



**Environmental
Protection Agency**

Robert R. Anderson, Governor
Lee H. Fisher, Lt. Governor
Chris M. Jones, Director

July 22, 2010

Jay Amin
Vice President
Cleveland Circuits Corporation dba Instrumatics
15516 Industrial Parkway
Cleveland, OH 44135

**RE: CLEVELAND CIRCUITS CORPORATION, dba INSTRUMATICS, OHD 050 396 126
CUYAHOGA COUNTY, LQG, NOTICE OF VIOLATION (NOV)**

Dear Mr. Amin:

On June 16, 2010 I, as a representative of the Ohio EPA Division of Hazardous Waste Management, conducted an inspection of the Cleveland Circuits Corporation dba Instrumatics facility (Instrumatics) located at 15516 Industrial Parkway in Cleveland, Ohio, for compliance with Ohio's hazardous waste and used oil regulations. Sam Amin, Bob Patel and Jeffrey Pallotta represented Instrumatics during the inspection. Mr. Pallotta subsequently provided additional information via email and phone conversations.

Since January 1, 2010, the facility has been owned by Cleveland Circuits Corporation and is now operating as Cleveland Circuits Corporation dba Instrumatics. The facility was previously owned by Gayatri, Inc. and operated as Gayatri, Inc. dba Instrumatics.

The facility is a manufacturer of printed circuit boards. The facility operates copper, tin and palladium plating lines. Facility representatives stated during the inspection that the only plating bath solution that is changed out is the electroless copper solution. Facility representatives also stated that lead plating is no longer conducted and that the only lead used is in a molten tin/lead protective dip. Dross from the molten tin/lead process is recycled to Metallic Resources.

The largest volume hazardous waste stream appeared to be spent copper etchant largely composed of ammonium hydroxide and copper chloride. This spent copper etchant is recycled to Micronutrients located in Indianapolis, Indiana where it is processed to recover a copper compound and rejuvenated etchant. While Indiana and Region V of USEPA consider the Micronutrient process to constitute use or reuse per 40 CFR 261.2(e) so they do not regulated spent etchant as a waste, Ohio considers the Micronutrient process to be reclamation of a spent material that exhibits a characteristic of hazardous waste (D002). Consequently while in Ohio this spent etchant is a hazardous waste and must be managed as such.

Instrumatics also generates other types of spent etchants and rinse waters. Standing rinse and running rinse waters are reportedly shipped to Clean Harbors. Some acidic and basic wastes are neutralized on-site.

The inspection included a review of the facility's operations, as well as waste management practices and documentation. Instrumatics was inspected for the requirements of a Large Quantity Generator (LQG) since records indicated that the facility currently commonly generates more than 2,200 pounds of hazardous waste in a calendar month.

This letter will explain the violations I found and steps you need to take to correct them. Because of the change in ownership discussed above, the violations cited are only those since January 1, 2010. Ohio EPA reserves the right to cite violations attributable to the prior owners at another time.

I found the following violations of Ohio's hazardous waste, used oil and universal waste laws and regulations:

1. OAC Rule 3745-52-11 Waste Evaluation

OAC Rule 3745-52-11 requires "Any person who generates a waste...[to] determine if that waste is a hazardous waste..."

The facility periodically generates used fluorescent lamps. The facility did not provide any evidence that used lamps from this location have been evaluated to determine if they are hazardous waste and if so that they are either managed as hazardous waste or recycled as universal waste.

To return to compliance the facility must:

- Either manage discarded used lamps as universal waste; or,
- Evaluate all discarded fluorescent lamps not managed as universal wastes to determine if they exhibit any characteristic of hazardous waste.

You may use either generator knowledge based on documentation provided by the lamp manufacturer for that model number lamp or by taking a representative sample of the lamps for an analysis using the TCLP test.

-Only lamps that are determined to NOT exhibit any characteristic of hazardous waste may be placed in the trash dumpster. (Ohio EPA encourages recycling of these lamps.) All other discarded lamps must be managed in compliance with either the hazardous waste or universal waste rules. (Most generators of discarded lamps that cannot be disposed as trash elect to manage them as universal waste since this entails a lower regulatory burden.)

-Develop a plan that describes how Instrumatics plans to evaluate and manage discarded lamps. Submit a copy of the plan to this office within 30 days of the date of receipt of this letter.

Attached are Ohio EPA fact sheets on used lamps that you might wish to review when responding to this and related violations.

**2. OAC Rule 3745-52-11 Waste Evaluation
OAC Rule 3745-52-40 (C) Recordkeeping.**

OAC Rule 3745-52-11 requires "Any person who generates a waste...[to] determine if that waste is a hazardous waste using the following...Testing the waste...or...Applying knowledge of the hazardous characteristic of the waste in light of the materials or the processes used." OAC Rule 3745-52-40 (C) requires a generator to keep records of any test results, waste analyses, or other determinations made in accordance with rule 3745-52-11 for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal.

Ohio EPA was unable to determine if wastes have been adequately evaluated as the facility did not provide copies of any waste profiles or any other waste evaluation documents.

To return to compliance, Instrumatics must provide a copy of a current waste profile for each waste stream to this office within 30 days of receipt of this letter.

3. OAC Rule 3745-52-12 Generator Identification Number

This rule states that a generator may not treat, store, dispose of, transport, or offer for transportation hazardous waste without having received a U.S. EPA identification number from U.S. EPA or Ohio EPA and that a generator who has not received a U.S. EPA identification number must obtain one by applying to Ohio EPA using Ohio EPA form EPA 9029.

The generator identification number OHD050396126 was issued to Gayatri dba Instrumatics. During the inspection Ohio EPA was informed that the new owner and operator of the facility is Cleveland Circuits Corporation dba Instrumatics, which is a separate legal entity from Gayatri dba Instrumatics. A “generator” is defined in OAC rule 3745-50-10(A)(45) as any person, by site, whose act or process produces hazardous waste as identified or listed in Chapter 3745-51 of the Administrative Code or whose act first causes a hazardous waste to become subject to the hazardous waste rules.

While it is true that the same identification number will be issued to Cleveland Circuits Corporation dba Instrumatics that was issued to Gayatri dba Instrumatics, Cleveland Circuits Corporation dba Instrumatics still needs to complete EPA Form 9029 to assign the number to the appropriate owner. You can renotify and have the hazardous waste identification number assigned to Cleveland Circuits Corporation dba Instrumatics by going to the following web site and following the instructions for the Notification of Regulated Waste Activity form: <http://www.epa.ohio.gov/dhwm/notiform.aspx>.

To return to compliance Instrumatics must submit proof to this office to this office within 30 days of receipt of this letter that it has submitted a revised complete EPA Form 9029 to Ohio EPA, DHWM's central office in Columbus.

4. OAC Rule 3745-52-40 Recordkeeping

Rule 3745-52-40 (A) requires that a generator keep a signed copy of each manifest received from the designated facility which received the waste for at least three years from the date the waste was accepted by the initial transporter.

The only manifests provided by the facility were for waste shipments to Micronutrients.

To return to compliance, Instrumatics must provide a copy of a manifest for each hazardous waste shipment (including those to Micronutrients) in 2010 to this office within 30 days of receipt of this letter.

5. OAC Rule 3745-65-16 Personnel training.

(A) (1) Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with hazardous waste rules. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (D)(3) of this rule.

(2) This program must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures, including contingency plan implementation, relevant to the positions in which they are employed.

(3) At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including, where applicable;

- (a) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;**
- (b) Key parameters for automatic waste feed cut-off systems;**
- (c) Communications or alarm systems;**
- (d) Response to fires or explosions;**
- (e) Response to ground water contamination incidents; and**
- (f) Shutdown of operations.**

(B) Facility personnel must successfully complete the program required in paragraph (A) of this rule within six months after January 7, 1983 or six months after the date of their employment or assignment to a facility, or to a new position at a facility, whichever is later. Employees hired after January 7, 1983 must not work in unsupervised positions until they have completed the training requirements of paragraph (A) of this rule.

(C) Facility personnel must take part in an annual review of the initial training required in paragraph (A) of this rule.

(D) The owner or operator must maintain the following documents and records at the facility:

(1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;

(2) A written job description for each position listed under paragraph (D)(1) of this rule. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;

(3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (D)(1) of this rule; and

(4) Records that document that the training or job experience required under paragraph (A), (B), and (C) of this rule has been given to, and completed by, facility personnel.

(E) Training records on current personnel must be kept until closure of the facility.

Training records on former employees must be kept for at least three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.

No personnel training program documentation was provided by the facility.

To return to compliance Instrumatics is required to:

- Create a training plan that it meets all the requirements of OAC Rule 3745-65-16(A)(1) through (E);
- Submit a copy of the revised training plan to this office within 30 days of receipt of this letter.

After OEPA review of the program, Instrumatics will be required to document that required training has been provided for 2010.

Please note that the training program must be directed by a person trained in hazardous waste management procedures which will require that someone at Instrumatics receive adequate training to be the program director unless Instrumatics wishes to use an outside consultant as the director of the training program.

Please also note that in the above rule, "facility personnel" are those employees that have responsibilities for hazardous waste management and that the personnel training program only applies to facility hazardous waste management responsibilities and activities. Employees whose only hazardous waste responsibility is to place hazardous waste in a satellite accumulation container need not be part of the formal personnel training program.

A sample training plan can be obtained by going to our web site at www.epa.ohio.gov/dhwm , then going to and clicking on the "Forms & Publications" link (which is along the left side of the window) and when the Publications Catalog opens, then entering the search terms:

+sample +training +plan in the "Search by Keyword box".

Or if you have difficulties with the above, I can provide a copy of a sample training plan by email. Contact me if interested.

6. OAC Rule 3745-65-51 Purpose And Implementation Of Contingency Plan

(A) Each owner or operator shall have a contingency plan for the facility. The contingency plan shall be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

OAC Rule 3745-65-52 Content of contingency plan.

(A) The contingency plan must describe the actions facility personnel must take to comply with rules 3745-65-51 and 3745-65-56 of the Administrative Code in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

(B) If the owner or operator has already prepared a "Spill Prevention, Control, and Countermeasures Plan"...or some other emergency or contingency plan, he need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of Chapters 3745-65 to 3745-69 and 3745-256 of the Administrative Code.

(C) The contingency plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and Ohio EPA and local emergency response teams to coordinate emergency services, pursuant to rule 3745-65-37 of the Administrative Code.

(D) The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see rule 3745-65-55 of the Administrative Code), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates.

(E) The contingency plan must include a list of all emergency equipment at the facility [such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment], where this equipment is required. This list must be kept up to date. In addition, the contingency plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

LQGs are required to have a facility plan that meets the requirements of OAC Rule 3745-65-52 (A) through (E). No contingency plan documentation was provided by the facility.

Amending other emergency or contingency plans to incorporate hazardous waste management provisions is acceptable for complying with OAC Rule 3745-65-51 and OAC 3745-65-52, however all the specific requirements of OAC 3745-65-52 must be addressed in the amended plan.

Please note that the “contingency plan” required by these rules is only for hazardous waste management activities conducted at the facility.

To return to compliance Instrumatics is required to:

- Create a new hazardous waste contingency plan or amend a current contingency to plan to ensure that it meets all the requirements of OAC Rule 3745-65-50 through OAC Rule 3745-65-56;
- Submit a copy of the new or amended contingency plan to this office within 30 days of receipt of this letter;
- After Ohio EPA review and acceptance, distribute the revised plan to the local police, fire department and hospital identified in the plan and provide proof of such distribution to Ohio EPA

A sample contingency plan can be obtained by going to our web site at www.epa.ohio.gov/dhwm , then going to and clicking on the "Forms & Publications" link (which is along the left side of the window) and when the Publications Catalog opens, then entering the search terms:

+sample +contingency +plan in the “Search by Keyword box”.

Or if you have difficulties with the above, I can provide a copy of a sample contingency plan by email. Contact me if interested.

7. OAC Rule 3745-65-33 Testing and maintenance of equipment.

This rule states, “All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency. The owner or operator must record the inspections in a log or summary.”

The only records of the required inspections provided by the facility were for the ADT alarm system. Inspections are also required for spill control equipment and decontamination equipment for the 90 day hazardous waste accumulation area.

An example inspection log is attached for your assistance in responding to this violation.

To return to compliance Instrumatics is required to:

- Develop an inspection log,
- Provide a completed inspection log for one inspection cycle.
- Submit the completed inspection log to this office within 30 days of receipt of this letter.

8. OAC Rule 3745-52-34 (C)(1)(b) Satellite Accumulation of hazardous waste.

This rule provides "A generator may accumulate as much as fifty five gallons of hazardous waste...in containers at or near any point of generation where wastes initially accumulate...provided he...Marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers." Containers meeting these criteria are commonly referred to as "satellite accumulation containers".

I observed several containers accumulating hazardous waste at or near the point of generation, for example containers collecting spent etchant, that were not marked with the words "Hazardous Waste" or with other words that identify the contents of the containers.

To return to compliance Instrumatics is required to:

- Identify all satellite accumulation containers;
- Mark these containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers; and
- Provide photos of all satellite accumulation containers with the marking visible to this office within 30 days of receipt of this letter.

9. OAC Rule 3745-52-34(A)(2) & (3) Accumulation time of hazardous waste

These rule sections allow a LQG to accumulate, for ninety days or less, hazardous waste that is generated on-site without an Ohio hazardous waste permit, provided each container in the 90 day accumulation area is labeled or marked clearly with:

- The date upon which each period of accumulation and/or treatment begins; and,
- The words "Hazardous Waste".

None of the drums of spent etchant hazardous waste in the 90 day accumulation area at the time of the inspection were marked or labeled with the start date of the accumulation period or the words "hazardous waste".

To return to compliance Instrumatics must:

- Mark all containers of hazardous waste in the 90 day accumulation area with the words "Hazardous Waste";
- Mark all containers of hazardous waste in the 90 day accumulation area with the start date of the accumulation period and
- Provide photos of hazardous waste containers in the 90 day accumulation area with the words "Hazardous Waste" and accumulation start date to this office within 30 days of receipt of this letter.

10. OAC Rule 3745-65-35 Required aisle space

This rule states "The owner or operator shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of the above-mentioned purposes."

At the time of the inspection approximately five 55-gallon drums of hazardous waste (spent etchant) were observed in the 90 day area. Inadequate aisle space was provided for access to these drums of spent etchant hazardous waste in the 90 day accumulation area at the time of the inspection.

To return to compliance Instrumatics must:

- Immediately develop and implement procedures for providing aisle space adequate to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to all hazardous waste containers in the 180 day accumulation area; and,
- Submit a copy of these procedures and a recent photo of the 90 day accumulation area to this office within 30 days of receipt of this letter.

11. OAC Rule 3745- 66-74 Weekly Inspections of Hazardous Waste Containers

A large quantity generator of hazardous waste is required to inspect all containers of hazardous waste in the 90 day accumulation area at least weekly and to record the inspections in a log or summary. At the time of the inspection approximately five 55-gallon drums of hazardous waste (spent etchant) were observed in the 90 day area. No inspection documentation forms were provided by the facility.

An example inspection log is attached for your assistance in responding to this violation.

To return to compliance the facility must:

- Prepare inspection forms for the 90 day accumulation area;
- Conduct inspections of the hazardous waste containers in the 90 day accumulation area for 2 weeks;
- Continue conducting these inspections; and,
- Submit copies of the completed inspection forms for 2 weeks to this office within 30 days of receipt of this letter.

12. OAC Rule 3745-52-32(B) Marking Hazardous Waste Containers For Transportation Off-Site

This rule states that, "Before transporting hazardous wastes or offering hazardous wastes for transportation off-site, a generator must mark each container of one hundred nineteen gallons or less used in such transportation with the following words and information displayed in accordance with the requirements of 49 CFR 172.304:

"Hazardous waste – Federal law prohibits improper disposal. If found, contact the nearest police or public safety authority, or the United States Environmental Protection Agency. Generator's name and address _____ Generator's U.S. EPA identification number Manifest document number _____."

The facility stated that prior to off-site transportation containers (55 gallon drums) of spent etchant shipped to Micronutrients were not labeled with the required hazardous waste label but instead had a label applied that stated "Material For Use Or Reuse per 40 CFR 261.2(e)". While within Ohio, spent etchant bound for Micronutrients is a hazardous waste and must be managed in accordance with Ohio hazardous waste regulations.

To return to compliance the facility must:

- Prior to offering for transportation off-site, initiate labeling of all containers of spent etchant to be shipped to Micronutrients with the required hazardous waste label; and,
- Submit a photo of a container of spent etchant properly labeled for transportation off-site to this office within 30 days of receipt of this letter.

**13. OAC Rule 3745-270-07(A)(2) Land Disposal Ban Notice
OAC Rule 3745-270-07(A)(8) Land Disposal Ban Notice Recordkeeping**

These rules apply to LQGs and require that with the initial shipment of a hazardous waste that does not meet the land disposal treatment standard to a treatment or storage facility, the generator must send a one-time written notice to each treatment or storage facility receiving the waste, and place a copy in the generator's files and retain the copy for three years after the hazardous waste was last shipped.

The facility did not provide any copies of the land disposal ban notices that it had submitted to treatment or storage facilities.

To return to compliance the facility must:

- Obtain copies of land disposal ban notices from its files or from the treatment or storage facilities to which it has shipped hazardous waste;
- Or if some were never submitted, create and submit to the treatment or storage facilities; and
- Submit copies of the above land disposal ban notices to this office within 30 days of receipt of this letter.

**14. OAC Rule 3745-270-09(A) Identification Of Underlying Hazardous Constituents (UHCs)
in Wastes Subject to the Land Disposal Ban
OAC Rule 3745-270-07(A)(5) Generator Treatment of Wastes Subject to the Land
Disposal Ban**

My understanding is Instrumatics generates some wastes that exhibit the corrosivity characteristic (i.e., are strong acids or bases) and that Instrumatics treats some of these on-site to neutralize the wastes. My further understanding is that these wastes are then either shipped off-site as non-hazardous wastes or disposed to the sewer system.

A generator of hazardous wastes may treat its wastes in containers or tanks. When treatment is done to meet the Land Disposal Ban (LDR) standards, the generator must follow a waste analysis plan and must evaluate the neutralized acids or bases for underlying hazardous constituents (UHCs) if he claims that the treated waste meets the LDR treatment standard (including UHCs) and the acid/base does not go for further treatment at a wastewater treatment unit (e.g., the NEORS).

To return to compliance the facility must:

- For any neutralized wastes shipped off-site the facility must determine whether any underlying hazardous constituents (UHCs) are present and if so whether they are at concentrations that meet the LDR standards;
- Prepare and follow a waste analysis plan;
- Submit copies of the results of above determination of underlying hazardous constituents (UHCs) land disposal ban notices to this office within 30 days of receipt of this letter, and
- Submit a copy of the waste analysis plan to this office within 30 days of receipt of this letter, **OR**
- Submit information to this office within 30 days of receipt of this letter documenting why a waste analysis plan is not required.

15. OAC Rule 3745-270-09(D)(1)(a) Notification Must Include Name, Address Of Solid Waste Facility

OAC Rule 3745-270-09(D)(1)(b) Notification Must Include Description of Waste Initially Generated

OAC Rule 3745-270-09(D)(2) Notification Must Be Signed By Authorized Representative

OAC Rule 3745-270-09(D) states that:

“Wastes that exhibit a characteristic are also subject to requirements of rule 3745-270-07 of the Administrative Code, except that once the waste is no longer hazardous, a one-time notification and certification must be placed in the generator's or treater's files and sent to the director...

(1)The notification must include the following information:

(a)The name and address of the licensed solid waste facility receiving the waste shipment; and

(b)A description of the waste as initially generated, including the applicable EPA hazardous waste number(s), treatability group(s), and underlying hazardous constituents (as defined in rule 3745-270-02 of the Administrative Code), unless the waste will be treated and monitored for all underlying hazardous constituents. If all underlying hazardous constituents will be treated and monitored, there is no requirement to list any of the underlying hazardous constituents on the notice.

(2)The certification must be signed by an authorized representative and must state the language in paragraph (B)(4) of rule 3745-270-07 of the Administrative Code.”

My understanding is Instrumatics generates some wastes that exhibit the corrosivity characteristic (i.e., are strong acids or bases) and that Instrumatics treats some of these on-site to neutralize the wastes. My further understanding is that these wastes are they either shipped off-site as non-hazardous wastes or disposed to the sewer system.

If treatment is done to meet the Land Disposal Ban (LDR) standards, the facility submit the one-time notification and certification required by OAC 3745-270-09(D) for a characteristic waste that is treated so that the waste is no longer hazardous.

To return to compliance the facility must:

- Prepare and submit the one-time notification and certification to the director and retain a copy in its records as required by OAC 3745-270-09(D).
- Provide documentation of submittal of the one-time notification and certification to this office within 30 days of receipt of this letter; **OR**

-Submit information to this office within 30 days of receipt of this letter documenting why the one-time notification and certification is not required.

Concerns

Annual Report

Because Instrumatics is an LQG for most of the months in 2010, Instrumatics must submit an annual report for the year 2010 by March 1, 2011.

Ohio generators who have shipped hazardous waste off-site are required to submit an annual report (OAC Rule 3745-52-41(A)). If the site is a Large Quantity Generator (LQG) in any one month during the calendar year, an annual report must be filed and it must report ALL hazardous wastes generated and/or shipped during the entire year.

See this webpage for more information on the annual report process:
http://www.epa.ohio.gov/dhwm/ann_report.aspx

Enclosed you will find a copy of the checklists completed during the inspection.
Also attached are several guidance documents to assist you in responding to this letter.

Other Information

The division 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/>

Should you have any questions regarding this letter, please contact me at (330) 963-1165.

Sincerely,



Neil J. Wasilk
Environmental Specialist
Division of Hazardous Waste Management

NJW:ddw
Enclosure

ec: Nyal McKenna, Ohio EPA, DHWM, NEDO
Natalie Oryshkewych, Ohio EPA, DHWM, NEDO
Harry Sarvis, Ohio EPA, DHWM, CO

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

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

For Ohio EPA use only

E-mail this completed form to kristina.durnell@epa.state.oh.us
 or mail it to Kristina Durnell, Central Office

Site EPA ID No.	EPA ID Number: OHD 050 396 126	
Site Name	Name: Cleveland Circuits Corporation dba Instrumatics	Website: (Optional)
Site Location Information	Street Address: 15516 Industrial Parkway City, Town, or Village: Cleveland County Name: Cuyahoga	State: OH Zip Code: 44135
Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html	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"/>	
Facility Representative	First Name: Jay Phone Number: 216-941-2226 E-Mail Address: Fax Number: Street or P.O. Box: City, Town or Village: State: OH	MI: Last Name: Amin Phone Number Extension: Fax Number Extension: Zip Code:
Additional names can be recorded in number 12 Only provide address information if it is different than the site address		
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: 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: City, Town or Village: State: Name of Site's Operator: Same as above 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: State:	Date Became Owner (mm/dd/yyyy): Owner Phone #: Country: Zip Code: Date Became Operator (mm/dd/yyyy): Operator Phone #: United States Zip Code:

VIOLATIONS CITED? Yes No

TYPE OF HANDLER- A MINIMUM OF ONE BOX MUST BE CHECKED

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input checked="" type="checkbox"/> Large Quantity Generator (LQG) <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
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Hazardous Waste Compliance Inspection Notes

Facility:

Cleveland Circuits Corporation
DBA Instrumatics
15516 Industrial Parkway
Cleveland, OH 44135

This facility was formerly Gayatri, Inc. dba Instrumatics. The facility was recently acquired by new owners and is now operating as Cleveland Circuits Corporation dba Instrumatics.

The facility is a manufacturer of printed circuit boards. The facility operates copper, tin, palladium and gold plating lines. Facility representatives stated that the only plating bath solution that is changed out is the electroless copper solution. Facility representatives also stated that lead plating is no longer conducted and that the only lead used is in a molten tin/lead protective dip. Dross from the molten tin/lead process is recycled to Metallic Resources and is not regulated as a hazardous waste.

Manufacturing process for circuit boards include drilling holes in boards, printing circuits on boards, coating areas to be protected during processing, etching, plating, washing, rinsing, solder masking. Various etchant processes remove copper and/or some of the plated materials.

Alcohol based solvents are used in small amounts for wiping during certain parts of production process. Facility thought nearly all the alcohol was evaporated during use. Rags used are sent to a commercial laundry.

No painting is conducted at this facility. No parts washers are used.

The 90 day accumulation area is located near the loading dock in rear of building. The only hazardous wastes observed in the area were about 5 drums of spent copper etchant to be recycled to Micronutrients which is a division of Heritage Technologies. Micronutrients supplies fresh etchant and removes the spent. No hazardous waste labels or accumulation dates were on the drums of spent copper etchant.

The machine that uses the Micronutrient etchant had a fresh drum and spent drum connected. Spent drum is a satellite accumulation container; not marked with words "hazardous waste" or other words to identify contents.

The largest volume hazardous waste stream appeared to be spent copper etchant which is largely composed of ammonium hydroxide and copper chloride. This spent copper etchant is recycled to Micronutrients located in Indianapolis, Indiana where it is processed to recover a copper

compound and produce rejuvenated etchant. This spent copper etchant has a pH is about 9.5 so it would not meet the first part of the definition of D002 (i.e., pH less than 2.0 or greater than 12.5). Apparently it is considered corrosive under the second part of the definition of D002 (i.e., corrosion rate on steel of greater than ¼ inch per year).

While Indiana and Region V of USEPA consider the Micronutrient process to constitute use or reuse per 40 CFR 261.2(e) so that spent etchant is not regulated as a waste, Ohio considers the Micronutrient process to be reclamation of a spent material that exhibits a characteristic of hazardous waste (D002). Consequently while in Ohio this spent etchant is a hazardous waste and must be managed as such.

The following manifest shipment dates and drum quantities (presumed to be 55 gallon drums) were copied from the manifests for shipments of spent etchant to Micronutrients:

Date	No. of Drums	Pounds per shipment (density of 22.5° Baume)	Approx. lbs/ month
6-4-10	12	6508	3099
4-1-10	10	5423	6025
3-4-10	14	7592	3796
1-3-10	8	4338	5423
12-11-09	10	5423	2357
10-1-09	11	5965	3313
8-6-09	16	8677	

Note: 22.5° Baume equals 9.86 lbs/gal.

Facility is a LQG solely from the waste spent to Micronutrients. In addition other hazardous wastes are also generated as indicated by 2009 information on wastes shipped to Ohio TSDFs.

INSURANCE

**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 type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
4.	Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)] <i>NEW CONNOR HAS CF 1-1-10 REPORT DUE 3-1-10</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
6.	Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
7.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]	
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input checked="" type="checkbox"/> No <input 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 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 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 checked="" 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 checked="" type="checkbox"/>
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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 checked="" 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 checked="" 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)(1)] <i>ONLY MANIFESTS FOR SHIPMENTS</i>	Yes <input 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)(1)]&[3745-52-27(A)] <i>TO MICRONUTRIENTS PROVIDED</i>	Yes <input 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)(1)]		
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input 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 type="checkbox"/>
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
17.	If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	Yes <input 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.		
18.	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 - NO DOCUMENTATION PROVIDED		
21.	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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
22.	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
25.	Does the generator provide annual refresher training to employees? [3745-65-16(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
26.	Does the generator keep records and documentation of:	
a.	Job titles? [3745-65-16D(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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					
34.		Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
35.		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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: Verify that the equipment is listed in the contingency plan.					
36.		Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
37.		Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
38.		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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
39.		If there is only one employee on the premises, is there immediate access to a device (eg., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
40.		Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
41.		Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
42.		Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
SATELLITE ACCUMULATION AREA REQUIREMENTS					
43.		Does the generator ensure that satellite accumulation area(s):			
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
44.		Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

[Facility Name/Inspection Date]

[ID number]

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	b.	Job descriptions? [3745-65-16D(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Type and amount of training given to each person? [3745-65-16D(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Completed training or job experience required? [3745-65-16D(4)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
27.		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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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 *NO DOCUMENTATION PROVIDED*

28.		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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
29.		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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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

30.		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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
31.		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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
32.		Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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

33.		Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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

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

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

48.	Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] <i>NONE OBSERVED. BASES & ACIDS</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
51.	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)] <i>ARE INCOMPATIBLE.</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
52.	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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.

53.	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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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

54.	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 <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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INSTRUMATICS

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.

NO USED GENERATOR

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input 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 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 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 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 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 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 type="checkbox"/>
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NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

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

[Facility Name/Inspection Date]

[ID Number]

	b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input 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 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 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 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 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 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 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.

INSTRUMENTS

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS – BATTERIES AND LAMPS

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

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

PROHIBITIONS *NO INFORMATION PROVIDED ON MANAGEMENT OF USED LAMPS FROM THIS FACILITY*

- | | | |
|----|---|---|
| 1. | Did the SQUWH dispose of universal waste? [3745-273-11(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 2. | Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES *NO U.W. BATTERIES OBSERVED*

- | | | |
|----|--|---|
| 3. | Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 5. | Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 6. | If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 7. | Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

UNIVERSAL WASTE LAMPS *NO LAMPS ON-SITE AT TIME OF INSPECTION*

- | | | |
|----|---|---|
| 8. | Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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 rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.

- | | | |
|-----|--|---|
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|-----|--|---|

ACCUMULATION TIME		
11.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. If not, is 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: Accumulation is defined as date generated or date received from another handler.</i>		
12.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RESPONSE TO RELEASES		
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
16.	If the material released is a hazardous waste, was 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 OAC Chapter 3745-52) [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
OFF-SITE SHIPMENTS		
<i>NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.</i>		
17.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
21.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u> :	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
EXPORTS		
23.	Is waste being sent to a foreign destination? If so:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

a.	Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

INSTRUMENTALS

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

GENERAL REQUIREMENTS

- 1. If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07 (A)(7)] Yes No N/A
 - 2. Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] *NO INFORMATION PROVIDED.* Yes No N/A
- NOTE: This is done by determining if the HW/soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07 (A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).*
- 3. Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)] *SEE ABOVE COMMENT* Yes No N/A
 - 4. Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)] *SEE ABOVE COMMENT* Yes No N/A
 - 5. Does the generator generate a listed HW that exhibits a characteristic? If yes,
 - a. Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)] Yes No N/A

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

- 6. Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)] Yes No N/A
- NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.*

NOTE: Written documentation of this determination is not required.

- 7. Did the generator treat his HW /soil on-site to meet the LDR treatment standard? *TREATING ACIDS & BASES, UNCLEAR IF TREATING TO MEET THE LDR STANDARD* Yes No N/A

NOTE If "Yes" see question #16.

- 8. Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility?[3745-270-07(A)(2)] *NONE PROVIDED DURING INSPECTION* Yes No N/A
- 9. Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)] Yes No N/A
- 10. Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)] *NONE PROVIDED* Yes No N/A
- a. Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)] *NONE PROVIDED* Yes No N/A

NOTIFICATION FORM

- 11. Does the LDR Notification form contain the following information: - *NONE PROVIDED*
 - a. Manifest number of the first waste shipment to the TSD?[3745-270-07(A)(2)] Yes No N/A
 - b. Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)] Yes No N/A
 - c. A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)] Yes No N/A
 - d. A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]. Yes No N/A

NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.

e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories

f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.

g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for?[3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.

PROHIBITED DILUTION *NO INFORMATION PROVIDED*

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

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

	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: If Yes, HW is improperly being treated by dilution.

	b.	Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B) and 3745-270-40(A)(3)].

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

GENERATOR TREATMENT			
16.	Does the generator treat to meet LDRs on-site [3745-270-40(A)]? <i>TREATING BY NEUTRALIZATION UNCLE EARL IF TO MEET LDRS</i>		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
If "yes"...complete the rest of the checklist. If "No"...stop...you are done.			
	a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: This is a laboratory analysis but it does not have to be kept by the generator.</i>			
	c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTIFICATION FORM <i>None PROVIDED</i>			
17.	a.	Contains all information in #11 a-g above and	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	If the treated HW/soil is listed.....notification contains the following certification statement: "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment stands specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:	
	i.	Send a one-time notification to the director?[3745-270- 09 (D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	ii.	Maintain a copy of the notice onsite?[3745-270-09(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iii.	Include in the notification: [3745-270-09(D)(1)(a)]	
		1. Name & address of receiving landfill?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		2. Description of HW when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		3. HW code when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		4. Treatability group when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		5. Underlying hazardous constituents present when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iv.	Contain the right certification statement as required by 3745-70-07(B)(4)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>