



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 7, 2008

RE: **Chromium Corporation  
OHD 061 023 768  
Large Quantity Generator  
Notice of Violation**

John Junkin  
Chromium Corporation  
8701 Union Ave.  
Cleveland, OH 44105

Dear Mr. Junkin:

The Ohio EPA Division of Hazardous Waste Management conducted an inspection of Chromium Corporation (Chromium) located at 8701 Union Ave., Cleveland, Ohio, on December 10 and 20, 2007. The purpose was to determine if Chromium had violations of Ohio's hazardous waste and used oil laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC).

This letter will document any violations and concerns found and outline what you need to do to correct them. A written response to these issues is required within 30 days.

Please see the attached Waste Summary for my understanding of how the various wastes are generated and managed.

Another purpose of the inspection was to look for ways Chromium may be able to reduce its waste generation, conserve energy, and save money. An attachment to this letter covers these issues.

The following violations were found:

1. OAC rule 3745-52-11 – Hazardous waste determination.  
This rule requires that any person who generates a waste must determine if that waste is a hazardous waste using the following method: (A) Determine if it is excluded, (B) Determine if it is listed, and (C) Determine if it is characteristic.

Chromium violated this rule by not determining that the waste it ships from its hazardous waste tank is a F006 listed waste. **This code must be included on the manifest used for the next shipment of this waste. Please send me a copy of the next manifest used for shipment of this waste.**

2. OAC rule 3745-270-07(A)(2) – Land disposal restriction notice sent to receiving facility.  
This rule requires that if the waste does not meet the land disposal restriction treatment standard, then with the initial shipment of waste, the generator must send a one-time written notice to the receiving facility and place a copy of that

notice in the generator's files. The notice must include the information in Column A of Table 1 (copy enclosed).

Chromium violated this rule by not having the F006 waste code listed on this notice. **Please send me a revised land disposal restriction (LDR) notice that includes this F006 code.** The D006, D007, and D008 waste codes do not need to be on the LDR notice because the LDR treatment standard for F006 includes treatment for cadmium, chromium, and lead.

3. OAC rule 3745-65-52(E) – Contingency plan emergency equipment.  
This rule requires the contingency plan to include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications, and alarm systems), where this equipment is required. Included must be the location, physical description, and capabilities of each item on the list.

Chromium violated this rule by not including this information in its contingency plan. **This information must be added and a copy of the revised page(s) sent to me. It is suggested that this equipment be marked on a map of the facility which is included in the contingency plan.**

4. OAC rule 3745-65-31 – Maintenance and operation of facility.  
This rule requires facilities be maintained and operated to minimize the possibility of a fire, explosion, or release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Chromium violated this rule by having spills on the floor behind the tin strip tank and at the Mart Washer. On December 20, 2007 I saw that the spill at the Mart Washer had been cleaned up. You told me that the floor behind the tin strip would be cleaned over your shutdown which started on December 21, 2007. **Please send me documentation that this cleanup has been completed.**

5. OAC rule 3745-65-35 – Required aisle space.  
This rule requires aisle space to be maintained to allow the unobstructed movement of personnel, fire protection equipment, and spill control equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of the above-mentioned purposes.

Chromium violated this rule by not having adequate aisle space around its containers of hazardous waste in the Environmental Area on December 10, 2007. By December 20, 2007 this violation had been corrected.

6. OAC rule 3745-52-34(A)(3) – Labeling as hazardous waste.  
This rule requires that, while being accumulated and/or treated on site, each hazardous waste container and tank must be labeled clearly with the words “Hazardous Waste”.

Chromium violated this rule by having containers of hazardous waste in the Environmental Area that were not clearly labeled as hazardous waste on December 10, 2007. By December 20, 2007 this violation had been corrected.

7. OAC rule 3745-52-34(A)(2) – Accumulation start date.  
This rule requires that, while being accumulated and/or treated on site, each hazardous waste container must be labeled with the accumulation start date.

Chromium violated this rule by having containers of hazardous waste in the Environmental Area that were not labeled with the accumulation start date on December 10, 2007. On December 20, 2007 all but one tote of hazardous waste had an accumulation start date on it. You corrected this during the inspection.

8. OAC rule 3745-66-73(A) – Keeping containers closed.  
This rule requires that a container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

Chromium violated this rule by having open totes of hazardous waste chromium plating solution and rinse water. We discussed how this rule could be practically complied with and determined that flat covers over the hole in the top of the tote needed to lower a pump into would be sufficient. **Please send me documentation that these totes are now kept closed.**

Chromium also violated this rule by having a 30 gallon drum of chromic acid waste in the lab that was open. You closed this during the inspection.

9. OAC rule 3745-279-22(C) - Used oil labels.  
This rule requires containers and aboveground tanks used to store used oil at generator facilities to be labeled or marked clearly with the words Used Oil.

Chromium violated this rule by having a tank of used oil that was not labeled as used oil on December 10, 2007. You corrected this on that day.

10. OAC rule 3745-279-22(D) - Response to releases of used oil.  
This rule requires that upon detection of a release of used oil to the environment, the generator must clean up and manage properly the released used oil and other materials.

Chromium violated this rule by having used oil leaking out of its scrap metal bin stored outside on December 10, 2007. **Please send me documentation that this has been cleaned up.**

11. OAC rule 3745-273-13 (D) - Universal waste lamp containers.  
This rule requires universal waste lamps to be in closed containers or packages that are structurally sound and adequate to prevent breakage.

Chromium violated this rule by having a waste fluorescent lamp in a container that was not closed. In addition, the box this lamp was in was too short to be able to be closed. **Please send me documentation showing this has been corrected.**

The following other issues were found:

1. On December 20, 2007 you gave me copies of land disposal restriction notifications. I did not receive a copy of this for the many wastes you ship out together as alkaline cleaning sludge (CS 5373). **Please send me a copy of this notification.**
2. On December 20, 2007 you gave me copies of job descriptions that relate to hazardous waste management. You said you would email me your job description – that of Environmental and Laboratory Specialist. **Please get me a copy of that job description.**
3. On December 20, 2007 we saw a fax machine in an inside trash bin. You took this out of the trash bin during the inspection. If such things are disposed then you must determine whether or not they are a hazardous waste. If waste electronics are recycled instead of being disposed then you do not need to make this determination. A list of places that may be able to recycle waste electronics can be found at: <http://www.cuyahogaswd.org/business/recdirectory.asp> (Search under computers.)
4. OAC rule 3745-66-95 - Tank inspections.  
OAC 3745-66-95 requires the owner or operator to inspect, where present, at least once each operating day:
  - 1) Overfill/spill control equipment (e.g., waste-feed cut-off systems, bypass systems, and drainage systems) to ensure that it is in good working order;
  - 2) The aboveground portions of the tank system, if any, to detect corrosion or releases of waste;
  - 3) Data gathered from monitoring equipment and leak-detection equipment (e.g., pressure and temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design; and

- 4) The construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures (e.g., dikes) to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation).

Chromium is currently using two logs to comply with this requirement. These are the Hazardous Waste Tank Farm Accumulation Date Log and the Hazardous Waste Tank Farm Inspection Log. You may wish to combine these two logs and these two inspections. In fact, it would make sense to inspect the tank and secondary containment (see 2 and 4 above) while you check the tank level which you do before pumping any waste to the tank. The Hazardous Waste Tank Farm Inspection Log lists two of the three tanks as Tank #1 – Caustic Waste which makes it confusing as to which tank is recorded where. In addition, you told me that two of the tanks are currently not being used. I suggest you put a cap on the fill pipes in the building for these two tanks to limit confusion as to which tank waste should be pumped to. In addition, if two tanks are empty and a system is in place to avoid their use (like caps on the fill pipes), then there is no requirement to inspect them until they are used again.

5. OAC rule 3745-66-93(C)(3) – Tank leak detection system.  
OAC rule 3745-66-93(C)(3) requires that hazardous waste tank system secondary containment must be provided with a leak detection system that is designed and operated so that it will detect the failure of either the primary and secondary containment structure or any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours, or at the earliest practicable time if the existing detection technology or site conditions will not allow detection of a release within 24 hours.

This detection system can be an inspection program and your Hazardous Waste Tank Farm Inspection Log does have a column to record secondary tank level. **Please send me more information regarding how this requirement is complied with.** For example, as I recall, the bottom of the secondary containment system cannot be seen without a flashlight. I also was not clear on where this secondary containment system sloped to.

**Please send a written response to this letter within 30 days including the documentation required above.**

The Division of Hazardous Waste Management has created an email service to provide updates on events and news related to hazardous waste activities in Ohio. You can find more information and sign up at: <http://www.epa.state.oh.us/dhwm/listserv.html>.

John Junkin  
Chromium Corporation  
January 7, 2008  
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You can find copies of the regulations and other information on the Division of Hazardous Waste Management web page at <http://www.epa.state.oh.us/dhwm/>.

If you have any questions, please contact me at (330) 963-1217, or [robert.almquist@epa.state.oh.us](mailto:robert.almquist@epa.state.oh.us).

Sincerely,



Robert Almquist  
Division of Hazardous Waste Management

RA:cl  
Enclosures

cc: Natalie Oryshkewych, DHWM, NEDO

ec: Frank Popotnik, DHWM, NEDO  
Harry Sarvis, DHWM, CO  
Ed D'Amato, DHWM, NEDO

Notice:

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

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

For Ohio EPA use only

E-mail this completed form to  
[tammy.mcconnell@epa.state.oh.us](mailto:tammy.mcconnell@epa.state.oh.us) or mail it to Tammy  
 McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OHD061023768	
3. Site Name	Name: <i>Chromium Corporation</i>	Website: <a href="http://www.chromcorp.com/">http://www.chromcorp.com/</a> (Optional)
4. Site Location Information	Street Address: 8701 Union Ave.	
	City, Town, or Village: Cleveland	State: OH
	County Name: Cuyahoga	Zip Code: 44105
5. 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"/>
6. NAICS code(s) <a href="http://www.cerclis.gov/epcd/www/naics.htm">www.cerclis.gov/epcd/www/naics.htm</a>		
7. Facility Representative	First Name: John	MI: W. Last Name: Junkin
Additional names can be recorded in number 12	Phone Number: 216-271-4185	Phone Number Extension:
Only provide address information if it is different than the site address	E-Mail Address: <a href="mailto:john.junkin@chromcorp.com">john.junkin@chromcorp.com</a>	Fax Number Extension:
	Fax Number: 216-271-4195	
	Street or P.O. Box:	
	City, Town or Village:	
	State:	Country: Zip Code:
8. Facility Owner and Operator (See Site List, Appendix A and/or Appendix B for definitions. Provide another copy of this page.)	Name of Site's Legal Owner: Chromium Corporation	Date Became Owner (mm/dd/yyyy): 06/25/1999
	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: same	
	City, Town or Village:	Owner Phone #:
	State:	Country: Zip Code:
	Name of Site's Operator: same	Date Became Operator (mm/dd/yyyy):
	Owner Type: <input 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:	
	City, Town or Village:	Operator Phone #:
	State:	Country: Zip Code:
9. Violations Cited?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)		
<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)		
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace	
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Small Quantity On-Site Burner Exemption	
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption	
<input type="checkbox"/> Underground Injection Control Facility		

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))

<input type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)
<input type="checkbox"/> Destination Facility for Universal Waste	

Check all boxes below that apply for each of the three types of facilities above

	Managed	10C. Used Oil Activities (Indicate Type(s) of Activities)	
Batteries	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
		<input type="checkbox"/> Used Oil Re-refiner	

11. 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, etc.) on an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed on most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

D002          D006          D007          D008          F006

12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks, containers, etc.

<b>Announced</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Additional Facility Representatives:</b>
<b>Tanks</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<b>Other Comments:</b>
<b>Containers</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

13. Name of Inspector(s)          Name of Inspector(s)          Date of Inspection/Time (mm/dd/yyyy) (hh:mm)

Robert Almquist          Ed D'Amato (on 12-20-07)          10/12/2007

14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly reviewed and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Owner, Operator, or an Authorized Representative	Name and Title (Print)	Date (mm/dd/yyyy)

Pollution Prevention Attachment  
To January 2007 letter to  
Chromium Corporation (OHD 061 023 768)

The following is offered as information and suggestions that you may want to investigate further. If requested, I can provide paper copies of the documents and websites for which the links are given. If you have any questions, want additional information, or a more detailed assessment, please contact me at 330-963-1217 or [robert.almquist@epa.state.oh.us](mailto:robert.almquist@epa.state.oh.us)

**Waste rinse water from chromium plating:**

You told me that Chromium Corp. will be working on changing its process in 2008 to include more rinsing of the parts over top of the chromium plating tanks. This should greatly reduce the amount of waste rinse water generated and reduce the amount of water needed to add to the plating tanks to replace water that has evaporated. I would be interested in hearing how well this works out.

**Segregate Wastes:**

Chromium mixes many wastes together and ships them out as hazardous waste. Specifically, the waste shipped to Envirite using profile # CS5373 (Alkaline Cleaning Sludge) and that shipped to Vickery using profile # AD9432 (Chromic Acid Liquid) are both mixtures of different wastes. Keeping different wastes separate may enhance the opportunities for recycling the wastes and may reduce disposal costs, especially if some of the wastes are not hazardous wastes. It may be that some of the wastes shipped out as hazardous waste with the Alkaline Cleaning Sludge, such as, boiler blow down and waste Rust Arrest 1073, are not hazardous wastes. I encourage you to consider waste segregation and determination of whether each individual waste is a hazardous waste.

**Reanalyze Wastes:**

You have told me that Chromium plans to reanalyze some of its waste. This may provide some benefits or at least some insight into the wastes. For example, you gave me a copy of a 2001 analysis labeled as Mart Wash. I'm not sure whether this represented the waste from the oil skimmer on the Mart Washer or the waste liquid taken from the Mart Washer. The oil skimmer waste is shipped out using the D007 waste code (for chromium) and the waste liquid is shipped using both the D007 and D008 (for lead) waste codes. The 2001 analysis mentioned above conflicts with these waste codes because it found the sample to not be hazardous for chromium and lead. The disposal companies that your wastes are sent to may already have more up-to-date analytical data.

You may want to analyze the TCLP metals in your chromium hydroxide filtercake (CS4352). This may have already been analyzed but I didn't review any data on it. One reason to know if this waste is hazardous for metals is because I'm not sure the waste would be F006 waste if the lab waste was not added to this treatment system. If it is not F006 then it may be a nonhazardous waste. Also

having such metals data can help you in finding a place that can recycle this waste as opposed to its current disposal.

**Send metal bearing waste to be recycled instead of disposed:**

The waste that comes out of the evaporator that is high in chromium may be able to be recycled. Companies such as the following may be able to do this:

Inmetco in Ellwood City, PA  
Ph. 724-758-2800  
<http://www.inmetco.com/>

Agmet in Oakwood Village, OH  
Ph. 440-439-7400  
<http://www.agmet1.com/home.htm>

Even better, some or all of the wastes that go into the evaporator may be able to be recycled. This could save you the cost of running the evaporator.

You stated you had talked to a recycling company about this waste but that the company could not ensure that Chromium would no longer have liability for the waste. I don't understand this concern since, as I understand it, now the waste is going to a land disposal facility and Chromium retains some liability for the disposed waste. Our Columbus office should be able to offer more information regarding this. I know they have had discussions with Inmetco regarding how waste sent there is regulated. You can call The Division of Hazardous Waste Management's Regulatory Service Unit at 614-644-2917 with questions. You can also submit a question on line at: [http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/std\\_alp.php](http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/std_alp.php)

**Porous Pot:**

Chromium tried filtering its chromium plating tanks a few years ago. You said this did get the iron out but left the cations (I assume mainly Cr +3). You may want to look into another technology such as a porous pot to purify the chromium plating solution. Information on this can be found at:

<http://www.nmfrc.org/crarchive/feb02c.cfm>  
<http://www.hard-chromesystems.com/index.html>

**General Metal Finishing:**

Information on waste minimization for metal finishers can be found in the following documents which I gave you during the inspection:

Source Reduction and Metal Recovery Techniques for Metal Finishers, Dec. 2004

<http://www.epa.state.oh.us/opp/fact24.pdf>

Hard Chrome Plating Consultants

<http://www.hard-chromesystems.com/index.html>

Section 4 – Chemical Solution Maintenance, 4.6 Ion Transfer

<http://www.nmfrc.org/bluebook/sec462.htm>

Section 4 – Chemical Solution Maintenance, 4.7 Membrane Electrolysis

<http://www.nmfrc.org/bluebook/sec474.htm>

Achieving Quality Chrome Plating by Use of Agitation and Filtration

<http://serfilco.com/pdfs/lituration/T-F143.pdf>

**General:**

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides compliance and pollution prevention assistance on environmental issues related to air, land, and water. If desired, this can include an onsite assessment of your operations with a resulting report containing waste minimization and energy conservation suggestions. They can be contacted at 800-329-7518 or <http://www.epa.state.oh.us/ocapp/ocapp.html>. Their Small Business Environmental Compliance Self-Assessment Guide can be found at: <http://www.epa.state.oh.us/ocapp/sb/publications/selfgde.pdf>

The Small Business Development Centers of Ohio (SBDCs of Ohio) can help with professional guidance by connecting you with research, financing sources, and training opportunities.

<http://www.odod.state.oh.us/edd/osb/sbdc/>

Significant pollution prevention opportunities can be realized when the cost of managing each waste is tied back to the production process where it originated. If all the true costs are assessed, then the true potential savings of a pollution prevention project can be seen. More information, including worksheets, can be found at:

<http://www.ecy.wa.gov/pubs/95400.pdf>

**Steam:**

Information regarding energy savings from steam systems can be found at:

<http://www.ecw.org/infopackagedetail.php?infopackageid=30>

[http://www.energystar.gov/ia/business/industry/bnch\\_cost.pdf](http://www.energystar.gov/ia/business/industry/bnch_cost.pdf)

A variety of 2-page steam tip sheets for improving a steam system can be found at: [http://www1.eere.energy.gov/industry/bestpractices/tip\\_sheets\\_steam.html](http://www1.eere.energy.gov/industry/bestpractices/tip_sheets_steam.html)

If a new heating system is being considered, new technology may provide much greater efficiencies. An example of such technology can be found at:

<http://mntap.umn.edu/source/2007-2/kraft.html>

You may also want to consider insulating certain lines and tanks to reduce the need for the steam heat.

**Energy use reduction for metal finishers:**

The following documents were given to you during the inspection:

Metal Finishers Guide to Reducing Energy Costs, November 2000

<http://www.ecw.org/prod/319-1.pdf>

part of Metal Finisher's Technical Supplement, November 2000

<http://www.ecw.org/prod/319-2.pdf>

**Energy use reduction - general:**

ENERGY STAR is a government-backed program helping businesses and individuals protect the environment through superior energy efficiency. Their website is at:

<http://www.energystar.gov/>

The US Department of Energy has various software tools to help identify and analyze energy system savings opportunities in your plant. These can be found at: <http://www1.eere.energy.gov/industry/bestpractices/software.html>

This link leads to the part of the site that deals with improving the energy performance of buildings and plants:

[http://www.energystar.gov/index.cfm?c=business.bus\\_index](http://www.energystar.gov/index.cfm?c=business.bus_index)

Ohio businesses that spend less than \$150,000 on their annual energy bill now have a tool to help them reduce energy waste and hold costs down. The Ohio Department of Development has developed a free online tool that is confidential and easy to use. If you are looking for ways to save on energy expenses at your business, visit the Small Business Energy Saver at:

<http://www.energyguide.com/EnergySmartSBE/welcomeba.asp?referrerid=227&sid=436>

Grant funding is available for business owners who are ready to implement measures suggested by the Ohio Small Business Energy Saver. For more information, visit:

[http://www.odod.state.oh.us/cdd/oeel/ELFGrant.htm#NOFA\\_07-05](http://www.odod.state.oh.us/cdd/oeel/ELFGrant.htm#NOFA_07-05)

The Ohio Department of Development's Office of Energy Efficiency may also be able to help with energy efficiency issues. Their website is at:

<http://www.odod.state.oh.us/cdd/oeel/>

**Financial:**

There are various grants, loans, and tax incentives available for environmental projects in Ohio.

The Ohio Department of Development's Economic Development Division works to create, retain and expand job opportunities for Ohioans. Their website is:

<http://www.odod.state.oh.us/EconomicDevelopment.htm> The Division focuses on issues affecting Ohio's economy and provides a variety of business development resources. The Division offers companies direct financial assistance in the form of low-interest loans, grants, bonds, and state and local tax incentives. The Division also offers assistance with employee training and infrastructure development.

**Waste Exchange:**

A waste exchange such as Ohio's Material Exchange which can be found at:  
<http://www.epa.state.oh.us/ocapp/p2/omex/omex.html>  
may help you find a company that can use or recycle some of your waste.

Waste summary sheet for Chromium Corporation, OHD 061 023 768, 12-10-07 and 12-20-07 inspection

#	Process generating the waste	Waste description	Profile #	Date and results of last analysis	Date of last LDR	Amount generated	On-site management	Off-site management
1	Cleaning of pistons and liners using an alkaline solution in the Mart washer	Cleaning sludge – from oil skimmer on the Mart washer	041499MZ	4-2-01? (sample called Mart Wash) Cr 1.32 mg/l and pH 13.72; another sample of unknown date Cr 1.75 mg/l	10-23-07	So far in 2007 shipped 1965 gallons in metal drums and 680 gallons in plastic drums (total 2645 gallons) Last shipped on 10-23-07.	Collected in satellite accumulation drum at the Mart washer oil skimmer. Full drum are taken to the Environmental Area.	Shipped to Michigan Disposal, Belleville, MI as D002, D007 (chromium) Management method is stabilization or chemical fixation prior to disposal at another site (code H111)
2	Pressure tests for leaks using dilute solution of Rust Arrest 1073	Waste Rust Arrest 1073 solution				Have three leak test tanks.	When need to empty one of the tanks it is put into the heavy duty cleaner tank.	See note 1
3	Ventilation system for the	Liquid collected in					Collected in drum and then	See note 1

	tin plating line	ventilation pipes					put into heavy duty cleaner tank	
4	Steam boiler	Boiler blow down					Put into heavy duty cleaner tank	See note 1
5	Pressure washing using Rust Arrest 1073	Runoff into the pit					Put into heavy duty cleaner tank	See note 1
6	Heavy duty cleaning using Rust Stripper M including cleaning of hooks used on tin plating line	Waste solution				Every 4 or 5 months the sludge in the heavy duty cleaner tank builds up and they remove the liquid and the sludge. At this time the pressure wash pit is also cleaned out.		See note 1
7	Final cleaning using a caustic sodium solution with sodium gluconate in it to trap the iron	Waste solution					If still clean enough when the heavy duty cleaner is emptied this is put into the heavy duty	

							cleaner tank, if not, it is shipped out – see note 1	
8	Cleaning of pistons and liners using an alkaline solution in the Mart washer	Waste cleaning solution		4-2-01?				See note 1
9	Electrocleaning							See note 1
10	Stripping of tin off pistons if had a problem with plating and also cleaning pistons after being cleaned in the Mart Washer	Piston strip solution						See note 1
11	Floor scrubber	wastewater					Put into heavy duty cleaner tank	See note 1
12	Chromium contaminated tank removal and demolition projects	Chromium contaminated debris (bulk)	041204EBF		10-23-07	So far in 2007 have shipped 3500 pounds, last shipped on 10-23-07	Cubic yard boxes	Shipped to Michigan Disposal, Belleville, MI as D007 (chromium) H111 and H129
13	Chromium	Chromium	041499MR	2-14-	10-	So far in 2007	Collected in	Shipped to

	contaminated masking, rags, adsorbents, PPE, and debris	solids, drums		2000 Cr 0-1%	23-07	have shipped 11,100 pounds in plastic drums and 500 pounds in metal drums (total 11,600 pounds). Last shipped on 10-23-07.	two satellite drums at the end of each chromium plating line. Full drums are stored in the environmental area.	Michigan Disposal, Belleville, MI as D007 (chromium). Management method is stabilization or chemical fixation prior to disposal at another site (code H111)
14	Functional chromium electroplating	Spent chromium plating solution			12-12-07	Have 12 chromium plating tanks. Each one lasts 6 months to a year until the iron concentration gets to high and it needs to be replaced. They replace about one tank per month.	It is pumped into a tote and the tote is taken to the evaporator and pumped into it.	See note 2
15	Rinsing using city water after functional chromium	Waste rinse water			12-12-07		From plating bay 2 it is pumped into a tote and the	See note 2

	plating. This is done with a spray hose over the grate at the ends of the plating lines.						tote is taken to the evaporator and pumped into it. From plating bay 3 it is pumped directly to the evaporator.	
16	Stripping chromium	Waste chromium strip			12-12-07	When the chromium builds up too high which is about every 6 months this needs to be replaced.	It is mixed with waste chromic acid and put in the evaporator.	See note 2
17	Treatment of groundwater to remove chromium	Wastewater treatment sludge (water is discharged to the city sewer)	CS4352		10-23-07	So far in 2007 have shipped 500 pounds on 10-23-07. Didn't ship any in 2006	Emptied from bin under filter press and put into a cube container	Shipped to Envirite, Canton, OH as F006. Management method is stabilization or chemical fixation prior to disposal at another site (code H111)
18	Lab analysis of chromium solutions	Diluted waste chromium samples					Collected in satellite drum in the lab and	

							then transferred to the beginning of the groundwater treatment system.	
19	Tin electroplating	Waste tin plating solution	CS7219			Shipped 1500 gallons on 10-4-07. Hasn't been replaced in 6 years.		Shipped to Envirite, Canton, OH as D002. Management method is stabilization or chemical fixation prior to disposal at another site (code H111)
20	Cleaning on tin plating line							
21	Rinsing on tin plating line	Waste rinse water						Discharged to city sewer
22	Sand blasting cast iron parts	Sandblast grit	VEX4891			Last shipped 10,000 pounds on 10-23-07.		Shipped to Vexor Tech., Medina, OH as nonhazardous
23	Honing	Honing sludge	VEX4888					
24	Honing fluid management	Honing solids filter paper	VEX4889			Last shipped 2,000 pounds		Shipped to Vexor Tech.,

						on 10-23-07.		Medina, OH as nonhazardous
25	Alkaline cleaning	Alkaline solids – PPE, debris, and oily rags	5729					
26	Machining	Flame spray machine chips	4890					
27	Honing	Waste oil, coolant, and water	3254N-L			Last shipped 1903 gallons on 8-28-07.	Stored in used oil containers and tanks in environmental area	Shipped to General Environmental Management, Cleveland, OH as RCRA non-regulated waste (waste oil)
28	Lab analysis of rust preventative	Waste samples					Put into used oil containers and tanks in the environmental area	See above
29		Scrap metal including empty chromium flake metal drums					Stored in open hopper outside.	Shipped for metal recycling
30		Waste pallets						

31	Lighting	Waste lamps				Last shipped 150 pounds on 4-16-07	Shipped to USA Lamp & Ballast, Cincinnati, OH
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Note 1: These wastes are shipped to Envirite, Canton, OH as D002, D007 (chromium), and D008 (lead) and profile # CS5373. The management method at Envirite is stabilization or chemical fixation prior to disposal at another site (code H111). So far in 2007, 9,450 gallons have been shipped, most recently on 10-29-07.

Note 2: From the evaporator these wastes are pumped into hazardous waste tank #2. From this tank it is pumped out using a vacuum hose into a tanker truck and shipped to Vickery Environmental, Vickery, OH using the waste codes of D002, D006, D007 (chromium), and D008 (lead) and profile # AD9432. The disposal method at Vickery is deepwell or underground injection (with or without treatment) (Code H134). So far in 2007, 13,998 gallons have been shipped, most recently shipped on 12-12-07.

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

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

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

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

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

Safety Equipment Used:

**GENERAL REQUIREMENTS**

- |   |     |                                     |    |                                     |     |                          |
|---|-----|-------------------------------------|----|-------------------------------------|-----|--------------------------|
| 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11]  | Yes | <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 <sup>st</sup> ? [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 <b>other</b> 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 <b>on-site without a permit</b> or at another facility <b>other</b> than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] | Yes | <input type="checkbox"/>            | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 8. Does the generator accumulate hazardous waste?   | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/> |

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

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

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

- |   |     |                          |    |                                     |     |                          |
|---|-----|--------------------------|----|-------------------------------------|-----|--------------------------|
| 10. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)] |     |                          |    |                                     |     |                          |
| a. Container that meets 3745-66-70 to 3745-66-77?                       | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)?     | Yes | <input type="checkbox"/> | No | <input checked="" 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 checked="" 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 checked="" 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 type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]                                      | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/> |
| b. Has the generator complied with special manifest requirements? [3745-52-54]                                  | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input 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 type="checkbox"/> |
| d. Has an annual report been submitted to U.S. EPA? [3745-52-56]  | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/> |
| e. Are export related documents being maintained on-site? [3745-52-57(A)]                                       | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/> |

**MANIFEST REQUIREMENTS**

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

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

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

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

- |   |     |                                     |    |                          |     |                                     |
|---|-----|-------------------------------------|----|--------------------------|-----|-------------------------------------|
| 15. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] | Yes | <input type="checkbox"/>            | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)]   | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/>            |

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.

- 17. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes  No  N/A
- 18. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes  No  N/A
- 19. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes  No  N/A

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

**PERSONNEL TRAINING**

- 20. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes  No  N/A
- 21. Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes  No  N/A
- 22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes  No  N/A
- 23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes  No  N/A
- 24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes  No  N/A
- 25. Does the generator keep records and documentation of:
  - a. Job titles [3745-65-16D(1)]? Yes  No  N/A
  - b. Job descriptions [3745-65-16D(2)]? Yes  No  N/A
  - c. Type and amount of training given to each person [3745-65-16D(3)]? Yes  No  N/A
  - d. Completed training or job experience required [3745-65-16D(4)]? Yes  No  N/A
- 26. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes  No  N/A

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained

**CONTINGENCY PLAN**

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

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

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

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

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

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

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

**EMERGENCY PROCEDURES**

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

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

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

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

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

**PREPAREDNESS AND PREVENTION**

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

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

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

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

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

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

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

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

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

37. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] Yes  No  N/A

38. If there is only one employee on the premises, is there immediate access to a device (ex.phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] Yes  No  N/A

39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes  No  N/A

40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes  No  N/A

41. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes  No  N/A

**SATELLITE ACCUMULATION AREA REQUIREMENTS**

42. Does the generator ensure that satellite accumulation area(s):

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  X
- e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes  No  N/A
- 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: Yes  No  X N/A
- a. Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes  No  N/A
- b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded?[3745-52-34(C)(2)] Yes  No  N/A

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

**USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS**

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

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

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

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

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

*NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]*

**PRE-TRANSPORT REQUIREMENTS**

53. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] 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

**TANK SYSTEM REQUIREMENTS (OAC rule 3745-52-34(A) and OAC rules 3745-66-100)**

(Please refer to the rules before or while completing this checklist.)

1. Is each tank clearly labeled/marked with the words "Hazardous Waste" [3745-52-34(A)(3)]? Yes  No  N/A

**TANK SYSTEM – GENERAL OPERATING REQUIREMENTS**

2. Does the o/o follow the general operating requirements below:
- a. Does the o/o prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail?[3745-66-94(A)] Yes  No  N/A
- b. Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)?[3745-66-94(B)] Yes  No  N/A
- c. If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96?[3745-66-94(C)] Yes  No  N/A

**TANK SYSTEM – INSPECTION REQUIREMENTS**

3. Has the o/o documented the inspections required in 3745-66-95, in the operating record, including inspection of the following:
- a. Spill control equipment each operating day? [3745-66-95(A)(1)] Yes  No  N/A
- b. Above ground portion of tank each operating day?[3745-66-95(A)(2)] Yes  No  N/A
- c. Data from leak detection equipment each operating day?[3745-66-95(A)(3)] Yes  No  N/A
- d. Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste each operating day?[3745-66-95(A)(4)] Yes  No  N/A

*NOTE: "Each operating day" is each day that the tank system is being used to manage (store or treat) hazardous waste.*

4. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter?[3745-66-95(B)(1)] Yes  No  N/A
5. Where applicable, all sources of impressed current at least bi-monthly?[3745-66-95(B)(2)] Yes  No  N/A

**TANK SYSTEM CLOSURE REQUIREMENTS**

6. 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). Yes  No  N/A

**TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES**

7. For tanks used or treat or store ignitable or reactive wastes, has the o/o complied with **one of the following**: [3745-66-98(A)] Yes  No  N/A
- a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-66-17(B)?[3745-66-98(A)]; **OR** Yes  No  N/A
- b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction?[3745-66-98(A)]; **OR** Yes  No  N/A
- c. The tank is used solely for emergencies?[3745-66-98(A)] Yes  No  N/A
8. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (1996)? [3745-66-98(B)] Yes  No  N/A
9. Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material?[3745-66-99(A) and/or (B)] Yes  No  N/A
- a. **If so**, have the requirements of 3745-65-17(B) been met?[3745-66-99(A) and/or (B)] Yes  No  N/A

**TANK SYSTEM – WASTE ANALYSIS REQUIREMENTS**

10. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following:[3745-66-100]
- a. Conducted waste analysis and trial treatment or storage tests?[3745-66-100(A)]; **OR** Yes  No  N/A
- b. Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-100(B)] Yes  No  N/A

**TANK SYSTEMS REQUIREMENTS**

11. Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)?[3745-66-92(A)] Yes  No  N/A

*NOTE: You should review the file to see if the written assessment has been previously reviewed and what the results were.*

12. Does the written assessment include the following:[3745-66-92(A)]
- |  |     |                                     |                                     |                          |     |                                     |
|--|-----|-------------------------------------|-------------------------------------|--------------------------|-----|-------------------------------------|
| a. Certification by an independent registered, professional engineer?[3745-66-92(A)]   | Yes | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | N/A | <input type="checkbox"/>            |
| b. Consideration of the design standards of the system?[3745-66-92(A)]   | Yes | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | N/A | <input type="checkbox"/>            |
| c. Consideration of the hazardous characteristics of the waste(s)?[3745-66-92(A)]  | Yes | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | N/A | <input type="checkbox"/>            |
| d. An evaluation by a corrosion expert (if the external system/components are metal)?[3745-66-92(A)]   | Yes | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | N/A | <input type="checkbox"/>            |
| e. A determination of design and operational measures that will be needed to protect the tank system from potential damage (for underground tank components)?[3745-66-92(A)] | Yes | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| f. Design considerations to ensure that the tank foundations will maintain the load of a full tank?[3745-66-92(A)]   | Yes | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | N/A | <input type="checkbox"/>            |
| g. Design considerations for anchoring the unit to prevent floatation (for tanks situated in a seismic fault zone or saturated zone)?[3745-66-92(A)]                         | Yes | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | N/A | <input type="checkbox"/>            |
| h. Design considerations to ensure that the tank system will withstand the effects of frost heave(for underground tank systems)?[3745-66-92(A)]                              | Yes | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | N/A | <input type="checkbox"/>            |

NOTE: CO-DHWM Engineering staff are available to assist you with evaluation of the written assessment.

13. Are there written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed?[3745-66-92(G)]
- |  |     |                          |                                     |                          |     |                                     |
|--|-----|--------------------------|-------------------------------------|--------------------------|-----|-------------------------------------|
|  | Yes | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
|--|-----|--------------------------|-------------------------------------|--------------------------|-----|-------------------------------------|

Do the written statements address all of the following:

- |   |     |                          |                                     |                          |     |                          |
|---|-----|--------------------------|-------------------------------------|--------------------------|-----|--------------------------|
| a. Inspection for damage and/or inadequate construction and installation was conducted?[3745-66-92(B)]                              | Yes | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| b. Statement that deficiencies were corrected before the tank system was covered or put into use?[3745-66-92(B)]                    | Yes | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| c. Proper backfilling?[3745-66-92(C)]   | Yes | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| d. Tightness test; if the tank was found not to be tight, does the statement indicate that proper repairs were made?[3745-66-92(D)] | Yes | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| e. Proper support and protection of ancillary equipment?[3745-66-92(E)]   | Yes | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| f. Supervision of the installation of field fabricated corrosion protection?[3745-66-92(F)]   | Yes | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

## SECONDARY CONTAINMENT

14. Has secondary containment been provided? Yes  No  N/A

NOTE: All tank systems must have secondary containment at this point, except for tank systems that store/treat materials that become hazardous waste after January 12, 1987, must have secondary containment required within the time intervals in [3745-66-92(A)(1)] to (A)(4). The date the material became a hazardous waste must be used in place of January 12, 1987.[3745-66-92(A)(5)]

15. Is secondary containment one of the following:
- |   |     |                                     |                                     |                                     |     |                                     |
|---|-----|-------------------------------------|-------------------------------------|-------------------------------------|-----|-------------------------------------|
| a. An <b>External Liner?</b> [3745-66-93(E)(1)] If so,  | Yes | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | N/A | <input type="checkbox"/>            |
| i. Is liner designed or operated to contain 100% of the capacity of the largest tank?   | Yes | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | N/A | <input type="checkbox"/>            |
| ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm? | Yes | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | N/A | <input type="checkbox"/>            |
| iii. Is liner free of cracks and gaps?  | Yes | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | N/A | <input type="checkbox"/>            |
| iv. Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release?   | Yes | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | N/A | <input type="checkbox"/>            |
| v. Are chemically resistant water stops in place at all points? (concrete liners only)  | Yes | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | N/A | <input checked="" type="checkbox"/> |
| vi. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? (concrete liners only)  | Yes | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | N/A | <input checked="" type="checkbox"/> |
| b. <b>Vault System?</b> [3745-66-93(E)(2)] If so,   | Yes | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/>            |
| i. Is vault system designed to contain 100% of the capacity in the largest tank?  | Yes | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | N/A | <input type="checkbox"/>            |
| ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm? | Yes | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | N/A | <input type="checkbox"/>            |
| iii. Are chemically resistant water stops in place at all points?   | Yes | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | N/A | <input type="checkbox"/>            |
| iv. Is there a compatible interior coating to prevent migration into the concrete?  | Yes | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | N/A | <input type="checkbox"/>            |

- v. For **ignitable or reactive waste**: Is the vault system provided with means to prevent against the formation or ignition of vapors? Yes  No  N/A
- vi. Is vault system provided with an exterior moisture barrier? Yes  No  N/A
- c. **Double-Walled Tank?** [3745-66-93(E)(3)] If so, Yes  No  N/A 
  - i. Is double-walled tank designed as an integral structure to contain any release from the inner tank? Yes  No  N/A
  - ii. **If metal**, are the primary tank interior and outer shell exterior surfaces protected from corrosion? Yes  No  N/A
  - iii. Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time? Yes  No  N/A
- d. **An Equivalent Device?** As described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D&E)] Yes  No  N/A

**SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION**

- 16. Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, groundwater, or surface water and is it capable of detecting and collecting releases and accumulated liquids?[3745-66-93(B)(1) and (2)] Yes  No  N/A
- 17. Does the secondary containment system meet the following minimum requirements of [3745-66-93(C)]:
  - a. Constructed or lined with compatible materials of sufficient strength to prevent failure?[3745-66-93(C)(2)] Yes  No  N/A
  - b. Placed on a foundation or base capable of providing support?[3745-66-93(C)(2)] Yes  No  N/A
  - c. Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time?[3745-66-93(C)(3)] Yes  No  N/A
  - d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation?[3745-66-93(C)(4)] Yes  No  N/A
  - e. Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner?[3745-66-93(C)(4)] Yes  No  N/A

**ANCILLARY EQUIPMENT REQUIREMENTS**

- 18. Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)? Yes  No  N/A 

*If not, is the ancillary equipment one of the following: [3745-66-93(F)]*

  - a. Above ground piping (exclusive of flanges, joints, valves and connections) that is inspected daily? Yes  No  N/A
  - b. Welded flanges, welded joints and/or welded connections that is inspected daily? Yes  No  N/A
  - c. Sealless or magnetic coupling pumps and/or sealless valves? Yes  No  N/A
  - d. Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown and/or loss of pressure-actuated shut-off devices) that is inspected daily? Yes  No  N/A

**TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE**

- 19. Has there been a leak or spill from any tank system or has any tank system been found unfit for use? **If so**, did the o/o: Yes  No  N/A

*NOTE: If the tank is found to be unfit for use, inspector should explain why.*

- a. Immediately cease flow of material into tank and investigate the cause of the release?[3745-66-96(A)] Yes  No  N/A
- b. Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time?[3745-66-96(B)(1)] Yes  No  N/A
- c. Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment?[3745-66-96(B)(2)] Yes  No  N/A
- d. Immediately conduct a visual inspection of the release?[3745-66-96(C)] Yes  No  N/A
- e. Prevent further migration of the leak or spill to soils or surface waters?[3745-66-96(C)] Yes  No  N/A
- f. Properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)] Yes  No  N/A
- g. Report the release to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)] Yes  No  N/A
- h. Submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)] Yes  No  N/A

- i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)(2)] Yes  No  N/A
- j. For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)] Yes  No  N/A

NOTE: The requirements noted in 20.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.

- 20. In the event that the repairs to the tank system were major (replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from an independent, registered P.E. attesting that the repaired unit is capable of handling hazardous waste? [3745-66-96(F)] Yes  No  N/A
- 21. Was a copy of the certification submitted to the director within seven days after returning the system to use? [3745-66-96(F)] Yes  No  N/A
- 22. If the o/o was unable to repair and return the unit to service as described in 20.a through 20.e, was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)] Yes  No  N/A
- 23. Does the o/o have a tank system **with a variance from secondary containment** from which a release has occurred but has not migrated beyond the zone of engineering control? Yes  No  N/A   
**If so,**
  - a. Has the o/o complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G)(3)] Yes  No  N/A
  - b. If soils cannot be decontaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)] Yes  No  N/A
- 24. Does the o/o have a tank system **with a variance from secondary containment** from which a release occurred and has migrated from the zone of engineering control? **If so,**
  - a. Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)] Yes  No  N/A
  - b. If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(4)] Yes  No  N/A

**UNIVERSAL WASTE HANDLER REQUIREMENTS - SMALL QUANTITY - BATTERIES AND LAMPS**

Facility Name: Chromium Corporation ID #: OHD061023768 Inspection Date: 12-10 and 20-2007

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

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

**PROHIBITIONS**

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

**WASTE MANAGEMENT & LABELING/MARKING**

**UNIVERSAL WASTE BATTERIES**

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

If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)]

Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK#

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

Yes \_\_\_ No  N/A \_\_\_ RMK#

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

Yes \_\_\_ No  N/A \_\_\_ RMK#

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

Yes \_\_\_ No  N/A \_\_\_ RMK#

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

Yes \_\_\_ No  N/A \_\_\_ RMK#

### UNIVERSAL WASTE LAMPS

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

Yes \_\_\_ No  N/A \_\_\_ RMK#

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

Yes \_\_\_ No  N/A  RMK#

10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)]

Yes  No  N/A \_\_\_ RMK#

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

**ACCUMULATION TIME**

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

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

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

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

**EMPLOYEE TRAINING**

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] Yes \_\_\_ No  N/A \_\_\_RMK#  
See #8 above

**RESPONSE TO RELEASES**

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

**OFF-SITE SHIPMENTS**

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

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

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

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes \_\_\_ No  N/A \_\_\_ RMK#
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes \_\_\_ No  N/A \_\_\_ RMK#
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK#

b. Agree to where the shipment will be sent? [3745-273-18(E)(2)]

Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK#

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

Yes \_\_\_ No  N/A NA RMK#

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

Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK#

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

Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK#

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

Yes \_\_\_ No  N/A NA RMK#

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

Yes \_\_\_ No  N/A NA RMK#

### EXPORTS

24. Is waste being sent to a foreign destination? If so:

Yes \_\_\_ No X N/A \_\_\_ RMK#

a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]

Yes \_\_\_ No  N/A \_\_\_ RMK#

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)]

Yes \_\_\_ No  N/A \_\_\_ RMK#

c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]

Yes \_\_\_ No  N/A \_\_\_ RMK#

### REMARKS

**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  No  N/A
- a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] Yes  No  N/A
2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes  No  N/A
3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? Yes  No  N/A

*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  No  N/A
- a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] Yes  No  N/A

*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  No  N/A

*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  No  N/A
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes  No  N/A
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes  No  N/A
9. Has the generator, upon detection of a release of used oil, done the

following: [3745-279-22(D)]

- a. Stopped the release? Yes  No  N/A
- b. Contained the release? Yes  No  N/A
- c. Cleaned up and properly managed the used oil and other materials? Yes  No  N/A
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes  No  N/A

**ON-SITE BURNING IN SPACE HEATER**

- 10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: Yes  No  N/A 
  - 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  No  N/A
  - b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes  No  N/A
  - c. Are the combustion gases from heater vented to the ambient air? Yes  No  N/A

**GENERATOR TRANSPORTATION**

- 11. If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] Yes  No  N/A 
  - a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24] Yes  No  N/A
  - b. Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24] Yes  No  N/A

*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).*

**COLLECTION CENTERS AND AGGREGATION POINTS**

- 12. 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  No  N/A
- 13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes  No  N/A
- 14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes  No  N/A

*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.*

Keyword: UsedOilChecklistforGenerators.Oct.2007.doc

## Land Disposal Restriction Requirements

Facility Name: Chromium Corporation ID #: OHD061023768 Inspection Date: 12-10 and 20-07

### 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)(a)] Yes  No  N/A  RMK#
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)(b)] 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#

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**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#

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

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

Yes  No  N/A  RMK#

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

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03]

Yes  No  N/A  RMK#

Controlled by variance that Vickery has.

**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  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# \_\_\_

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**REMARKS**

**NOTIFICATION AND CERTIFICATION REQUIREMENTS**

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)]

Yes \_\_\_ No  N/A  RMK# \_\_\_

15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-

07? [3745-270-07(A)(4)]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)]

Yes \_\_\_ No  N/A  RMK# \_\_\_

17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so:

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

**NOTE: Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit.(See 270-07(A)(7))**

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

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

unknown

**REMARKS**

**GENERATORS TREATING HAZARDOUS WASTE**

1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40?

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

3. Is the WAP on-site in the facility's files and available to inspectors?

[3745-270-07(A)(5)(b)]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

4. Has the generator followed their WAP [3745-270-07(A)(5)?

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

5. Have the treated wastes met the applicable treatment standards in 3745-270-40?

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

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

6. Has the generator sent a notification and certification with the initial shipment of waste?[3745-270-07(A)(5)(c)]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

7. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

8. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following:

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

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

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

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

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

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

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

Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

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

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

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

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

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

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

Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

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

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

11. Does each notification/certification form completed, contain the information found in Table1? [3745-270-07(A)(3)]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

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

### REMARKS

### HAZARDOUS DEBRIS

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)?

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.)

Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so:

Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

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

4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so: Yes\_\_ No\_\_ N/A\_\_ RMK#\_\_
- a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] Yes\_\_ No\_\_  N/A\_\_ RMK#\_\_
5. Is the waste a PCB waste under 40 CFR Part 761? If so: Yes\_\_ No\_\_ N/A\_\_ RMK#\_\_
- a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)] Yes\_\_ No\_\_  N/A\_\_ RMK#\_\_
6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)] Yes\_\_ No\_\_  N/A\_\_ RMK#\_\_
7. Does the owner/operator of a treatment facility that claims the debris is excluded from regulation as a hazardous waste under 3745-51-03(F)(1) maintain the following information? Yes\_\_ No\_\_ N/A\_\_ RMK#\_\_
- a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)] Yes\_\_ No\_\_  N/A\_\_ RMK#\_\_
- b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)] Yes\_\_ No\_\_  N/A\_\_ RMK#\_\_
- c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)] Yes\_\_ No\_\_  N/A\_\_ RMK#\_\_
8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F)(1) have the following information? [3745-270-07(D)(3)] Yes\_\_ No\_\_ N/A\_\_ RMK#\_\_
- a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)] Yes\_\_ No\_\_  N/A\_\_ RMK#\_\_
- b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)] Yes\_\_ No\_\_  N/A\_\_ RMK#\_\_
- c. Technology used from Table 1? [3745-270-07(D)(1)(c)] Yes\_\_ No\_\_  N/A\_\_ RMK#\_\_
9. Has the above notification been sent to the director? [3745-270-07(D)(1)] Yes\_\_ No\_\_ N/A\_\_ RMK#\_\_

### REMARKS

### TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS

Does the treating facility test waste according to their waste analysis

1. plan as required in 3745-54-13 or 3745-65-13?[3745-270-07(B)] Yes\_\_ NoN/A\_\_ RMK#\_\_
2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)] Yes\_\_ NoN/A\_\_ RMK#\_\_

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

3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07?[3745-270-07(B)(3)] Yes\_\_ NoN/A\_\_ RMK#\_\_
4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so:**
- a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)]
5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? If so:
- a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)), excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)] Yes\_\_ NoN/A\_\_ RMK#\_\_
- b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4)[3745-270-07(B)(6)] Yes\_\_ NoN/A\_\_ RMK#\_\_
- c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)] Yes\_\_ NoN/A\_\_ RMK#\_\_
6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)] Yes\_\_ NoN/A\_\_ RMK#\_\_
7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have:
- a. Copies of all notices and certifications required in 3745-270? Yes\_\_ NoN/A\_\_ RMK#\_\_
- b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49? Yes\_\_ NoN/A\_\_ RMK#\_\_
- c. The testing frequency specified in the facility's WAP and have they followed the protocol? Yes\_\_ NoN/A\_\_ RMK#\_\_

**REMARKS**