and local emergency response teams to coordinate emergency services, pursuant to rule 3745-65-37 of the Administrative Code.

The contingency plan states that Miba has provided information and facility tours to local fire and emergency response personnel but does not actually describe the arrangements agreed to by the local emergency authorities as required by this rule.

In order to return to compliance with this rule, Miba must revise the contingency plan to describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and Ohio EPA and local emergency response teams to coordinate emergency services, pursuant to rule 3745-65-37 of the Administrative Code. To demonstrate your compliance, provide a copy of the revised contingency plan.

(13) ***OAC Rule 3745-65-52(D), Content of Contingency Plan:*** The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see rule 3745-65-55 of the Administrative Code), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates.

The contingency plan does not list the addresses and home phone numbers of emergency response coordinators.

Miba must revise the contingency plan to include the addresses and home phone numbers of emergency response coordinators. To demonstrate your compliance, provide a copy of the revised contingency plan.

(14) ***OAC Rule 3745-65-52(E), Content of Contingency Plan:*** The contingency plan must include a list of all emergency equipment at the facility such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment, where this equipment is required. This list must be kept up to date. In addition, the contingency plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.
The plan mentions that the plant has fire extinguishers and a supply of absorbents but does not include a list of all emergency equipment, the location, and physical description of each item or a brief outline of its capabilities as required by this rule.

Miba must revise the contingency plan to include a list of all emergency equipment at the facility with the location and a physical description of each item on the list, and a brief outline of its capabilities. To demonstrate your compliance, provide a copy of the revised contingency plan.

(15) ***OAC Rule 3745-65-52(F), Content of Contingency Plan:*** The contingency plan must include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).

The plan states that in an evacuation the intercom announcement will direct personnel to walk to the nearest exit. This is not detailed enough. The rule requires that the plan describe the evacuation routes and alternate evacuation routes.

Miba must revise the contingency plan to include an evacuation plan with evacuation routes, and alternate evacuation routes. It is recommended that the evacuation plan include a facility map showing the evacuation routes. To demonstrate your compliance, provide a copy of the revised contingency plan.

(16) ***OAC Rule 3745-65-53(B), Content of Contingency Plan:*** A copy of the contingency plan and all revisions to the plan shall be: Submitted to all local police departments, fire departments, hospitals, and Ohio EPA and local emergency response teams, that may be requested to provide emergency services.

Miba did not submit a copy of the contingency plan to all local police departments, fire departments, hospitals, and Ohio EPA and local emergency response teams as required by this rule.

To comply with this rule, provide documentation to this office that all local police departments, fire departments, hospitals, and Ohio EPA and local emergency response teams have been provided with a copy of the revised contingency plan.

(17) ***OAC Rule 3745-66-73(A), Management of Containers:*** A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

Miba was storing filters from the plating area, which are hazardous D006/D008 waste, in the DI building in an open hopper. At the time of the inspection, waste was not being added or removed.

In order to return to compliance with this rule, Miba must immediately begin storing the spent plating area filters in a closed container. To demonstrate your compliance, submit a photograph of the closed container to this office.

(18) ***OAC Rule 3745-66-74, Inspections:*** The owner or operator must inspect areas where containers are stored, at least once during the period from Sunday to Saturday, looking for leaks and for deterioration caused by corrosion or other factors. The owner or operator must record inspections in an inspection log or summary.

Miba has no documentation that the container accumulation areas are inspected weekly for leaks and for deterioration caused by corrosion or other factors. Miba uses a "5-S Daily Audit Sheet" but this sheet does not document that the container accumulation areas are inspected for the items required by the rule.

In order to return to compliance with this rule Miba must immediately begin conducting inspections of all less than 90-day container accumulation areas on a weekly basis for leaks and for deterioration caused by corrosion or other factors. The inspections must be documented on an inspection log. To demonstrate your compliance, provide a copy of a completed weekly inspection log.

(19) ***OAC Rule 3745-66-95(B), Inspections:*** The owner or operator must inspect at least once per operating day: (1) Overfill/spill control equipment (e.g., waste-feed cutoff systems, bypass systems, and drainage systems) to ensure that it is in good working order; (2) Above ground portions of the tank system, if any, to detect corrosion or releases of waste; and (3) The construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures (e.g., dikes) to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation).

Miba has no record of conducting daily inspections of the hazardous waste tanks. Miba uses a "5-S Daily Audit Sheet" but this sheet does not document that the hazardous waste tanks are inspected for the items required by the rule.

In order to return to compliance Miba must immediately begin conducting daily inspections of the hazardous waste tanks for the items detailed in this rule. To demonstrate your compliance, provide 7 days of daily tank inspection records to this office.

(20) ***OAC Rule 3745-270-07(A)(2), Testing, Tracking, and Recordkeeping Requirements:*** If the waste or contaminated soil does not meet the treatment standards, or if the generator chooses not to make the determination of whether his waste must be treated, with the initial shipment of waste to each treatment or storage facility, the generator must send a one-time written notice to each treatment or storage facility receiving the waste, and place a copy in the generator's files. No further notification is necessary until such time as the waste changes or, the treatment, or the storage facility changes, in which case a new notification must be sent to the new treatment or storage facility and a copy must be placed in the generator's files.

Miba generates a casting mix waste that was characterized as D008 hazardous waste until sampling in May 2009 revealed that it was also hazardous for D006. Miba did not resubmit the LDR notification to the TSD with the D006 waste code until May 2012. With the May 2012 LDR update Miba returned to compliance with this rule.

(21) ***OAC Rule 3745-279-22(C), Used Oil Storage Requirements for Generators:*** Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

At the time of the inspection, Miba had two 250-gallon totes of used oil in the scrap storage fluid collection area that were not labeled with the words "Used Oil." During the inspection the totes were properly labeled, returning Miba to compliance with this rule.

(22) ***OAC Rule 3745-279-22(D), Used Oil Storage Requirements for Generators:*** Upon detection of a release of used oil a generator must clean up and manage properly the released used oil and other materials.

At the time of the inspection, the secondary containment for the three outdoor used oil tanks had an oily sludge in it from past used oil releases that had not been cleaned up.

In order to return to compliance with this rule, Miba must clean the used oil tanks' secondary containment of all released used oil. Before disposing of the cleanup materials, Miba must do a waste evaluation which takes into the consideration constituents that may be present from the storage of floor wash water and spent solvent in the used oil tanks. To demonstrate Miba's compliance, provide waste characterization of the oily sludge, information on how the oily sludge cleanup waste was disposed, and submit a photograph of the cleaned secondary containment.

General Comments

(A) During the inspection we discussed a mercury switch that Miba has been storing for disposal/recycling with no service provider in mind to manage the waste for you. To assist you in locating a service provider who manages mercury switches, I have enclosed with this letter a list of recyclers from Ohio EPA's web site.

(B) During the inspection a container in the casting area labeled dross/slag, which is managed as a hazardous waste was observed to have bronze pieces in it. I recommend that you segregate the bronze from the other hazardous waste and have it recycled.

(C) Miba uses satellite accumulation in the EFCO area for D008 casting mix. The exit side of the EFCO has two containers side by side, both collecting the casting mix. Together, the capacity of these two containers exceeds the 55-gallon limit that applies to satellite accumulation per 3745-52-34(C)(1). At the time of the inspection, the combined total of the waste in the two containers was less than 55-gallons. I recommend that Miba decrease the size of each container so that if both containers are full the 55-gallon limit will not be exceeded.

(D) During the inspection it was noted that rainwater sometimes gets into the containment vault for the hazardous waste tanks. Because of this, if liquid is seen in the vault a determination must be made as to whether the liquid is from rainwater or from a tank leak. Currently the backs of the tanks cannot be fully observed. Ohio EPA requests that Miba make engineering changes, such as adding a door or a catwalk that will allow a complete view of the backs of the tanks. We discussed this during the inspection and you indicated that Miba would be willing to make this improvement. Ensuring a clear view of all parts of the tanks could prevent mistakenly assuming that liquid in the containment vault is from a leak in the rear of the tanks or is rainwater.

(E) At the time of the inspection, Miba could not provide information on where the spent oil vacuum pump filters from the Synthec plasma cleaner are disposed. Please provide a written response stating where these spent filters are stored at Miba and the name and location of the off-site facility that has been receiving this waste stream.

(F) The Division of Materials and Waste Management has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link: http://ohioepa.custhelp.com/ci/documents/detail/2/subscriptionpage.

Miba needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, Miba is requested to provide documentation to this office including the steps taken to abate the violations cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to Elizabeth.Herron@epa.ohio.gov.

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734. of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to $10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, Miba is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

Enclosed is a copy of the checklists completed as a result of the inspection. You can find Ohio's hazardous waste rules and other information on the division's web page at http://www.epa.ohio.gov/dhwm/.

If you have any questions, please contact me by telephone at (740) 380-5248 or by e-mail at Elizabeth.Herron@epa.ohio.gov.

Sincerely,

Elizabeth A. Herron
Environmental Specialist
Division of Materials and Waste Management

EH/cb/sb

Enclosures

cc: Mykal Mercer, SEDO, DAPC

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

Send to Central Office ☒	Ohio Environmental Protection Agency **RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM**	For Ohio EPA use only

Completed verification forms required to be submitted to CO should be e-mailed to brad.hauser@epa.state.oh.us.

Site EPA ID No.
Site Name

EPA ID Number: **OHD004288056**

Name: **MIBA BEARINGS US LLC** | Website: (Optional)

Site Location Information

Street Address: **5037 STATE RTE 60 N**

City, Town, or Village: **MCCONNELSVILLE** | State: OH

County Name: **MORGAN** | Zip Code: **43756**

Site Land Type (check only one)

Private	County	District	Federal	Indian	Municipal	State	Other
☒	☐	☐	☐	☐	☐	☐	☐

NAICS code(s) www.census.gov/epcd/www/naics.html

Facility Representative

Additional names can be recorded in number 12

Only provide address information if it is different than the site address

First Name: **Heidi** | MI: | Last Name: **Suhoski**

Title: **Environmental , Health and Safety Coordinator**

Phone Number: **740 962 4242** | Phone Number Extension: **1001**

E-Mail Address:

Fax Number: | Fax Number Extension:

Street or P.O. Box:

City, Town or Village:

State: | Zip Code:

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: | Date Became Owner (mm/dd/yyyy):

Owner Type:	Private	County	District	Federal	Indian	Municipal	State	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):

Operator Type:	Private	County	District	Federal	Indian	Municipal	State	Other
	☐	☐	☐	☐	☐	☐	☐	☐

Street or P.O. Box:

City, Town or Village: | Operator Phone #:

State: | Country | Zip Code:

VIOLATIONS CITED? ☒ Yes ☐ No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

☐ Not a HW Generator	☐ UNKNOWN: Cited for violation of 3745-52-11	☒ Large Quantity Generator (LQG)
	☐ Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). *Check the box for the applicable generator status and provide a comment.*	☐ Small Quantity Generator (SQG)
		☐ Conditionally Exempt Small Quantity Generator
		☐ U.S. Importer of Hazardous Waste
		☐ Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

- ☐ Hazardous Waste Transporter
- ☐ Hazardous Waste Transfer Facility
- ☐ Treater, Storer or Disposer of Hazardous Waste
- ☐ Recycler of Hazardous Waste
- ☐ 72-Hour Recycler
- ☐ Exempt Boiler and/or Industrial Furnace
  - ☐ Small Quantity On-Site Burner Exemption
  - ☐ Smelting, Melting, Refining Furnace Exemption
- ☐ Underground Injection Control Facility
- ☐ Receives Hazardous Waste from Off-site

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY)

- ☒ Small Quantity Handler of Universal Waste
- ☐ Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)
- ☐ Destination Facility for Universal Waste

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

- ☒ Batteries
- ☐ Pesticides
- ☒ Mercury containing equipment
- ☒ Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S)

- ☒ Used Oil Generator
- ☐ Used Oil Transporter
- ☐ Used Oil Transfer Facility
- ☐ Used Oil Processor
- ☐ Used Oil Re-refiner
- ☐ Off-Specification Used Oil Burner
- ☐ Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil
- ☐ Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

- ☐ College or University
- ☐ Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
- ☐ Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

D001 D002 D006 D007 D008 D039 F001 F002 F006

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

Announced	☐ Yes	☒ No	Additional Facility Representatives:
Tanks	☒ Yes	☐ No	
Containers	☒ Yes	☐ No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Elizabeth Herron	**Donna Goodman**	**6/6/2012 and 6/11/2012**

Comments:

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: MIBA Bearings **Facility Type:** LQG **EPA ID#:** OHD 004288056

Description of Waste					On-Site Management			Off-Site Management
	Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	**Waste Generated** (e.g. sludge, spent solvent, ash, etc)	**EPA Waste Code**	**QTY Generated per Month**	**Type of Accumulation/ Storage** (e.g. container, tank, etc)	**Type of On-Site Treatment**	**Waste Location** (Include map if possible)	**Name, state, and type of activity occurring at the facility.**
1	Quenching Parts	Quench Oil Spent Coolant	Used Oil	19,000 gallons	3 tanks	NA	Southwest side of plant outside employee entrance	Clean Water, Columbus, OH Recycle and treat or United Waste Water, Nitro, WV Fuels blending
2	Cleanout of Quench System	Oil Sludge	D008	4-6 drums per year	Drums	NA	Satellite area in casting then DI Building	EQ, Canton, OH Stabilization and landfilled
3	Machining	Scrap Metal (various types)	NA	80,000 lbs. weekly	Bins	NA	Indoor Scrap Storage Area on lower level	Lewis Padnos, MI recycled
4	Casting	Casting Mix and other Pb-contaminated solids	D006 D008	Up to 20 cy. per ninety days	4-5 20 cy. roll-off per year	NA	Outside WWTP shed	EQ transports to Envirosafe Services of Ohio, Inc. Oregon, OH Stabilization and Landfilled
5	Vapor Degreasing	Spent Solvent/ Cleaner ("Lenium GS")	D008	11,015 lbs. per year	Drums	NA	DI Building	EQ transports to Chemtron
6	Wastewater Treatment	WWT Filter Cake	F002 F006	4-5 roll offs per year	Roll-off	NA	Near WWTP	Envirosafe Services of Ohio, Inc. Stabilization and landfilled
7	Metal Cleaning in Electroplating Process	Hi Lead Acid Liquid (>5000 ppm Pb)	D002/ D008/ D007	4,500 gallons per month	5000 gallon tank	NA	Near WWTP	EQ Michigan Neutralized
8	Metal Cleaning in Electroplating Process	Waste Alkaline	D002/ D008	2,500 gallons per month	5000 gallon tank	NA	Near WWTP	EQ Canton, OH Neutralized

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: MIBA Bearings **Facility Type:** LQG **EPA ID#:** OHD 004288056

Description of Waste					On-Site Management			Off-Site Management
	Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	**Waste Generated** (e.g. sludge, spent solvent, ash, etc)	**EPA Waste Code**	**QTY Generated per Month**	**Type of Accumulation/ Storage** (e.g. container, tank, etc)	**Type of On-Site Treatment**	**Waste Location** (Include map if possible)	**Name, state, and type of activity occurring at the facility.**
9	Plating and Cleaning Tanks from Electroplating Process	Filter Tubes and Annode Bags	D008	5 cy/mo. Placed in rolloff box with casting mix.	Tip hopper then to roll-off box	NA	Outside WWTP	Envirosafe Services of Ohio, Inc. Oregon, OH Stabilized and landfilled
10	QA/QC	Dye Penatrant	Used oil	Varies	Used oil tanks via utility room sink	NA	Southwest side of plant outside	Clean Water, Columbus, OH Recycle and treat or United Waste Water, Nitro, WV Fuels blending
11	Cleaning fixtures in synthec booth	n-methyl per. Xylene Lacquer	D001	1-2 drums per year	Drums	NA	DI Building	Not yet disposed
12	Synthec Booth	Mesh filters	Non-hazardous per TCLP test	Varies	Hopper	NA	DI Building	Republic Waste Disposed as a solid waste
13	Synthec	Rags	NA	55-gallon drum 4 times a year	Drums	Drying	DI Building	Republic Waste Disposed as a solid waste
14	Synthec Transfer Line (parts cleaning)	Pero degreaser (perchloro-ethylene)	F001 D039	14-18 drums generated in two cleanouts in the past year	Drums	NA	Pero Degreaser	Clean Harbors Hebron, OH recycled
15	Maintenance	Mercury switch	NA	Seldom generated but currently have one in storage	Bucket	NA	DI Building	Not yet disposed

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: MIBA Bearings **Facility Type:** LQG **EPA ID#:** OHD 004288056

Description of Waste					On-Site Management			Off-Site Management
	Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	**Waste Generated** (e.g. sludge, spent solvent, ash, etc)	**EPA Waste Code**	**QTY Generated per Month**	**Type of Accumulation/ Storage** (e.g. container, tank, etc)	**Type of On-Site Treatment**	**Waste Location** (Include map if possible)	**Name, state, and type of activity occurring at the facility.**
16	Maintenance	Dry cell batteries	Uni-versal waste	5 or 6 5-gallon buckets per year	5-gallon buckets	NA	DI Building	Envirite of Ohio (name change to EQ) Stabilization and treatment
17	Fluorescent Lighting	Spent Lamps and Ballasts	NA	5 boxes totaling 1,000 lbs. per year	Cardboard Boxes	NA	DI Building	EQ Industrial Services recycled
18	Maintenance	Shop Rags	NA	Varies	Drums	NA	DI Building	Spirit Cambridge, OH Laundering
19	Maintenance	Parts Washer solvent	D001 D008	Varies	Placed in used oil tanks.	NA	Southwest side of plant outside employee entrance	Clean Water, Columbus, OH Recycle and treat or United Waste Water, Nitro, WV Fuels blending

REMARKS–GENERAL INFORMATION

General Process Information:

MIBA Bearings employs approximately 325 people. They operate 24 hours per day in 3 shifts. Staffing is heavy Monday through Friday and limited on Saturday and Sunday. Miba manufactures diesel engine bearings. They vary in size from a dime to 120 pounds. Bronze, aluminum, and steel are cast into the housing for the bearings. The cast parts are then machined, assembled, cast, quenched, re-machined, degreased, electroplated, inspected and shipped. Electroplating generates the largest volume of waste.

In October 2011 Miba added the HDEP line. Processes for the HDEP line include the following: blanking, forming, transfer line (an automated machining process), Pero degreasing, Sputter (physical vapor deposition – a coating using a gas) Synthec (a spray coating of Molybdenum Disulfide and Graphite poly coating), heat treat oven, and a second washing in oil in the Pero degreaser.

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

The facility was formerly known as Federal Mogul, Glacier Clevite Heavywall Bearings (and T&N and Gould).

Hazardous Waste

Miba was last inspected on September 11 and 15, 2008. The violations identified resulted in an enforcement action. Miba entered into Director's Final Findings and Orders, agreeing to pay a $23,550 civil penalty and complete a supplemental environmental project in lieu of payment of the remaining $8,000 civil penalty.

Remedial Action

A remedial investigation (RI) was conducted at the site as a result of a historical spill of perchloroetrylene (PCE) waste. Soil and ground water was contaminated as a result. The company uses a contaminated well for production process, therefore, all wastes in contact with this water bear an F002 waste code. An interim action negotiated with DERR-SEDO required the company to use an air stripper to remove PCE. A preferred plan was issued in 1997 and an SVE pilot test conducted in June 2000. A revised Preferred Plan and Decision Document were issued during 2005. The selected remedy includes continued pumping and treatment of groundwater, along with SVE to remove contaminants from soils. In November 2009, an RD/RA consent order was signed between Ohio EPA, Gould Electronics, Miba Bearings, and Morgan County Improvement Corporation, for the purposes of implementing the selected remedy. Construction of the SVE and upgraded groundwater pumping systems commenced in May 2012 and is expected to begin operation during the fall of 2012.

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.*			
GENERAL REQUIREMENTS			
1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]		Yes ☐ No ☒ N/A ☐
	Miba has not adequately evaluated the following waste streams: their spent parts washer solvent; floor wash water; their mixture of used oil, parts washer solvent, and floor wash water; oil vacuum pump filters from the Pero degreaser; and oil vacuum pump filters from the Synthec plasma cleaner.		
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 1st? [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 ☐
	Oil filters from the vacuum pump at the Pero degreaser contain tetrachloroethylene (PCE) an F001 hazardous waste. When spent these filters are taken to the boiler room where they are dried and then disposed of as a solid waste. By these actions Miba has disposed of hazardous waste to the air by evaporation and caused their hazardous waste to be transported to and disposed at a facility that is not permitted to receive hazardous waste, in violation of this regulation.		
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 ☐
		See note for item # 7.	
	b.	Tank that meets 3745-66-90 to 3745-66-100 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.			
NOTE: If waste is treated to meet LDRs, 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)(1)]	Yes ☐ No ☒ N/A ☐
		Oil filters from the vacuum pump at the Pero degreaser contain tetrachloroethylene (PCE) an F001 hazardous waste. When spent these filters are taken to the boiler room where they are dried and then disposed of as a solid waste. This waste has been offered for transport for off-site disposal without a manifest.	
13.		Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes ☐ No ☒ N/A ☐
		Miba generates a casting mix waste that was characterized as D008 hazardous waste until sampling in May 2009 revealed that it was also hazardous for D006. Manifests in 2010 and 2011 for the casting mix did not report the D006 hazardous waste code as required by this rule. In 2012 Miba began including the D006 waste code on the manifest, returning Miba to compliance with this rule.	
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 ☒ 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 received a rejected load or residue, did the generator:	
	a.	Sign item 20 of the new manifest or item 18c of the original manifest? [3745-52-23(F)(1)	Yes ☐ No ☐ N/A ☒
	b.	Provide the transporter a copy of the manifest? [3745-52-23(F)(2)]	Yes ☐ No ☐ N/A ☒
	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)]	Yes ☐ No ☐ N/A ☒
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)]	Yes ☐ No ☐ N/A ☒
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)]	Yes ☐ No ☐ N/A ☒
20.		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: A generator who sends a shipment of hazardous waste to a TSD facility with the understanding that the TSD facility can accept and manage the waste and later receives that shipment back as a rejected load or residue may accumulate the waste on-site for <90 days or <180 days depending on the amount of hazardous waste on-site in that calendar month. [3745-52-34(M)]			

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 ☐ No ☒ N/A ☐
	This rule requires that personnel have training that teaches them to perform their job in a way that ensures the facility's compliance with the requirements of OAC Rules 3745-65 to 3745-69. In that set of rules Miba has violations of OAC Rules 3745-65-33, 3745-65-52(A), 3745-65-52(C), 3745-65-52(D), 3745-65-52(E), 3745-65-52(F), 3745-65-53(B), 3745-66-73(A), 3745-66-74, and 3745-66-95(B). These ten violations strongly indicate that that there is a deficiency in Miba's employee training.		
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 ☒ No ☐ N/A ☐
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)]		Yes ☒ No ☐ N/A ☐
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 ☒ No ☐ N/A ☐
25.	Does the generator provide refresher training to employees during each period from January 1st to December 31st and does each training occur within 15 months after the previous training? [3745-65-16(C)]		Yes ☒ No ☐ N/A ☐
26.	Does the generator keep records and documentation of:		
	a.	Job titles? [3745-65-16(D)(1)]	Yes ☒ No ☐ N/A ☐
	b.	Job descriptions? [3745-65-16(D)(2)]	Yes ☒ No ☐ N/A ☐
	c.	Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes ☒ No ☐ N/A ☐
	d.	Completed training or job experience required? [3745-65-16(D)(4)]	Yes ☒ No ☐ N/A ☐
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 ☒ 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		
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 ☒ No ☐ N/A ☐

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 ☐ No ☒ N/A ☐
		The contingency plan does not describe the actions that facility personnel must take in response to fires or explosions. The contingency plan does not fully describe the actions that facility personnel must take to comply with OAC Rule 3745-65-56. For example on page 14 of the plan plant management is directed to report discharges of a harmful quantity to oil to Ohio EPA. This does not meet standard for notification detailed in 3745-65-56(A).	
	b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes ☐ No ☒ N/A ☐
		The contingency plan states that Miba has provided information and facility tours to local fire and emergency response personnel but does not actually describe the arrangements agreed to by the local emergency authorities as required by this rule.	
	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 ☐
		The contingency plan does not list the addresses and home phone numbers of emergency response coordinators.	
	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 ☐
		The plan mentions that the plant has fire extinguishers and a supply of absorbents but does not include a list all emergency equipment, the location and physical description of each item or a brief outline of its capabilities as required by this rule.	
	e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes ☐ No ☒ N/A ☐
		The plan states that in an evacuation the intercom announcement will direct personnel to walk to the nearest exit. This is not detailed enough. The rule requires that the plan describe the evacuation routes and alternate evacuation routes.	
NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 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. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]			
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 ☐ No ☒ N/A ☐
	Miba did not submit a copy of the contingency plan to all local police departments, fire departments, hospitals, and Ohio EPA and local emergency response teams as required by this rule.		
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]		Yes ☒ No ☐ N/A ☐
32.	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			
33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:		Yes ☐ No ☒ N/A ☐
	a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes ☐ No ☐ N/A ☒
	b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes ☐ No ☐ N/A ☒

	c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)?	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			
34.		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 ☐
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 ☒ No ☐ N/A ☐
	b.	Emergency communication device? [3745-65-32(B)]	Yes ☒ No ☐ N/A ☐
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes ☒ No ☐ N/A ☐
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes ☒ No ☐ N/A ☐
NOTE: Verify that the equipment is listed in the contingency plan.			
36.		Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes ☐ No ☒ N/A ☐
37.		Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes ☐ No ☒ N/A ☐
		Miba does a monthly check of fire extinguishers and eye wash stations. Miba does not have a record of testing and maintaining their alarm systems, or spill control and decontamination equipment as necessary to assure its proper operation in time of emergency.	
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 ☒ No ☐ N/A ☐
39.		If there is only one employee on the premises, is there immediate access to a device (eg. 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 ☐
40.		Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes ☒ No ☐ N/A ☐
41.		Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes ☒ No ☐ N/A ☐
42.		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			
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 ☒ 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 ☐
		The tip hopper for D008 floor washing debris was not under the control of the operator.	
	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 ☐
		Miba was accumulating the following wastes in open containers: D008 floor washing debris, in the casting area a waste labeled "dross/slag", and in the plating area filter tubes.	
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes ☐ No ☒ N/A ☐
		The tip hopper for D008 floor washing debris was not marked with words "Hazardous Waste" or other words identifying its contents. In the casting area there was satellite accumulation container labeled "dross/slag only" this label did not accurately identify the actual contents of the container which included gloves, plastic, bronze, and other materials.	
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:		Yes ☐ No ☒ N/A ☐
	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 ☒
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 then 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			
45.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]		Yes ☐ No ☒ N/A ☐
	At the time of the inspection Miba was storing filters from the plating area, which are hazardous D006/D008 waste, in the DI building in a hopper not labeled with the words "Hazardous Waste."		
46.	Is the accumulation date on each container? [3745-52-34(A)(2)]		Yes ☐ No ☒ N/A ☐
	At the time of the inspection Miba was storing filters from the plating area, which are hazardous D006/D008 waste, in the DI building in a hopper that was not marked with an accumulation date.		
47.	Are hazardous wastes stored in containers which are:		
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes ☐ No ☒ N/A ☐
		Miba was storing filters from the plating area, which are hazardous D006/D008 waste, in the DI building in an open hopper. At the time of the inspection waste was not being added or removed.	
	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.			
48.	Is the container accumulation areas(s) inspected at least once during the period from Sunday to Saturday? [3745-66-74]		Yes ☐ No ☒ N/A ☐
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes ☐ No ☒ N/A ☐
	Miba has no documentation that the container accumulation areas are inspected weekly for leaks and for deterioration caused by corrosion or other factors. Miba uses a "5-S Daily Audit Sheet" but this sheet does not document that the container accumulation areas are inspected for the items required by the rule.		
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 ☒ No ☐ N/A ☐

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)]	Yes ☒ No ☐ 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)]	Yes ☐ No ☐ 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)]	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.		
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)]	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		
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 ☒ No ☐ N/A ☐
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes ☒ No ☐ N/A ☐
56.	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 ☐
NOTE: Continue with the generator LDR requirements on the next page.		

GENERATOR LDR REQUIREMENTS			
NOTE: This LDR checklist does not include the requirements for generators that treat to meet LDR standards. If the generator treats, the inspector should use the stand-alone Generator LDR checklist instead of this checklist.			
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 ☐ No ☐ N/A ☒
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,		Yes ☒ No ☐ N/A ☐
	a.	Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)]	Yes ☐ No ☐ N/A ☒
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 ☒ No ☐ N/A ☐
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 ☒ No ☐ N/A ☐
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,		Yes ☒ No ☐ N/A ☐
	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 ☒ No ☐ N/A ☐

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 ☒ No ☐ N/A ☐
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 to meet the LDR treatment standard?			Yes ☐ No ☒ N/A ☐
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 ☒ No ☐ N/A ☐
	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:		Yes ☐ No ☐ N/A ☒
		i	Applicable HW codes?	Yes ☐ No ☐ N/A ☒
		ii	Manifest number of the first shipment to the TSD?	Yes ☐ No ☐ N/A ☒
		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."?	Yes ☐ No ☐ N/A ☒
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 ☐ No ☒ N/A ☐
	Miba generates a casting mix waste that was characterized as D008 hazardous waste until sampling in May 2009 revealed that it was also hazardous for D006. Miba did not resubmit the LDR notification to the TSD with the D006 waste code until May 2012. With the May 2012 LDR update Miba returned to compliance with this rule.			
10.	Does the generator have a copy of the LDR notification form/notice on file? [3745-270-07(A)(2)]			Yes ☒ No ☐ N/A ☐
	a.	Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)]		Yes ☒ No ☐ N/A ☐
NOTIFICATION FORM				
11.	Does the LDR Notification form contain the following information:			
	a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]		Yes ☒ No ☐ N/A ☐
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]		Yes ☒ No ☐ N/A ☐
	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 ☒ No ☐ N/A ☐
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]		Yes ☒ No ☐ N/A ☐
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 ☒ No ☐ N/A ☐
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 ☒ No ☐ N/A ☐

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 ☒ No ☐ N/A ☐
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.			Yes ☐ No ☐ N/A ☒
13.	Is the HW a metal-bearing HW?			Yes ☐ No ☐ 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 is 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?	Yes ☐ No ☐ N/A ☒
		ii.	Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes ☐ No ☐ N/A ☒
		iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes ☐ No ☐ N/A ☒
		iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes ☐ No ☐ N/A ☒
		v.	Co-generated with a HW that must be combusted?	Yes ☐ No ☐ 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?		Yes ☐ No ☐ N/A ☒
15.	Was the HW treated by wastewater treatment?			Yes ☐ No ☒ N/A ☐
	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)]		Yes ☐ No ☐ N/A ☒
NOTE: If "Yes", HW is improperly being treated by dilution.				
	b.	Does the waste carry the D001 code and contain ≥10% TOC?		Yes ☐ No ☐ N/A ☒
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?		Yes ☐ No ☐ 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.				

LQG TANK SYSTEM REQUIREMENTS (OAC rule 3745-52-34(A) and OAC rules 3745-66-90 through 3745-66-100)			
(Please refer to the rules before or while completing this checklist.)			
1.	Is each tank clearly labeled/marked with the words "Hazardous Waste?" [3745-52-34(A)(3)]		Yes ☒ No ☐ N/A ☐
TANK SYSTEM – GENERAL OPERATING REQUIREMENTS			
2.	Does the o/o follow the general operating requirements below:		
	a.	Does the o/o prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail? [3745-66-94(A)]	Yes ☒ No ☐ N/A ☐
	b.	Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)? [3745-66-94(B)]	Yes ☒ No ☐ N/A ☐
	c.	If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96? [3745-66-94(C)]	Yes ☐ No ☐ N/A ☒
TANK SYSTEM – INSPECTION REQUIREMENTS			
3.	Has the o/o documented the inspections required in 3745-66-95, in the operating record, including inspection of the following:		
	a.	Data from leak detection equipment each operating day? [3745-66-95(A)]	Yes ☐ No ☐ N/A ☒
	b.	Spill control equipment each operating day? [3745-66-95(B)(1)]	Yes ☐ No ☒ N/A ☐
	c.	Above ground portion of tank each operating day? [3745-66-95(B)(2)]	Yes ☐ No ☒ N/A ☐
	d.	Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste each operating day? [3745-66-95(B)(3)]	Yes ☐ No ☒ N/A ☐
	Miba has no record of conducting daily inspections of the hazardous waste tanks. Miba uses a "5-S Daily Audit Sheet" but this sheet does not document that the hazardous waste tanks are inspected for the items required by the rule.		
NOTE: "Each operating day" is each day that the tank system is used to manage (store or treat) hazardous waste.			
4.	For tank systems using leak detection systems to alert facility personnel to leaks or implementing established workplace practices to ensure leaks are promptly identified, has the o/o documented: [3745-66-95(C)]		Yes ☐ No ☐ N/A ☒
	a.	Inspections of spill control equipment weekly?	Yes ☐ No ☐ N/A ☒
	b.	Inspections of above ground portion of tank weekly?	Yes ☐ No ☐ N/A ☒
	c.	Inspections of construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste weekly?	Yes ☐ No ☐ N/A ☒
	d.	Use of the alternate inspection schedule, including a description of the established workplace practices at the facility?	Yes ☐ No ☐ N/A ☒
5.	For ancillary equipment NOT provided with secondary containment, has the o/o documented inspections of such equipment each operating day? [3745-66-95(E)]		Yes ☐ No ☐ N/A ☒
6.	Where applicable, did the o/o inspect the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(F)(1)]		Yes ☐ No ☐ N/A ☒
7.	Where applicable, did the o/o inspect all sources of impressed current at least bi-monthly? [3745-66-95(F)(2)]		Yes ☐ No ☐ N/A ☒
TANK SYSTEM CLOSURE REQUIREMENTS			
8.	If the o/o has closed a <90 day tank, was closure completed in accordance with OAC 3745-66-97 (except for paragraph C)?		Yes ☐ No ☐ N/A ☒

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES			
9.	For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with one of the following: [3745-66-98(A)]		Yes ☐ No ☐ N/A ☒
	a.	Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-66-17(B)? [3745-66-98(A)]; or	Yes ☐ No ☐ N/A ☒
	b.	Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A)]; or	Yes ☐ No ☐ N/A ☒
	c.	The tank is used solely for emergencies? [3745-66-98(A)]	Yes ☐ No ☐ N/A ☒
10.	If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (2008)? [3745-66-98(B)]		Yes ☐ No ☐ N/A ☒
11.	Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material? [3745-66-99(A) and/or (B)]		Yes ☐ No ☒ N/A ☐
	a.	**If so,** have the requirements of 3745-65-17(B) been met? [3745-66-99(A) and/or (B)]	Yes ☐ No ☐ N/A ☒
TANK SYSTEM – WASTE ANALYSIS REQUIREMENTS			
12.	In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-100]		Yes ☐ No ☐ N/A ☒
	a.	Conducted waste analysis and trial treatment or storage tests? [3745-66-100(A)]; **OR**	Yes ☐ No ☐ N/A ☒
	b.	Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-100(B)]	Yes ☐ No ☐ N/A ☒
TANK SYSTEMS REQUIREMENTS			
13.	Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)]		Yes ☒ No ☐ N/A ☐
NOTE: You should review the file to see if the written assessment has been previously reviewed and what the results were.			
14.	Does the written assessment include the following: [3745-66-92(A)]		
	a.	Certification by a qualified professional engineer? [3745-66-92(A)]	Yes ☒ No ☐ N/A ☐
	b.	Consideration of the design standards of the system? [3745-66-92(A)]	Yes ☒ No ☐ N/A ☐
	c.	Consideration of the hazardous characteristics of the waste(s)? [3745-66-92(A)]	Yes ☒ No ☐ N/A ☐
	d.	An evaluation by a corrosion expert (only if the external system/components are metal and in contact with soil or water)? [3745-66-92(A)]	Yes ☐ No ☐ N/A ☒
	e.	A determination of design and operational measures that will be needed to protect the tank system from potential damage (only for underground tank components)? [3745-66-92(A)]	Yes ☐ No ☐ N/A ☒
	f.	Design considerations to ensure that the tank foundations will maintain the load of a full tank? [3745-66-92(A)]	Yes ☒ No ☐ N/A ☐
	g.	Design considerations for anchoring the unit to prevent floatation (only for tanks situated in a seismic fault zone or saturated zone)? [3745-66-92(A)]	Yes ☐ No ☐ N/A ☒

	h.	Design considerations to ensure that the tank system will withstand the effects of frost heave (only for underground tank systems)? [3745-66-92(A)]		Yes ☐ No ☐ N/A ☒
NOTE: CO-DHWM Engineering staff are available to assist you with evaluation of the written assessment.				
15.	Are there written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)]			Yes ☒ No ☐ N/A ☐
	Do the written statements address all of the following:			
	a.	Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)]		Yes ☒ No ☐ N/A ☐
	b.	Statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)]		Yes ☒ No ☐ N/A ☐
	c.	Proper backfilling? [3745-66-92(C)]		Yes ☒ No ☐ N/A ☐
	d.	Tightness test; if the tank system was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)]		Yes ☒ No ☐ N/A ☐
	e.	Proper support and protection of ancillary equipment? [3745-66-92(E)]		Yes ☒ No ☐ N/A ☐
	f.	Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)]		Yes ☒ No ☐ N/A ☐
SECONDARY CONTAINMENT				
16.	Has secondary containment been provided? [3745-66-93(A)]			Yes ☒ No ☐ N/A ☐
NOTE: Secondary containment must be provided for tank systems that store or treat materials that become hazardous wastes within two years after the hazardous waste listing, or when the system has reached 15 years of age, whichever comes later. [3745-66-92(A)(2)]				
17.	Is secondary containment one of the following:			Yes ☒ No ☐ N/A ☐
	a.	An **External Liner**? [3745-66-93(E)(1)] If so,		Yes ☐ No ☐ N/A ☒
		i.	Is liner designed or operated to contain 100% of the capacity of the largest tank?	Yes ☐ No ☐ N/A ☒
		ii.	Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	Yes ☐ No ☐ N/A ☒
		iii.	Is liner free of cracks and gaps?	Yes ☐ No ☐ N/A ☒
		iv.	Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release?	Yes ☐ No ☐ N/A ☒
		v.	Are chemically resistant water stops in place at all points? *(concrete liners only)*	Yes ☐ No ☐ N/A ☒
		vi.	Is there a compatible interior coating or lining to prevent migration of waste into the concrete? (concrete liners only)	Yes ☐ No ☐ N/A ☒
	b.	**Vault System?** [3745-66-93(E)(2)] If so,		Yes ☒ No ☐ N/A ☐
		i.	Is vault system designed to contain 100% of the capacity in the largest tank?	Yes ☒ No ☐ N/A ☐
		ii.	Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	Yes ☒ No ☐ N/A ☐
		iii.	Are chemically resistant water stops in place at all points?	Yes ☒ No ☐ N/A ☐

		iv.	Is there a compatible interior coating to prevent migration into the concrete?	Yes ☒ No ☐ N/A ☐
		v.	For **ignitable or reactive waste**: Is the vault system provided with means to prevent (or alternatively "protect against") the formation or ignition of vapors?	Yes ☐ No ☐ N/A ☒
		vi.	Is vault system provided with an exterior moisture barrier?	Yes ☒ No ☐ N/A ☐
	c.		**Double-Walled Tank?** [3745-66-93(E)(3)] If so,	Yes ☐ No ☐ N/A ☒
		i.	Is double-walled tank designed as an integral structure to contain any release from the inner tank?	Yes ☐ No ☐ N/A ☒
		ii.	**If metal**, are the primary tank interior and outer shell exterior surfaces protected from corrosion?	Yes ☐ No ☐ N/A ☒
		iii.	Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time?	Yes ☐ No ☐ N/A ☒
	d.		**An Equivalent Device?** As described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D)&(E)]	Yes ☐ No ☐ N/A ☒
SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION				
18.			Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, groundwater, or surface water and is it capable of detecting and collecting releases and accumulated liquids? [3745-66-93(B)(1)&(2)]	Yes ☒ No ☐ N/A ☐
19.			Does the secondary containment system meet the following minimum requirements of [3745-66-93(C)]:	
	a.		Constructed or lined with compatible materials of sufficient strength to prevent failure? [3745-66-93(C)(1)]	Yes ☒ No ☐ N/A ☐
	b.		Placed on a foundation or base capable of providing support? [3745-66-93(C)(2)]	Yes ☒ No ☐ N/A ☐
	c.		Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time? [3745-66-93(C)(3)]	Yes ☒ No ☐ N/A ☐
	d.		Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? [3745-66-93(C)(4)]	Yes ☒ No ☐ N/A ☐
	e.		Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner? [3745-66-93(C)(4)]	Yes ☒ No ☐ N/A ☐
ANCILLARY EQUIPMENT REQUIREMENTS				
20.			Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)?	Yes ☐ No ☐ N/A ☒
			If not, is the ancillary equipment one of the following: [3745-66-93(F)]	
	a.		Above ground piping (exclusive of flanges, joints, valves and connections) that is inspected daily?	Yes ☐ No ☐ N/A ☒
	b.		Welded flanges, welded joints and/or welded connections that is inspected daily?	Yes ☐ No ☐ N/A ☒
	c.		Sealless or magnetic coupling pumps and/or sealless valves?	Yes ☐ No ☐ N/A ☒
	d.		Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown and/or loss of pressure-actuated shut-off devices) that is inspected daily?	Yes ☐ No ☐ N/A ☒
TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE				
21.			Has there been a leak or spill from any tank system or has any tank system	Yes ☐ No ☒ N/A ☐

	been found unfit for use? **If so**, did the o/o:		
NOTE: If the tank is found to be unfit for use, inspector should explain why.			
	a.	Immediately cease flow of material into tank and investigate the cause of the release? [3745-66-96(A)]	Yes ☐ No ☐ N/A ☒
	b.	Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time? [3745-66-96(B)(1)]	Yes ☐ No ☐ N/A ☒
	c.	Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment? [3745-66-96(B)(2)]	Yes ☐ No ☐ N/A ☒
	d.	For a visible release to the environment, immediately conduct a visual inspection of the release? [3745-66-96(C)]	Yes ☐ No ☐ N/A ☒
	e.	For a visible release to the environment, prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C)]	Yes ☐ No ☐ N/A ☒
	f.	For a visible release to the environment, properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)]	Yes ☐ No ☐ N/A ☒
	g.	Report any release to the environment to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)]	Yes ☐ No ☐ N/A ☒
	h.	For a release to the environment, submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)]	Yes ☐ No ☐ N/A ☒
	i.	Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)(2)]	Yes ☐ No ☐ N/A ☒
	j.	For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)]	Yes ☐ No ☐ N/A ☒
NOTE: The requirements noted in 20.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.			
22.	In the event that the repairs to the tank system were major (e.g., replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from a qualified professional engineer attesting that the repaired unit is capable of handing hazardous waste? [3745-66-96(F)]		Yes ☐ No ☐ N/A ☒
23.	Was a copy of the certification submitted to the director within seven days after returning the system to use? [3745-66-96(F)]		Yes ☐ No ☐ N/A ☒
24.	If the o/o was unable to repair and return the unit to service as described in 20.a through 20.e, was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)]		Yes ☐ No ☐ N/A ☒
25.	Does the o/o have a tank system **with a variance from secondary containment** from which a release has occurred but <u>has not</u> migrated beyond the zone of engineering control? **If so,**		Yes ☐ No ☒ N/A ☐
	a.	Has the o/o complied with 3745-66-96(A) through (F), except (D), and decontaminated soils? [3745-66-93(G)(3)]	Yes ☐ No ☐ N/A ☒
	b.	If soils cannot be decontaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)]	Yes ☐ No ☐ N/A ☒
26.	Does the o/o have a tank system **with a variance from secondary containment** from which a release occurred and <u>has</u> migrated from the zone of engineering control? **If so,**		Yes ☐ No ☒ N/A ☐
	a.	Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)]	Yes ☐ No ☐ N/A ☒
	b.	If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(4)]	Yes ☐ No ☐ N/A ☒

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)]		Yes ☐ No ☒ N/A ☐
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]		Yes ☐ No ☒ 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)]		Yes ☐ No ☐ N/A ☒
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]		Yes ☐ No ☐ N/A ☒
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]		Yes ☐ No ☒ N/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)]		Yes ☐ No ☐ N/A ☒
	a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes ☐ No ☐ N/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)]	Yes ☐ No ☐ N/A ☒
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)]		Yes ☒ No ☐ N/A ☐
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)]		Yes ☐ No ☐ N/A ☒
9.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]		Yes ☐ No ☐ N/A ☒
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)]		Yes ☐ No ☐ N/A ☒
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)]		Yes ☐ No ☐ N/A ☒
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)]		Yes ☐ No ☐ N/A ☒
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)]		Yes ☐ No ☐ N/A ☒

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 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)]		Yes ☐ No ☐ N/A ☒
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)]	Yes ☐ No ☐ N/A ☒
	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)]	Yes ☐ No ☐ N/A ☒
	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)]	Yes ☐ No ☐ N/A ☒
	d.	Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	Yes ☐ No ☐ N/A ☒
	e.	Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	Yes ☐ No ☐ N/A ☒
	f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-13(C)(2)(h)]	Yes ☐ No ☐ N/A ☒
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)]		Yes ☐ No ☐ N/A ☒
	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)]	Yes ☐ No ☐ N/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)]	Yes ☐ No ☐ N/A ☒
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)]		Yes ☐ No ☐ N/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)]	Yes ☐ No ☐ N/A ☒
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)]		Yes ☒ No ☐ N/A ☐

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)]		Yes ☐ No ☐ N/A ☒
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 ☒ No ☐ N/A ☐
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 ☐ No ☐ N/A ☒
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 ☒ No ☐ N/A ☐
ACCUMULATION TIME			
23.	Is the waste accumulated for less than one year? [3745-273-15(A)]		Yes ☒ No ☐ N/A ☐
	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)]	Yes ☐ No ☐ N/A ☒
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)]		Yes ☒ No ☐ N/A ☐
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 ☒ No ☐ N/A ☐
RESPONSE TO RELEASES			
26.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]		Yes ☐ No ☐ N/A ☒
27.	Is the material released characterized? [3745-273-17(B)]		Yes ☐ No ☐ N/A ☒
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)]		Yes ☐ No ☐ N/A ☒
OFF-SITE SHIPMENTS			
NOTE: If a SQUWH self-transports 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 ☒ No ☐ N/A ☐

30.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.		Yes ☒ No ☐ N/A ☐
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 ☒ No ☐ N/A ☐
32.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?		Yes ☐ No ☒ N/A ☐
	a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)]	Yes ☐ No ☐ 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>:		Yes ☐ No ☐ 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)]	Yes ☐ No ☐ 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)]		Yes ☐ No ☐ 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.

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:		Yes ☐ No ☒ N/A ☐
	a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes ☐ No ☐ 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)]		Yes ☐ No ☒ N/A ☐
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?		Yes ☐ No ☐ N/A ☒
NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).			

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,		Yes ☒ No ☐ N/A ☐
	a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes ☐ No ☐ N/A ☒
	Miba mixes hazardous waste D001/D008 parts washer solvent into their used oil. September 17, 2008 sampling results indicate that the waste solvent is hazardous for lead, a D008 waste. Miba has not analyzed the resultant mixture of used oil and parts washer solvent to determine if it exhibits a characteristic hazardous waste. Therefore compliance with this rule cannot be determined at this time.		
NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.			
5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]		Yes ☐ No ☐ N/A ☒
NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.			
6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]		Yes ☒ No ☐ N/A ☐
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]		Yes ☒ No ☐ N/A ☐
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]		Yes ☐ No ☒ N/A ☐
	At the time of the inspection Miba had two 250-gallon totes of used oil in the scrap storage fluid collection area that were not labeled with the words "Used Oil." During the inspection the totes were properly labeled, returning Miba to compliance with this rule.		
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]		Yes ☐ No ☒ N/A ☐
	a.	Stopped the release?	Yes ☒ No ☐ N/A ☐

	b.	Contained the release?	Yes ☒ No ☐ N/A ☐
	c.	Cleaned up and properly managed the used oil and other materials?	Yes ☐ No ☒ N/A ☐
		At the time of the inspection of the three outdoor used oil tanks' secondary containment had an oily sludge in it from past used oil releases that had not been cleaned up.	
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes ☐ No ☐ 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:		
	a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes ☐ No ☐ N/A ☒
	b.	Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour?	Yes ☐ No ☐ N/A ☒
	c.	Are the combustion gases from heater vented to the ambient air?	Yes ☐ No ☐ N/A ☒
NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).			
GENERATOR TRANSPORTATION			
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]		Yes ☒ No ☐ N/A ☐
12.	If the generator self-transports used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]		
	a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes ☐ No ☐ N/A ☒
	b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes ☐ No ☐ N/A ☒
NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).			
COLLECTION CENTERS AND AGGREGATION POINTS			
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]		Yes ☐ No ☐ N/A ☒
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]		Yes ☐ No ☐ 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]		Yes ☐ No ☐ N/A ☒
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.			