



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468  
www.epa.state.oh.us

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

Re: Metokote Corp. Plant 25  
OHD048788426  
Hazardous Waste  
Allen County  
NOV-PRTC

November 24, 2008

Mr. Matt Moyer  
Metokote Corporation  
1340 Neubrecht Road  
Lima, Ohio 45801

Dear Mr. Moyer:

On October 21, 2008, Melissa Boyers and I conducted a hazardous waste compliance evaluation inspection of Metokote Corporation's Plant 25 (hereafter Metokote) located in Lima, Ohio on behalf of the Ohio Environmental Protection Agency (Ohio EPA). This inspection was conducted in order to determine Metokote's compliance with Ohio's hazardous waste laws as adopted under Chapter 3745 of the Ohio Administrative Code (OAC) and Chapter 3734 of the Ohio Revised Code (ORC). The Agency's inspection included a tour of your facility and a review of written documentation. This letter will explain the violations we found and what you need to do to correct the violations.

Metokote applies coatings to different metal products for various industries. Coatings which can be applied include electrocoating (e-coat) and powder coating. Metokote may begin using a solvent based spray coating in the future. The two main hazardous waste streams generated are used Dana Primer (F005, D001, D035) and ZEP 143 contaminated wipes and gloves (D001). Other wastes generated include universal waste bulbs and aerosol can residue (D001). You are currently operating as a small quantity generator of hazardous waste.

The following violations of Ohio's hazardous waste laws were observed and noted during the inspection:

**1) Weekly Container Inspections, OAC rule 3745-66-74:**

Container storage areas shall be inspected on a weekly basis looking for leaks and for deterioration. Ohio EPA interprets weekly to mean once within the seven day period following the previous inspection.

Metokote failed to conduct weekly inspections of the hazardous waste drum located in building ten used to collect ZEP 143 contaminated wipes/gloves from satellite areas located on production lines 10-7 and 10-8. Metokote also had five exceedances of weekly inspections in the main hazardous waste storage area.

Mr. Matt Moyer  
November 24, 2008  
Page Two

**To abate this violation, please submit to me four weeks of completed weekly inspection logs.**

**2) Container Storage Area, Labeling, OAC Rule 3745-52-34(D)(4):**

The date upon which each period of accumulation and/or treatment begins must be clearly marked and visible for inspection.

The drum located in building ten used to collect hazardous waste zep rags was not labeled with an accumulation start date.

**To abate this violation, you must submit a photograph showing that this drum has been properly labeled with an accumulation start date or confirm that you will no longer be managing the waste as hazardous (include analytical).**

**3) Satellite Accumulation Areas, Labeling, OAC Rule 3745-52-34(C)(1)(b):**

Metokote must keep all hazardous waste satellite containers labeled with the words "hazardous waste". There was one container located along line 10-7 and one container along line 10-8, both holding ZEP 143 wipes/gloves, that were not labeled with the words "hazardous waste". Additionally, there was one bucket of primer/solvent located in the Dana primer area that was not labeled.

During our inspection, the containers located in lines 10-7 and 10-8 were labeled. On October 22, 2008, I received an email showing that the bucket was removed and placed inside the satellite drum which is in the Dana Primer area. **Therefore, this violation is considered abated.**

**4) Satellite Accumulation Areas, Container Management, OAC Rule 3745-52-34(C)(1)(a):**

A generator may accumulate as much as fifty-five gallons of hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under control of the operator of the process generating the waste provided the container holding the waste is closed except when it is necessary to add or remove waste.

Metokote had one open bucket of Dana primer waste. The two satellite containers holding ZEP 143 wipes/gloves in lines 10-7 and 10-8 were also open at the time of inspection.

During our inspection, the containers located in lines 10-7 and 10-8 were closed. On October 22, 2008, I received an email showing that the bucket of Dana primer waste was removed and placed inside the satellite drum which is in the Dana Primer area. **Therefore, this violation is considered abated.**

**5) Universal Waste Bulbs, Containers, OAC Rule 3745-273-13(D)(1):**

All containers and packages holding universal waste bulbs must be closed and structurally sound to prevent breakage.

Metokote had two boxes of universal waste bulbs (HIDs) that were not in closed boxes.

On October 22, 2008, I received an email showing that the bulbs were properly placed in a larger box with a lid. **Therefore, this violation is considered abated.**

Mr. Matt Moyer  
November 24, 2008  
Page Three

**6) Universal Waste Training, OAC Rule 3745-273-16:**

Employees who handle or manage universal waste must be informed or trained about proper handling and emergency procedures, relative to their responsibilities.

Metokote has not properly trained employees on universal waste handling. Metokote must determine who will need trained, then conduct the training.

**To abate this violation, you must submit sign in sheets or documentation to me showing that you have trained the appropriate individuals on universal waste handling. On October 28, 2008, you emailed me universal waste training documentation and attendance records of those who were trained on the same date.**

*Therefore, this violation is considered abated.*

**7) Underlying Hazardous Constituents, OAC Rule 3745-270-07(A)(2):**

A generator must properly identify all underlying hazardous constituents (UHCs) for which a characteristic waste must be treated. This is part of the land disposal restriction requirements.

Metokote did not properly identify all UHCs associated with the Dana primer waste (D001, D035, F005).

On October 20, 2008, you submitted an updated land disposal restriction form which included all associated UHCs. Therefore, this violation is considered abated.

Please respond, in writing, to this NOV letter within **thirty (30) days**. Your response must include all actions and timetables necessary to demonstrate compliance.

**Additional Information**

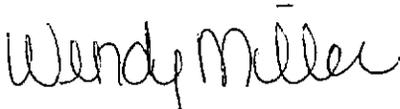
We discussed the solvent wipes/rags and gloves that you are currently disposing of as hazardous. The Material Safety Data Sheet (MSDS) for the solvent, Zep Dyna 143 shows that the solvent has a flashpoint of 143 degrees which would not make it a D001 ignitable waste. An ignitable waste is a waste that has a flashpoint of less than 140 degrees Fahrenheit. You stated that you are going to run analytical on the Zep solvent to be certain that the MSDS is correct. A pollution prevention opportunity exists whether these rags and gloves are hazardous or non-hazardous. Metokote could switch to cloth rags and gloves so that they could be laundered and recycled instead of being disposed. As we discussed during the inspection, I believe that Metokote could remain a small quantity generator if the rags/gloves are not a hazardous waste.

You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address <http://www.epa.state.oh.us/ocapp/ocapp.html>. We discussed Ohio EPA's on site compliance and P2 assessments. The contact for our Bowling Green office is Ron Nabors. He can be contacted at (419) 373-3147.

Mr. Matt Moyer  
November 24, 2008  
Page Four

Enclosed you will find a copy of the checklists that Ohio EPA completed during the inspection. Should you have any questions, please feel free to call me at (419) 373-3114.

Sincerely,



Wendy Miller  
Division of Hazardous Waste Management

/lb

Enclosures

pc: Jodi Birr, Metokote Corp. (same address, w/enclosures)  
Colleen Weaver, DHWM, NWDO  
Cindy Lohrbach, DHWM, NWDO  
~~NWDO File (w/original enclosure)~~

<p>NOTE: Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.</p>
---

## PROCESS, WASTE, P2 SUMMARY SHEET

**Facility Name:** Metokote 25     
 **Facility Type:** SOG     
 **Date of Inspection:** 10-21-08     
 **EPA ID#:** OHD048788426

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	Primer application Dana Primer F005, D001, D035	10-15 gallons/per month Satellite drum of rags and of primer waste/MEK		Petrochem		
2	Application of ZEP 143 Rags/gloves D001	3-5 drums/every 2-3 months		PSC		
3	Spent bulbs Universal waste	Recycled		Environmental Recycling		
4	Used aerosol cans Residue from cans D001	1 drum/year		Petrochem		
5	Paint stripping operation D002, D008	No longer generate, 1 drum shipped 6/4/08				
6						
7						

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

**GENERAL REQUIREMENTS**

1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07 (A)(7)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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

3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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

6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
----	---	--

*NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.*

*NOTE: Written documentation of this determination is not required.*

7.	Did the generator treat his HW /soil on-site <u>to meet</u> the LDR treatment standard?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
----	---	--

*NOTE If "Yes" see question #16.*

8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility?[3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
10.	Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)].	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
----	--	--

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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
----	--	--

NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents. *\* updated 10-30-08*

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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
----	---	--

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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
-----	--	--

13.	Is the HW a metal-bearing HW?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
-----	-------------------------------	--

NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.

14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless <u>one</u> of the following conditions apply. [3745-270-03(c)]	
-----	----	---	--

	i.	Contains > 1% TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	----	--------------------	--

	ii.	Contains organic constituents or cyanide at levels greater than the UST levels?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	-----	---	--

	iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	------	--	--

	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	-----	--	--

	v.	Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	----	--	--

	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	----	---	--

15.	Was the HW treated by wastewater treatment?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
-----	---	--

	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	----	---	--

NOTE: If Yes, HW is improperly being treated by dilution.

	b.	Does the waste carry the D001 code <u>and</u> contain ≥10% TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	----	---	--

	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	----	---	--

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

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

GENERATOR TREATMENT			
16.	Does the generator treat to meet LDRs on-site [3745-270-40(A)]?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	If "Yes" ... complete the rest of the checklist. If "No" ... stop ... you are done.		
a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
<b>NOTE: This is a laboratory analysis but it does not have to be kept by the generator.</b>			
c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
NOTIFICATION FORM			
17.	a.	Contains all information in #11 a-g above and	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	If the treated HW/soil is listed.....notification contains the following certification statement:  " I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or trough knowledge of the waste, to support this certification that the waste complies with the treatment stands specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:	
	i.	Send a one-time notification to the director?[3745-270- 09 (D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	ii.	Maintain a copy of the notice onsite?[3745-270-09(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iii.	Include in the notification: [3745-270-09(D)(1)(a)]	
	1.	Name & address of receiving landfill?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	2.	Description of HW when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	3.	HW code when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	4.	Treatability group when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	5.	Underlying hazardous constituents present when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iv.	Contain the right certification statement as required by 3745-70-07(b)(4)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**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 \_\_\_ RMK# \_\_\_
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes  No  N/A \_\_\_ RMK# \_\_\_

**UNIVERSAL WASTE LAMPS**

Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are 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 \_\_\_ RMK# \_\_\_

< need to repackage HID bulbs  
\* fluorescents ok.

3. 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  RMK# \_\_\_
4. 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 \_\_\_ RMK# \_\_\_

**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 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

**ACCUMULATION TIME**

5. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Was 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  RMK# \_\_\_

**RESPONSE TO RELEASES**

8. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes \_\_\_ No  N/A  RMK# \_\_\_
9. Is the material released characterized? [3745-273-17(B)] Yes \_\_\_ No  N/A  RMK# \_\_\_
10. If the material released is a hazardous waste, is 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 Chapter 3745-52) [3745-273-17 (B)] Yes \_\_\_ No  N/A  RMK# \_\_\_

**OFF-SITE SHIPMENTS**

**NOTE: If a SQUWH self-transport waste, then they must comply with the Universal Waste transporter requirements.**

11. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes  No  N/A \_\_\_ RMK# \_\_\_

**NOTE: SQUWHs are prohibited to send waste to any other facility.**

12. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes  No  N/A \_\_\_ RMK# \_\_\_
13. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes  No  N/A \_\_\_ RMK# \_\_\_
14. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:

- a. Receive the waste back? [3745-273-18(E)(1)] Yes \_\_\_ No \_\_\_ N/A X RMK# \_\_\_
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes \_\_\_ No \_\_\_ N/A X RMK# \_\_\_
- 15. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
  - a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes \_\_\_ No \_\_\_ N/A X RMK# \_\_\_
  - b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes \_\_\_ No \_\_\_ N/A X RMK# \_\_\_
- 16. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes \_\_\_ No  N/A X RMK# \_\_\_
- 17. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes \_\_\_ No  N/A X RMK# \_\_\_

**EXPORTS**

- 18. Is waste being sent to a foreign destination? If so: Yes \_\_\_ No X N/A \_\_\_ RMK# \_\_\_
  - a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes \_\_\_ No  N/A X RMK# \_\_\_
  - b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)] Yes \_\_\_ No  N/A X RMK# \_\_\_
  - c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes \_\_\_ No  N/A X RMK# \_\_\_

**REMARKS**

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

For Ohio EPA use only

E-mail this completed form to [kristina.durnell@epa.state.oh.us](mailto:kristina.durnell@epa.state.oh.us)  
or mail it to Kristina Durnell, Central Office

<b>Site EPA ID No.</b>	EPA ID Number: <b>OHD048788426</b>	
<b>Site Name</b>	Name: <b>Metokote Corporation</b>	Website: (Optional)
<b>Site Location Information</b>	Street Address: <b>1340 Neubrecht Road</b> City, Town, or Village: <b>Lima</b> County Name: <b>Allen</b>	State: <b>OH</b> Zip Code: <b>45801</b>
<b>Site Land Type</b> (check only one)	Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	
<b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	<b>332812</b>	
<b>Facility Representative</b>	First Name: <b>Matt</b> MI: _____ Last Name: <b>Moyer</b> Phone Number: <b>419-996-7883</b> Phone Number Extension: _____ E-Mail Address: <b>mmoyer@metokote.com</b> Fax Number: <b>419-996-7973</b> Fax Number Extension: _____ Street or P.O. Box: _____ City, Town or Village: _____ State: _____ Zip Code: _____	
Additional names can be recorded in number 12		
Only provide address information if it is different than the site address		
<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: <b>Metokote Corporation</b> Owner Private County District Federal Indian Municipal State Other Type: <input type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: _____ City, Town or Village: _____ State: _____ Name of Site's Operator: <b>Metokote Corporation</b> Owner Private County District Federal Indian Municipal State Other Type: <input type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: _____ City, Town or Village: _____ State: _____	Date Became Owner (mm/dd/yyyy): _____ Owner Phone #: _____ Country: _____ Zip Code: _____ Date Became Operator (mm/dd/yyyy): _____ Operator Phone #: _____ United States Zip Code: _____

**VIOLATIONS CITED?**  Yes  No

**TYPE OF HANDLER- A MINIMUM OF ONE BOX MUST BE CHECKED**

<input type="checkbox"/> Not a Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input checked="" type="checkbox"/> Large Quantity Generator (LQG)
		<input type="checkbox"/> Small Quantity Generator (SQG)
		<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
		<input type="checkbox"/> U.S. Importer of Hazardous Waste
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

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

- |   |  |
|---|--|
| <input type="checkbox"/> Recycler of Hazardous Waste                    | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace       |
| <input type="checkbox"/> Underground Injection Control Facility         | <input type="checkbox"/> Small Quantity On-Site Burner Exemption       |
| <input type="checkbox"/> Hazardous Waste Transporter                    | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste |  |

**UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED)**

(CHECK ALL BOXES THAT APPLY)

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste                         | <input type="checkbox"/> Destination Facility for Universal Waste |
| <input type="checkbox"/> Large Quantity Handler of Universal Waste<br>(accumulates 5,000 kg. or more) |   |

**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. Oil  
 Used Oil Fuel Marketer to Off-Specification Used Oil Burner

**Waste Codes for Federally Regulated Hazardous Wastes.** Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

**F005                      D001                      D035**

**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:      **Jodi Birr**  
Tanks               Yes       No      Other Comments:  
Containers         Yes       No

Name of Inspector(s)

**Wendy Miller**

Name of Inspector(s)

**Melissa Boyers**

Date of Inspection/Time  
(mm/dd/yyyy) (hh:mm)

**10/21/2008 10:00 am**

**OPTIONAL CERTIFICATION.** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Owner, Operator, or an Authorized Representative

Name and Title (Print)

Date (mm/dd/yyyy)

**SMALL QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤ 100 Kg. (approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.  
 SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month  
 LQG: ≥ 1,000 Kg. (-300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month  
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds  
 Safety Equipment Used:

**GENERAL REQUIREMENTS**

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

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

6. Has the generator accumulated hazardous wastes in excess of (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)] Yes  No  N/A

NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]

7. Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)] Yes  No  N/A

NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.

8. Does the generator treat hazardous waste in a:
- a. Container that meets 3745-66-70 to 3745-66-77? Yes  No  N/A
- b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? Yes  No  N/A
- c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes  No  N/A
- d. Containment building that meets 3745-256-100 to 3745-256-102? Yes  No  N/A

NOTE: Complete appropriate checklist for each unit.

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

**MANIFEST REQUIREMENTS**

9. Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)] Yes  No  N/A
10. Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)] Yes  No  N/A
- a. Does the contractual agreement specify the type of waste and frequency of shipment? Yes  No  N/A

*Metokote Plant 25*

b. Is the transport vehicle owned and operated by the reclaimer? Yes  No  N/A

c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? Yes  No  N/A

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

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

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

12. 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 alternative facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]

13. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes  No  N/A

14. Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (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 made a good faith effort to minimize their waste generation.

15. If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? 3745-52-42(B)] Yes  No  N/A

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

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

### PREPAREDNESS AND PREVENTION

17. Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)] Yes  No  N/A

18. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]  
a. Name and telephone number of emergency coordinator? Yes  No  N/A

b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes  No  N/A

c. Telephone number of local fire department? Yes  No  N/A

19. Are employees familiar with waste handling and emergency procedures [3745-52-34(D)(5)(c)] Yes  No  N/A

20. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)] Yes  No  N/A

21. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31] Yes  No  N/A

MemoKote-Plan#25

22. Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:
- a. Internal Alarm system? [3745-65-32(A)] Yes  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
23. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]
- a. Are inspections recorded in a log or summary? [3745-65-33]? Yes  No  N/A
24. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)] Yes  No  N/A
25. If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32?) [3745-65-34(B)] Yes  No  N/A
26. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes  No  N/A
27. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes  No  N/A
28. 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**

29. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes  No  N/A
  - b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes  No  N/A
  - c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes  No  N/A
  - d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes  No  N/A
  - e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. Yes  No  N/A   
*10-7 \* 10-8 / Dana primer bucket*
  - f. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes  No  N/A   
*loading rooms*
30. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:
- a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes  No  N/A
  - b. Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes  No  N/A

Mebkote State

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

**USE AND MANAGEMENT OF CONTAINERS**

- 31. Has the generator marked containers with the words "Hazardous Waste" [3745-52-34(D)(4)] Yes  No  N/A
- 32. Is the accumulation date on each container? [3745-52-34(D)(4)] ZEP <sup>drum</sup> ~~666~~ Yes  No  N/A
- 33. Are hazardous wastes stored in containers which are:
  - a. Closed (except when adding/removing wastes)? [3745-66-73(A)] C I A Yes  No  N/A
  - b. In good condition? [3745-66-71] Yes  No  N/A
  - c. Compatible with wastes stored in them? [3745-66-72] Yes  No  N/A
  - d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes  No  N/A

NOTE: Record location on process summary sheets and photograph the area.

- 34. Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days. <sup>add ZEP drum & also exceedances</sup> Yes  No  N/A 
  - a. Are inspections recorded in a log or summary? [3745-66-74] Yes  No  N/A
- 35. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes  No  N/A
- 36. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B) 3745-66-77(A)] Yes  No  N/A
- 37. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B) ? [3745-66-77(B)] 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.

**PRE-TRANSPORT REQUIREMENTS**

- 38. Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes  No  N/A
- 39. Does each container ≤100 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes  No  N/A
- 40. 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