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Ohio | Environmental Protection Agency

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

June 24, 2011

Mr. Greg Halcomb
Milacron, Inc. LLC
418 West Main Street
Mt. Orab, Ohio 45154

RE: NOV –MILICRON, INC LLC- LQG (OHD072885429)

Dear Mr. Halcomb:

On June 13, 2011 I conducted an inspection to determine the compliance status of the Mt. Orab facility of Milacron, Inc. with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). I anticipated that you may be at a different plant so in a deviation from standard procedures, I phoned you an hour before my arrival to announce my inspection. My inspection consisted of an introductory meeting during which we discussed process activities, a tour of the plant including the chrome plating lines, the 'pit' where the waste water treatment system is located, production areas, the < 90 day storage area and the recycling vestibule. The inspection continued with a review of manifests, your contingency plan, and training records review. We also discussed your efforts at waste minimization and pollution prevention. We concluded with a summary discussion of my preliminary conclusions. You provided me a photocopy of the' 'LDR forms' for my review later and the next morning you e-mailed me some training materials to enable me to assess your personnel training strategy. At various times, Richard Hall, John Anderkin and Tim Neutzling helped you to gather information and explain internal procedures. I found the following violations of the hazardous waste regulations of the State of Ohio:

① **Testing and maintaining emergency equipment and maintaining records: OAC 3745-65-33** requires that communications, alarm systems, fire protection equipment, spill control equipment and decontamination equipment where required, must be tested and maintained as necessary to assure its proper operation in time of emergency. The inspections must be recorded in a log or summary.

Milacron was performing inspections and testing of fire extinguishes, fire protection equipment, and you do a quarterly Spill Prevention, control and countermeasures inspection. These inspections do not cover all the items listed in your contingency plan and records are not kept of all items inspected .

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☞You must devise and implement a plan to perform and record the inspections. Start by compiling a list of all emergency equipment mentioned in your contingency plan. (As a rule of thumb, if an item is mentioned in your contingency plan, you must test and maintain it to assure it is available for use in an emergency.) The regulations are silent on how frequently you must test your emergency equipment so you will have to determine the inspection/testing schedule for each item individually. As a starting place, you should use the manufacturer's recommended interval to determine the frequency of testing. You are not required to inspect all items at the same time and you may find that it is more efficient to incorporate the inspections into your standard operating practices. It would be acceptable to me if you add contingency plan inspections to general health and safety inspections, preventative maintenance walk-thrus, and fire equipment checks, etc. The important points are to be sure to inspect all emergency equipment and to remember to keep a written record of the inspection.

To be returned to compliance, provide me by e-mail the list of emergency equipment and also your plan to inspect the equipment. Your plan should include the person or department responsible, the inspection frequency, and some level of detail in how to address any deficiencies that the inspections reveal.

(2) **Proper management of universal waste lamps: OAC 3745-273-13(D)(1)** requires that small quantity handlers (SQHs) of universal waste lamps must contain used lamp in a package or container that is structurally sound and adequate to prevent breakage. The package must be closed.

The used 4 foot fluorescent lamps stored in the recycling vestibule were contained in a round, cardboard shipping box. Some of the tubes were protruding as much as a foot from the box. The box was not closed.

☞To be returned to compliance, e-mail me a photo of the recycling vestibule that shows the properly closed container of tubes.

(3) **Labeling used oil containers : OAC [3745-279-22(C)(1)** requires that containers used to store used oil be labeled with the words "Used oil". No other wording is allowed. Some of the large totes used to store used oil were labeled with the words "used oil" and some were labeled "waste oil".

☞To return to compliance, re-label all used oil containers with the words 'used oil'. Be sure to re-label all containers, not just the totes. You should also remove the labels reading 'waste oil'. Be aware that you are not required to label oil that is currently in use in process equipment. Please e-mail me photos of the totes labeled properly.

Please provide me the photographic documentation that you have corrected the violations I cited within 30 days of your receipt of this letter.

Enclosed you will find a copy of the checklists completed to document the inspection and a process description summary form.

Please feel free to call me (937) 285-6090 if I can assist you in any way.

Sincerely,

Tom Ontko
Hazardous Waste Inspector
Southwest District Office

Enclosures
- LGQ checklist
- Process description summary
- Used oil checklist
- Universal waste checklist
- LDR checklist

cc: DMWM files

NOTICE:

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

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Milacron Mt. Orab inspected 6/13/2011 **Facility Type:** LQG **EPA ID#:**OHD072885429

	Description of Waste				***On-Site Management***			***Off-Site Management***	
	Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	**Waste Generated** (e.g. sludge, spent solvent, ash, etc)	**EPA Waste Code**	**QTY Generated per Month**	**Type of Accumulation/ Storage** (e.g. container, tank, etc)	**Type of On-Site Treatment** (recycle, wwt, etc)	**Waste Location** (Include map if possible)	**Name, state, and type of activity occurring at the facility.**	**P2 Activities**
1	puncturing aerosol cans	drained liquids	likely D001	< 55 gallons in several years.	drum		recycling vestibule	Resource One	
2	puncturing aerosol cans	metal aerosol cans	not yet characterized	< 55 gallon to date	drum		same	same recycled	
3	draining oil filters	used oil	NA	volume not tracked as all oil is bulked on-site	drum and 400 gallon totes		same	same recycled	
4	draining oil filters	drained filters	possibly D 00				same	incinerated and then landfilled	
5	plating sludge filter press	sludge/filter cake	F006				basement below plating area	Resource One and Envirite to comply w/ LDR	

REMARKS–GENERAL INFORMATION

General Process Information: Milacron manufactures industrial equipment used for the extrusion and injection molding of plastic. This plant does hard chrome plating and machining and milling various metal parts. Final assembly of equipment occurs at other Milacron facilities. Other operations include nitriding, carborizing, iron phospatizing and tempering and quenching metal parts. No process waters are discharged to the local POTW; these are transported off-site for treatment. Sanitary waste, gray water from floor cleaning and Parco rinse overflow discharges to the POTW.
Most of the chrome plating corporate-wide is performed at this location. The waste water treatment system is in a pit below the plating lines. The F006 waste falls from a filter press to a hopper in batches and the filter cake is shoveled into a 55-gallon steel drum. The drums are transported to the < 90 day storage area along the east wall of the plantwhen filled. The final stage of water treatment is the oil skimmer shed located north of the main building in the general area of the recycling vestibule and the staging area for the used oil totes.
Except for some larger machines, all cutting/metal working fluids are managed in a flume system. The flume makes a closed-loop path that runs throughout the plant underneath the floors. Lathes, mills, etc. draw coolant from the flume, apply it to the job as needed. The excess is returned to the flume. The flume system is cleaned out annually and the sludge is managed as non-hazardous. The Mt. Orab facility performs extensive pollution prevention activities. Bearings, gaskets, seals, etc. on machinery prone to weep is protected by absorbent socks to capture and recover oil and grease. The hydrocarbons are squeezed out and recycled off-site, the socks are laundered and re-used. Aqueous cleaners have replaced chlorinated solvents for cleaning parts prior to electroplating. Fluorescent tubes, aerosol cans, used oil and batteries (including computer batteries) are all recycled.

Regulatory/Enforcement History (if applicable):
A joint USEPA-Ohio EPA inspection was conducted on December 6, 2006. No violations were cited, Milacron was found to be in compliance.
In a Feb 6, 1995 inspection, Milacron was found to be non-compliant with emergency equipment inspections and for failing to note the time of day for <90 day storage inspections. (Note that current regulations do not require the time to be noted in the inspection log). Milacron was found to be fully compliant when re-inspected on June 26, 1995.

Other: As was noted in the process summary prepared for the 2006 inspection, this facility is very clean. I've never seen a cleaner machine shop.

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS			
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more			
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less			
PROHIBITIONS			
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]		no
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]		no
WASTE MANAGEMENT AND LABELING/MARKING			
UNIVERSAL WASTE BATTERIES			
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]		N/A
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]		Yes
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]		Yes
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]		N/A
	a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	N/A
	b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	N/A
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)]		yes
UNIVERSAL WASTE PESTICIDES			
8.	Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]		N/A
9.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]		N/A
10.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97, of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]		N/A
11.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(B)(4)]		N/A
12.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-14(B)(1)&(2)]		N/A
13.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste-Pesticides" or "Waste Pesticides?" [3745-273-14(C)(1)&(2)]		N/A

UNIVERSAL WASTE MERCURY-CONTAINING EQUIPMENT			
14.	Has mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage or damage that could cause leaks been placed in a container that is closed, structurally sound, compatible with contents of the device and lacks evidence of leakage, spillage or damage that could cause leakage and is designed to prevent escape of mercury into the environment by volatilization or any other means? [3745-273-13(C)(1)]		N/A
15.	If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]		N/A
	a.	Remove and manage the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-13(C)(2)(a)&(b)]	N/A
	b.	Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)&(d)]	N/A
	c.	Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)]	N/A
	d.	Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	N/A
	e.	Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	N/A
	f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-13(C)(2)(h)]	N/A
16.	If the open original housing holding mercury is removed from a mercury-containing equipment that does not contain an ampule, does the SQUWH: [3745-273-13(C)(3)]		N/A
	a.	Immediately seal the original housing holding the mercury with an air-tight seal to prevent the release of any mercury to the environment? [3745-273-13(C)(3)(a)]	N/A
	b.	Follow all requirements for removing ampules and managing removed ampules in accordance with 3745-273-13(C)(2)? [3745-273-13(C)(3)(b)]	N/A
17.	When removing mercury containing ampules from mercury-containing equipment or sealing mercury from its original housing if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining mercury-containing device), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-13(C)(4)(a)]		N/A
	a.	If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-13(C)(4)(b)]	N/A
18.	Is mercury-containing equipment or containers of mercury-containing equipment labelled either "Universal Waste-Mercury-Containing Equipment" or "Waste Mercury-Containing Equipment" or "Used Mercury-Containing Equipment"? [3745-237-14(D)(1)]		N/A
19.	Are mercury-containing thermostats or containers containing ONLY thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or		N/A

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

29.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]		Yes
30.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.		Yes
31.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]		Yes
32.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?		No
	a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)]	N/A
33.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do one of the following:		
	a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)]	N/A
34.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]		N/A
EXPORTS			
35.	Is waste being sent to a foreign destination? If so:		No
	a.	Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	N/A
	b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	N/A
	c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	N/A

Milacron manages universal waste batteries and lamps in an area referred to as the recycling vestibule. This area also contains the aerosol can crusher and a drum used to collect used oil drained from filters. Some of the 4-foot fluorescent lamps were protruding from outside of the cardboard carton. The carton was not closed. The staging area for the used oil totes is located outside not far from the recycling vestibule.

LARGE QUANTITY GENERATOR REQUIREMENTS COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY			
CESQG: =100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste. SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month. LQG: = 1,000 Kg. (~300 gallons) of waste in a calendar month or =1 Kg. of acutely hazardous waste in a calendar month. *NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.*			
Safety Equipment Used: safety glasses, safety shoes			
GENERAL REQUIREMENTS			
1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]		Yes
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]		Yes
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]		Yes
4.	Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] **The 2010 annual report was in the 'staging area' of DRUMS.**		Yes
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]		Yes
6.	Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]		No
7.	Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]		No
8.	Does the generator accumulate hazardous waste?		Yes
NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.			
9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?		No
NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).			
10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]		
	a.	Container that meets 3745-66-70 to 3745-66-77?	N/A
	b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	N/A
	c.	Drip pads that meet 3745-69-40 to 3745-69-45?	N/A
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	N/A
Milacron does not do generator treatment.			
11.	Does the generator export hazardous waste? If so:		No
	a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	N/A
	b.	Has the generator complied with special manifest requirements? [3745-52-54]	N/A
	c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	N/A
	d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	N/A
	e.	Are export related documents being maintained on-site? [3745-52-57(A)]	N/A
MANIFEST REQUIREMENTS			
12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]		Yes
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]		Yes

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]		
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]		
15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	N/A
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.		
17.	If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	N/A
18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	N/A
19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	N/A
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	N/A

PERSONNEL TRAINING		
21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]	Yes
NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]		
23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	yes
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	yes
25.	Does the generator provide annual refresher training to employees? [3745-65-16(C)]	yes
26.	Does the generator keep records and documentation of:	
	a. Job titles? [3745-65-16(D)(1)]	Yes ☐ No ☐ N/A ☐
	b. Job descriptions? [3745-65-16(D)(2)]	Yes ☐ No ☐ N/A ☐
	c. Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes ☐ No ☐ N/A ☐
	d. Completed training or job experience required? [3745-65-16(D)(4)]	Yes ☐ No ☐ N/A ☐
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes ☐ No ☐ N/A ☐

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the -job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained
WWT plant operator	Dave Jordan	
	Ron Reeves	

CONTINGENCY PLAN

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

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 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. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]

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

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

EMERGENCY PROCEDURES

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

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

PREPAREDNESS AND PREVENTION

34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]		Yes
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:		
	a.	Internal communications or alarm system? [3745-65-32(A)] **A telephone is on the post by the steps which go downstairs to the WWT area.**	Yes
	b.	Emergency communication device? [3745-65-32(B)]	Yes
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes
NOTE: Verify that the equipment is listed in the contingency plan.			
36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]		Yes
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] **See letter. Milacron intends to expand the quarterly SPCC Inspection to include those activities required by this rule.**		No
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]		Yes
39.	If there is only one employee on the premises, is there immediate access to a device (eg., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]		N/A
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]		Yes
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]		Yes
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]		N/A
SATELLITE ACCUMULATION AREA REQUIREMENTS			
43.	Does the generator ensure that satellite accumulation area(s):		
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	N/A
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:		No
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	N/A
	b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded?	N/A

		[3745-52-34(C)(2)]	

Milacron manages WWT sludge in the WWT room under the plating lines. The filter press drops the filter cake into a hopper and about 1 1/2 hopper loads will fill a 55-gallon drum. The hopper had no lid and but it had a hazardous waste label. The WWT facility is not operated continuously, rather waste water is treated in campaigns as needed. The WWT operator also is charged with labeling and dating the drums and transporting the drums to the < 90 day storage area. For the purpose of this inspection, I have determined that the hopper is a part of the process generating the waste and that the sludge is not being accumulated in the hopper. A primary consideration in arriving at this determination is that the hopper only is moved to allow the sludge to be shoveled out; it is not moved to transport sludge from one location to another. Other factors I considered include: the physical isolation of the WWT area, the chemical and physical property of the sludge, the minimal benefit to be gained by providing the hopper with a lid and the minimal benefits to be gained by requiring the operator to completely empty it in lieu of equipping the hopper with a lid. Additionally, the same process was in place made during the previous joint Ohio EPA/USEPA inspection and the hopper was found to be compliant at that time.

Although I have used the term 'sludge', the waste is a somewhat cohesive dry solid. It holds its shape when removed from its container.

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

45.		Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes
46.		Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes
47.		Are hazardous wastes stored in containers which are:	
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes
	b.	In good condition? [3745-66-71]	Yes
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes

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

48.		Is the container accumulation areas(s) inspected weekly? [3745-66-74]	Yes
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes

Please note that Milacron is required to inspect the < 90 day storage area every seven days if waste is present in the storage area. The inspections are required even when the facility is shut down for Holidays. Anticipated changes to the OAC that would change this requirement to every calendar week are not yet applicable.

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

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	N/A

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate

that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]		
PRE-TRANSPORT REQUIREMENTS		
54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	yes
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	yes
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	yes

Milacron manages hazardous waste in a metal shed located outside. The shed has a grating that serves as a shelf so that drums are managed on two levels. The shelves are deep enough for two drums; drums are stored two high and two deep. Both levels of drums are placed on gratings. When I was there, all drums in storage could be seen and all labels were visible. The drums were stored far enough apart that it was possible to determine if any were leaking. I determined that the aisle space is sufficient to allow the drums to be properly inspected.

Milacron manages waste under the SAA rules at the WWT plant filter press and at the chrome plating lines. The plating line drum is used for miscellaneous wastes, clean up scraps, PPE, etc. that may be contaminated with chromic acid.

USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

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

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

PROHIBITIONS			
1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:		No
	a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	N/A
NOTE: For example, used oil contaminated scrap metal stored in a pile.			
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]		No
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?		No
NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).			
GENERATOR STANDARDS			
4.	Does the generator mix hazardous waste with used oil? If so,		No
	a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	N/A
NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.			
5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]		N/A
NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.			
6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]		No
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]		Yes
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]		No
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]		N/A
	a.	Stopped the release?	N/A
	b.	Contained the release?	N/A
	c.	Cleaned up and properly managed the used oil and other materials?	N/A
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	N/A
ON-SITE BURNING IN SPACE HEATER			
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:		No

	a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	N/A
	b.	Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour?	N/A
	c.	Are the combustion gases from heater vented to the ambient air?	N/A
NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).			
GENERATOR TRANSPORTATION			
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]		Yes
12.	If the generator self-transports used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]		
	a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	N/A
	b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	N/A
NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).			
COLLECTION CENTERS AND AGGREGATION POINTS			
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]		yes
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]		yes
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]		yes
NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.			

Milacron manages used oil in totes stored outside in the general area of the Skimmer Building and the Recycling vestibule. Sources of used oil include the skimmer and hydraulic oil.
Some of the totes were marked with the words 'used oil' and some were marked 'waste oil'.

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
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not,			N/A
	a.	Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)]		Yes
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
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
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,			Yes
	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
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
NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.				
NOTE: Written documentation of this determination is not required.				
7.	Did the generator treat his HW /soil on-site to meet the LDR treatment standard?			No
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
	a.	If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include:		N/A
		i	Applicable HW codes?	N/A
		ii	Manifest number of the first shipment to the TSD?	N/A
		iii	A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination."?	N/A
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]			N/A
10.	Does the generator have a copy of the LDR notification form/notice on file? [3745-270-07(A)(2)]			Yes
	a.	Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)]		Yes
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
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]		Yes
	c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]		Yes
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]		Yes
NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.				
	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]		Yes
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories				
	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]		Yes
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.				
	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]		Yes
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.				
PROHIBITED DILUTION				
12.	Is the HW treated by burning? If "No" go to #15.			No
13.	Is the HW a metal-bearing HW?			N/A
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.				
14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless **one** of the following conditions apply. [3745-270-03(c)]		
		i.	Contains > 1% TOC?	N/A
		ii.	Contains organic constituents or cyanide at levels greater than the UTS levels?	N/A
		iii.	Is made up of combustible material e.g., paper, wood, plastic?	N/A
		iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	N/A
		v.	Co-generated with a HW that must be combusted?	N/A
	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?		No
15.	Was the HW treated by wastewater treatment?			No
	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]		N/A
NOTE: If "Yes", HW is improperly being treated by dilution.				
	b.	Does the waste carry the D001 code and contain ≥10% TOC?		N/A
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?		N/A
NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].				
NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.				
GENERATOR TREATMENT				

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