



State of Ohio Environmental Protection Agency

Northeast District Office

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

May 15, 2009

Daniel T. Jones  
Environmental Compliance Engineer  
Avery Dennison  
Specialty Tapes Division  
250 Chester Street Bldg. 5  
Painesville, OH 44077

**RE: AVERY DENNISON BLDG. 5, SPECIALTY TAPE DIVISION, OHD987018447,  
LAKE COUNTY, RCRA LARGE QUANTITY GENERATOR (LQG) CEI NOTICE  
OF VIOLATION (NOV)/RETURN TO COMPLIANCE (RTC)**

Dear Mr. Jones:

On April 2 and 8, 2009, this writer, Todd Surrena and Ron Shadrach, representing Ohio EPA's Division of Hazardous Waste Management (DHWM), visited Avery Dennison Bldg. 5 (Avery) located at 205 Chester Street, Painesville, Ohio. The purpose of the visit was to conduct a hazardous waste compliance evaluation inspection (CEI) to determine the facility's compliance with Ohio's hazardous waste laws and rules as adopted under the Ohio Revised Code (ORC) Chapter 3734 and Chapter 3745 of the Ohio Administrative Code (OAC). The CEI included a discussion of facility operations, a review of records, a pollution prevention discussion, and a visual inspection of the facility operations and hazardous waste management areas. You represented Avery.

The following represents Ohio EPA's findings:

Avery is a manufacturer of specialty engineered film and self adhesive products. At this location Avery is primarily engaged in the manufacture of pre-printed labels and specialty tapes for the medical and HVAC industries.

Avery notified as a Large Quantity Generator (LQG) of hazardous waste and was inspected for the requirements of a LQG of hazardous waste. Enclosed is a copy of Ohio EPA's LQG inspection checklist which includes a General Remarks summary describing Avery's processes, waste management activities and Pollution Prevention (P2) activities. Also enclosed is a checklist for the Used Oil Requirements and the Land Disposal Restriction (LDR) Requirements.

Additionally, included is the RCRA Subtitle C Site Identification/Verification Form which includes owner/operator information and other waste management information occurring at this location. If any of the information on the form is incorrect, please forward the corrected information to my attention. Otherwise, a signature on the form is not required at this time.

AVERY DENNISON  
MAY 15, 2009  
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Based on this inspection Ohio EPA found the following violations.

- 1) Avery was found in violation of **OAC 3745-52-34 (A) (2)** for failure to mark the date of accumulation for a hazardous waste drum located in the <90 day area located near the compaction closet.

Corrective Measures: On the return visit of April 8, 2009, Ohio EPA noted the drum of hazardous waste was appropriately marked with the date of accumulation.

- 2) Avery was found in violation of **OAC 3745-279-22 (C) (1)** for failure to mark a container of used oil with the words "Used Oil".

Corrective Measures: On the return visit of April 8, 2009, Ohio EPA noted the drum of used oil was appropriately marked.

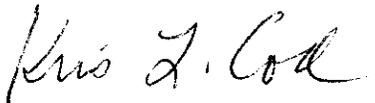
Thank you for your cooperation in this matter. If you have any questions about this letter, please call me at (330) 963-1266.

The Division of Hazardous Waste Management has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link:

[http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc\\_serve.php?2=subscriptionpage](http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage).

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

Sincerely,



Kris L. Coder  
Environmental Specialist  
Division of Hazardous Waste Management

KLC:ddw

Enclosure

ec: Nyall McKenna, NEDO, DHWM  
Harry Sarvis, CO, DHWM

Ohio Environmental Protection Agency  
**RCRA SUBTITLE C SITE  
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to [kristina.durnell@epa.state.oh.us](mailto:kristina.durnell@epa.state.oh.us)  
or mail it to Kristina Durnell, Central Office

Site EPA ID No.	EPA ID Number: OHD987018447								
Site Name	Name: Avery Dennison Bldg 5 Specialty Tape Division					Website: (Optional)			
Site Location Information	Street Address: 205 Chester St. Bldg 5								
	City, Town, or Village: Painesville Twp					State: OH			
	County Name: Lake					Zip Code: 44077			
Site Land Type (check only one)	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	322222								
Facility Representative  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: Daniel			MI: T		Last Name: Jones			
	Phone Number: 440-358-3460				Phone Number Extension:				
	E-Mail Address: <a href="mailto:daniel.jones@averydennison.com">daniel.jones@averydennison.com</a>								
	Fax Number: 440-358-3132				Fax Number Extension:				
	Street or P.O. Box: same as location								
	City, Town or Village:								
	State:				Country: USA		Zip Code:		
Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Avery Dennison Corp					Date Became Owner (mm/dd/yyyy): 01/16/1964			
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: 150 N Orange Grove Blvd								
	City, Town or Village: Pasadena				Owner Phone #: 626-398-2700				
	State: CA				Country: USA		Zip Code: 91103		
	Name of Site's Operator: Avery Dennison-Specialty Tape Division					Date Became Operator (mm/dd/yyyy): 01/16/1964			
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: 205 Chester St.								
	City, Town or Village: Painesville				Operator Phone #: 440-358-3132				
	State: OH				Country: USA		Zip Code: 44077		
Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
Type of Generator									
<input type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste					
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)									
Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Underground Injection Control Facility				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste									

Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply))			
<input checked="" type="checkbox"/> <b>Small Quantity Handler of Universal Waste</b>		<input type="checkbox"/> <b>Large Quantity Handler of Universal Waste</b> (accumulates 5,000 kg. or more)	
<input type="checkbox"/> <b>Destination Facility for Universal Waste</b>			
(Check all boxes below that apply for each of the three types of facilities above)		Used Oil Activities (Indicate Type(s) of Activity(ies))	
	<b>Managed</b>	<input checked="" type="checkbox"/> <b>Used Oil Generator</b>	<input type="checkbox"/> <b>Off-Specification Used Oil Burner</b>
<b>Batteries</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Transporter</b>	<input type="checkbox"/> <b>Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil</b>
<b>Pesticides</b>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Transfer Facility</b>	<input type="checkbox"/> <b>Used Oil Fuel Marketer to Off-Specification Used Oil Burner</b>
<b>Mercury containing equipment</b>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Processor</b>	
<b>Lamps</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Re-refiner</b>	
Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRA Info source record, you do not need to list them all. Instead just indicate the date of the most recent source record.			
<b>D001</b>	<b>D002</b>	<b>F003</b>	<b>F005</b> <b>D035</b>
Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.			
<b>Announced</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Additional Facility Representatives:</b> na
<b>Tanks</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Other Comments:</b> Includes wastes generated from Bldg 6, first floor. According to facility representative for Bldg 5, the waste generated on the 2 <sup>nd</sup> floor of Building 6 is managed by Building 7. RCRA Info indicates that Avery Dennison requested inactivation of OHD987014818 (Bldg 6) on March 3, 2008.
<b>Containers</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
<b>Name of Inspector(s)</b>		<b>Name of Inspector(s)</b>	<b>Date of Inspection/Time (mm/dd/yyyy) (hh:mm)</b>
Kris Coder		Todd Surrena on April 2 and Ron Shadrach on April 8.	4/2/2009 & 4/8/2009
OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.			
<b>Signature of Owner, Operator, or an Authorized Representative</b>		<b>Name and Title (Print)</b>	<b>Date (mm/dd/yyyy)</b>

**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 glasses, steel toed shoes, no cell phones in production.

**General Remarks:** Avery Dennison, Bldg. 5 and first floor of Bldg 6, manufactures specialty engineered film and self adhesive products for consumer and industrial markets. This facility primarily manufactures pre-printed labels and specialty tapes for the medical and HVAC industries. Four coating lines run at this location. During this inspection only one of the four lines was operating. Lines are shut down on Fridays and weekends because of the economic slowdown. All four shifts (ABCD) are operating but at a reduced number of days. Adhesives consisting of toluene, heptanes & hexane, MEK, and an acetone compound are purchased and mixed at this facility. Rubbers and polymers are then mixed in with glue and applied to the backing of paper to make labels. The hazardous waste and waste codes associated with the waste types that are generated at this location are as follows: MSW3 solvent contaminated solid waste, D001, D035, F003, F005; waste adhesive, silicon/solvent, D001, D035, F003, F005; acrylic polymer solution, D001; distillation bottoms, D001; waste ink, D001 and sonic wash water, D002. Rinco located in Arkansas receives their hw for offsite management. Other non-hazardous wastes generated are as follows: waste maintenance oil (used oil); oily rags/debris (used oil); used equipment batteries as UW. No used fluorescent lamps were noted by Ohio EPA during the walk through on April 2, 2009. (During the records review on April 8, 2009, Ohio EPA noted that three boxes of four foot spent lamps were shipped offsite on April 2, 2009.) Rinco receives all of these wastes for offsite management. Ohio EPA received copies of the following documents during the inspection: Rinco Waste Material Profile Sheets. During the facility walk through on April 2, 2009 Ohio EPA saw satellite locations for hw accumulation in Line I-1, including a satellite for hw liquid and a satellite for solvent based ink; in the Compounding Area is the distillation unit and a <90 day area for hw accumulation of distillation bottoms; there were five hw drums at the <90 day area with dates of accumulation of 3/30/09, 4/2/09 (two drums), 3/25/09 and 3/17/09; also, two other hw satellite locations were noted in the Compounding Area; the Inspection Log for the Compounding Area was reviewed by Ohio EPA, including the HW Weekly Inspection log 2/22/09 to 3/22/09 and the Emergency Equipment Weekly Inspection Log for the <90 day area; in addition at the I-1 line was a hw satellite drum and a drum of dirty rags that go offsite for laundering; next at Lines I-2 and I-3 was a Compaction Closet for compacting solid hw into a 55 gallon drum, there was no drum being compacted at this time, also in this area is a second <90 day area for accumulation of the compacted solid hw; Ohio EPA noted four drums of hw, all were closed and dated (the dates on three of the drums were 4/2/09 (two drums) and 3/4/09) except for one drum that did not have a date of accumulation (on April 8, 2009, this drum was noted with a date of accumulation of 3/4/09); Ohio EPA reviewed a HW log for this <90 day area for inspection dates 3/23/09 to 3/29/09; next at Line I-2 a drum of non-hazardous water based ink was noted; at Line I-5 three satellite drums were noted and a yellow drum of Emergency Equipment was noted with an Inspection Form noted on the outside of the drum; next was another satellite drum of hw solids noted for Line I-5; next at the Maintenance Area was a drum of used oil (maintenance oil) that was not labeled "used oil" (on April 8, 2009, this drum was noted labeled "used oil"); all satellite containers were noted closed, in good condition and marked. In the third, outside, <90 day hw accumulation area Ohio EPA did not see any hw drums at this time, this area is roofed with a protective canopy and is secured by a locked gate and fencing, with an emergency phone and fire extinguisher present; Ohio EPA noted some other drums of I-5 Oven Washout that were located here; Mr. Jones said that this waste has been profiled and they are awaiting the results. This concluded the inspection for April 2, 2009. On April 8, 2009, during the walk through Ohio EPA noted the used oil drum was correctly labeled and the hw drum from the Compaction Closet <90 day area had been moved to the outside hw <90 day accumulation area; the drum was appropriately dated with a date of accumulation. Included in the walk through was walk through of the first floor of Bldg 6 which is now under the OHD number for Building 5. The wastes generated by the first floor of Bldg 6 are managed by Building 5 and Mr. Jones. The waste generated on the second floor of Bldg 6 is managed by Bldg. 7. During the walk through of Bldg 6, Process Area, Ohio EPA noted an Emergency Equipment Yellow Spill Over Pack with an Emergency Inspection Checklist on the container; a Compaction Closet containing a 55 gallon hw solvent contaminated solids satellite drum that was labeled and closed; a yellow hw cabinet containing two satellite drums one was labeled non-haz water based waste and the other was labeled with a hw label; both were closed and in good condition; next in the lab was a 55 gallon satellite drum of hw solids which was labeled, closed and in good condition; no liquid hw was noted.

**GENERAL REQUIREMENTS**

[Avery Dennison, Bldg 5(including Bldg 6, first floor)/April 2&8, 2009]

[OHD987018447]

LQG

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 1<sup>st</sup>? [3745-52-41(A)] Yes  No  N/A
5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] 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- Yes  No  N/A

42(A)(1)]

- 18. If the generator has 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.*

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date Trained</u>
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**On May 4, 2009, Ohio EPA received an e-mail message from Daniel Jones with attached additional personnel training information requested during the inspection. The outline of the RCRA Training Course in the Roger's Learning System software was included in the e-mail message. Avery may go with another similar type of computer based training program in the near future.**

**CONTINGENCY PLAN Ron Shadrach reviewed Avery Dennison's Incident Command System Plan which was reported to be the "RCRA Contingency Plan" according to Mr. Jones. This plan was last revised on 2/18/09. An e-mail message was received by Ohio EPA on April 28, 2009, from Daniel Jones indicated that a new, revised Contingency Plan is pending.**

- 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 Yes  No  N/A

- coordinator? [3745-65-52(D)]
- d. A list 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 may be necessary? [3745-65-52(F)] Yes  No  N/A

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

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

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

### EMERGENCY PROCEDURES

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

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

### PREPAREDNESS AND PREVENTION

33. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes  No  N/A
34. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:
- a. Internal communications or alarm system? [3745-65-32(A)] Yes  No  N/A
- b. Emergency communication device? [3745-65-32(B)] Yes  No  N/A
- c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes  No  N/A
- d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes  No  N/A

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

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

**SATELLITE ACCUMULATION AREA REQUIREMENTS Ohio EPA did not note any problems with satellite accumulation areas throughout Bldg 5 and first floor Bldg 6.**

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 Ohio EPA noted three <90 day hw accumulation areas, two in Bldg 5, and an outside hw <90 day accumulation area shared by Bldg 5 and the first floor of Bldg 6 as noted above in the General Remarks.**

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)] **See remarks above in General Remarks.** 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? [3745-66-34(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

**Additional Remarks: A 55 gallon drum of unknown contents located outside between Buildings 5 & 6 which sat next to a yellow over pack drum of emergency equipment that Mr. Jones could not identify. Ohio EPA asks that the contents of the drum, if any, be identified and if the contents is determined to be a waste, it be appropriately managed. This location was not part of the outside <90 day hw accumulation area. On April 28, 2009, Ohio EPA received an e-mail message from Daniel Jones indicating that a sample was pulled for the contents of the drum and sent out for testing. It was thought that the drum contained "Simple Green" but they will confirm that.**

**USED OIL INSPECTION CHECKLIST  
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

*NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.*

**PROHIBITIONS**

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: For example, used oil contaminated scrap metal stored in a pile.*

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).*

**GENERATOR STANDARDS**

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.*

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
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*NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.*

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil"? [3745-279-22(C)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Ohio EPA noted a used oil container (55 gallon drum) in the maintenance area of Bldg 5 that was marked waste maintenance oil but failed to be marked used oil.
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9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

	b.	Contained the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>ON-SITE BURNING IN SPACE HEATER</b>			
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:		
	a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).</i>			
<b>GENERATOR TRANSPORTATION</b>			
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#?		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]		
	a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).</i>			
<b>COLLECTION CENTERS AND AGGREGATION POINTS</b>			
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.</i>			

On April 8, 2009, Ohio EPA noted that the drum of waste maintenance oil was marked "used oil".

**GENERATOR LDR CHECKLIST**

Avery Dennison Bldg 5

April 2 and 8, 2009

Inspection by

Kris Coder, Ron Shadrach and Todd Surrena, DHWM, Ohio EPA

**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)]	Yes	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
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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 checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
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*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 checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
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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 checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
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5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
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a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
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*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)]	Yes		No	<input type="checkbox"/>	N/A	<input checked="" 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 to meet the LDR treatment standard?	Yes		No	<input checked="" type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
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*NOTE If AYes@ 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		No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
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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)]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
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10.	Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
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a.	Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
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**NOTIFICATION FORM**

11.	Does the LDR Notification form contain the following information:						
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a.	Manifest number of the first waste shipment to the TSD?[3745-270-07(A)(2)]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
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b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
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	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 checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)].	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <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	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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)]	Yes	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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 A No, @ go to #15.		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input checked="" type="checkbox"/>
13.	Is the HW a metal-bearing HW?		Yes	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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 <u>one</u> of the following conditions apply. [3745-270-03(c)]			
	i.	Contains > 1% TOC?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	ii.	Contains organic constituents or cyanide at levels greater than the UST levels?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	v.	Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	b.	If all responses to 14 a.i. through 14 a.v. are A No @, HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
15.	Was the HW treated by wastewater treatment?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	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)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	x
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.									
<b>GENERATOR TREATMENT</b>									
16.		Does the generator treat to meet LDRs on-site [3745-270-40(A)]?	Yes		No	<input checked="" type="checkbox"/>	N/A	<input type="checkbox"/>	x
		Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building <u>to meet</u> the LDR treatment standard?	Yes		No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	x
		If AYes@...complete the rest of the checklist. If ANo@...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)]	Yes		No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	x
	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)]	Yes		No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	x
NOTE: This is a laboratory analysis but it does not have to be kept by the generator.									
	c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]	Yes		No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	x
	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)]	Yes		No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	x
	e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]	Yes		No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	x
	f.	Is the WAP available for the inspector=s review during the inspection? [3745-270-07(A)(5)(b)]	Yes		No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	x
<b>NOTIFICATION FORM</b>									
17.	a.	Contains all information in #11 a-g above and	Yes		No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	x
	b.	If the treated HW/soil is listed.....notification contains the following certification statement:  A 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		No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	x
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:							
		i. Send a one-time notification to the director?[3745-270- 09 (D)]	Yes		No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	x
		ii. Maintain a copy of the notice onsite?[3745-270-09(D)]	Yes		No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	x
		iii. Include in the notification: [3745-270-09(D)(1)(a)]							
		1. Name & address of receiving landfill?	Yes		No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	x
		2. Description of HW when generated?	Yes		No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	x

		3.	HW code when generated?	Yes	No	<input type="checkbox"/>	N/A	x
		4.	Treatability group when generated?	Yes	No	<input type="checkbox"/>	N/A	x
		5.	Underlying hazardous constituents present when generated?	Yes	No	<input type="checkbox"/>	N/A	x
		iv.	Contain the right certification statement as required by 3745-70-07(b)(4)?	Yes	No	<input type="checkbox"/>	N/A	x