



State of Ohio Environmental Protection Agency

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File

Southwest District

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Ted Strickland, Governor
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CERTIFIED MAIL

July 26, 2007

Clopay Building Products
Mr. Steve Lammers, Production Manager
101 North Liberty Street
P.O. Box 38
Russia, Ohio 45363

**Re: Compliance Inspection - Notice of Violation
Clopay Building Products – Troy Facility
Large Quantity Generator - US EPA ID# OHD986967172**

Dear Mr. Lammers:

On July 19, 2007, Larry Dickerson and I inspected the Clopay Building Products Facility located at 1400 West Market Street, Troy, Ohio to determine Clopay's 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).

This Clopay facility has been in operation since approximately August of 2006. This letter will explain the violations we found and what you need to do to correct them.

Violations

1) OAC Rule 3745-52-34(A)(3) - Labeling of Drums in the 90 Day Storage Area

A generator who, for ninety days or less, accumulates a hazardous waste, must label or clearly mark, each container with the words "Hazardous Waste." (Note: This is a different requirement from the Satellite Accumulation rules, which states that a satellite accumulation container can be labeled with "Hazardous Waste" or other words identifying the contents). The container must be so labeled as soon as hazardous waste begins to be accumulated in it.

During the inspection, we observed two cardboard pallet boxes that were more than full, in the 90 day hazardous waste storage area that were not properly labeled with the words hazardous waste. In order to correct this violation, these

and future hazardous waste containers in the 90 day storage area must be properly labeled with the words "Hazardous Waste."

2) OAC Rule 3745-52-34(A)(2) – Dating of Drums in the 90 Day Storage Area

A generator, who, for ninety days or less, accumulates a hazardous waste, must place the date upon the container when each period of accumulation begins and is clearly marked and visible.

During the inspection, the same two cardboard pallet boxes in the 90 day hazardous waste storage area were not dated with the accumulation started date. (A satellite accumulation drum does not require dating until the start date begins, which is at the moment the 55 gallon limit is reached).

In order to correct this violation, these and future hazardous waste containers in the 90 day storage area must be properly dated with each accumulate start date.

3) OAC Rule 3745-66-73(A) - Open Containers

A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste. During the inspection, the two cardboard pallet boxes were both uncovered and over-filled. Additionally, in the Coachman Assembly Room, the 55 gallon drum used as a satellite hazardous waste accumulation drum had a bung cap missing. In the same area four 5 gallon buckets used to accumulate hazardous waste purge material were uncovered.

In order to correct these violations, the pallet boxes in the 90 day storage area must be kept closed; the 55-gallon satellite accumulation drum must be kept closed, including the bung openings; and the 5 gallon hazardous waste accumulation buckets must be kept closed; except when adding or removing waste.

Enclosed: Closed Containers, June 2004

4) OAC Rule 3745-66-74 - Inspections and Inspection Log

The owner or operator must inspect areas where hazardous waste containers are stored, at least weekly, looking for leaks and deterioration caused by corrosion or other factors. The owner or operator must record inspections in an inspection log or summary. At the time of the inspection, it did not appear that inspections were being conducted and no records of completed inspection logs existed.

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In order to abate this violation, Clopay must begin weekly inspections immediately, and record the inspections in a log. The term weekly as it applies to these inspections means every seven calendar days.

Enclosed: Example LQG Inspection Log

5) OAC Rules 3745-65-50 through 56 - Contingency Plan

Large Quantity Generators must have and maintain a Contingency Plan, as required by OAC 3745-65-50 through 56. This plan must contain at least the elements set forth in the OAC. We reviewed the Contingency Plan information at the time of the inspection. The following items are missing:

OAC 3745-65-52 (A): Releases to the environment. The contingency plan must describe actions facility personnel must take in response to any release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

OAC 3745-65-52 (C): The contingency plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and Ohio EPA and local emergency response teams to coordinate emergency services.

OAC 3745-65-52 (D): The plan must list names, addresses, and phone numbers (both office and home) of all persons qualified to act as emergency coordinator. Where more than one person is listed, one must be named as primary emergency coordinator and the others must be listed in the order in which they will assume responsibility as alternates.

OAC 3745-65-52 (E): The contingency plan must include a complete list of all emergency equipment at the facility [such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment]. This list must be kept up to date. In addition, the contingency plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

OAC 3745-65-52 (F): The contingency plan must include an evacuation plan for facility personnel. The facility may already have maps that should be reviewed for accuracy and must be included in the plan.

OAC 3745-65-53: A copy of the contingency plan and all revisions to the plan shall be maintained at the facility; and submitted to all local police departments, fire departments, hospitals, and Ohio EPA and local emergency response teams, that may be requested to provide emergency services.

In general, the current plan is not organized into one convenient document. Note that the purpose of the plan is to help the facility and local authorities to be

prepared for an emergency, and for personnel to be thoroughly trained in implementing the plan, prior to an incident occurring.

In order to abate these violations, Clopay will need to compile and update the required information and provide copies as required.

*Enclosed: Contingency Plan Implementation and Incident Reporting
Under Ohio Hazardous Waste Rules, June 2002
Sample Contingency Plan*

6) OAC 3745-65-16 - Personnel Training

Large Quantity Generators must conduct personnel training, as required by OAC 3745-65-16. This training program must contain at least the elements set forth in the OAC. Facility personnel must be trained in hazardous waste management operations specific to the facility within six months after the date of their employment and must take part in an annual review of the initial training. Currently, there appears to be no training program at Clopay, specific to hazardous waste management.

Large Quantity Generators are required to have a formal written training program specific to the site's hazardous waste practices; to identify all employees that manage hazardous waste; to list out each individual's duties and training requirements; and to provide formal and on the job training that is documented.

The training requirements for hazardous waste management are too numerous to list. A copy of OAC 3745-65-16, Hazardous Waste Personnel Training Requirements is enclosed. Please note that other training requirements may apply such as Hazard Communication training. See osha.gov for other requirements.

Mr. Hall inquired as to what hazardous waste training would be acceptable. This depends on the level needed to properly manage waste. Clopay may consider having one person in charge of waste management who takes (at a minimum) the OSHA 40-hour Hazardous Waste Operations and Emergency Response (Hazwoper) course, and this person can train others at the plant. This is highly dependant on the level of expertise required for each individual's job. It will be necessary for Clopay to determine the level and amount of training necessary for each of its employees. Other formal training may include DOT-126 training, 24-hour Hazwoper course, and OSHA Train the Trainer. These are just examples. It is important to remember that training must be specific for an individual's actual duties. Generic formal training should only be considered a foundation. Courses can be found locally via the internet or phone book.

In order to begin correcting the violations regarding Personnel Training, submit a formal written training program specific to the site's hazardous waste practices; a

list that identifies all employees that manage hazardous waste and their individual hazardous waste management duties and their training requirements; and a schedule for complying with training.

Guidance Enclosed: OAC 3745-65-16
Sample Personnel Training Plan

7) OAC 3745-273-13)(D) - Universal Waste

Universal waste lamps must be stored in containers that must remain closed. Some of the waste bulb containers were not closed. They must be kept closed except when adding or removing waste.

Guidance Enclosed: Universal Waste, December 2002

8) OAC 3745-273-14)(E) - Universal Waste

Containers storing universal waste bulbs must be labeled or marked clearly with one of the following phrases: "Universal Waste Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)." During the inspection, we observed that the containers used to store the universal waste bulbs were not labeled. These containers must be labeled.

Additional Concerns at Clopay

1) Waste Characterization - OAC 3745-52-11, -52-40(C)

It was unclear at times during the inspection, which wastes were hazardous and which ones were not, especially during discussions in the Coachman Assembly Room, when we evaluated satellite accumulation. The generator is required to be certain of which wastes are hazardous and to know how to manage them. It took some discussion to resolve which of the small accumulation containers contained hazardous waste and which were only being managed as hazardous waste.

Note that Clopay needs to be certain that all of the waste that is disposed of is characterized with the correct hazardous waste codes. Currently, all hazardous waste is assigned the D001 code only under one generic profile. Based on our records review of limited information, this may be the only code required. However, be aware that other codes exist and not everything can be always be lumped together.

We noted also that because this is a newer facility, Clopay may not have generated other hazardous wastes here yet. As we mentioned during the inspection, all wastes generated must be properly evaluated. This includes and is not limited to waste paints, solvents, and aerosols, for instance, used in maintenance. Under Ohio EPA's regulations you must maintain records to show that you have reviewed each waste to determine whether or not it is hazardous.

As we discussed in the exit interview, you may be able to separate some solid waste from your hazardous waste. This may be cheaper to dispose of and may get Clopay below the Large Quantity Generator threshold. (Based on disposal records, it appears that Clopay was over the threshold for more than 1 month in 2007).

*Enclosed: Identifying Your Waste - November 2006
Use of Generator Knowledge In Complying with OAC Rule
3745-52-11, Hazardous Waste Evaluation - October 2005
Solvent Contaminated Rags and Wipers – Spring 2006 Article*

2) Satellite Accumulation – Labeling Requirement OAC Rule 3745-52-34(C)

It appears that Clopay is managing the Satellite Accumulation containers properly. Satellite Accumulation containers must be marked with the words "Hazardous Waste" or with other words that identify the contents of the containers. (Note: This is a different labeling requirement than OAC Rule 3745-52-34(A)(3) above). We observed the 55 gallon drum used as a satellite hazardous waste accumulation drum in the Coachman Assembly Room and the four 5 gallon hazardous waste purge buckets. The contents were identified, but could be made more descriptive. Once 55 gallons is accumulated, the container must be marked with the words "Hazardous Waste" and moved to a hazardous waste storage area.

Guidance Enclosed: Satellite Accumulation Under Ohio Hazardous Waste Rules, July 2004

3) Annual Report

OAC Rule 3745-52-41 requires a Large Quantity Generator who ships any hazardous waste off-site to prepare and submit to the Ohio EPA an Annual Hazardous Waste Report and to describe and certify efforts that were taken to minimize hazardous wastes. These reports are due in March of each year for the previous calendar year.

Information, forms, and instructions for submitting these Annual Reports are available on the Ohio EPA website at

http://www.epa.state.oh.us/dhwm/ann_report.html.

If you have any questions about the Annual Report, please contact Tammy Heffelfinger directly in our Columbus Office at 614-644-2954.

4) Spills and Housekeeping - OAC Rule 3745-65-35

During the inspection, a spill kit could not be located near the hazardous waste storage area. Although Clopay's hazardous waste may not be completely fluid, a spill kit will contain appropriate cleanup material such as absorbent materials,

shovels, and brooms, personal protective equipment, and containers that can be used in the event of a spill. These spill materials should be inspected weekly to ensure they are of adequate quantity and in usable condition. Personnel should know where spill materials are kept and be trained in their use.

The area where the materials and wastes are stored in general must be provided good housekeeping standards. We noted that some of the containers in the 90 day storage area were overfilled. We were able to adequately view the hazardous waste containers in the 90 day storage area, however, please be reminded that Clopay must maintain adequate aisle space. Aisle space is required to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.

There were no extra empty pallet boxes on hand during the inspection. To ensure that waste in these pallet boxes doesn't overflow, Clopay should be certain to have extra empty containers on hand so that once one is full, another can immediately be used.

5) Internal Waste Transfer and Pallet Boxes

As discussed during the inspection, it may be safer and more efficient to use 55 gallon drums instead of pallet boxes. The current practice at Clopay is to accumulate hazardous waste in a 55 gallon drum in the Coachman Assembly Room. This waste is then removed from the drum and transferred to the 90 day storage area and put into pallet boxes. This is acceptable, but Clopay may find an opportunity to improve this process.

Rather than transfer the hazardous waste from the satellite accumulation drum, it may be safer to move the entire sealed drum out to the storage area and then use the same full drum for shipping. An empty 55 gallon drum could immediately replace the one being removed.

Generally, this is usually the way we see satellite accumulation being conducted. It keeps personnel from double handling the waste. Hazardous Waste shipping labels can be used on the satellite drums and the date could be filled in on these labels immediately once 55 gallons is accumulated. It may be considered safer to store and to ship hazardous waste in the drums rather than in the plastic lined cardboard boxes.

6) Pollution Prevention

As discussed, the Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP) is a one-stop location for answers and information about environmental regulations, compliance concerns, and pollution prevention for all

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businesses. OCAPP will be able to provide more information specific to your business. Their office can be reached at (614) 644-3469 or <http://www.epa.state.oh.us/ocapp/ocapp.html>.

7) Generator Requirements OAC 3745-52

This letter does not list all requirements. Further rules and guidance documents can be found on our website at: <http://www.epa.state.oh.us/dhwm>.

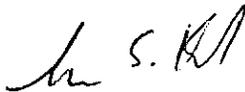
8) Summary

I will return to your facility for a Return to Compliance Inspection in 30 days from the date of this letter to re-inspect the facility to ensure, at a minimum, that the violations have been corrected.

Enclosed you will find a copy of the checklist(s) that I completed for the inspection. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us>. If you have any questions, please call me at (937) 285-6594.

If you have any questions, please call me at 937- 285-6594.

Sincerely,



Thomas E. Koch
Division of Hazardous Waste Management

Cc: Dinah Crawford, SWDO-DHWM/SWDO File

Enclosures: checklists
guidance document(s)

TEK/rif

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

CESQG: ≤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 No N/A
2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] Yes No N/A
3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes No N/A
4. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] ^{Not needed for 2006} Yes No N/A
5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] ^{but will be needed for 2-007} Yes No N/A
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 No N/A
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 No N/A

8. Does the generator accumulate hazardous waste? Yes No N/A

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

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 No N/A

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 No N/A
 - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? Yes No N/A
 - c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A
 - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: Complete appropriate checklist for each unit.

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

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

MANIFEST REQUIREMENTS

12. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes No N/A
13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Yes No N/A

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

14. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] Yes No N/A

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

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 No N/A
16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] Yes No N/A



NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity 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)] needs updating w/ home #'s Yes No N/A
 - d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes No N/A



e. An evacuation plan for facility personnel where there is possibility that evacuation be necessary? [3745-65-52(F)] posted on wall, needs to be put in the plan 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] should be better (house keeping) 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):

a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes No N/A

b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes No N/A

c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A

[Facility Name/Inspection Date]

[ID number]

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- d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes No N/A
- e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] *must be closed, including bung openings* Yes No N/A
- f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] *could be more descriptive* Yes No N/A
43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes No 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)] Yes No N/A
- b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes No N/A

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)] 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

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)] *by transporter* 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 DOT placards to the initial transporter? [3745-52-33] Yes No N/A

[Facility Name/Inspection Date]

[ID number]

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SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more

Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No ___ N/A ___ RMK#
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes No N/A ___ RMK#

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes ___ No N/A RMK#
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes ___ No N/A RMK#
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes ___ No ___ N/A RMK#
 - b. Mix battery types in one container? Yes ___ No ___ N/A RMK#
 - c. Discharge batteries to remove the electric charge? Yes ___ No ___ N/A RMK#
 - d. Regenerated used batteries? Yes ___ No ___ N/A RMK#
 - e. Disassemble them into individual batteries or cells? Yes ___ No ___ N/A RMK#
 - f. Remove batteries from consumer products? Yes ___ No ___ N/A RMK#



g. Remove the electrolyte from the battery?

Yes If so, are the casings of the batteries breached, not
intact, or open (except to remove the electrolyte)?
No [3745-273-13(A)(2)]

Yes No N/A RMK#

N/A

RM
K#

6. If the electrolyte is removed or other waste
generated, has it been determined whether it is a
hazardous waste? [3745-273-13(A)(3)]

Yes No N/A RMK#

a. If the electrolyte or other waste is characteristic,
is it managed in compliance with 3745-50
through 3745-69? [3745-273-13(A)(3)(a)]

Yes No N/A RMK#

b. If the electrolyte or other waste is not hazardous,
is it managed in compliance with applicable law?
[3745-273-13(A)(3)(b)]

Yes No N/A RMK#

7. Are the battery(ies) of container(s) of batteries
labeled with the words "Universal Waste - Batteries"
or "Waste Battery(ies)" or "Used Battery(ies)?"
[3745-273-14(A)]

Yes No N/A RMK#

UNIVERSAL WASTE PESTICIDES



8. Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)] Yes ___ No N/A RMK#
9. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)] Yes ___ No N/A RMK#
10. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97; 3745-66-100 and -66-101 of the OAC met? (Use tank checklist) [3745-273-13(B)(3)] Yes ___ No N/A RMK#
11. If pesticides are stored in a transport vehicle, is it closed, structurally sound and compatible with the pesticide(s)? [3745-273-13(B)(4)] Yes ___ No N/A RMK#
12. Are containers, tanks, or transport vehicles that contain universal waste pesticides, labeled with either "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-14(B)]

UNIVERSAL WASTE THERMOSTATS



13. Are thermostats that show evidence of leaking, spilling, or damage that could cause leaks, properly contained? [3745-273-13(C)(1)] Yes ___ No N/A RMK#
14. If the thermostats are contained, are the containers closed, structurally sound, compatible with contents of the thermostats and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(C)(1)] Yes ___ No N/A RMK#
15. If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]
- a. Remove the ampules in a manner to prevent breakage and are they removed over or in a containment device? [3745-273-13(C)(2)(a)(b)] Yes ___ No N/A RMK#
- b. Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)(d)] Yes ___ No N/A RMK#
- c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)] Yes ___ No N/A RMK#
- d. Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)] Yes ___ No N/A RMK#
- e. Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)] Yes ___ No N/A RMK#
- f. Pack removed ampules in containers with packing material to prevent breaking during storage, handling and transportation? [3745-273-13(C)(2)(h)] Yes ___ No N/A RMK#



16. If mercury, clean-up residues, or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-13(C)(3)(a)]

Yes No N/A RMK#
No
N/A
RM
K#

a. If the waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to Chapter 3745-52.) [3745-273-13]

Yes No N/A RMK#

b. If the mercury, residues and/or other wastes are not hazardous, are they managed in compliance with applicable law? [3745-273-13(C)(3)(c)]

Yes No N/A RMK#

17. Are thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)?" [3745-273-14[D]]

Yes No N/A RMK#

UNIVERSAL WASTE LAMPS

18. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]

Yes No N/A RMK#

19. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]

Yes No N/A RMK#

not closed

20. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-

Yes No N/A RMK#



14(E)]

NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

21. Is the waste accumulated for less than one year? Yes ___ No ___ N/A RMK#
[3745-273-15(A)] If not:

a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes ___ No N/A RMK#

- Not at the facility for 1 year
- Need dates on accumulation containers

NOTE: Accumulation is defined as date generated or date received from another handler.



22. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)]
- Yes ~~___~~ No N/A ___ RMK#
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)]
- Yes ___ No N/A ___ RMK#
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)]
- Yes ___ No N/A ___ RMK#
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)]
- Yes ___ No N/A ___ RMK#
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)]
- Yes ___ No N/A ___ RMK#
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)]
- Yes ___ No N/A ___ RMK#
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)]
- Yes ___ No N/A ___ RMK#

EMPLOYEE TRAINING

23. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]
- Yes ___ No N/A ___ RMK#
- need to try on labeling and closing containers*

RESPONSE TO RELEASES



24. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes ___ No N/A RMK#
25. Is the material released characterized? [3745-273-17(B)] Yes ___ No N/A RMK#
26. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes ___ No N/A RMK#

OFF-SITE SHIPMENTS

NOTE: *If a SQUWH self-transportes waste, then they must comply with the Universal Waste transporter requirements.*

27. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes No N/A ___ RMK#

NOTE: *SQUWHs are prohibited to send waste to any other facility.*

28. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes No N/A ___ RMK#
29. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No N/A ___ RMK#
30. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:



a. Receive the waste back? [3745-273-18(E)(1)]

Yes No N/A RMK#

No

N/A

RM
K#

31. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:

Yes No N/A RMK#

a. Sending the waste back to the originating handler? [3745-273-18(F)(1)]

Yes No N/A RMK#

b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)]

Yes No N/A RMK#

33. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]

Yes No N/A RMK#

34. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)]

Yes No N/A RMK#

EXPORTS



35. Is waste being sent to a foreign destination? If so: Yes ___ No ___ N/A RMK#
- a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes ___ No N/A RMK#
- b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)] Yes ___ No N/A RMK#
- c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes ___ No N/A RMK#

REMARKS



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#
by destination facility
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:
- 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 Table1? [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?
 - 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)]
 - 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

