



State of Ohio Environmental Protection Agency

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TO  
File

Southwest District

401 East Fifth Street  
Dayton, Ohio 45402-2911

TELE: (937)285-6357 FAX: (937)285-6249  
www.epa.state.oh.us

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

April 17, 2007

Ms. Annette Ehrhorn-Willeman  
Three Bond International, Inc.  
6184 Schumacher Park Drive  
West Chester, Ohio 45069

**RE: Three Bond International, Inc.- LQG (OHD987002490)**

Dear Ms. Ehrhorn-Willeman:

On March 27, 2007 Paul Pardi and I conducted an inspection of the Three Bond International, Inc. (TBI) plant in order to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). Consistent with long-standing practice, the inspection was unannounced. You and Kris Singleton represented TBI. The inspection consisted of an introductory meeting during which we discussed our inspection process, TBI's production processes and waste streams and we also discussed pollution prevention opportunities. We then inspected the plant including the R&D lab, production areas, the MEC area, the MEC mixer area, the bulk mixing room and the UV mixing room. We also inspected the < 90 day waste storage area and the satellite accumulation containers located throughout the plant. We concluded with a final meeting to review manifests and summarize our inspection. I took a two photocopies of restricted waste disposal notification/certification forms (commonly called LDR forms) with me to ascertain compliance with OAC 3745-270-07 at my office.

I found the following violation of Ohio' hazardous waste laws:

**Retention of waste analysis information:** OAC 3745-270-07(A)(6) requires that supporting documentation used to determine if a waste is restricted from land disposal be retained on the generator's site.

The LDR forms which I took with me listed 8 total waste streams and correctly stated that the waste were restricted from land disposal. The proper treatability group (all were non-wastewaters) was also determined. However, you were not able to find supporting documentation in the Three Bond International, Inc. files.

Ms. Annette Ehrhorn-Willeman  
April 17, 2007  
Page 2

- Re-create the proper records for all restricted waste streams following the format you used in the .pdf you e-mailed me on April 10. Be sure that the technology codes and the underlying hazardous constituents are properly determined. As we have discussed, the OAC documentation retention requirements are dependent on the waste properties (such as solids content and TOC content) as well as actions taken by your TSDf (if your TSDf analyses treatment residuals for UHCs, the original generator is not required to list them). You will need to carefully refer to the specific language in OAC 3745-270-07 as the usual guidance documents may not be specific enough. You will also need to know specific details of the how your TSDf manages your waste streams. Please e-mail the paperwork as .pdf attachments 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 contact me (937-285-6090) if I can provide any assistance to you in understanding the regulations or in completing the paperwork.

Sincerely,



Tom Ontko  
Hazardous Waste Inspector  
Southwest District Office

Enclosures

cc: ~~Diana/He~~

TO\bp

**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	Ohio Environmental Protection Agency <b>RCRA SUBCELLULAR SITE IDENTIFICATION/VERIFICATION FORM</b>		For Ohio EPA use only						
2. Site EPA ID No.	EPA ID Number: OHD987002490								
3. Site Name	Name: Three Bond International, Inc.		Website (optional):						
4. Site Location Information	Street Address: 6184 Schumacher Park Drive								
	City, Town, or Village: West Chester	State: OH							
	County Name: Butler	Zip Code: 45069							
5. Site Land Type (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other	
6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	A.				B.				
	C.				D.				
7. Facility Representative:  Additional names can be recorded in number 12.  Only provide address information if it is different than the site address.	First Name: Annette			MI:	Last Name: Ehrhorn-Willema				
	Phone Number: 513-759-8765				Phone Number Extension:				
	E-Mail Address: aehrhorn-willeman@threebond.com								
	Fax Number: 513-779-7375				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 Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	A. Name of Site's Legal Owner:				Date Became Owner (mm/dd/yyyy):				
	Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
	Street or P.O. Box:								
	City, Town, or Village:				Owner Phone #:				
	State:				Country:		Zip Code:		
	B. Name of Site's Operator:				Date Became Operator (mm/dd/yyyy):				
	Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
	Street or P.O. Box:								
	City, Town, or Village:				Operator Phone #:				
	State:				Country:		Zip Code:		
9. Violations Cited?	<input checked="" type="checkbox"/>	Yes	<input checked="" 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"/> 3. Treater, Storer or Disposer of Hazardous Waste
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> 4. Recycler of Hazardous Waste
<input type="checkbox"/> a. Large Quantity Generator (LQG):	<input type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace
<input checked="" type="checkbox"/> b. Small Quantity Generator (SQG)	<input type="checkbox"/> a. Small Quantity On-site Burner Exemption
<input type="checkbox"/> c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> d. United States Importer of Hazardous Waste	<input type="checkbox"/> 6. Underground Injection Control Facility
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/> 7. Hazardous Waste Transporter

B. Universal Waste Activities	C. Used Oil Activities															
<input checked="" type="checkbox"/> 1. Small Quantity Handler of Universal Waste (Indicate types of universal waste generated and/or accumulated (check all boxes that apply):	<input type="checkbox"/> 1. Used Oil Generator															
<input type="checkbox"/> 2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more).	<input type="checkbox"/> 2. Used Oil Transporter Indicate Type(s) of Activity(ies) <input type="checkbox"/> Transporter <input type="checkbox"/> Transfer Facility															
<input type="checkbox"/> 3. Destination Facility for Universal Waste (Check all boxes below that apply for each of the three types of facilities above.)	<input type="checkbox"/> 3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies) <input type="checkbox"/> Processor <input type="checkbox"/> Re-refiner															
<table border="1"> <thead> <tr> <th></th> <th>Generated</th> <th>Accumulated</th> </tr> </thead> <tbody> <tr> <td>A. Batteries</td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>B. Pesticides</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>C. Thermostats</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>D. Lamps</td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </tbody> </table>		Generated	Accumulated	A. Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/>	B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>	C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>	D. Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> 4. Off-Specification Used Oil Burner
	Generated	Accumulated														
A. Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/>														
B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>														
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>														
D. Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/>														
	<input type="checkbox"/> 5. Used Oil Fuel Marketer - 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.

D001	D040	F003	F005	U008		
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12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

N	Announced ?	Additional Facility Representatives:	Kris Singleton, QA/Regulatory Manager; Michael Ftacnik, Plt. Mgr.
N	Tanks?	Other comments: Facility in the last month or two has changed status from an LQG to an SQG because a spent-solvent waste stream is now being managed in a continued use program. A SQG inspection was conducted. Cited for a violation of OAC 3745-270-07(A)(6) in letter dated 4/16/07.	
Y	Containers?		

13.	Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
	Tom Ontko, Ohio EPA, SWDO	Paul Pardi, Ohio EPA, SWDO	(03-27-2007)(12:20)

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)



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

CESQG: ≤ 100 Kg. (approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.  
 SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month  
 LQG: ≥ 1,000 Kg. (-300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month  
 NOTE: *To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds*  
 Safety Equipment Used: safety shoes, safety glasses w/ side shields  
 Three Bond International; date of inspection March 27, 2007

**GENERAL REQUIREMENTS**

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

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

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

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

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

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

- |    |   |     |
|----|---|-----|
| 8. | Does the generator treat hazardous waste in a:                      |     |
|    | a. Container that meets 3745-66-70 to 3745-66-77?                   | N/A |
|    | b. Tank that meets 3745-66-90 to 3745-66-101 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 |

*NOTE: Complete appropriate checklist for each unit.*

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

**MANIFEST REQUIREMENTS**

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



- a. Does the contractual agreement specify the type of waste and frequency of shipment? N/A
- b. Is the transport vehicle owned and operated by the reclaimer? N/A
- c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? N/A

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

- 11. Have items 1 through 20 of each manifest been completed?[3745-52-20(A)] Yes

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

- 12. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] Yes

*NOTE: The generator may designate on the manifest one alternative facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]*

- 13. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D) ] N/A

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

- 15. If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? 3745-52-42(B)] N/A

- 16. Are signed copies of all manifests being retained for at least three years? [3745-52-40] Yes

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

#### PREPAREDNESS AND PREVENTION

- 17. Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)] Yes

- 18. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]

- a. Name and telephone number of emergency coordinator? Yes
- b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes
- c. Telephone number of local fire department? Yes

- 19. Are employees familiar with waste handling and emergency procedures [3745-52-34(D)(5)(c)] Yes

- 20. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)] N/A



21. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31] Yes
22. Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:
- a. Internal Alarm system? [3745-65-32(A)] Yes
  - 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
23. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency?[3745-65-33] Yes
- a. Are inspections recorded in a log or summary? [3745-65-33]? Yes
24. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (*unless the device is not required under OAC 3745-65-32*)? [3745-65-34(A)] Yes
25. If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance? (*Unless not required under 3745-65-32*)? [3745-65-34(B)] N/A
26. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes
27. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes
28. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes

#### SATELLITE ACCUMULATION AREA REQUIREMENTS

29. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? {3745-52-34(C)(1)} Yes
  - 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 the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes
30. 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 the excess with the accumulation date when the gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] 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

31. Has the generator marked containers with the words "Hazardous Waste"[3745-52-34(D)(4)] Yes
32. Is the accumulation date on each container? [3745-52-34(D)(4)] Yes
33. 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
34. Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days. Yes
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes
35. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] N/A
36. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B) 3745-66-77(A)] N/A
37. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B) ? [3745-66-77(B)] N/A

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

### PRE-TRANSPORT REQUIREMENTS

38. Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes
39. Does each container ≤100 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes
40. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes



## PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

**Facility Name:** Three Bond International, Inc **Facility Type:** SQG **EPA ID#:** OHD987002490

<i>Description of Waste</i>				<i>On-Site Management</i>			<i>Off-Site Management</i>	
<b>Process/Activity Generating Waste</b> <small>(e.g. plating bath, machining, baghouse, painting, etc)</small>	<b>Waste Generated</b> <small>(e.g. sludge, spent solvent, ash, etc)</small>	<b>EPA Waste Code</b>	<b>QTY Generated per Month</b>	<b>Type of Accumulation/Storage</b> <small>(e.g. container, tank, etc)</small>	<b>Type of On-Site Treatment</b> <small>(recycle, vwt, etc)</small>	<b>Waste Location</b> <small>(Include map if possible)</small>	<b>Name, state, and type of activity occurring at the facility.</b>	<b>P2 Activities</b>
MEC waste 1	spent solvent	D001, D040, F002, F005		container			Waste is now being managed as a continued use product. It is no longer managed as a waste for fuels blending	
2 MEC product	off-spec product		750 lbs/yr	container				
3 mop liquid from floor cleaning	dirty water	D001, D040, F005	700 lbs.	container			Veola currently, but will soon be put into continued use	
4 UV waste product	off-spec product	D001	1557 lbs/'06	container			Veola fuels blending	
5 MSW silicone-based product	off-spec product	D001, U154, U159, U220, U239		container			same	



## **REMARKS-GENERAL INFORMATION**

**General Process Information:** Three Bond International formulates automotive adhesives of several types for auto manufacturers automotive aftermarket. The largest product is MEC (micro-encapsulated adhesive) which is used to 'lock' fasteners into place. (Loctite is a brand name consumer product similar to MEC. TBI does not manufacture Loctite.) TBI also formulates UV-cured adhesives, epoxy adhesives and anaerobic-cure adhesives. Wastes generated typically include expired raw materials and solvents used in the R&D lab and also to remove adhesives.

One pollution-prevention opportunity involves the way the MEC adhesive is applied to bolts. One customer requires that bolts be free from the adhesive at the tips so that the bolt readily engages the threads into the part. The process is in two stages; racks of bolts are dipped into a pool of the MEC, allowed to dry and then only the tip is dipped into a solvent to remove MEC from the tip. A potential savings in raw materials, solvents and time could be realized if a one-step process could be devised.

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

**Other:** TBI changed generator status to a SQG when the MEC solvent was placed into a continued-use program. The spent solvent is 'clean' in many respects in that it is a flowable liquid and doesn't have enough dissolved/suspended solids to resemble a sludge or to leave sludge in the bottom of the containers. Representatives of TBI told us they personally visited the end-use facility in Indiana.



## LDR CHECKLIST

### GENERAL LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] If so: Yes
    - a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)] No
    - b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] No
  2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] Yes
  3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes
  4. Does the generator generate a characteristic hazardous waste? If so: Yes
    - a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes
- NOTE: If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.**
5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so: Yes
    - a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes
  6. Has the generator correctly determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)] Yes



7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] Yes
8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] N/A

**NOTE:** *In other words, is combustion a legitimate treatment method.*

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] N/A
10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] If so: No
- a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05] N/A
11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] If so: No
- a. The facility can land dispose of the waste. [3745-270-06] N/A
12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? No
- If so:
- a. Has the facility complied with 3745-270-04? N/A

**NOTIFICATION AND CERTIFICATION REQUIREMENTS**

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)] Yes
14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)] N/A



15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)] N/A
16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)] N/A
17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so: No
- a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] N/A

**NOTE: Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit.(See 270-07(A)(7))**

18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)] No

