



State of Ohio Environmental Protection Agency

Southwest District Office

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Corresp
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TO
file

December 22, 2008

Mr. Daniel Ott
Plating Technologies, Inc.
11525 West River Road
Dayton, OH 45418

Re: **NOV** Plating Technologies, Inc. OHD000723452

Dear Mr. Ott:

On November 24, 2008 I performed an inspection to determine Plating Technologies, Inc. compliance with Ohio's hazardous waste rules as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). As is our practice, my inspection was unannounced. You represented Plating Technologies, Inc. and were present during the entire inspection. I found violations of the hazardous waste rules found in OAC 3745-65-16. All of the violations pertain to the training of employees who handle hazardous waste. The most recent training was performed in January 2007 and you were not able to show records of any employee being trained more recently.

Personnel training: OAC 3745-65 -16(D)(1) requires large quantity generators (LQG) to maintain a list of names and job titles for each position related to hazardous waste management.

Written job descriptions: OAC 3745-65-16(D)(2) requires that a written job description be maintained for each job title listed in (D)(1) above. The description must include the requisite skill, education, or other qualifications and duties of facility personnel assigned to each position.

Written description of training OAC 3745-65-16(D)(3) requires that a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed above be maintained.

Training program must ensure personnel are able to respond effectively to emergencies: OAC 3745-65-16(A)(3) lists minimum requirements for employee training.

Mr. Daniel Ott
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When we reviewed employee training records, we were not able to find any records for employee training more recent than January 2007.

☞ To return to compliance, Plating Technologies will functionally need to perform the following actions:

- Develop a list of job duties involving the management of hazardous waste. As examples, your list will probably include the following job duties: operate the WWT system; clean up around plating tanks, place sweepings in a steel drum, label and date the drum and transfer the drum to the less than 90 day storage area; prepare and sign hazardous waste manifests.

- Determine the nature and extent of the training that will be necessary to enable employees to safely and effectively perform the job duties. As an example, an employee who operates a plating line should be trained in what actions to perform if it becomes necessary to clean up a spill. Additionally, if the spill response requires the employees to wear personal protective equipment (PPE), be sure to include the training required so that employees can safely use the PPE. OAC 3745-65-16 requires that the type and amount of this training be documented in writing.

Once the above actions are completed, develop a schedule to train all relevant employees. Be sure to keep in mind that the primary intent of the training is to enable employees to perform their duties in a way that ensures that Plating Technology is compliant with Ohio's hazardous waste rules. Also be aware that the requirements place most of the burden of determine the nature and format of the training on you. You have wide latitude in determining the mix of classroom and on-the-job that is appropriate. Sometime after 30 days after your expected receipt of this letter, I will conduct a re-inspection to review the written items I asked you to prepare.

Enclosed you will find a copy of the LQG checklist, a process description summary, and an LDR checklist. If you have any questions, please call me at (937) 285-6090.

Sincerely,



Tom Ontko
Hazardous Waste Inspector
Southwest District Office

TO/mab

Enclosures

cc: Dinah/file

NOTICE:

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

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Plating Technologies, Inc. **Facility Type:** LQG SQG CESQG TSD **Date of Inspection:** November 24, 2008 **EPA ID#:** OHD000723452

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	Waste water treatment sludge from electroplating	F006 pale brown solid sludge	filter press from WWT drops to ROB-one ROB per week	none	Heritage Environmental Services	
2	floor clean ups, drips, accumulations from plating processes are routed thru WWT	F006	combined with waste from first process			
3						
4						
5						
6						
7						

8							
9							

REMARKS **GENERAL INFORMATION**

General Process Information:

Plating Technology, Inc. electroplates metal parts using the following processes: alkaline zinc; zinc-iron; acid chloride, zinc; anodized chemical film on aluminum; and two lines for electrode-less nickel, a mid phosphate and a high phosphate. Prior to being anodized, aluminum parts are cleaned in a non-hazardous (per MSDS) cleaner. The company is phasing out Cr(VI). Floor sweepings, dribbles from process tanks and incidental losses are placed into drums, labeled and dated and stored adjacent to the WWT line. All residuals of this type are treated by working away batch-wise into the WWT except when oil-dry or a similar product is used. These materials are placed directly into the ROB b/c they tend to foul the system. These are all manifested in the ROB as F006. The WWT consists of two identical lines operating in parallel. They discharge to a screw conveyor which feeds the single ROB.

Regulatory/Enforcement History (if applicable):

January, 2003 inspection: cited for open container, emergency coordinator's name in contingency plan.
 May 1998 inspection: cited for failing to note time of inspections on log failing to list an emergency coordinator in the contingency plan.

Additional P2 remarks and information:

Plating Technology, Inc. recycles steel from strapping bands, wood pallets, damaged parts, etc. Rinse tanks make-up water flows counter-current and reduces water use.

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

Other:

**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: safety shoes, safety glasses w/ side shields

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes
4.	Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)]	Yes
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes
6.	Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	No
7.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)]	No
8.	Does the generator accumulate hazardous waste?	Yes

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

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)?	N/A
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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?	No
	b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)?	No
	c. Drip pads that meet 3745-69-40 to 3745-69-45?	No
	d. Containment building that meets 3745-256-100 to 3745-256-102?	No

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

Note: Plating Technology, Inc. ships all their F006 waste within the 90 day period

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
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13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)]	Yes
<i>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)]</i>		
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes
<i>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)].</i>		
15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	N/A
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)]	Yes
<i>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.</i>		
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)]	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)]	N/A
19.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes
<i>NOTE: Dan reported that there were no manifest discrepancies.</i>		
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)]	No
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)]	No
22.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes
23.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	
24.	Does the generator provide annual refresher training to employees? [3745-65-16(C)]	No
25.	Does the generator keep records and documentation of:	
	a. Job titles? [3745-65-16D(1)]	No
	b. Job descriptions? [3745-65-16D(2)]	No
	c. Type and amount of training given to each person? [3745-65-16D(3)]	No
	d. Completed training or job experience required? [3745-65-16D(4)]	No
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)]	No
<i>NOTE: Plating Technologies has not been keeping current on the training requirements. The last training they were able to document occurred in January 2007.</i>		
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
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
b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes
c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	No
d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes
e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 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
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
31.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes

NOTE: The contingency plan I reviewed was written in 1997. The named emergency coordinator is retired. The plan met the letter of the regulations but is typically generic and contains the minimum of facility-specific detail. It is currently being revised and I suggested to Dan that the revisions be as specific to the current operations as possible.

EMERGENCY PROCEDURES

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

	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes
NOTE: Facility is equipped with internal paging system, The F006 waste is not flammable so fire control system is not required, but it is present.			
35.		Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes
36.		Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes
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
38.		If there is only one employee on the premises, is there immediate access to a device (eg., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	N/A
39.		Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes
40.		Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes
41.		Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes
The contingency plan includes a notation that copies have been provided to emergency authorities. Company policy does not permit employees to work alone.			
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)]	N/A
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	N/A
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	N/A
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	N/A
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	N/A
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	N/A
43.		Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	N/A
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	N/A
	b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	N/A
NOTE: I did not observe any containers of hazardous waste being managed under the reduced satellite accumulation requirements.			
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
45.		Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes
46.		Are hazardous wastes stored in containers which are:	
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes

	b.	In good condition? [3745-66-71]	Yes
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes
NOTE: Record location on process summary sheets, photograph the area, and record on facility map.			
47.		Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days.	Yes
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes
48.		Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	N/A
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)]	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)]	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)]	N/A
The F006 waste is a non-flammable solid. It has no compatability or reactivity hazards.			
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)]	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)]	Yes
54.		Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes
55.		Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes

**GENERATOR LDR CHECKLIST
DOES NOT APPLY TO CESQGS**

GENERAL REQUIREMENTS

1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07 (A)(7)]	N/A	<input type="checkbox"/>
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)]	Yes	<input type="checkbox"/>

NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07 (A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).

3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]	Yes	<input type="checkbox"/>
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]	Yes	<input type="checkbox"/>
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,	No	<input type="checkbox"/>
a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]	N/A	<input type="checkbox"/>

FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.

6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]	N/A	<input type="checkbox"/>
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NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.

NOTE: Written documentation of this determination is not required.

7.	Did the generator treat his HW /soil on-site <u>to meet</u> the LDR treatment standard?	No	<input type="checkbox"/>
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NOTE If Yes see question #16.

8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility?[3745-270-07(A)(2)]	Yes	<input type="checkbox"/>
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]	N/A	<input type="checkbox"/>
10.	Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)]	Yes	<input type="checkbox"/>
a.	Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes	<input type="checkbox"/>

NOTIFICATION FORM

11.	Does the LDR Notification form contain the following information:		
a.	Manifest number of the first waste shipment to the TSD?[3745-270-07(A)(2)]	Yes	<input type="checkbox"/>
b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes	<input type="checkbox"/>
c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes	<input type="checkbox"/>
d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)].	Yes	<input type="checkbox"/>

NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is

a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.

e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes	<input type="checkbox"/>
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NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories

f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	N/A	<input type="checkbox"/>
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NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.

g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for?[3745-270-07(A)(2)]	N/A	<input type="checkbox"/>
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NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.

PROHIBITED DILUTION

12.	Is the HW treated by burning? If No, go to #15.	No	<input type="checkbox"/>
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13.	Is the HW a metal-bearing HW?	N/A	<input type="checkbox"/>
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NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.

14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless one of the following conditions apply. [3745-270-03(c)]	
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	i.	Contains > 1% TOC?	N/A
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	ii.	Contains organic constituents or cyanide at levels greater than the UST levels?	N/A
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	iii.	Is made up of combustible material e.g., paper, wood, plastic?	N/A
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	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	N/A
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	v.	Co-generated with a HW that must be combusted?	N/A
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	b.	If all responses to 14 a.i. through 14 a.v. are aNo@, HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	
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15.	Was the HW treated by wastewater treatment?	No	<input type="checkbox"/>
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	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	N/A
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NOTE: If Yes, HW is improperly being treated by dilution.

	b.	Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC?	N/A
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	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	N/A
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NOTE: If the answers to b & c are ayes@ and ano@, respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B) and 3745-270-40(A)(3)].

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

GENERATOR TREATMENT

16.	Does the generator treat to meet LDRs on-site [3745-270-40(A)]?	No	<input type="checkbox"/>
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	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?	N/A	<input type="checkbox"/>
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	If Yes...complete the rest of the checklist. If No...stop...you are done.		
a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]		N/A
b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]		N/A
c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]		N/A
d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]		N/A
e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]		N/A
f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]		N/A
NOTIFICATION FORM			
17.	a.	Contains all information in #11 a-g above and	Yes <input type="checkbox"/>
	b.	If the treated HW/soil is listed.....notification contains the following certification statement: I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or trough knowledge of the waste, to support this certification that the waste complies with the treatment stands specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.	Yes <input type="checkbox"/>
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:	N/A
	i.	Send a one-time notification to the director?[3745-270- 09 (D)]	N/A
	ii.	Maintain a copy of the notice onsite?[3745-270-09(D)]	N/A
	iii.	Include in the notification: [3745-270-09(D)(1)(a)]	N/A
		1. Name & address of receiving landfill?	N/A
		2. Description of HW when generated?	N/A
		3. HW code when generated?	N/A
		4. Treatability group when generated?	N/A
		5. Underlying hazardous constituents present when generated?	N/A
	iv.	Contain the right certification statement as required by 3745-70-07(b)(4)?	N/A