



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

April 15, 2011

**RE: ARTISAN INDUSTRIES, INC.
CONDITIONALLY EXEMPT SMALL QUANTITY
GENERATOR
OHR 000 153 429
CUYAHOGA COUNTY
NOC**

Mr. Ken Quinn
Artisan Industries, Inc.
1760 Miller Parkway
Streetsboro, Ohio 44241

Dear Mr. Quinn:

Thank you for your April 6, 2011 response to Ohio EPA's March 10, 2010 Notice of Violation letter. The documentation you submitted included your statement that waste lamps generated by Artisan Industries will be managed as Universal Waste and recycled by an approved lamp recycler.

My review of this documentation reveals that Artisan Industries has now abated the violation discovered during the February 14, 2011 inspection as listed below.

Letter Citation #	Rule Citation
1.	OAC Rule 3745-52-11, Waste Evaluation

Should you have any questions, please feel free to contact me at (330) 963-1231.

Sincerely,

Tom Roth
District Representative
Division of Hazardous Waste Management

TR/cl
Enclosure

ec: Nyall McKenna, DHWM, NEDO
Natalie Oryshkewych, DHWM, NEDO

cc: Marlene Kinney, DHWM, NEDO



State of Ohio Environmental Protection Agency

Northeast District Office

2110 E. Aurora Road
Twinsburg, Ohio 44087-1969

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Bob Taft, Governor
Jennette Bradley, Lieutenant Governor
Christopher Jones, Director

01/03/2008

ASHTABULA

ASHTA CHEMICALS INC

NOV

Hazardous Waste

OHD980793301-004-01/03/2008





State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

January 3, 2008

John Reese
Ashta Chemical, Inc.
3509 Middle Road
Ashtabula, OH 44004

RE: ASHTA CHEMICALS, INC., RCRA/LQG, COMPLIANCE EVALUATION, INSPECTION, OHD 980 793 301, ASHTABULA COUNTY, NOTICE OF VIOLATION

Dear Mr. Reese:

On November 13 and 14, 2007, Ohio EPA conducted a Compliance Evaluation Inspection of Ashta Chemicals, Inc. (Ashta) located at 3509 Middle Road, Ashtabula, Ohio. Ashta manufactures chlorine gas, potassium hydroxide and chloropicrin utilizing a chlor-alkali process and is a Large Quantity Generator (LQG) of hazardous waste. Waste streams produced at the facility include mercury contaminated debris (D009), brine purification muds (K071), wastewater treatment sludge (K106), KOH filter sludge (D009), chloropicrin dryer sludge (D001), barium lab waste (D005) and various lab packs (D001, D002, F002).

The purpose of this inspection was to determine Ashta's compliance with Ohio's hazardous waste laws and regulations as found under the Ohio Revised Code and Ohio Administrative Code ("ORC" and "OAC" respectively). Ashta was represented by John Reese and Andrew Laituri. Ohio EPA was represented by me and Sherry Slone. Ohio EPA's inspection included an inspection of the Ashta facility and a review of written documentation. Ohio EPA also documented portions of the inspection using digital photography. You made a copy of the digital photographs at the end of the inspection. Based on this inspection, Ohio EPA has determined that Ashta has violated at least the following state hazardous waste regulations:

1. **OAC Rule 3745-52-11 Hazardous waste determination:** *Any person who generates a waste in the state of Ohio, as defined in rule 3745-51-02 of the Administrative Code shall determine if that waste is a hazardous waste.*

At the time of this inspection, Ohio EPA observed one open and unlabeled container on the north side of the Chloropicrin process that contained a granular material and debris which the facility stated was a waste generated from the clean out and repair of the chloropicrin spent liquor surge tank. Upon Ohio EPA's inquiry the facility could not demonstrate that the container of waste had characterized to determine if it contained a hazardous waste.

Upon being informed of this violation, Ashta closed the container and designated the container to be sampled and characterized.

By e-mail dated December 4, 2007, Ohio EPA received analytical data (TCLP) demonstrating that the container of waste had been analyzed and determined to be a non-hazardous waste. On December 6, 2007 Ohio EPA received via e-mail a copy of the facility protocol for proper container management and waste identification, including a sign-off sheet signed by employees, demonstrating that employees involved in hazardous waste management had been retrained in said protocol.

Based upon the submitted documentation, Ohio EPA considers this violation abated and no further action is required.

2. **OAC 3745-52-34(A)(2) Accumulation date:** *A generator may, for ninety days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit, provided that the date upon which each period of accumulation and/or treatment begins is **clearly marked and visible** for inspection on each container.*

At the time of this inspection Ohio EPA observed the following containers of hazardous waste were not marked with an accumulation date:

- Four (4) containers of hazardous waste in the less than 90 day hazardous waste accumulation area.
- One (1) full one yard hopper of K106 waste located in the new filter press building.

Upon observing these violations, Ohio EPA pointed them out to the facility at which time an employee was instructed to properly date the containers. Prior to leaving the facility, Ohio EPA observed that the above containers were properly labeled. Ashta has also submitted documentation demonstrating that employees have been retrained in labeling containers clearly. Therefore Ohio EPA considers this violation abated and no further action is required.

3. **OAC Rule 3745-273-14(E) Labeling/marking of Universal Waste:** *Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste- Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)."*

Ashta manages spent fluorescent lamps generated as Universal Waste to be shipped off site for recycling. At the time of this inspection, Ohio EPA observed one 8' box of Universal Waste lamps was not properly labeled per OAC 3745-273-14(E).

ASHTA CHEMICALS, INC.
JANUARY 3, 2008
PAGE - 4 -

Ashta also must submit information regarding the material in the secondary containment pallet and how it is to be managed.

Enclosed you will find copies of the checklists completed at the time of the inspection. Please submit all of the requested documentation to my attention within thirty (30) days of the date of this letter demonstrating that all issues have been addressed.

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information at the following Web link

<http://www.epa.state.oh.us/dhwm/listserv.html>

Please feel free to share this information with your colleagues.

Failure to list specific deficiencies in this communication does not relieve Ashta from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve Ashta from liability for any past or present violations of the state's hazardous waste laws.

Should you have any questions, please feel free to call me at (330) 963-1181.

Sincerely,



Suzanne Prusnek
Environmental Specialist
Division of Hazardous Waste Management

SP:ddw

Enclosures

cc: Harry Sarvis, DHWM, CO, OEPA
Frank Popotnik, DHWM, NEDO, OEPA

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

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

- | | | | | | | |
|--|-----|--------------------------|----|--------------------------|-----|--------------------------|
| 9. Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
|--|-----|--------------------------|----|--------------------------|-----|--------------------------|

NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G) & (H).

- | | | | | | | |
|---|-----|--------------------------|----|--------------------------|-----|-------------------------------------|
| 10. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| a. Container that meets 3745-66-70 to 3745-66-77? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| c. Drip pads that meet 3745-69-40 to 3745-69-45? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| d. Containment building that meets 3745-256-100 to 3745-256-102? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

NOTE: Complete appropriate checklist for each unit.

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

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

Ashta Chem
 [Facility Name/Inspection Date]

[ID number]

11/13, 14/07

LQG/February 2007

Page 1 of 6

- 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, a. minimum, include instructions to ensure th. Yes No N/A
 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)]
22. Is the personnel training program directed by a person trained in hazardous waste Yes No N/A
 management procedures? [3745-65-16(A)(2)]
23. Do new employees receive training within six months after the date of hire (or assignment Yes No N/A
 to a new position)? [3745-65-16(B)]
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 Yes No N/A
 records for former employees kept for at least three years from the date the employee last
 worked at the facility? [3745-65-16(E)]

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.

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date Trained</u>

CONTINGENCY PLAN

27. Does the owner/operator have a contingency plan to minimize hazards to human health or Yes No N/A
 the environment from fires, explosions or any unplanned release of hazardous waste?
 [3745-65-51(A)]
28. Does the plan describe the following:
- a. Actions to be taken in response to fires, explosions or any unplanned release of Yes No N/A
 hazardous waste [3745-65-52(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 Yes No N/A
 persons qualified to act as emergency coordinator? [3745-65-52(D)]
- d. A list of all emergency equipment, including: location, a physical description and brief Yes No N/A
 outline of capabilities? [3745-65-52(E)]

e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes No N/A

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

29. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes No N/A

30. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] Yes No N/A

31. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes No N/A

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

EMERGENCY PROCEDURES

32. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes No N/A

a. Was the contingency plan implemented? [3745-65-51(B)] Yes No N/A

b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes No N/A

c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes No N/A

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

PREPAREDNESS AND PREVENTION

33. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes No N/A

34. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:

a. Internal communications or alarm system? [3745-65-32(A)] Yes No N/A

b. Emergency communication device? [3745-65-32(B)] Yes No N/A

c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes No N/A

d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes No N/A

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

35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes No N/A

36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A

[Facility Name/Inspection Date]

[ID number]

LQG/February 2007

Page 4 of 6

37. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] Yes No N/A
38. If there is only one employee on the premises, is there immediate access to a device (ex. phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] Yes No N/A
39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes No N/A
41. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes No N/A

SATELLITE ACCUMULATION AREA REQUIREMENTS

42. Does the generator ensure that satellite accumulation area(s):
- 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
- 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)] Yes No N/A
- f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:
- 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

[Facility Name/Inspection Date]

[ID number]

LQG/February 2007

Page 5 of 6

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) Yes No N/A
 "Week" means 7 consecutive days.
- 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)] 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

LDR CHECKLIST

GENERAL LDR REQUIREMENTS

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

NOTE: If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so: Yes No N/A RMK#
- a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes No N/A RMK#
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#

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# ___

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))

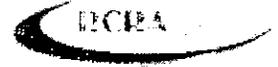
18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)]

Yes No N/A ___ RMK# ___

REMARKS



View Site Identification Form



ASHTA CHEMICALS INC

ASHTABULA

OHD980793301

Navigational Shortcuts: General Information Reason Site ID and Name Location Land Type NAICS Mailing Contact Owner and Operator Waste Activity Lat/Long Haz. Wastes Certification

Last Updated By: PCE

Last Updated On: 10/31/2006

General Information

Received Date:*	02/23/2006	Non-notifier:	Select
Number of Employees:		Extract to Public?	Send Acknowledgement:
Accessibility:	Select		

1. Reason for Submittal *

<input type="checkbox"/>	To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities). [Source N]
<input checked="" type="checkbox"/>	To provide subsequent notification (to update site identification information). [Source N]
<input type="checkbox"/>	As a component of a First RCRA Hazardous Waste Part A Permit Application. [Source A]
<input type="checkbox"/>	As a component of a Revised RCRA Hazardous Waste Part A Permit Application. [Source A]
<input checked="" type="checkbox"/>	As a component of the Hazardous Waste Report. [Source R]
<input type="checkbox"/>	Implementer - Agency that is implementer of Record for Handler. [Source I]
<input type="checkbox"/>	Emergency. [Source E]
<input type="checkbox"/>	Temporary. [Source T]

2. Site ID

EPA ID:*	OHD980793301	Activity Location:*	OH
----------	--------------	---------------------	----

3. Site Name

Name:*	ASHTA CHEMICALS INC
--------	---------------------

4. Site Location (Physical address, not P.O. Box or Route)

Number:			
Street 1:*	3509 MIDDLE RD		
Street 2:			
City:*	ASHTABULA	State:*	OHIO

Zip Code:*	44004	County:*	ASHTABULA
State District:	NE		

5. Site Land Type	
Site Land Type:	Private

6. North American Industry Classification System (NAICS) <small>Hint</small>			
NAICS A:	325181 (Primary)	NAICS B:	
NAICS C:		NAICS D:	

7. Site Mailing Address			
Number:			
Street 1:	PO BOX 858		
Street 2:			
City:	ASHTABULA	State:	OHIO
Zip Code:	44005	Country:	UNITED STATES

8. Site Contact Person			
First Name:	JOHN	Middle Initial:	
Last Name:	REESE		
Phone Number:	4409976813	Extension:	
Email Address:	jreese@ashtachemicals.com		

8a. Site Contact Address			
Number:			
Street 1:			
Street 2:			
City:		State:	Select
Zip Code:		Country:	Select

9. Legal Owner and Operator <small>Hint</small>					
A. Legal Owner					
Seq. Ind.	Type	Name	Address	Date Became	Date Ended

1	CO	P	BAXTER ASSOCIATES	1250 W NORTHWEST HWY STE 503 PALATINE IL 60067 US	01/01/2001	Current	Current
B. Legal Operator							
Seq.	Ind.	Type	Name	Address	Date Became Current	Date Ended Current	
2	CP	P	BAXTER ASSOCIATES	1250 W NORTHWEST HWY STE 503 PALATINE IL 60067 US	01/01/2001		

10. Type of Federal Regulated Waste Activity	
A. Hazardous Waste Activity	
1. Generator of Hazardous Waste (Federal)	For items 2 through 6, check all that apply.
Large Quantity Generator <input type="checkbox"/>	<input type="checkbox"/> 2. Transporter of Hazardous Waste
Indicate other generator activities (check all that apply).	<input type="checkbox"/> 3. Treater, Storer, or Disposer of Hazardous Waste ...
<input type="checkbox"/> d. United States Importer of Hazardous Waste	<input type="checkbox"/> 4. Recycler of Hazardous Waste ...
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	5. Exempt Boiler and / or Industrial Furnace
Generator of Hazardous Waste (State)	<input type="checkbox"/> a. Small Quantity On-site Burner Exemption
1 - Large Quantity Generator <input type="checkbox"/>	<input type="checkbox"/> b. Smelting, Melting, Refining Furnace, Exemption
	<input type="checkbox"/> 6. Underground Injection Control
B. Universal Waste Activities	C. Used Oil Activities
1. Large Quantity Handler of Universal Waste ...	1. Used Oil Transporter - Indicate types of activities.
Generated Accumulated/Managed	<input type="checkbox"/> a. Transporter
Batteries <input type="checkbox"/>	<input type="checkbox"/> b. Transfer Facility
Mercury containing equipment <input type="checkbox"/>	2. Used Oil Processor and / or Re-refiner - Indicate types of activities.
Lamps <input type="checkbox"/>	<input type="checkbox"/> a. Processor
Pesticides <input type="checkbox"/>	<input type="checkbox"/> b. Re-refiner
<input type="checkbox"/> 2. Destination Facility for Universal Waste ...	<input type="checkbox"/> 3. Off-Specification Used Oil Burner
	4. Used Oil Fuel Marketer - Indicate types of activities.
	<input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner

b. Marketer Who First Claims the Used Oil Meets the Specifications

D. State Activities

<input type="checkbox"/>	CINR - COMPLAINT INVESTIGATION - NOT RCRA-REGULATED
<input type="checkbox"/>	CSFB - COMPARABLE/SYNGAS FUEL BURNER
<input type="checkbox"/>	CSFG - COMPARABLE/SYNGAS FUEL GENERATOR
<input type="checkbox"/>	SQHUV - SMALL QUANTITY HANDLER OF UNIVERSAL WASTE
<input type="checkbox"/>	UOCC - USED OIL COLLECTION CENTER
<input type="checkbox"/>	UOG - USED OIL GENERATOR

10a. Latitude and Longitude

Latitude (in decimal degrees):	Format	Convert DMS	Longitude (in decimal degrees):	Format	Convert DMS
Geometric Type Code:	Select				
Reference Point Code:	Select				
Source Map Scale Numbers:			Horizontal Accuracy Measure:		
Horizontal Collection Method:	Select				
Horizontal Reference Datum:	Select				

11. Description of Hazardous Waste

Hint

Dropdown Size: 10

D001	F001	K001	LABP	U001	
D002	F002	K002	P001	U002	
D003	F003	K003	P002	U003	
D004	F004	K004	P003	U004	
D005	F005	K005	P004	U005	
D006	F006	K006	P005	U006	
D007	F007	K007	P006	U007	
D008	F008	K008	P007	U008	
D009	F009	K009	P008	U009	
D010	F010	K010	P009	U010	
Total D Selected: 8	Total F Selected: 0	Total K Selected: 2	Total P Selected: 0	Total U Selected: 0	Total X Selected: 0

12. Comments

Clear Notes

Chars Remaining

13. Certification

Hint: Read the certification

First Name:	M.I.:	Last Name:	Title:	Date Signed:
JOHN		REESE JR	VP-TECH EH&S	02/23/2006

Navigation Shortcuts: [General Information](#) [Reason Site ID and Name](#) [Location](#) [Land Type](#) [NAICS](#) [Mailing Contact](#) [Owner and Operator](#) [Waste Activity](#) [Lat/Long](#) [Haz. Wastes](#) [Certification](#)

[Cancel](#)

URL: /rcrainfo/handler/siteidmntn.jsp