



State of Ohio Environmental Protection Agency

Southwest District Office

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TO File

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

September 4, 2008

Ms. Tracey Burton
Clermont Steel Fabricators, LLC
2565 Old State Route 32
Batavia OH 45103

Re: NOV: Clermont Steel Fabricators LLC-SQG (OHD085513026)

Dear Ms. Burton;

On August 1, 2008 I arrived at Clermont Steel Fabricators, LLC (hereafter CSF) in order to perform an inspection 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). As is our practice, my inspection was unannounced. Because you were not in the office, I decided to schedule an appointment with you the following week. I returned on August 7, 2008 and performed the inspection with you and Ken Miller representing CSF. I found the following violations of Ohio's hazardous waste rules:

- 1) **Labeling of containers of hazardous waste: OAC 3745-53-34(D)(4)** requires that small-quantity generators comply with the standards in OAC 3745-52-34(A)(3) which requires that containers being used to accumulate hazardous wastes be labeled or clearly marked with the words 'hazardous waste'.

When I inspected the drum containing liquid paint wastes in the rear of the paint storage room, the drum was electrically grounded and equipped with a funnel properly attached to the top bung. The drum stored waste paint. Another drum stored next to it and also equipped with a funnel was unlabeled, but since it was apparently empty, it is not cited here as being in violation.

- CSF must properly label drums as "hazardous waste" when wastes are first placed in the drum.

- 2) **Labeling containers of hazardous waste with accumulation date: OAC 3745-53-34(D)(4)** requires that small-quantity generators comply with the standards in OAC 3745-52-34(A)(2) which requires the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

When I inspected the drum containing liquid paint wastes in the rear of the paint storage room, the drum was electrically grounded and equipped with a funnel which was properly attached to the top bung. The drum bore no labels or markings. The drum stored ignitable paint wastes.

Ms. Tracey Burton
September 4, 2008
Page 2

Under the container management requirements, CSF is required to mark the date of accumulation when wastes are first placed in the drum. This date begins the 180 day accumulation period as provided in OAC 3745-52-34(D).

3) **Inspections of containers: OAC 3745-66-74** requires that areas where hazardous wastes is stored in containers be inspected at least weekly for leaks. The inspection must be recorded in a log or summary.

You were not performing the required inspections and could not provide a log.

CSF must begin a program of inspecting the hazardous waste containers and maintaining records of such inspections. Please be aware that Ohio EPA interprets the word weekly as meaning 'every seven days'.

4) **Copy of one-time written notice must be kept in generator's file: OAC 3745-270-07(A)(2)** requires that generators keep a copy of the one-time written notice provided with the initial shipment of a waste that does not meet the treatment standard.

4b) **Waste evaluation data must be maintained on-site: OAC 3745-270-07(A)(6)(a) and (b)** requires that generators of restricted hazardous wastes must keep supporting data used to make that determination on site. Violations #4 and 4b are related. OAC 3745-270-07(A)(6)(a) and (b) requires generators to determine whether their wastes are restricted and requires them to keep records of this determination on-site. The supporting documentation for this determination must be kept on file regardless of whether the waste is restricted or not. This waste determination may be made by either generator knowledge {in which case sub-item (a) applies} or analytical testing {sub-item (b)} applies. If it is determined that the waste is restricted from land disposal, then OAC 3745-270-07(A)(2) requires that the generator provide a one-time notification when the waste is offered for disposal for the first time. A copy of this notification must be kept in the generator's files.

The 'waste paint-related materials' manifested as D001, F003 and F005 are subject to land disposal restrictions (LDR) and as a generator of the waste, CSF is required to maintain copies of both types of records-the determination itself and the initial notification to Clean Water Ltd. You were not able to produce the records during my inspection on August 7. The electronic version of a fax from Clean Waters Ltd that you subsequently provided me was dated 8/14/08. I conclude that CSF was not maintaining the copies either records in the generator's files.

I have determined that the waste paint-related materials were adequately characterized. Violations 4 and 4b are cited merely for failing to maintain adequate records. To correct these violations, be sure to keep the documentation on file at your facility. The violations I have cited will be adequately remedied by maintaining the records in the future. There are no additional actions required on your part.

Ms. Tracey Burton
September 4, 2008
Page 3

To correct the violations, please complete the actions indicated by the ● symbol within 30 days of your receipt of this letter. Soon thereafter, I will schedule a 'return to compliance' (RTC) inspection during which I will return to CSF to confirm your compliance with the Ohio hazardous waste rules. Please contact me at (937) 285-6090 if you have any questions. Enclosed you will find a copy of the SQG checklist, a process description summary, and an LDR checklist and a summary description of the documentation which you provided to me by e-mail. Should you have any questions, please call me at (937) 285-6090.

Sincerely,



Tom Ontko
Hazardous Waste Inspector
Southwest District Office

Enclosures

cc: "Dinah/file"

TO/mab

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.



10/1/77

Summary of electronic submittal provided by Clermont Steel Fabricators in support of Compliance Evaluation Inspection performed on August 7, 2008
OHD085513026

- 8/8/08 permafix.pdf -Three page scan of a manifest. I asked that this be sent to me during the inspection. As I recall, we forgot to get it when we went to receiving/shipping and I asked for it to be faxed instead of walking back. It does not include any LDR notification. I consider this timely as it was transmitted at my request and for my convenience.
- 8/14/08 Permafix 02-15-07.pdf was a two-page scan of a different manifest.
8/14/08 Kalmeyer.pdf scan was transmitted with same e-mail as Permafix 02-15-07. This documents that the waste shipped as floor scrapings was properly evaluated per OAC 3745-52-11 and that the waste floor scrapings are not regulated as a hazardous waste. I conclude that this is also compliant with OAC 3745-52-40(C) which requires generators to keep supporting documentation on file for three years from the last date the waste was shipped off-site. Because CSF reports no changes in the paint types I consider this an adequate evaluation despite being performed in calendar year 2000. If there are significant changes to the paint, this evaluation will need to be performed again.
- 8/14/08 Eight page .pdf scan saved as CWL.pdf. This is a scan of a fax from Clean Water Ltd to CSF dated 8/14/08 This was transmitted as a separate e-mail and contains LDR documentation. I have determined that this and CsfPermafixdocs.pdf together establish that the LDR requirements are met with one exception of OAC 3745-270-07(A)(6)(a) and (b) requiring records retention. Because the info was not kept in the generator's files on site, this is cited as a violations 4 and 4b in the CEI letter.
- 8/20/08 CsfPermafixdocs.pdf This is a 6 page .pdf file.

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

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

GENERAL REQUIREMENTS

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

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

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

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 | <input type="checkbox"/> |
|----|---|----|--------------------------|

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: | No | <input type="checkbox"/> |
| | a. Container that meets 3745-66-70 to 3745-66-77? | | <input type="checkbox"/> |
| | b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? | | |
| | c. Drip pads that meet 3745-69-40 to 3745-69-45? | | |
| | d. Containment building that meets 3745-256-100 to 3745-256-102? | | |

NOTE: CSF does not treat hazardous wastes.

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 | <input type="checkbox"/> |
| 10. | Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)] | No | <input type="checkbox"/> |
| | a. Does the contractual agreement specify the type of waste and frequency of shipment? | N/A | <input type="checkbox"/> |

- b. Is the transport vehicle owned & 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)] Yes

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]

I only looked at one manifest to determine compliance with this section.

CSF uses a laundry service to recycle red shop rags used to wipe down steel items prior to painting.

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

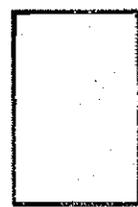
- b. Emergency communication device? [3745-65-32(B)] Yes
- c. Portable fire control, spill control and decon equipment? [3745-65-32(C)]? Yes
- d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes
- 23. Is emergency equipment tested (inspected) as necessary to ensure 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



Signage is posted with phone numbers for plant emergency contact (Wayne Miller), Ohio EPA ER hotline, and National Response Team. The local fire department inspects the facility annually. Vendors for sprinkler system and fire extinguishers perform annual inspections. I did not ask to see copies of vendor inspections or records of fire department inspections. A manually-activated fire alarm notifies both the fire department and facility personnel and is located in the paint room where wastes are stored. Spill clean up equipment is located in the maintenance area which is arguably not in close proximity to the Paint Room. I did not ask to see records for the inspections of spill clean up equipment. Facility reps report no fires or spills of hazardous wastes.

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)] N/A
 - b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] N/A
 - c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] N/A
 - 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)]. N/A
 - f. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] N/A
- 30. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: N/A
 - a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] N/A
 - b. Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] N/A



CSF does not manage waste under the dilute accumulation rules.

USE AND MANAGEMENT OF CONTAINERS

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

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

- | | | |
|--|-----|--------------------------|
| 34. Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days. | No | <input type="checkbox"/> |
| a. Are inspections recorded in a log or summary? [3745-66-74] | No | <input type="checkbox"/> |
| 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 | <input type="checkbox"/> |
| 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 | <input type="checkbox"/> |
| 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 | <input type="checkbox"/> |

Only drummed paint wastes (manifested as D001, F003 and F005) are managed in containers.

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 | <input type="checkbox"/> |
| 39. Does each container ≤100 gallons have a completed hazardous waste label? [3745-52-32(B)] | Yes | <input type="checkbox"/> |
| 40. Before off-site transportation, does the generator placard <u>or</u> offer the appropriate DOT placards to the initial transporter? [3745-52-33] | Yes | <input type="checkbox"/> |

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Clermont Steel Fabricators, LLC **Facility Type:** SQG **EPA ID#:** OHD085513026

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	red rags generated from wiping down steel parts prior to painting						laundered at Spirit Cleaners	
2	shot blasting steel parts prior to painting	fines					recycled w/ scrap steel	
3	fines from cutting steel						recycled w/ scrap steel	
4	cleaning/scraping paint from floor	solid paint waste			generated during periodic cleanups		disposed of as solid waste	
5	waste paint-related materials	liquid and semi-liquid sludges			drums		rear of paint room	Clean Water Ltd.

REMARKS-GENERAL INFORMATION

General Process Information: Clermont Steel Fabricators, LLC (CSF) purchased the 145,000 square foot facility from Southern Ohio Fabricators in 2004. CSF manufactures the steel towers and tracks for roller coasters. Customers are world wide. Incoming raw materials include hot-rolled steel, paints, cutting fluids, etc. Precision machining to close tolerances and precision bending of round steel forms (pipes) are sub-contracted out and these operations are not performed at this site. Processes include welding, cutting (with beam saws and plasma), drilling, painting, grit-blasting, fabricating. No electro-plating is performed. Steel parts are wiped down with a rag wetted with MEK prior to painting. Steel scrap is recycled. Fines from two different grit-blasting operations are recycled as steel scrap.

No used universal waste lamps were reported to be in storage.

Periodically, the floor in the painting area is scraped. Analytical tests show that the paint scrapings are non-hazardous.

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information:

Red shop rags used to wipe down steel parts prior to painting are laundered off-site. Parts are painted with a two-component solvent based paint. Customers insist on a highly durable painted surface that remains glossy in use and do not require painting sooner than 10 years. P2 opportunities exist in substituting a different solvent for MEK.

Other:

**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)]	N/A
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)]	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)]	No
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)]	No
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)]	N/A
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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
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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
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 on file?[3745-270-07(A)(2)]	No
a.	Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	N/A

NOTIFICATION FORM

11.	Does the LDR Notification form contain the following information:	
a.	Manifest number of the first waste shipment to the TSD?[3745-270-07(A)(2)]	Yes
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 <1.0% wt. total suspended solids(TSS) and <1.0% 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
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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)]	N/A
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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)]	N/A
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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
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13.	Is the HW a metal-bearing HW?	N/A
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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)]	
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	i.	Contains > 1% TOC?	N/A
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	ii.	Contains organic constituents or cyanide at levels greater than the UST levels?	N/A
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	iii.	Is made up of combustible material e.g., paper, wood, plastic?	N/A
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	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	N/A
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	v.	Co-generated with a HW that must be combusted?	N/A
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	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?	
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15.	Was the HW treated by wastewater treatment?	N/A
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	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
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NOTE: If Yes, HW is improperly being treated by dilution.

	b.	Does the waste carry the D001 code and contain $\geq 10\%$ TOC?	N/A
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	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	N/A
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NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B) and 3745-270-40(A)(3)].

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

GENERATOR TREATMENT

16.	Does the generator treat to meet LDRs on-site [3745-270-40(A)]?	No
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	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			
17.	a.	Contains all information in #11 a-g above and	Yes
	b.	If the treated HW/soil is listed.....notification contains the following certification statement: " I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or trough knowledge of the waste, to support this certification that the waste complies with the treatment stands specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."	Yes
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:	N/A
	i.	Send a one-time notification to the director?[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)(a)]	N/A
		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 right certification statement as required by 3745-70-07(b)(4)?	N/A