



FILE COPY

State of Ohio Environmental Protection Agency

Central District Office

Lazarus Government Center  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, OH 43216

TELE: (614) 728-3778 FAX: (614) 728-3898  
www.epa.state.oh.us

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Laura H. Powell, Acting Director

January 2, 2007

Re: Franklin International  
Large Quantity Generator  
OHD004280590  
Franklin County

Mr. William Heck  
Director of Engineering, Maintenance and EHS  
Franklin International  
2020 Bruck St.  
Columbus, OH 43207

Dear Mr. Heck:

Thank you for accompanying me during Ohio EPA's December 19, 2006, inspection of Franklin International's facility in Columbus, Ohio. We inspected Franklin to determine its compliance with Ohio's hazardous waste, universal waste and used oil laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). This letter will explain the violations we found, what you need to do to correct the violations.

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 30 days of your receipt of this letter**.

1. **OAC Rule 3745-65-32 (B) Preparedness and Prevention**

All facilities shall be equipped with the following, a device such as a telephone or a hand held two way radio, capable of summoning emergency assistance from local police, fire, or local emergency response teams.

Franklin International has failed to provide emergency communication equipment near the 90 day accumulation area in Building 31.

Franklin International needs to provide some form of emergency communication for all employees handling hazardous waste (such as a telephone in the area immediately next to the 90 day area or a two way radio) and provide documentation to Ohio EPA.

2. **OAC Rule 3745-65-34 Preparedness and Prevention**

Whenever hazardous waste is being poured, mixed, spread, or otherwise handled,

all personnel involved in the operation shall have immediate access to an internal alarm or communication device.

Franklin International has failed to provide emergency communication equipment near the 90 day accumulation area in Building 31.

Mr. William Heck  
Director of Engineering, Maintenance and EHS  
Franklin International  
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Franklin International must provide emergency communication equipment for employees handling hazardous waste (such as a telephone in the area immediately next to the 90 day area or a two way radio) and provide documentation to Ohio EPA.

**3. OAC Rule 3745-66-74 Use and Management of Containers**

The owner or operator shall inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The owner or operator shall record inspections in an inspection log or summary.

At the time of the inspection weekly inspection of the 90 day accumulation area in building 31 were being done and logs were kept until 11-28-06.

Franklin International must continue weekly inspections of the 90 day accumulation area and provide 3 weeks of continuous inspections to Ohio EPA.

Enclosed please find copies of the checklists completed at the time of the inspection. Should you have any further questions, please feel free to contact me at (614) 728-3884.

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/opp/oppmain.html>

Sincerely,



Peter Maneff  
Environmental Specialist II  
Division of Hazardous Waste Management  
Central District Office

Enclosures

c: Tammy McConnell, DHWM/CO  
CDO File

PM/sj FranklinNOV2006

**NOTICE:**

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

|   |  |   |  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
|---|--|---|--|-----------------|-----------------|-----------|---------|----------|-----------|--------|-----------|-------|-------|---|--|--|--|--|--|--|--|
| E-mail this completed form to <a href="mailto:tammy.mcconnell@epa.state.oh.us">tammy.mcconnell@epa.state.oh.us</a> or mail it to Tammy McConnell, Central Office    | <b>Environmental Protection Agency</b><br><b>RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM</b>   |   | For Ohio EPA use only  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
| 2. Site EPA ID No.  | EPA ID Number: OHD004294419  |   |  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
| 3. Site Name  | Name: Franklin International   |   | Website (optional):  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
| 4. Site Location Information  | Street Address: 2020 Bruck St.   |   |  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
|   | City, Town, or Village: Columbus   | State: OH                               |  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
|   | County Name: Franklin  | Zip Code: 43207                         |  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
| 5. Site Land Type (check only one)  | <table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td>x</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table> |   |  | Private         | County          | District  | Federal | Indian   | Municipal | State  | Other     | x     |       |   |  |  |  |  |  |  |  |
| Private   | County   | District                                | Federal  | Indian          | Municipal       | State     | Other   |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
| x   |  |   |  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
| 6. NAICS code(s)<br><a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>  | A. 32552   |   | B.   |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
| C.  |  | D.                                      |  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
| 7. Facility Representative:<br><br>Additional names can be recorded in number 12.<br><br>Only provide address information if it is different than the site address. | First Name: William  |   | MI: J  | Last Name: Heck |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
|   | Phone Number: 614-445-1374   |   | Phone Number Extension:  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
|   | E-Mail Address:  |   |  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
|   | Fax Number:  |   | Fax Number Extension:  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
|   | Street or P.O. Box:  |   |  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
|   | City, Town or Village:   |   |  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
|   | State:   |   | Country:   |                 | Zip Code:       |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
| 8. Legal Owner and Operator of the Site List<br>Additional Owners and/or Operators in the Comment Section or on another copy of this form page.                     | A. Name of Site's Legal Owner:<br>Franklin International Inc.  |   | Date Became Owner (mm/dd/yyyy):<br>01/01/1938  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
|   | Owner Type:<br>Mark with an X  |   | <table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td>x</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table> |                 |                 | Private   | County  | District | Federal   | Indian | Municipal | State | Other | x |  |  |  |  |  |  |  |
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|   | x  |   |  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
|   | Street or P.O. Box: 2020 Bruck St.   |   |  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
|   | City, Town, or Village: Columbus   |   | Owner Phone #: 614-443-0241  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
|   | State: OH  |   | Country: USA   |                 | Zip Code: 43207 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
|   | B. Name of Site's Operator:<br>Franklin International, Inc.  |   | Date Became Operator (mm/dd/yyyy):<br>01/01/1938   |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
|   | Operator Type:<br>Mark with an X   |   | <table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td>x</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table> |                 |                 | Private   | County  | District | Federal   | Indian | Municipal | State | Other | x |  |  |  |  |  |  |  |
|   | Private  | County                                  | District   | Federal         | Indian          | Municipal | State   | Other    |           |        |           |       |       |   |  |  |  |  |  |  |  |
| x   |  |   |  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
| Street or P.O. Box:   |  |   |  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
| City, Town, or Village:   |  | Operator Phone #:                       |  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
| State:  |  | Country:                                |  | Zip Code:       |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
| 9. Violations Cited?  |  | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
| 10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)  |  |   |  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |
| <input type="checkbox"/> Not Regulated  |  |   |  |                 |                 |           |         |          |           |        |           |       |       |   |  |  |  |  |  |  |  |

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

**A. Hazardous Waste Activities**  
 (choose only one of the following categories)

|                                     |  |                          |   |
|-------------------------------------|--|--------------------------|---|
| <input type="checkbox"/>            | UNKNOWN: Cited for violation of 3745-52-11           | <input type="checkbox"/> | 3. Treater, Storer or Disposer of Hazardous Waste |
| <input checked="" type="checkbox"/> | a. Large Quantity Generator (LQG):                   | <input type="checkbox"/> | 4. Recycler of Hazardous Waste                    |
| <input type="checkbox"/>            | b. Small Quantity Generator (SQG)                    | <input type="checkbox"/> | 5. Exempt Boiler and/or Industrial Furnace        |
| <input type="checkbox"/>            | c. Conditionally Exempt Small Quantity Generator     | <input type="checkbox"/> | a. Small Quantity On-site Burner Exemption        |
| <input type="checkbox"/>            | d. United States Importer of Hazardous Waste         | <input type="checkbox"/> | b. Smelting, Melting, Refining Furnace Exemption  |
| <input type="checkbox"/>            | e. Mixed Waste (hazardous and radioactive) Generator | <input type="checkbox"/> | 6. Underground Injection Control Facility         |
|                                     |  | <input type="checkbox"/> | 7. Hazardous Waste Transporter                    |

|                                      |   |                                     |  |
|--------------------------------------|---|-------------------------------------|--|
| <b>B. Universal Waste Activities</b> |   | <b>C. Used Oil Activities</b>       |  |
| <input checked="" type="checkbox"/>  | 1. Small Quantity Handler of Universal Waste<br>(Indicate types of universal waste generated and/or accumulated (check all boxes that apply): | <input checked="" type="checkbox"/> | 1. Used Oil Generator  |
| <input type="checkbox"/>             | 2. Large Quantity Handler of Universal Waste<br>(accumulates 5,000 kg or more).   | <input type="checkbox"/>            | 2. Used Oil Transporter Indicate Type(s) of Activity(ies)                    |
| <input type="checkbox"/>             | 3. Destination Facility for Universal Waste<br>(Check all boxes below that apply for each of the three types of facilities above.)            | <input type="checkbox"/>            | Transporter  |
|                                      |   | <input type="checkbox"/>            | Transfer Facility  |
|                                      |   | <input type="checkbox"/>            | 3. Used Oil Processor and/or Re-refiner<br>Indicate Type(s) of Activity(ies) |
|                                      |   | <input type="checkbox"/>            | Processor  |
|                                      |   | <input type="checkbox"/>            | Re-refiner   |
|                                      |   | <input type="checkbox"/>            | 4. Off-Specification Used Oil Burner   |
|                                      |   | <input type="checkbox"/>            | 5. Used Oil Fuel Marketer -<br>Indicate Type(s) of Activity(ies)             |
|                                      |   | <input type="checkbox"/>            | a. Marketer Who Directs Shipment of Off-Specification Oil                    |
|                                      |   | <input type="checkbox"/>            | b. Used Oil to Off-Specification Used Oil Burner                             |

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

|  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|
|  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|

12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

|     |             |                                      |            |
|-----|-------------|--------------------------------------|------------|
| No  | Announced ? | Additional Facility Representatives: | Tim Salney |
| No  | Tanks?      | Other comments:                      |            |
| yes | Containers? |                                      |            |

|     |                      |                      |  |
|-----|----------------------|----------------------|--|
| 13. | Name of Inspector(s) | Name of Inspector(s) | Date of Inspection/Time (mm-dd-yyyy) (HH:MM) |
|     | Peter Maneff         |                      | 12-19-06                                     |

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

|   |                        |                   |
|---|------------------------|-------------------|
| Signature of owner, operator, or an authorized representative | Name and Title (Print) | Date (mm-dd-yyyy) |
|   |                        |                   |

\*\*\*\*\*

## PROCESS DESCRIPTION SECTION

Give a general process description ( include all processes done at the facility )

Franklin International (Franklin) is a privately owned company located at 2020 Bruck Street, Columbus, Ohio 43207. The company was started in 1935 and was known as Franklin Chemical Industries until 1985 when the name was changed. The ownership did not change. The name was changed because Franklin International was not a chemical manufacturing company but produced only glues and adhesives. Franklin manufactures glues and adhesives for all types of uses. The company operates three shifts per week, five days per week. Presently, Franklin employees 400 to 450 employees.

Franklin currently consists of three main divisions at the Columbus site. There is a Polymers Division, a Construction Division and an Industrial Division. There are also eight laboratories located on site.

The Polymer Division manufactures pressures sensitive adhesives and basic products for the Industrial Division for use in their process. The pressure sensitive adhesive manufactured by the Polymer Division is used on pressure sensitive stamps, bumper stickers and popcorn bags, etc. The raw material used in this area are Acrylic monomers, Surfactants, colloids, Transfer agents, Initiators (Peroxides, ect.), Rubbers and resins. This material is placed in one of the 10 batch or 1 continuous reactors to make the glues and adhesives. The hazardous waste generated in this process is flammable liquids (D001) and acrylates (U162)

The Industrial Division manufactures wood glues used mainly in the furniture industry. The raw materials used in this area are adhesives manufactured in the Polymer Division, water, polyvinyl alcohols, fillers and starches. This material is placed in one of the 12 mixing units or in one of the 6 product or raw material storage tanks until needed.

This area also has a packaging line where the glues are packaged in bottles. Polyurethane glues are also packaged here. The polyurethane glues are manufactured off-site. Hazardous waste generated here is mainly from the out of date product or off-spec product.

The Construction Division manufactures glues used in the construction industry. This division manufactures both water based and solvent based glues and adhesives. The raw materials used in the Division are water, fillers and solvents. The hazardous waste generated is trichloroethylene from cleaning of equipment and off-spec products. This is characteristic for Ignitability (D001, F002).

There are also several laboratories at the facility. Most of the waste generated in the laboratories is from solvents, QA/QC materials, rework products and testing of raw materials. These wastes are both characteristic and listed wastes.

The hazardous waste generated at Franklin is managed in containers. There are several satellite accumulation areas at the facility. Each of the eight laboratories has several satellite accumulation areas. Each chemist is responsible for the waste that he/she generates. They are responsible for labeling each container and placing it at a central location in the laboratory. Each chemist could have their own satellite accumulation area. These areas could be in a cabinet or in a chemical hood located in the laboratory. Approximately once every two months Raider Environmental will lab pack or combine all the waste for disposal. This laboratory waste is accumulated in 5 gallon pails or in small laboratory containers ranging in size from less than a pint, up to a liter. Most of this waste is generated from QA/QC testing, new product development and general laboratory chemicals.

There are also several other satellite accumulation areas located through out the plant. Accumulation occurs in 55 gallon drums. These are removed to the <90 day accumulation areas when they are full.

Any metal drums that are reusable are sent to Columbus Steel Drum for reconditioning. Those that are not reusable are sent off-site as scrap.

Used oil is generated at the facility from general maintenance operations on machinery and forklifts. Absorbent is used throughout the facility to clean up oil spills, soak up grease, and then thrown away in the dumpster.

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#### **WASTE ACTIVITIES SUMMARY SECTION**

For each of the processes listed above that generate a waste give the following information: (1) name of process generating waste, (2) name or description of waste generated, (3) EPA waste codes, (4) quantity generated per month, (5) type of accumulation container used, (6) waste accumulation location in facility, (7) type of on-site treatment (if used), (8) name of off-site management facility (9) type of activity occurring at off-site management facility and (10) P2 activities

##### **1. Off-spec material,**

Spilled Aqueous Acrylamide (U007), Spilled Vinyl Acetate (D001), Pre-Emulsion (D001), HAT based Syrup (D001), and obsolete flammable liquid (D001). The amount of off-spec material varies from year to year, the current generation is approximately 4250 G per year. All off-spec material is kept in 55 gallon drums located in the 90 day accumulation area. The off-spec material is sent to either Chemtron or Petrochem for fuels blending or incineration. In the past a majority of Franklin International's waste has been off spec material, through diligent management of their raw materials Franklin has been able to dramatically reduce the amount of off-spec material that they send off.

##### **2. Lab Waste,**

Spent chemical from QA/QC testing; maleic anhydride, chloroform, acetone, vinyl acetate (D001, D002, D038, U122, U220, U239), HAT based adhesive (D001, F003, F005). The amount of lab waste can vary greatly from year to year depending

upon the amount of R & D done, last years generation was approximately 9550 pounds. Lab waste is kept in satellite accumulation areas located in the lab until full. They are then lab packed by Raider Environmental and sent to Teris for Incineration.

3. Line Clean Outs,

N-Propyl Bromide (D001) and TCE (F002) are used as cleaning agents in the tanks and lines. The amount of cleaning solvents is gradually being reduced. TCE is currently being phased out and replaced with NPB. Franklin generates approximately 4500 gallons of NPB per year and only 1000 gallons of TCE. Both of these waste are stored in 55 gallon drums in the 90 day accumulation area before being sent to sent to Chemtron for fuels blending.

4. Maintenance clean out,

Mineral Spirits (D001), and hexane (D001) are use for general maintenance operations throughout the facility. Approximately 10 gallons of this waste is generated per month. This waste is stored in 55 gallon drums in the 90 day area. This waste is sent to Chemtron for fuels blending.

5. Spill clean up,

Acrylic acid spill debris (U008) used for obviously spill clean up. This is generated on an as needed basis last year producing 1604 pounds of waste. This waste is stored in 55 gallon drums in the 90 day area and sent to Chemtron.

6. Miscellaneous Non-Haz waste

Incidental Used oil is stored in 55 gallon drums until it is picked up by Central Ohio Oil, three drums every three to four months. Flourescent lamps recycled by Superior Special Services.

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

CESQG: <100Kg. (Approximately 25-30 gallons) of waste in a calendar month.

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 identification number? [3745-52-12] Yes  No  N/A
3. Were annual reports filed with Ohio EPA on or before March 1<sup>st</sup>? [3745-52-41(A)] Yes  No  N/A
4. 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
5. 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
6. 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.

7. 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).

8. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]
  - a. Container that meets 3745-66-70 to 3745-66-77? Yes  No  N/A
  - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C) and 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.

9. 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

10. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes  No  N/A

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 completed. [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 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)].

13. 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

14. 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 of the waste they generate.

15. 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

16. 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

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

NOTE: Waste generated at one location and transported along a 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

18. 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

19. Does the personnel training program include instructions to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes  No  N/A

20. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes  No  N/A
21. 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
22. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes  No  N/A
23. Does the generator keep records including: job titles [D(1)], job descriptions [D(2)], type and amount of training given to each person [D(3)] and documentation of completed training or job experience required [D(4)]? [3745-65-16(D)] Yes  No  N/A
24. 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.

| <u>Job Performed</u> | <u>Name of Employee</u> | <u>Date Trained</u> |
|----------------------|-------------------------|---------------------|
|----------------------|-------------------------|---------------------|

#### CONTINGENCY PLAN

25. 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
26. Does the plan describe the following:
- a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes  No  N/A
- b. Arrangements with emergency authorities [3745-65-52(C)]. Yes  No  N/A
- c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes  No  N/A
- d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes  No  N/A
- e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes  No  N/A

**NOTE:** If the facility already has a "Spill Prevention, Control and Counter measures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]

27. 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

28. 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

29. 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

30. 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(J)? Yes  No  N/A

NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

### PREPAREDNESS AND PREVENTION

31. 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

32. 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   
**At the time of the inspection the 90 day storage area in building 31 did not have an emergency communication device.**

c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes  No  N/A

d. Water of adequate volume/pressure? [3745-65-32(D)] Yes  No  N/A

NOTE: Verify that the equipment is listed in the contingency plan.

33. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes  No  N/A

34. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes  No  N/A

35. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-34(A))? [3745-65-34(A)] Yes  No  N/A

**At the time of the inspection the 90 day storage area in building 31 did not have an emergency communication device.**

36. 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
37. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes  No  N/A
38. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes  No  N/A
39. 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

40. 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 one quart of acutely hazardous waste at anyone time? [3745-52-34(C)(1)] Yes  No  N/A
- d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes  No  N/A
- e. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes  No  N/A
41. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:
- a. Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes  No  N/A
- b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes  No  N/A
- c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] 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 than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.*

#### USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

42. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes  No  N/A
43. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes  No  N/A
44. Are hazardous wastes stored in containers which are:

- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes  No  N/A
- b. In good condition? [3745-66-71] Yes  No  N/A
- c. Compatible with wastes stored in them? [3745-66-72] Yes  No  N/A
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes  No  N/A

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

45. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) Yes  No  N/A   
 "Week" means seven 7 consecutive days.

**At the time of the inspection the accumulation area in building 31 had not been inspected or recorded since 11-28-06.**

- a. Are inspections recorded in a log or summary? [3745-66-74] Yes  No  N/A
46. 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
47. 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
48. 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
49. 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.

50. 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 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**

51. 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
52. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes  No  N/A
53. 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

# USED OIL INSPECTION CHECKLIST (Short Version)

**NOTE:** This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.

## PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes  No  N/A  RMK#
- Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes  No  N/A  RMK#
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes  No  N/A  RMK#
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes  No  N/A  RMK#

## USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes  No  N/A  RMK#
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  RMK#
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes  No  N/A  RMK#
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  RMK#
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  RMK#
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes  No  N/A  RMK#
- b. Contained the release? Yes  No  N/A  RMK#

- c. Cleaned up and properly managed the used oil and other materials? Yes \_\_\_ No  N/A  RMK# \_\_\_
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes \_\_\_ No  N/A  RMK# \_\_\_
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- 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  RMK# \_\_\_
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes \_\_\_ No  N/A  RMK# \_\_\_
- c. Are the combustion gases from heater vented to the ambient air? Yes \_\_\_ No  N/A  RMK# \_\_\_
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes  No  N/A \_\_\_ RMK# \_\_\_

#### USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. 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  RMK# \_\_\_
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes \_\_\_ No  N/A  RMK# \_\_\_
14. 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  RMK# \_\_\_

#### WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes  No  N/A \_\_\_ RMK# \_\_\_

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#### REMARKS

