



State of Ohio Environmental Protection Agency

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 Korieski, Director

CERTIFIED MAIL

May 31, 2007

**RE: JAFE DECORATING CO, INC.
LARGE QUANTITY GENERATOR (LQG)
OHR000132100
DARKE COUNTY, SWDO
NOTICE OF VIOLATION (NOV)**

Mr. Casey Weiss
Jafe Decorating Co., Inc.
1250 Martin St.
Greenville, Ohio 45331

Dear Mr. Weiss:

Thank you for accompanying me during Ohio EPA's March 29, 2007, compliance evaluation inspection (CEI) of Jafe Decorating Co., Inc.'s facility in Greenville, Ohio. I inspected Jafe Decorating Co., Inc. (JAFE) 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).

I found the following violations of Ohio's hazardous waste laws. In order to correct these violations you must do the following and send me the required information within 30 days of your receipt of this letter:

1. **OAC Rule 3745-52-34(A)(3), Accumulation Time of Hazardous Waste:** While being accumulated and/or treated on site, each container and tank must be labeled or marked clearly with the words "Hazardous Waste."

During the March 29, 2007 CEI, JAFE failed to label its D011 tote located in the F-15 area with the words "Hazardous Waste".

During the March 29, 2007 CEI, JAFE labeled the D011 tote, and this action **corrected** the above violation.

2. **OAC Rule 3745-52-41, Annual Hazardous Waste Report:** Large quantity generators must complete and submit an annual hazardous waste report by March 1 of each year covering generator activities during the previous year.



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~~March 1 of each year covering generator activities during the previous year~~

JAFE did not submit their 2006 hazardous waste report by March 1, 2007. Ohio EPA received JAFE's hazardous waste report on April 5, 2007, and this action corrected the above violation.

3. **OAC Rules 3745-65-51(A) and (B); 3745-65-52 (A), (B), (C), (D), (E) and (F); 3745-65-53(A) and (B); and 3745-65-55, Contingency Plan.** A facility shall have a contingency plan which will be implemented during an emergency. The contingency plan must describe the actions personnel will take during an emergency, describe arrangements with responders, list the emergency contact and related information, list emergency equipment, and include an evacuation plan. A copy of the contingency plan must be maintained at the facility and submitted to entities that may be required to provide emergency services. A facility must have a designated emergency coordinator who is familiar with all aspects of the contingency plan, available to respond to an emergency and has the authority to commit the resources needed to implement a contingency plan.

During the March 29, 2007 CEI, you stated that a plan existed that could probably meet the requirements for a hazardous waste contingency plan and would like me to send information detailing contingency plan requirements. You stated you would find it and submit it. I sent you a follow-up e-mail on March 30, 2007 identifying the type of information required by a contingency plan. Ohio EPA has not received any information regarding a contingency plan from JAFE to-date. Therefore, Ohio EPA has determined that a contingency plan does not exist and that JAFE has violated all the applicable rule associated with the contingency plan requirements as follows:

- (a) 3745-65-51(A) - The facility does not have a contingency plan.
- (b) 3745-65-51(B) - By not having a contingency plan, the facility is unable to implement such a plan during a fire, explosion, or release of hazardous waste.
- (c) 3745-65-52(A) - The facility does not have a plan that describe actions the personnel must take.
- (d) 3745-65-52(B) - The facility has a SPCC plan that has not been amended to incorporate hazardous waste management provisions.
- (e) 3745-65-52(C) - The facility does not have a contingency plan that

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describes arrangement agreed to by local police departments, fire departments, hospitals, contractors, Ohio EPA, and local emergency responders.

(f) 3745-65-52(D) - The facility does not have a contingency plan that list the names, addresses, and phone numbers of persons qualified to act as emergency coordinator.

(g) 3745-65-52(E) - The facility does not have a contingency plan that list emergency equipment.

(h) 3745-65-52(F) - The facility does not have a contingency plan that includes an evacuation plan.

(i) 3745-65-53(A) - The facility does not maintain a contingency plan.

(j) 3745-65-53(B) - The facility has not submitted a contingency plan to all local police departments, fire departments, hospitals, and Ohio EPA and local emergency response teams, that may be requested to provide emergency services.

(k) 3745-65-55 - The facility did not designate an emergency coordinator.

JAFE must prepare a contingency plan and submit a copy to this office for review. This plan must include all the contents to demonstrate compliance with this rule. JAFE must maintain a contingency plan at its facility and submit such plan to agencies or organizations that may be required to provide emergency services. JAFE must designate an emergency coordinator and identify this person in its contingency plan. The contingency plan must demonstrate compliance with this rule.

4. **OAC Rule 3745-65-16(A)(2 and 3) and (C), Personnel Training.** Facility personnel must complete training on hazardous waste management procedures.

JAFE violated the applicable requirements of this rule as follows:

- (a) 3745-65-16(A)(2) and (3) - Facility personnel did not complete training that teaches them to perform their duties in a way that ensure compliance relating to a hazardous waste contingency plan. The employees trained in 2006 did not learn about contingency plan requirements.

JAFE must immediately provide this training as required and submit

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documentation (i.e., copy of the sign-in sheets) to this office for review.

(b) 3745-65-16(C) - The annual personnel training which instructs facility personnel on hazardous management procedures was not given in 2004 and 2005. During Ohio EPA's March 29, 2007 CEI, Christy McClurg of JAFE said she would send Ohio EPA training records for 2004 and 2005. Ohio EPA has not received any of these records from JAFE to-date and has determined that the 2004 and 2005 records do not exist.

JAFE must immediately

5. **OAC Rule 3745-65-33, Testing and Maintenance of Equipment:** All facility communication or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, must be tested and maintained to assure its proper operation in time of emergency. Inspections must be recorded in log.

During the March 29, 2007 CEI, JAFE stated that testing and maintenance of equipment was never conducted, and JAFE could not produce an inspection log. Christy McClurg of JAFE said she would develop a log pertaining to the inspection and maintenance of equipment, and I sent her a follow-up e-mail on March 30, 2007 identifying emergency equipment inspection log requirements. Ohio EPA has not received any information regarding storage area inspections from JAFE to-date. Therefore, Ohio EPA has determined that an inspection log still does not exist.

JAFE must immediately begin to inspect and maintain your emergency equipment and submit documentation in the form of an inspection log to this office for review.

4. **OAC Rule 3745-66-74, Inspections:** The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by other factors. The owner or operator must record inspections in an inspection log or summary.

During the March 29, 2007 CEI, JAFE stated that inspections of containers were never conducted, and JAFE could not produce an inspection log. Christy McClurg of JAFE said she would develop a hazardous waste storage area inspection log, and I sent her a follow-up e-mail on March 30, 2007 identifying

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inspection log requirements. Ohio EPA has not received any information regarding storage area inspections from JAFE to-date. Therefore, Ohio EPA has determined that an inspection log still does not exist.

JAFE must immediately begin weekly inspections of your hazardous waste storage areas and submit documentation in the form of an inspection log to this office for review.

Identified Concerns

- 1) During the inspection, you stated that JAFE had plans to potentially eliminate your D011 hazardous waste stream in the near future. Please phone me **immediately** at (937)285-6091 and provide me with the status of JAFE's hazardous waste generation. If JAFE's generator status has changed, it may not be necessary to complete some of the corrective measures identified above, and other regulations may apply.
- 2) During the inspection, it was unclear what, if any, universal waste JAFE generates. I won't be filling out Section 10.B. of the RCRA Subtitle C Site Identification/Verification Form (copy enclosed) until JAFE identifies what boxes should be checked to indicate what types of universal waste JAFE is generating and/or accumulating within 30 days of your receipt of this letter. I am enclosing a universal waste fact sheet and a June 30, 2005 regulatory interpretation issued by DHWM to assist you in classifying non lead acid batteries (i.e., batteries collected from home, nickel-cadmium, alkaline).

If you would like a free, non-regulatory on-site pollution prevention assessment or if you would like more information about pollution prevention, please contact me at 937-285-6091. Ohio EPA has helpful information about this at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp/>

Enclosed you will find a copy of the checklists that I completed as a result of the inspection. Should you have any questions, please feel free to call me at 937-285-6091. You can find copies of the rules and other information on the division's web page

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.

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Identified Concerns

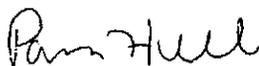
- 1) During the inspection, you stated that JAFE had plans to potentially eliminate your D011 hazardous waste stream in the near future. Please phone me **immediately** at (937)285-6091 and provide me with the status of JAFE's hazardous waste generation. If JAFE's generator status has changed, it may not be necessary to complete some of the corrective measures identified above, and other regulations may apply.

- 2) During the inspection, it was unclear what, if any, universal waste JAFE generates. I won't be filling out *Section 10.B.* of the **RCRA Subtitle C Site Identification/Verification Form** (copy enclosed) until JAFE identifies what boxes should be checked to indicate what types of universal waste JAFE is generating and/or accumulating within 30 days of your receipt of this letter. I am enclosing a universal waste fact sheet and a June 30, 2005 regulatory interpretation issued by DHWM to assist you in classifying non lead acid batteries (i.e., batteries collected from home, nickel-cadmium, alkaline).

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<http://www.epa.state.oh.us/ocapp/ocapp/>

Enclosed you will find a copy of the checklists that I completed as a result of the inspection. Should you have any questions, please feel free to call me at 937-285-6091. You can find copies of the rules and other information on the division's web page at:
<http://www.epa.state.oh.us/dhwm/>.

Sincerely,



Pam Hull
District Representative
Division of Hazardous Waste Management

cc: Dinah Crawford, SWDO-DHWM/SWDO file
SWDO-file: Jafe Decorating Co., Inc., LQG, Darke County, OHR000132100

Enclosure

PH/rjf

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 tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office	Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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2. Site EPA ID No.	EPA ID Number: OHR000132100
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3. Site Name	Name: Jafe Decorating Co., Inc. Website (optional): www.jafedecorating.com
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4. Site Location Information	Street Address: 1250 Martin St.						
	City, Town, or Village: Greenville				State: OH		
	County Name: Darke				Zip Code: 45331		

5. Site Land Type (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other
	<input checked="" type="checkbox"/>							

6. NAICS code(s) www.census.gov/epcd/www/naics.html	A. 327215			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: Casey		MI: R.	Last Name: Weiss				
	Phone Number: 937-547-1888				Phone Number Extension:			
	E-Mail Address: cweiss@jafedeco.com							
	Fax Number: 937-547-1760				Fax Number Extension:			
	Street or P.O. Box: 1250 Martin St.							
	City, Town or Village: Greenville							
	State: OH			Country:			Zip Code: 45331	

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: Lloyd D. Williams			Date Became Owner (mm/dd/yyyy): 07/01/1978					
	Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
		<input checked="" type="checkbox"/>							
	Street or P.O. Box: 1250 Martin St.								
	City, Town, or Village: Greenville				Owner Phone #:				
	State: OH				Country:		Zip Code: 45331		
	B. Name of Site's Operator: Lloyd D. Williams			Date Became Operator (mm/dd/yyyy): 07/01/1978					
	Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
		<input checked="" type="checkbox"/>							
	Street or P.O. Box: 1250 Martin St.								
City, Town, or Village: Greenville				Operator Phone #:					
State: OH				Country:		Zip Code: 45331			

9. Violations Cited?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)
Not Regulated

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

A. Hazardous Waste Activities			
(choose only one of the following categories)			
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input checked="" type="checkbox"/> a. Large Quantity Generator (LQG): <input type="checkbox"/> b. Small Quantity Generator (SQG) <input type="checkbox"/> c. Conditionally Exempt Small Quantity Generator <input type="checkbox"/> d. United States Importer of Hazardous Waste <input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/> 3. Treater, Storer or Disposer of Hazardous Waste <input type="checkbox"/> 4. Recycler of Hazardous Waste <input type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace <input type="checkbox"/> a. Small Quantity On-site Burner Exemption <input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption <input type="checkbox"/> 6. Underground Injection Control Facility <input type="checkbox"/> 7. Hazardous Waste Transporter		
B. Universal Waste Activities			
1. Small Quantity Handler of Universal Waste (Indicate types of universal waste generated and/or accumulated (check all boxes that apply): 2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more). 3. Destination Facility for Universal Waste (Check all boxes below that apply for each of the three types of facilities above.)			
<table border="0" style="margin-left: auto; margin-right: auto;"> <tr> <td style="padding: 0 10px;"><u>Generated</u></td> <td style="padding: 0 10px;"><u>Accumulated</u></td> </tr> </table>	<u>Generated</u>	<u>Accumulated</u>	C. Used Oil Activities <input type="checkbox"/> 1. Used Oil Generator <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. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies) <input type="checkbox"/> Processor <input type="checkbox"/> Re-refiner <input type="checkbox"/> 4. Off-Specification Used Oil Burner <input type="checkbox"/> 5. Used Oil Fuel Marketer - 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
<u>Generated</u>	<u>Accumulated</u>		
A. Batteries B. Pesticides C. Thermostats D. Lamps			

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.

D011							
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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.

Y / <input checked="" type="checkbox"/> N	Announced ?	Additional Facility Representatives:	Christy McClurg
Y / <input checked="" type="checkbox"/> N	Tanks?	Other comments:	
<input checked="" type="checkbox"/> Y / N	Containers?		

13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
Pam Hull		3/29/07 @ ~10:00

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)

**LA. QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

CEESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: ≥1,000 Kg. (~300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

- | | | | | | | |
|---|-----|-------------------------------------|----|-------------------------------------|-----|--------------------------|
| 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 4. Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)] Ohio EPA received JAFE's annual report on 4/5/07, and this action corrected the violation. | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 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)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 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)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 8. Does the generator accumulate hazardous waste? | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

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)? | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
|--|-----|--------------------------|----|-------------------------------------|-----|--------------------------|

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

NOTE: Complete appropriate checklist for each unit.

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

- | | | | | | | |
|---|-----|--------------------------|----|-------------------------------------|-----|-------------------------------------|
| 11. Does the generator export hazardous waste? If so: | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| b. Has the generator complied with special manifest requirements? [3745-52-54] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| d. Has an annual report been submitted to U.S. EPA? [3745-52-56] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| e. Are export related documents being maintained on-site? [3745-52-57(A)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |

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)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
- 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)]
- | | | | | | | |
|--|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| 14. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
|--|-----|-------------------------------------|----|--------------------------|-----|--------------------------|

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)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
|---|-----|--------------------------|----|--------------------------|-----|-------------------------------------|

16. Have the manifests been signed by the generator and initial transporter? [3745-52-42(A)(1)] Yes No N/A & (2)

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 did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes No N/A

18. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes No N/A

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

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

PERSONNEL TRAINING

20. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes No N/A

21. 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)(a-f)] Yes No N/A

22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A

23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes No N/A

24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A

25. Does the generator keep records and documentation of:
 a. Job titles [3745-65-16D(1)]? Yes No N/A
 b. Job descriptions [3745-65-16D(2)]? Yes No N/A
 c. Type and amount of training given to each person [3745-65-16D(3)]? Yes No N/A
 d. Completed training or job experience required [3745-65-16D(4)]? Yes No N/A

26. 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

CONTINGENCY PLAN

27. Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes No N/A

28. Does the plan describe the following:
 a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes No N/A
 b. Arrangements with emergency authorities [3745-65-52(C)]. Yes No N/A
 c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes No N/A

- d. A list of all emergency equipment, including: location, a physical description and a brief outline of capabilities? [3745-65-52(E)] Yes **No** N/A
- e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes **No** N/A

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

29. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes **No** N/A
30. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] Yes **No** N/A
31. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes **No** N/A

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

EMERGENCY PROCEDURES

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

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

PREPAREDNESS AND PREVENTION

33. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] **Yes** **No** N/A
34. 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)] **Yes** **No** N/A
- b. Emergency communication device? [3745-65-32(B)] **Yes** **No** N/A
- c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] **Yes** **No** N/A
- d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes **No** N/A

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

35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes **No** N/A
36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes **No** N/A
37. 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** **No** N/A
38. If there is only one employee on the premises, is there immediate access to a device (ex. phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] **Yes** **No** N/A
39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] **Yes** **No** N/A
40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] **Yes** **No** N/A
41. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] **Yes** **No** N/A

SATELLITE ACCUMULATION AREA REQUIREMENTS

42. Does the generator ensure that satellite accumulation area(s): **No satellite, only 2 <90 day storage areas**
- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes **No** N/A

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

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

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

44. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] **JAFE labeled the D011 tote located in the F-15 area with the words "hazardous waste", and this action corrected the violation.** Yes No N/A
45. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No N/A
46. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A
- b. In good condition? [3745-66-71] Yes No N/A
- c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A

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

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. Yes No N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes No N/A
49. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes No N/A
50. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] Yes No N/A
51. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] Yes No N/A

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

52. If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] Yes No N/A

NOTE: Please provide a description of the unit and documentation provided by the generator 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 – NO TRANSPORTATION WAS OCCURRING DURING THE 3/27/07 CEI

53. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes No N/A
54. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A

55. Before off-site transportation, does the generator placard or offer the appropriate placards to the initial transporter? [3745-52-33] Yes No N/A



PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Jafe Decorating Co., Inc. Facility Type: **LQG**/SQG/CESQG/TSD Date of Inspection: 3/2/07 EPA ID#: OHR000132100

Waste Generated			On- or Off-Site Management		P2 Activities		
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities	
1	Glass Coating	Clay Sludge & Silver Residue in Water Solution	~ 3.5 Tons/month		Tote Storage in F-15 and Warehouse Areas (see areas indicated on attached diagram)	Plans to eliminate/reduce generation of this waste in near future	
2							
3							
4							
5							
6							

REMARKS-GENERAL INFORMATION

General Process Information:

Jafe Decorating Co., Inc. applies color and specialty coating on and in glass.

Regulatory/Enforcement History (if applicable):

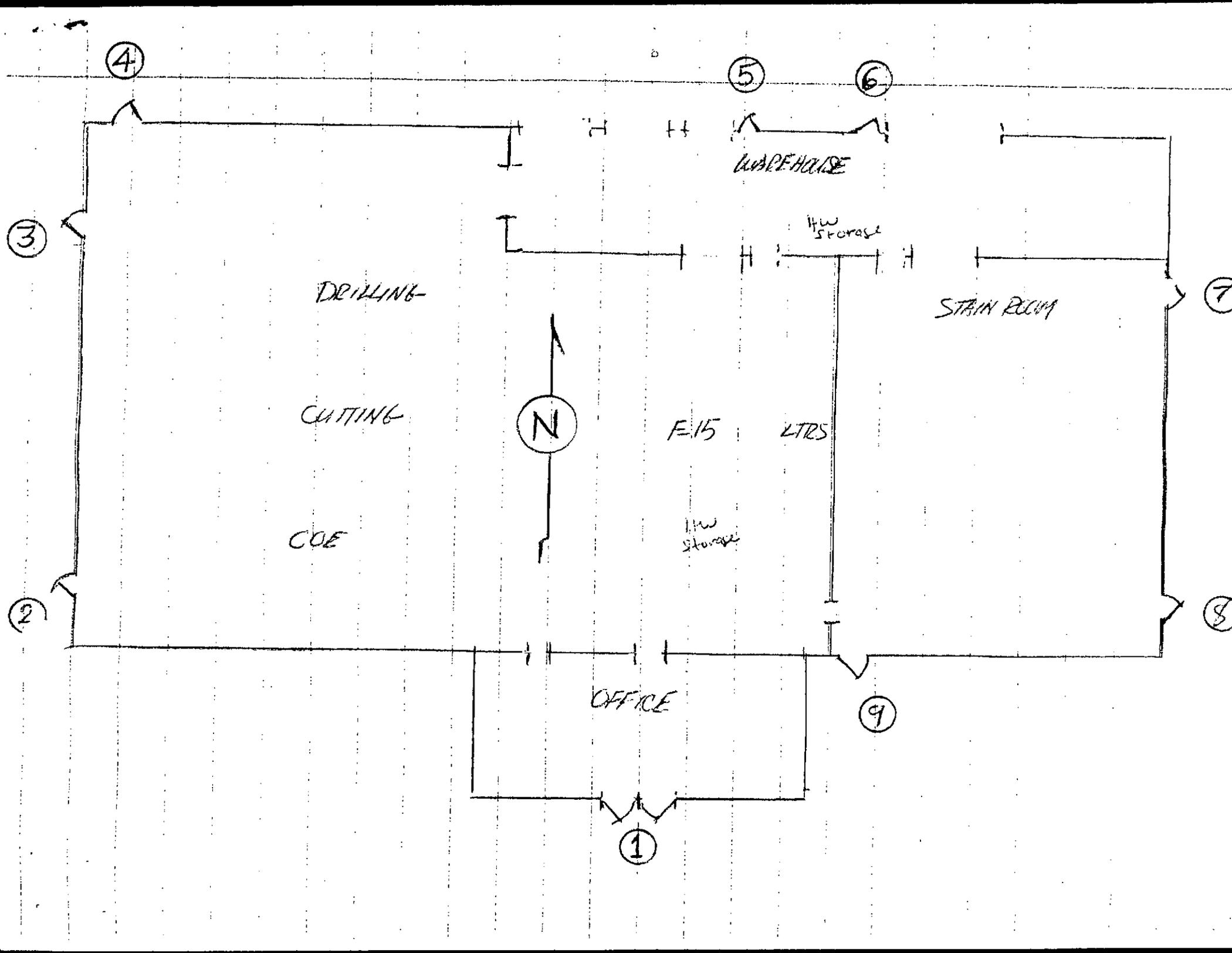
Jafe Decorating Co., Inc. became a LQG in 2004.

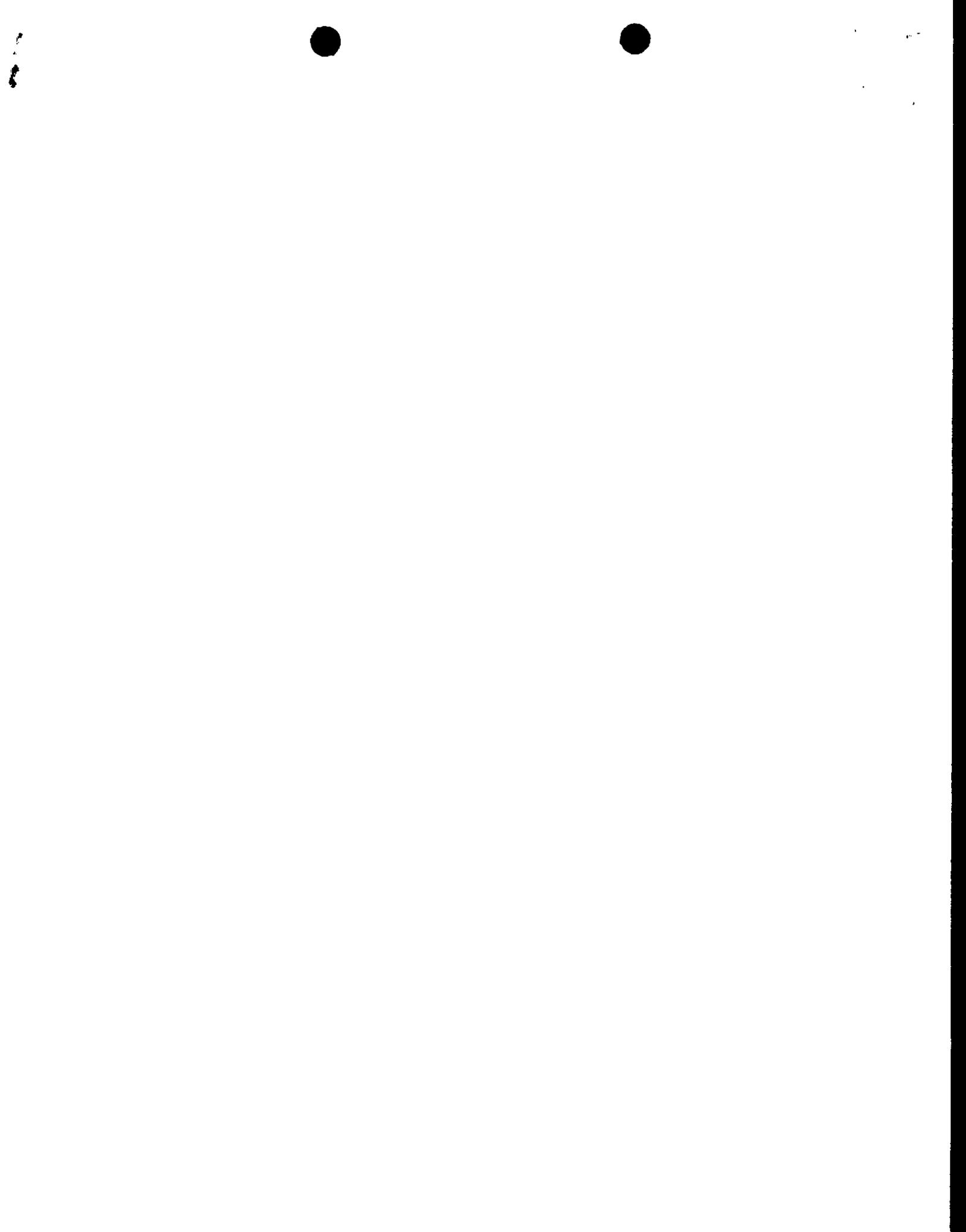
Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.
Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Jafe Decorating Co., Inc. has plans to eliminate/greatly reduce this waste stream in the near future.

Other:





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 No N/A RMK#
- a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)]
- Yes No N/A RMK#
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)]
- Yes No N/A RMK#
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1]
- Yes No N/A RMK#
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1]
- Yes No N/A RMK#
4. Does the generator generate a characteristic hazardous waste? If so:
- Yes No N/A RMK#
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)]
- Yes No N/A RMK#
-

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 No N/A RMK#
- 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 No N/A RMK#
-

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*

6. Has the generator correctly determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)]
-

Yes No N/A RMK#

NOTE: Wastes with EPA hazardous waste numbers K174 and K175 (chlorinated aliphatic wastes) have specific requirements in rule 3745-270-33. Waste with EPA hazardous waste numbers K176, K177 and K178 (inorganic chemical wastes) have specific requirements in rule 3745-270-36.

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 No N/A RMK#

NOTE: A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (§402 of CWA), that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater.[3745-270-03(B)]

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)] Yes No N/A RMK#

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)] Yes No N/A RMK#

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: Yes No N/A RMK#

a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05] Yes No N/A RMK#

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] If so: Yes No N/A RMK#

a. The facility can land dispose of the waste. [3745-270-06] Yes No N/A RMK#

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? If so: Yes ___ No N/A ___ RMK# ___

a. Has the facility complied with 3745-270-04? Yes ___ No N/A RMK# ___

REMARKS

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 No N/A ___ RMK# ___

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)] Yes ___ No N/A RMK# ___

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)] Yes ___ No N/A RMK# ___

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)] Yes ___ No N/A RMK# ___

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: Yes ___ No N/A ___ RMK# ___

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)] Yes ___ No N/A RMK# ___

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)] Yes No N/A ___ RMK# ___

REMARKS

GENERATORS TREATING HAZARDOUS WASTE

1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? Yes ___ No N/A ___ RMK# ___
2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)] Yes ___ No N/A RMK# ___
- a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] Yes ___ No N/A RMK# ___
- b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes ___ No N/A RMK# ___
3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes ___ No N/A RMK# ___
4. Has the generator followed their WAP [3745-270-07(A)(5)]? Yes ___ No N/A RMK# ___
5. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes ___ No N/A RMK# ___

NOTE: If the waste is a characteristic waste, which has been treated to render it non hazardous and subsequently sent to a solid waste landfill, proceed to question 7 & 8.

6. Has the generator sent a notification and certification with the initial shipment of waste?[3745-270-07(A)(5)(c)] Yes ___ No N/A RMK# ___
7. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] Yes ___ No N/A RMK# ___
8. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the

following:

Yes ___ No N/A RMK# ___

a. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)]

Yes ___ No N/A RMK# ___

b. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)]

Yes ___ No N/A RMK# ___

NOTE: *If the waste will be treated and monitored for all UHCs then they do not need to be listed on the notice.*

9. Has the process/operation generating the waste or the solid waste landfill facility changed? If so:

Yes ___ No N/A ___ RMK# ___

a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)]

Yes ___ No N/A RMK# ___

b. Has the director been notified of such changes? [3745-270-09(D)]

Yes ___ No N/A RMK# ___

NOTE: *The director need only be notified on an annual basis but no later than December 31.*

10. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so:

Yes ___ No ___ N/A RMK# ___

a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49 (C)]

Yes ___ No N/A RMK# ___

11. Does each notification/certification form completed, contain the information found in Table 1? [3745-270-07(A)(3)]

Yes ___ No N/A RMK# ___

NOTE: *If the waste will be treated and monitored for all constituents, there is no need to put them all on the LDR notice.*

REMARKS

HAZARDOUS DEBRIS

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)?
 Yes ___ No N/A ___ RMK# ___
2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.)
 Yes ___ No ___ N/A RMK# ___
3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so:
 Yes ___ No ___ N/A RMK# ___
- a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)]
 Yes ___ No N/A RMK# ___

NOTE: If immobilization has been used in a treatment train, it must be the last treatment technology used.

4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so:
 Yes ___ No ___ N/A RMK# ___
- a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)]
 Yes ___ No N/A RMK# ___
5. Is the waste a PCB waste under 40 CFR Part 761? If so:
 Yes ___ No N/A ___ RMK# ___
- a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)]
 Yes ___ No N/A RMK# ___
6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)]
 Yes ___ No N/A RMK# ___
7. Does the owner/operator of a treatment facility that claims the debris is excluded from regulation as a hazardous waste under 3745-51-03(F)(1) maintain the following information?
 Yes ___ No ___ N/A RMK# ___
- a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)]
 Yes ___ No N/A RMK# ___
- b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)]
 Yes ___ No N/A RMK# ___
- c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)]
 Yes ___ No N/A RMK# ___

8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F)(1) have the following information? [3745-270-07(D)(3)]
 Yes ___ No ___ N/A RMK# ___
- a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)]
 Yes ___ No N/A RMK# ___
- b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)]
 Yes ___ No N/A RMK# ___
- c. Technology used from Table 1? [3745-270-07(D)(1)(c)]
 Yes ___ No N/A RMK# ___
9. Has the above notification been sent to the director? [3745-270-07(D)(1)]
 Yes ___ No ___ N/A RMK# ___

REMARKS

TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13? [3745-270-07(B)]
 Yes ___ No N/A RMK# ___
2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)]
 Yes ___ No N/A RMK# ___

Note: *No further notification is necessary until such time that the waste changes or the receiving facility changes.*

3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07? [3745-270-07(B)(3)]
 Yes ___ No N/A RMK# ___
4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so:**
- a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)]
5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? **If so:**
- a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)), excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)]
 Yes ___ No N/A RMK# ___
- b. Has the treatment facility (recycler) sent a certification found in

3745-270-07(B)(4)[3745-270-07(B)(6)]

Yes ___ No N/A RMK# ___

c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)]

Yes ___ No N/A RMK# ___

6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)]

Yes ___ No N/A RMK# ___

7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have:

a. Copies of all notices and certifications required in 3745-270?

Yes ___ No N/A RMK# ___

b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49?

Yes ___ No N/A RMK# ___

c. The testing frequency specified in the facility's WAP and have they followed the protocol?

Yes ___ No N/A RMK# ___

REMARKS