



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 16, 2010

**RE: COMMERCIAL ANODIZING
OHD 004 209 409**

Mark Swetel
Commercial Anodizing
38387 Apollo Parkway
Willoughby, OH 44094

Dear Mr. Swetel:

Thank you for your letter dated March 2, 2010. That letter was in response to my February 2, 2010 letter that dealt with my December 2, 2009 inspection of Commercial Anodizing located at 38387 Apollo Parkway, Willoughby, Ohio. Your letter gave me more information regarding your hazardous waste generation, specifically your generation of F006 filter cake.

There are three categories of hazardous waste generators based mainly on the total weight of hazardous waste generated in a calendar month. In certain cases this can also be based on the total weight of hazardous waste on site. Some rules are specific to just one or two of these categories. A facility's category and the rules it must follow can change from month to month. The categories are a Conditionally Exempt Small Quantity Generator (CESQG) that generates from 0 to 220 pounds, a Small Quantity Generator (SQG) that generates 220 pounds to 2,200 pounds, and a Large Quantity Generator (LQG) that generates over 2,200 pounds. I encourage you to keep a monthly log so that you can track which category you are in every month. The following document that gives more information about this is enclosed:

Hazardous Waste Generator Categories and Episodic Generation 2007

http://epa.ohio.gov/portals/32/pdf/Episodic_Generation.pdf

Your letter states that the last time the F006 filter cake was shipped off site was in 2004. You currently have a cubic yard bag of this waste which I assume weighs about 1200 pounds. You currently generate this waste by cleaning the filter press plates 3-4 times a year. Your letter indicates that in the past this was somewhat more frequently generated.

The actual generator category that a facility is in during a specific month is normally based on the weight of hazardous waste generated from the first of that month to the last day of that month. Absent other records, such as keeping the log I mentioned above, shipping records can give a good indication of generator category. Since 2004 you have shipped hazardous waste to Envirite of Ohio, Inc. and Chemtron Corp. These facilities are required to submit records of all shipments to the Ohio EPA. I believe I gave you a copy of a search of those records for your facility. Another copy is enclosed. An averaging of these shipments over the year gives an indication (again, not exact) of your generator category during at least most of the months during that year. From this, it appears your monthly generator categories were typically the following over recent years:

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2009 SQG
2008 SQG
2007 CESQG
2006 LQG during the month(s) of the generation of the chromic acid waste and CESQG the other months
2005 LQG during the month(s) of the generation of the spent chromate solution and CESQG the other months

The following additional violations have been found based on the analysis discussed above. A completed checklist covering the SQG rules and the violations cited below is enclosed.

1. Ohio Revised Code (ORC) 3734.02(E) and (F) – Accumulation beyond 180 days. ORC 3734.02 (E) and (F) state that no person shall establish or operate a hazardous waste facility without a permit and that no person shall store, treat, or dispose of hazardous waste except at a facility with a hazardous waste permit.

Commercial Anodizing violated ORC 3734.02(E) and (F) by storing its F006 filter cake hazardous waste beyond 180 days. Hazardous waste generated during a month that a facility is a SQG can only be accumulated for up to 180 days without the facility becoming a storage facility. Shipment records indicate that this facility was a SQG during at least most of the months during 2008. F006 filter cake was also generated during 2008. This filter cake was seen on site during the inspection at the end of 2009. Therefore, this filter cake was stored for at least 6 months longer that allowed. **You must now provide for the proper recycling or disposal of the F006 filter cake hazardous waste. Please contact me when this shipment has been scheduled and send me a copy of the shipping papers when shipped.**

Since Commercial Anodizing violated (ORC) 3734.02(E) and (F), Commercial Anodizing 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 Commercial Anodizing begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

Although not required at this time, be advised that due to the nature of the violation, Ohio EPA may require cleanup procedures (called 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. OAC rule 3745-52-34(D)(5)(c) – Employees familiar with waste handling and emergency procedures. This rule requires that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.

Commercial Anodizing violated this rule because the violations outlined in this letter show that all employees were not familiar with this. **Please send me documentation showing that the issues of this letter have been discussed with all the employees involved.**

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

Commercial Anodizing violated this rule by having its drum of waste acetone open. This causes release of the acetone to the air. Your March 2, 2010 letter documents your correction of this violation by explaining the procedures you put in place to make sure this drum is kept closed.

4. OAC rule 3745-65-33 – Testing and maintenance of equipment.
This rule requires that 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. This rule also requires the owner or operator to record the emergency equipment inspections in a log or summary. An example log is enclosed and can be found at:

Emergency Equipment Inspection Log OAC Rule 3745-65-33, 2005
<http://epa.ohio.gov/portals/32/pdf/equiplog.PDF>

Commercial Anodizing violated this rule by not having this inspection program. **Please submit documentation including a completed log to show that you have corrected this violation.**

There is a conditional exemption to certain hazardous waste rules called the satellite accumulation exemption. This allows certain containers of hazardous waste to not have to meet all rules while being filled. This exemption was designed with the 55-gallon drum in mind and, therefore, only applies up to the time 55 gallons of hazardous waste has been accumulated. The drum you were using to accumulate your waste acetone qualified as a satellite container. A container you use to hold your F006 filter cake may also be a satellite container until it holds 55 gallons of waste. The following document which gives more information about this is enclosed:

Satellite Accumulation Under Ohio Hazardous Waste Rules 2004
http://epa.ohio.gov/portals/32/pdf/Satellite_Accumulation_Guidance.pdf

5. OAC 3745-52-34(C)(1)(a) – Satellite accumulation area.
This rule requires that containers in satellite accumulation areas be closed, in good condition, and compatible with the wastes stored in them.

Commercial Anodizing violated this rule by having an open drum of spent acetone. You closed this container during the inspection. Your March 2, 2010 letter documents your correction of this violation by explaining the procedures you put in place to make sure this drum is kept closed.

6. OAC 3745-52-34(C)(1)(b) – Satellite accumulation area.
This rule requires that containers in satellite accumulation areas be marked with the words hazardous waste or with other words identifying the contents.

Commercial Anodizing violated this rule by not labeling its drum of spent acetone. **Please send me documentation showing that this container is now labeled.**

7. OAC rule 3745-52-34(D)(4) – Hazardous waste labels.
This rule requires that each container of hazardous waste be labeled with the words "Hazardous Waste".

Commercial Anodizing violated this rule by having a cubic yard bag of F006 filter cake that was not labeled as hazardous waste. **Please send me documentation showing that all your containers of F006 filter cake are now properly labeled.**

8. OAC rule 3745-52-34(D)(4) – Accumulation start dates.
This rule requires that each container of hazardous waste be labeled with the accumulation start date. (If the container is a 55-gallon drum that qualifies as a satellite container, then this date is the date the drum is full.)

Commercial Anodizing violated this rule by having a cubic yard bag of F006 filter cake that was not labeled with the accumulation start date. **Please send me documentation showing that all your containers of F006 filter cake are now properly labeled.**

9. OAC rule 3745-66-74 – Inspections of container storage areas.
This rule requires that the owner or operator must inspect areas where containers of hazardous waste are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The owner or operator must also record inspections in an inspection log or summary. An example log is enclosed and can be found at:

[SQG Container Inspection Log - OAC Rule 3745-66-74](http://epa.ohio.gov/portals/32/pdf/ssglog.PDF)
<http://epa.ohio.gov/portals/32/pdf/ssglog.PDF>

Commercial Anodizing violated this rule by not having this inspection program. **Please submit documentation including a completed log to show that you have corrected this violation.**

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Your March 2, 2010 letter responded to the following violation that was previously cited:

1. OAC rule 3745-52-11 – Hazardous waste determination.

You plan to sample the contents of the blue plastic drum and the square, metal tank stored by the back fence. **Please let me know when you plan to sample these containers so that I have the opportunity to be present for the sampling.**

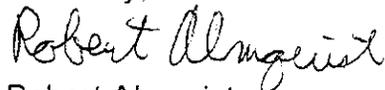
You also plan to sample the contents of the drum stored on a pallet outside. **Please let me know when you plan to sample this container so that I have the opportunity to be present for the sampling.** There was contamination on the ground that appeared to have come from this drum. Once it has been determined whether this waste is a hazardous waste, then I can give you the requirements specific to the cleanup needed here. If the drum contains used oil, then the requirement is to remove any visually contaminated soil or gravel.

A written response to the issues of this letter is required within 30 days.

You can find copies of the regulations and other information on the Division of Hazardous Waste Management web page at: <http://epa.ohio.gov/dhwm>.

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

Sincerely,



Robert Almquist
Division of Hazardous Waste Management

RA:cl
Enclosures

ec: Frank Popotnik, DHWM, NEDO
Harry Sarvis, DHWM, CO
Natalie Oryshkewych, DHWM, NEDO
Suzanne Prusnek, DHWM, NEDO

cc: Marlene Kinney, DHWM, NEDO

Notice:

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

**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:

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.	Has the generator obtained a U.S. EPA I.D. number? [3745-52-12]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.	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"/>
4.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
5.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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

6.	Has the generator accumulated hazardous wastes in excess of (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]

7.	Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.

8.	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 type="checkbox"/>
	b. Tank that meets 3745-66-101?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

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

MANIFEST REQUIREMENTS

9.	Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	Are wastes reclaimed under a contractual agreement? If so: [3745-52-0(E)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Does the contractual agreement specify the type of waste and frequency of shipment?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Is the transport vehicle owned and operated by the reclaimer?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

c.	Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.		
11.	Have items 1 through 20 of each manifest been completed? [3745-52-20(A)(1)] & [3745-52-27(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be complete. [3745-52-20(A)(1)]		
12.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternative 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)]		
13.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.		
15.	If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? [3745-52-42(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	Are signed copies of all manifests being retained for at least three years? [3745-52-40]	Yes <input checked="" 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.		
PREPAREDNESS AND PREVENTION		
17.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]	
a.	Name and telephone number of emergency coordinator?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Location of fire and spill control equipment, and, if present, fire alarm(s)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Telephone number of local fire department?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Are employees familiar with waste handling and emergency procedures? [3745-52-34(D)(5)(c)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
20.	Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
21.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
22.	Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:	
a.	Internal Alarm system? [3745-65-32(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
b.	Emergency communication device? [3745-65-32(B)]	Yes <input 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 type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
23.		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 type="checkbox"/>	<input type="checkbox"/>
	a.	Are inspections recorded in a log or summary? [3745-65-33]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
24.		Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
25.		If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance (unless not required under OAC 3745-65-32)? [3745-65-34(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
26.		Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
27.		Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
28.		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"/>	<input type="checkbox"/>
SATELLITE ACCUMULATION AREA REQUIREMENTS						
29.		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"/>	<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"/>	<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"/>	<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 type="checkbox"/>	<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 type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
	f.	Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
30.		Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input 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 type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
	b.	Did the generator mark the container(s) holding the 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"/>	<input type="checkbox"/>
<p><i>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.</i></p>						
USE AND MANAGEMENT OF CONTAINERS						
31.		Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(D)(4)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
32.		Is the accumulation date on each container? [3745-52-34(D)(4)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>

33.	Are hazardous wastes stored in containers which are:		
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input type="checkbox"/> No <input checked="" 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"/>
<i>NOTE: Record location on process summary sheets and photograph the area.</i>			
34.	Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days.		Yes <input type="checkbox"/> No <input 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"/>
35.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
36.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
37.	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 checked="" type="checkbox"/>
<i>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.</i>			
PRE-TRANSPORT REQUIREMENTS			
38.	Does each 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 type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
39.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
40.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>