



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

March 30, 2010

RE: MEDINA CITY OF (SERVICE GARAGE)
OHD 986 983 930
MEDINA COUNTY
CEI/NOV/RTC
SQG>CESQG

Mr. Nino Piccoli
Service Director
132 North Elmwood
P.O. Box 703
Medina, OH 44256-0703

CERTIFIED MAIL

Dear Mr. Piccoli:

On March 9, 2010, Ohio EPA conducted a compliance evaluation inspection of the City of Medina (Medina) facility located at 781 W. Smith Road, Medina, to determine Medina's compliance with Ohio's hazardous waste laws and regulations as found under the Ohio Revised Code and the Ohio Administrative Code ("ORC" and "OAC" respectively). Medina was represented by you and Adam Gajewski. The Ohio EPA was represented by Clarissa Gereby and me. The Ohio EPA's compliance inspection included an inspection of the facility operations and a review of written documentation.

On August 6, 1990, the City of Medina notified that they were a small quantity generator of hazardous waste (generated between 100 and 1000 kilograms in a calendar month). The inspection indicates that the facility was generating less than 100 kilograms per calendar month and was therefore a conditionally exempt small quantity generator of hazardous waste.

The City of Medina operates three different city services from this building. These include the sanitation department, the street department and vehicle maintenance. Of these three departments, only the street department and the vehicle maintenance generate waste that would be regulated under the hazardous waste regulations.

Based on this inspection, Ohio EPA has determined that Medina has violated at least the following state hazardous waste regulations:

Violations:

1. ***Establishing and operating a hazardous waste facility without a permit and storing hazardous waste without a permit, Ohio Revised Code (ORC) § 3734.02 (E) and (F):*** No person shall establish or operate a hazardous waste facility for the storage, treatment, disposal of hazardous waste without a hazardous waste facility installation and operation permit issued in accordance with section 3734.05 of the Revised Code nor shall they store, treat, or dispose of hazardous waste, regardless of whether the waste was generated on or off the premises without a permit.

During the inspection, Ohio EPA was told that Medina City contracts out the long line painting along the city streets. However, the painting device used to paint the cross-walks, turn arrows, etc. on the roads is brought back to the garage for cleaning. Any residual paint in the machine is sprayed onto the concrete behind the paint room and then the xylene is run through the machine until it comes out clear.

Based on the receipts you forwarded to me from Sherwin Williams, Medina purchased 60 gallons of xylene last year. There was approximately 18 gallons of xylene unused in the garage. The total amount of xylene that could have been disposed would have been approximately 42 gallons.

The worker who described to Ohio EPA how the painting machine was cleaned stated that the majority of the waste xylene evaporated.

You have indicated to Ohio EPA that the City of Medina is in discussions with Sherwin Williams to find a paint that it and the clean up waste would be considered non hazardous. On March 12, 2010 I sent an e-mail to you with information from Dave Foulkes, with Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) regarding paint that would meet Federal Specification for Waterborne Paint Traffic and Airfield Marking.

Please submit the Material Data Safety Sheets (MSDS) of all the paints you plan to use in the upcoming painting season. If the clean-up is a material other than water, please include the MSDS for that chemical also.

Since the City of Medina violated ORC §3734.02(E) and (F), the City of Medina is subject to all applicable general facility standards found in OAC chapters 3745-54 and 55. Additionally, at any time Ohio EPA may assert its right to have City of Medina begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

Although no further action is being required by Ohio EPA at this time regarding the disposal of the paint and cleaning solvent, be advised that due to the nature of the violation Ohio EPA may require closure pursuant to OAC rules 3745-55-11 through 3745-55-20 and OAC rules 3745-55-42 through 3745-55-47 at this site.

2. **Used Oil Storage Requirements for Generators, OAC rule 3745-279-22(C):** All containers and above ground tanks of used oil shall be clearly labeled or marked "Used Oil".

The tanks used to contain the used oil were not labeled with the words "used oil". In addition, the drain pans used to catch the oil during the oil changes were not labeled.

On March 23, 2010, you submitted photographs documenting the tanks and containers have been labeled with the words "used oil" to demonstrate this violation has been abated. No further action is required.

We also discussed four additional issues during the inspection.

3. "Orphan" drums have been left on the City's property during the night when no one is on site. During the inspection, I advised you to contact either Bart Ray or Ron Fodo, the Ohio EPA special investigators assigned to northeast Ohio, to see if they could assist you during these events. I also spoke with Jennifer Martin with the Sanitary Engineering Department and she said that she could assist you in determining if any of the "orphans" might be able to be disposed through the sanitary sewer system.

4. The drains in the front garage go to a sump that Medina has pumped out twice per year. The clean out is sent to Vexor. When asked if you had any analytical test results of the waste you were not aware of any existing. You did say that a jar of the waste was collected with each shipment. Per your discussions with Crystal Clean the waste is co-mingled with waste from other generators prior to delivery at Vexor. I cautioned you that you will want an independent sample of your waste to demonstrate that it is non-hazardous.

First, you will need to determine the configuration of the sump; this will affect how you design the sampling. You will also need to take care that a "representative" sample is collected. If you need assistance in developing a sampling plan, please contact me and I will be happy to assist.

5. Ohio EPA noted numerous aerosol cans at the facility. While none of the aerosol cans were in the trash, Ohio EPA did note that several cans, if not empty, would be considered a hazardous waste upon disposal.

Ohio EPA would strongly suggest that the City of Medina determine what aerosols they have on-site and how they would need to be disposed should any of the aerosols have a problem and cannot be completely emptied. Once all of the aerosols have been inventoried, you could either post a list or mark each aerosol to indicate to the workers which aerosols will need special handling if they malfunction and cannot be emptied. The City should then designate an area where these cans should be placed so that periodically, when enough are staged to be economically practical to dispose, they are ready for off site shipment.

I have included a portion of the Spring 2005 "Notifier" (a publication issued by the Division of Hazardous Waste Management) on how you may be able to save by switching to refillable bottles.

6. During the inspection, Ohio EPA noted two large tanks where the liquid calcium chloride is kept for road treatment. While these tanks are not required to have secondary containment, it is recommended that guard rails be installed to prevent any trucks from accidentally hitting the tanks. Additional information on best management practices, please attend the Division of Surface Waters "Pollution Prevention and Good Housekeeping for Municipal Operations" event which has tentatively been scheduled for May 20, 2010.
7. During the inspection, Ohio EPA was told that street sweepings and catch basin cleanouts were not managed as solid waste. Any follow up to this issue will be addressed by the Medina County Health Department.

The Division of Hazardous Waste Management has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage.

You can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>

MEDINA CITY OF (SERVICE GARAGE)
MARCH 30, 2010
PAGE – 4 –

If you would like a free, non-regulatory on-site pollution prevention assessment or if you would like more information about pollution prevention, please contact Adrienne LaFavre at (330) 963-1250. Ohio EPA has helpful information about this at the following web address: <http://www.epa.ohio.gov/ocapp/ocapp/>

I have enclosed the checksheets used during the inspection. Should you have any questions or require additional information, please contact Frank Popotnik, my supervisor, or me at (330) 963-1200.

Sincerely,



Karen L. Nesbit
Division of Hazardous Waste Management

KLN:ddw

Enclosure

ec: Harry Sarvis, DHWM, CO
Frank Popotnik, DHWM, NEDO
Natalie Oryshkewych, DHWM, NEDO
Jarnal Singh, DSIWM, NEDO

cc: Marlene Kinney, DHWM, NEDO
Clarissa Gereby, DSIWM, NEDO
John A. Schoeni, Medina County Health Department

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.

Send to Central Office

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

For Ohio EPA use only

Completed verification forms required to be submitted to CO should be e-mailed to kenneth.mell@epa.state.oh.us.

Site EPA ID No.	EPA ID Number: OHD 986 983 930														
	Site Name						Website:			(Optional)					
Site Location Information															
Street Address: 781 W SMITH ROAD															
City, Town, or Village: MEDINA						State: OH									
County Name: MEDINA															
Zip Code: 44256															
Site Land Type (check only one)															
Private		County		District		Federal		Indian		Municipal		State		Other	
<input type="checkbox"/>		<input checked="" type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	
NAICS code(s)															
www.census.gov/epcd/www/naics.html															

Facility Representative	First Name: NINO			MI:			Last Name: PICCOLI		
	Title: SERVICE DIRECTOR								
	Phone Number: 330-725-8861						Phone Number Extension:		
	E-Mail Address: NPICCOLI@MEDINA.OH.ORG								
	Fax Number: 330-722-9045						Fax Number Extension:		
	Street or P.O. Box: 132 NORTH ELMWOOD, P.O. BOX 703								
City, Town or Village: MEDINA									
State: OH						Zip Code: 44256			

Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner:									Date Became Owner								
	(Property) MEDINA COUNTY COMMISSIONERS									(mm/dd/yyyy):								
	Owner Type:		Private		County		District		Federal		Indian		Municipal		State		Other	
	<input type="checkbox"/>		<input checked="" type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	
	Street or P.O. Box: MEDINA CO ADMINISTRATIVE BLDG, 144 N BROADWAY AVE									Owner Phone #:								
	City, Town or Village: MEDINA									Country: USA			Zip Code: 44256					
	State: OH									Date Became Operator								
	Name of Site's Operator:									(mm/dd/yyyy):								
	CITY OF MEDINA																	
	Operator Type:		Private		County		District		Federal		Indian		Municipal		State		Other	
<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input checked="" type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		
Street or P.O. Box: 132 NORTH ELMWOOD AVE									Operator Phone #:									
City, Town or Village: MEDINA									Country: USA			Zip Code: 44256						
State: OH																		

VIOLATIONS CITED? Yes No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
<input checked="" type="checkbox"/> Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.	<input type="checkbox"/> Small Quantity Generator (SQG)	<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
	<input type="checkbox"/> U.S. Importer of Hazardous Waste	<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

- | | |
|---|--|
| <input type="checkbox"/> Hazardous Waste Transporter | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace |
| <input type="checkbox"/> Hazardous Waste Transfer Facility | <input type="checkbox"/> Small Quantity On-Site Burner Exemption |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Recycler of Hazardous Waste | <input type="checkbox"/> Underground Injection Control Facility |
| | <input type="checkbox"/> Receives Hazardous Waste from Off-site |

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED

(CHECK ALL BOXES THAT APPLY)

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

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

- Batteries
 Pesticides
 Mercury containing equipment
 Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))

- Used Oil Generator
 Used Oil Transporter
 Used Oil Transfer Facility
 Used Oil Processor
 Used Oil Re-refiner
 Off-Specification Used Oil Burner
 Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
 Used Oil Fuel Marketer to Off-Specification Used Oil Burner

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, F001, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

Announced Yes No Additional Facility Representatives: **ADAM GAJEWSKI**
 Tanks Yes No
 Containers Yes No

Name of Inspector(s) **KAREN NESBIT, DHWM, NEDO** Name of Inspector(s) **CLARISSA GEREBY, DSIWM, NEDO** Date of Inspection/Time (mm/dd/yyyy) (hh:mm) **03/09/2010 10:00 AM**

Comments:

While the site does not generate hazardous waste, 'orphan' drums are left there periodically at night and they need to evaluate the drums and dispose of the waste accordingly. There currently are two drums on site awaiting evaluation. Would it , be more appropriate to just call the site a CESQG so the ID number does not have to be activated?

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

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

PROHIBITIONS

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

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

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

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

GENERATOR STANDARDS

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

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

- | | | |
|----|--|--|
| 5. | Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|----|--|--|

NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

- | | | |
|----|--|---|
| 6. | Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 7. | Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 8. | Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "A Used Oil"? [3745-279-22(C)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<i>- rebutted</i> |
| 9. | Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| a. | Stopped the release? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Contained the release? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

	c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

ON-SITE BURNING IN SPACE HEATER

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:		
	a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Are the combustion gases from heater vented to the ambient air?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

GENERATOR TRANSPORTATION

11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]		
	a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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

13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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.

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

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:

WASTE EVALUATION

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11] <i>- concern - pump sludge</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
----	---	--

GENERATOR CLASSIFICATION

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
----	--	--

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <i>- see NOV</i>
----	---	--

TREATMENT OF HAZARDOUS WASTE

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

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

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

MIX HAZARDOUS WASTE WITH USED OIL

5.	Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>