



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

January 29, 2008

RE: METROHEALTH SYSTEM
EPA ID NO. OHD 071 124 291
CUYAHOGA COUNTY
SQG/CEI/NOV

Mr. John Appledorn
Director, Logistics/Environmental Safety
MetroHealth Medical Center
2500 MetroHealth Drive
Cleveland, OH 44109-1998

Dear Mr. Appledorn:

On January 15, 2008, I, as a representative of the Ohio EPA's Division of Hazardous Waste Management, conducted an inspection of the MetroHealth Medical Center facility (MetroHealth) in Cleveland, Ohio. I inspected the facility to determine MetroHealth's compliance with Ohio's hazardous waste, universal waste and used oil laws and regulations as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). You, Ron Wallace and Veronica Hejl represented MetroHealth.

The inspection included reviews of facility records, interviews with facility personnel and a facility walk-through. The results of these reviews are discussed below.

MetroHealth is a small quantity generator of hazardous waste and my inspection was for compliance with the small quantity generator (SQG) requirements.

Based on the facility documents reviewed and observations made during the facility walk-through, Ohio EPA has determined that MetroHealth has violated the following state hazardous waste 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..."

Reportedly unused doses of a multi-flu vaccine have apparently been placed in "Chemo bags" for disposal. "Chemo bags" are typically used for managing bags, tubing, etc. that was used for patient treatment with certain chemotherapy drugs. "Chemo bags" are not managed as hazardous waste.

Reportedly the mercury content (from use of thimerosal) of the vaccine in question was 40 mg/l, which is in excess of the toxicity characteristic leaching procedure (TCLP) limit for mercury which is 0.2 mg/l and which is the apparent regulatory limit. If the vaccine is composed solely of liquid that would pass through a paint filter, TCLP limits apply directly to the waste (i.e., the vaccine) and would require that the waste be managed as hazardous waste.

MetroHealth did not properly evaluate the vaccine waste identified above as required by OAC Rule 3745-52-11.

In addition, I expressed concern during the inspection that facility staff did not appear to be aware that certain chemotherapy medications (e.g., Mitomycin C and Cyclophosphamide), if discarded, would under certain conditions (e.g., in a formulation in which it is the sole active ingredient and in a container that is not empty) be hazardous waste. Even though the facility stated that these drugs are seldom if ever discarded other than as empty containers, the facility staff should be trained in how to manage if disposal of such a waste should occur.

To return to compliance the facility must:

- Develop and implement procedures to ensure that all pharmaceutical wastes are evaluated to determine whether they are hazardous wastes prior to shipment offsite.
- Review all waste streams placed in "Chemo bags".
- Develop and implement procedures to ensure that only non-hazardous wastes are placed in "Chemo bags".
- Develop and implement procedures to manage the following chemotherapy medications if they should become wastes:
 - ❖ Chloramubucil (U035),
 - ❖ Cyclophosphamide (U058),
 - ❖ Uracil Mustard (U237),
 - ❖ Daunomycin (U059),
 - ❖ Melphalan (U150),
 - ❖ Mitomycin C (U010), and
 - ❖ Streptozotocin (U206).
- Develop and implement procedures to manage the following medications if they should become wastes:
 - ❖ Vaccines that contain thimerosal.
 - ❖ Epinephrine (Note: the waste listing for P042 does not include epinephrine salts, only products in which epinephrine "base" is the sole active ingredient are included in the waste listing for P042.)
- Train appropriate personnel on these procedures.
- Submit copies of the procedures and training documentation to this office within 45 days of receipt of this letter.

2. OAC Rule 3745-52-20(A) Manifest Usage

This regulation requires that a generator must prepare a uniform hazardous waste manifest before transporting the hazardous wastes off-site including completion of Item 1 on the manifest. Item 1 requires entering the generator's EPA identification number.

MetroHealth's EPA I.D. Number is OHD 071 124 **291**. Many hazardous waste manifests for shipments of hazardous waste to Clean Harbors over the past three year's had an EPA I.D. Number of OHD 071 124 **791** entered in Box 1 of the manifest, which is incorrect.

To return to compliance the facility must:

- Implement procedures to ensure usage of the correct EPA I.D. Number on all future manifests.
- Send a letter of correction to the transporters and designated facilities identified on the manifests for 2005, 2006, 2007 and 2008 that had an incorrect EPA I.D. Number.
- Provide documentation of these actions to this office within 45 days of receipt of this letter.

3. OAC Rule 3745-52-34 (C) (1) (b) Labeling of Satellite Containers.

Under this rule, "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." These are commonly called "satellite accumulation containers".

I observed a 55-gallon drum containing hazardous waste (mineral spirits and other wastes from oil-based paints) in the paint shop that was not marked with the words "Hazardous Waste" or with any other words that identified the contents of the container. Similarly I observed a 55-gallon drum on the fluorescent bulb crusher containing hazardous waste (crushed fluorescent bulbs) in the 9th Floor Mechanical Room that was not marked with the words "Hazardous Waste" or with other words that identified the contents of the container.

Proper labels were added to both of the above 55-gallon drums during the inspection. No further action is required for labeling of these drums.

Please indicate in writing, within 45 days of receipt of this letter, what measures have been taken to insure that all satellite containers will be properly labeled in the future.

4. OAC Rule 3745-52-34 (C)(1)(a) Open Satellite Container

"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... a container holding hazardous waste shall always be closed...except when it is necessary to add or remove waste.." These containers are commonly called "satellite accumulation containers".

I observed a 55-gallon drum containing hazardous waste (mineral spirits and other wastes from oil-based paints) in the paint shop that was not closed. The container was closed during the inspection.

Please indicate in writing, within 45 days of receipt of this letter, what measures have been taken to insure that all satellite containers remain closed when wastes are not being added to or removed from those containers.

5. OAC Rule 3745-66-74 Inspection Log.

"The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The owner or operator must record inspections in an inspection log or summary."

MetroHealth did not provide an inspection log or summary for the 180-day accumulation area as required by OAC Rule 3745-66-74.

To return to compliance the facility must:

- Implement procedures to complete an inspection log or summary weekly for the 180-day accumulation area. The following site has a blank log that you could use or modify for this purpose: <http://www.epa.state.oh.us/dhwm/pdf/sqalog.PDF>
- Provide a copy of a completed log within 45 days of receipt of this letter, documenting that three weeks of the required inspections were completed.

6. OAC Rule OAC 3745-65-33 Emergency Equipment Log

All emergency equipment required for hazardous waste management shall be tested and maintained as necessary to assure operation in time of emergency. Inspections of emergency equipment required for hazardous waste management are to be recorded in a log as required by OAC 3745-65-33. The facility did not provide such a log.

To return to compliance the facility must:

- Immediately initiate documentation of inspections of emergency equipment needed for management of hazardous waste, for example, spill response equipment and fire extinguisher for the 180-day accumulation area. The following site has a blank log that you could use or modify for this purpose:
<http://www.epa.state.oh.us/dhwm/pdf/equiplog.PDF>
- Submit documentation in the form of a completed copy of the log to this office within 45 days of receipt of this letter.

7. OAC Rule 3745-52-34 (C)(1) Container Labeling .

Dozens of boxes of used fluorescent bulbs were present in the 9th Floor Mechanical Room as was a portable bulb crusher. The facility's practice is to crush the used fluorescent bulbs, after briefly holding them as intact bulbs, and to manage the crushed bulbs as hazardous waste.

During the inspection I commented that the boxes holding used fluorescent bulbs should comply with the universal waste rules prior to crushing, including labeling with one of the acceptable words in OAC Rule 3745 273-14(E), namely: "Universal Waste- Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)" and storing the boxes closed. Because bulbs that are crushed are not eligible for management under the universal waste rules, this advice was not appropriate. Bulbs that are to be crushed must comply with the hazardous waste rules, if the crushed bulbs exhibit a characteristic of hazardous waste.

At this point in time MetroHealth is converting from "traditional" fluorescent bulbs to EcoLux fluorescent bulbs which the bulb manufacturer (GE) claims to have a TCLP test result for mercury that is less than the amount that would cause these bulbs to exhibit the hazardous waste characteristic for mercury. Reportedly MetroHealth intends to eventually discard used EcoLux fluorescent bulbs as trash.

To return to compliance the facility must:

- Determine which used bulbs exhibit a characteristic of hazardous waste, unless the facility plans to manage all used bulbs as either hazardous waste or universal waste in the future.
- Determine if used EcoLux fluorescent bulbs exhibit a hazardous waste characteristic for any metals other than mercury. This can be done by getting results of analytical testing by the manufacturer or by MetroHealth conducting testing of a representative sample of its used EcoLux fluorescent bulbs. Ohio EPA takes this position because of information that indicates that metals other than mercury (e.g., lead) may cause used fluorescent bulbs to exhibit a characteristic of hazardous waste. If used EcoLux fluorescent bulbs exhibit any hazardous waste characteristic, they can not be managed as non- hazardous waste (e.g., trash).

- If the facility intends to continue crushing, develop a program that complies with the hazardous waste rules for those used bulbs that exhibit a characteristic of hazardous waste or that the facility chooses to manage as hazardous waste. The facility's options include:
 - ❖ Manage the bulbs in an accumulation area that meets all of the requirements for a 180-day hazardous waste accumulation area, or,
 - ❖ Manage the bulbs in a satellite hazardous waste accumulation area that meets all requirements of OAC Rule 3745-52-34 (C)(1), or,
 - ❖ Manage the bulbs in a combination of a satellite hazardous waste accumulation area (or areas) and an accumulation area that meets all of the requirements for a 180-day hazardous waste accumulation area.
- If the facility intends to discontinue crushing, the facility has the option of developing a program that complies with the universal waste rules for those used bulbs that exhibit a characteristic of hazardous waste or that the facility chooses to manage as universal waste.
- Submit documentation of the program selected and how compliance will be achieved to this office within 45 days of receipt of this letter.

8. **OAC Rule 3745-273-14(A) Small Quantity Handler must label universal waste batteries/containers.**

Several containers of batteries to be managed as universal waste were located in the Old Research Building Floor 5. None were labeled with any of the acceptable words in OAC Rule 3745 273-14(A), namely, "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)." Proper labels were added to the boxes during the inspection. No further action is required for labeling of these containers.

Please indicate in writing within 45 days of receipt of this letter what measures have been taken to insure that all containers of batteries will be properly labeled in the future.

9. **OAC Rule 3745-273-16 Employee training for small quantity handlers of universal waste**

Facility employees with universal waste duties did not appear to have been appropriately trained on universal waste requirements.

To return to compliance the facility must:

- Train appropriate personnel with universal waste management duties on applicable universal waste requirements.
- Submit copies of training documentation to this office with 45 days of receipt of this letter..

Enclosed you will find a copy of the checklists completed for the inspection.

Other Information

Attached to this letter is listing of some links to Ohio EPA and USEPA documents that address some hazardous waste compliance issues for hospitals.

A list of Ohio EPA DHWM guidance documents can be found at the following Internet site: <http://www.epa.state.oh.us/dhwm/guidancedocuments.html>. You can find copies of Ohio's hazardous waste laws and regulations at our web page at: <http://www.epa.state.oh.us/dhwm/Law&Regs.html>.

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign up for this free service. You can find more information at the following Web link <http://www.epa.state.oh.us/dhwm/listserv.html>.

The OEPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes and pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image through pollution prevention. More information about pollution prevention can be found on our website at <http://www.epa.state.oh.us/ocapp/ocapp.html>.

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

cc: 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 facility from its obligation to comply with all applicable regulations.

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

For Ohio EPA use only

E-mail this completed form to
tammy.mcconnell@epa.state.oh.us or mail it to Tammy
McConnell, Central Office

2. Site EPA ID Number	EPA ID Number: OHD071 124 291																			
3. Site Name	Name: MetroHealth System	Website: (Optional)																		
4. Site Location Information	Street Address: 2500 MetroHealth Drive																			
	City, Town, or Village: Cleveland	State: OH																		
	County Name: Cuyahoga	Zip Code: 44109																		
5. Site Type (check only one)	<table border="1"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td align="center"><input type="checkbox"/></td> <td align="center"><input checked="" type="checkbox"/></td> <td align="center"><input checked="" type="checkbox"/></td> <td align="center"><input type="checkbox"/></td> </tr> </table>		Private	County	District	Federal	Indian	Municipal	State	Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>						
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7. Facility Representative	First Name: John	MI: Last Name: Appledorn																		
Additional information recorded on this form is only provided for informational purposes. It does not constitute an operator's report or service record.	Phone Number: 216-778-8405																			
	Phone Number Extension:																			
	E-Mail Address: jappledorn@metrohealth.org																			
	Fax Number: 216-778-3303																			
	Fax Number Extension:																			
	Street or P.O. Box:																			
	City, Town or Village:																			
	State:	Country: Zip Code:																		
8. Name of Site's Legal Owner	Name of Site's Legal Owner: Cuyahoga County																			
	Date Became Owner (mm/dd/yyyy):																			
	<table border="1"> <tr> <td>Owner Type:</td> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td align="center"><input type="checkbox"/></td> </tr> </table>		Owner Type:	Private	County	District	Federal	Indian	Municipal	State	Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	Street or P.O. Box:																			
	City, Town or Village:																			
	Owner Phone #:																			
	State:																			
	Country: Zip Code:																			
Name of Site's Operator:																				
Date Became Operator (mm/dd/yyyy):																				
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Street or P.O. Box:																				
City, Town or Village:																				
Operator Phone #:																				
State:																				
Country: Zip Code:																				
9. Violations Cited at Site	Yes <input type="checkbox"/> No <input type="checkbox"/>																			
10A. Type of Regulated Waste Activity (Mark 'X' in all of the appropriate boxes):																				
<input type="checkbox"/> Not Regulated	<input type="checkbox"/> Conditionally Exempt Small Quantity Generator																			
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> United States Importer of Hazardous Waste																			
<input type="checkbox"/> Large Quantity Generator (LQG)	<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator																			
<input checked="" type="checkbox"/> Small Quantity Generator (SQG)																				
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace																			
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Small Quantity On-Site Burner Exemption																			
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption																			
<input type="checkbox"/> Underground Injection Control Facility																				

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

<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Large Quantity Handler of Universal Waste
<input type="checkbox"/> Destination Facility for Universal Waste	<input type="checkbox"/> Accumulates

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

10C. Used Oil Activities (Indicate Type(s) of Activity(ies))

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

11. Waste Codes for Federally Regulated Hazardous Wastes: Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D002, F001, etc.). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRA info source record, you do not need to list them all. Instead, just indicate the date of the most recent source record.

Same Annual report

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

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:	John Appledorn, Ron Wallace, Veronica Hejl
Tanks	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Other Comments:	
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		

13. Name of Inspector(s): Neil Wasilk
 Name of Inspector(s):
 Date of Inspection (time): 1/15/2008 10:00 a.m.
 (mm/dd/yyyy) (h:mm)

14. OPTIONAL CERTIFICATION: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who made the system, those persons are directly responsible for gathering the information, the information submitted is true and complete, and I believe it is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of criminal sanctions for knowingly submitting false information.

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

METRO HEALTH
SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET

CESQG: < 100 Kg. (approximately 25-30 gallons) of waste in a calendar month
 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 No N/A
Multi-phase vacuum not evaluated
2. Has the generator obtained a U.S. EPA I.D. number? [3745-52-12] Yes No N/A
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 No N/A
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 No N/A
5. Does the generator accumulate hazardous waste? Yes No N/A

NOTE: If the SQG does not accumulate or treat hazardous waste, the following requirements may not apply. All other requirements may 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 No N/A

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 No N/A

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: *NO TREATING*
 - a. Container that meets 3745-66-70 to 3745-66-77? Yes No N/A
 - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C) and Yes No N/A
 - c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A
 - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use DR 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)] Yes No N/A

10. Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)] Yes No N/A
- a. Does the contractual agreement specify the type of waste and frequency of shipment? Yes No N/A
- b. Is the transport vehicle owned and operated by the reclaimer? Yes No N/A
- c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? Yes No N/A

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)] Yes No N/A
*BUT EACH TANKER MANIFEST FOR 2005-2007
HAVE INCORRECT I.D. NO.*

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)]

12. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] Yes No N/A

NOTE: The generator may designate on the manifest one 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 No N/A

14. Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)] Yes No N/A

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have 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 No N/A

16. Are signed copies of all manifests being retained for at least three years? [3745-52-40] Yes No N/A

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

PREPAREDNESS AND PREVENTION

17. Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)] Yes No N/A

18. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]

a. Name and telephone number of emergency coordinator? Yes No N/A

b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes No N/A

c. Telephone number of local fire department? Yes No N/A

A team goes to telecommunication center which has the call out list.

19. Are employees familiar with waste handling and emergency procedures [3745-52-34(D)(5)(c)] Yes No N/A

HSE Staff & HAZMAT team only people w/ access.

20. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)] Yes No N/A

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 No N/A

22. Does and person at the facility understand the nature and potential hazards associated with the waste:

a Internal Alarm system? [3745-65-32(A)] *Alarm outside.* Yes No N/A

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

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

d Water of adequate volume/pressure? [3745-65-32(D)] *Spent.* Yes No N/A
Per Certificate statement

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

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

25. 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 No N/A

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

27. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
28. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes No N/A
29. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes No N/A

SATELLITE ACCUMULATION AREA REQUIREMENTS

30. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes No N/A
 - b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes No N/A
 - c. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes No N/A
 - d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. Yes No N/A
 - e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
31. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes No N/A
- a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes No N/A
 - b. Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes No N/A
 - c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A

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

32. Has the generator marked containers with the words "Hazardous Waste" [3745-52-34(D)(4)] Yes No N/A
33. Is the accumulation date on each container? [3745-52-34(D)(4)] Yes No N/A
34. Are hazardous wastes stored in containers which are: Yes No N/A

- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A
- b. In good condition? [3745-66-71] Yes No N/A
- c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A

NOTE: Record location on process summary sheets and photograph the area.

- 35. 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 No N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
- 36. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes No N/A
- 37. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B) 3745-66-77(A)] Yes No N/A
- 38. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B) ? [3745-66-77(B)] Yes No N/A

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

PRE-TRANSPORT REQUIREMENTS

- 39. 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 No N/A
- 40. Does each container ≤100 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A
- 41. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes No N/A

MBTRO HEALTH
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

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

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes No N/A RMK#
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes No N/A RMK#
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes No N/A RMK#
 - b. Mix battery types in one container? Yes No N/A RMK#
 - c. Discharge batteries to remove the electric charge? Yes No N/A RMK#
 - d. Regenerated used batteries? Yes No N/A RMK#
 - e. Disassemble them into individual batteries or cells? Yes No N/A RMK#
 - f. Remove batteries from consumer products? Yes No N/A RMK#
 - g. Remove the electrolyte from the battery? Yes No N/A RMK#
- If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] Yes No N/A RMK#

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] Yes ___ No N/A RMK# ___
- a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] Yes ___ No N/A RMK# ___
- b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] Yes ___ No N/A RMK# ___
7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)" [3745-273-14(A)] *ABATED DURING INSPECTION* Yes ___ No N/A ___ RMK#

UNIVERSAL WASTE LAMPS - *CRUSHING ALL LAMPS. NOT UNIVERSAL WASTE*

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] Yes ___ No N/A ___ RMK# ___
9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes ___ No N/A ___ RMK# ___
10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)" [3745-273-14(E)] Yes ___ No N/A RMK# ___

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

generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes No N/A RMK#
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes No N/A RMK#

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

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

EMPLOYEE TRAINING

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

RESPONSE TO RELEASES

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

OFF-SITE SHIPMENTS

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

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

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

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes No N/A ___ RMK# ___
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No N/A ___ RMK# ___
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes ___ No ___ N/A RMK# ___
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes ___ No ___ N/A RMK# ___

21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
 Yes ___ No N/A RMK#___
 a. Sending the waste back to the originating handler? [3745-273-18(F)(1)]
 Yes___ No___ N/A RMK#___
 b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)]
 Yes___ No___ N/A RMK#___
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]
 Yes ___ No N/A RMK#___
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)]
 Yes ___ No N/A RMK#___

EXPORTS

24. Is waste being sent to a foreign destination? If so:
 Yes___ No N/A ___ RMK#___
 a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]
 Yes ___ No N/A RMK#___
 b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)]
 Yes ___ No N/A RMK#___
 c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]
 Yes ___ No N/A RMK#___

REMARKS

LDR CHECKLIST

GENERAL LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] If so:
 - Yes No N/A RMK#
 - a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)]
 - Yes No N/A RMK#
 - b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)]
 - Yes No N/A RMK#
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1]
 - Yes No N/A RMK#
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1]
 - Yes No N/A RMK#
4. Does the generator generate a characteristic hazardous waste? If so:
 - Yes No N/A RMK#
 - a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)]
 - Yes No N/A RMK#

NOTE: If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so:
 - Yes No N/A RMK#
 - a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)]
 - Yes No N/A RMK#

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

6. Has the generator correctly determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)]
 - Yes No N/A RMK#

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

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

Yes No N/A RMK#

NOTE: A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (§402 of CWA), that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater.[3745-270-03(B)]

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)]

Yes No N/A RMK#

NOTE: In other words, is combustion a legitimate treatment method.

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)]

Yes No N/A RMK#

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] If so:

Yes No N/A RMK#

a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05]

Yes No N/A RMK#

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] If so:

Yes No N/A RMK#

a. The facility can land dispose of the waste. [3745-270-06]

Yes No N/A RMK#

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment?
If so:

Yes ___ No N/A ___ RMK# ___

a. Has the facility complied with 3745-270-04?

Yes ___ No N/A RMK# ___

REMARKS

NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)]
Yes No N/A RMK# _____
14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)]
Yes No N/A RMK# _____
15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)]
Yes No N/A RMK# _____
16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)]
Yes No N/A RMK# _____
17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so:
a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)]
Yes No N/A RMK# _____

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

18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)]
Yes No N/A RMK# _____

REMARKS

GENERATORS TREATING HAZARDOUS WASTE

- 1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? Yes__ No__ N/A RMK# ___
- 2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)] Yes__ No N/A RMK# ___
 - a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] Yes__ No N/A RMK# ___
 - b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes__ No N/A RMK# ___
- 3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes__ No N/A RMK# ___
- 4. Has the generator followed their WAP [3745-270-07(A)(5)]? Yes__ No N/A RMK# ___
- 5. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes__ No N/A RMK# ___

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

- 6. Has the generator sent a notification and certification with the initial shipment of waste?[3745-270-07(A)(5)(c)] Yes__ No N/A RMK# ___
- 7. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] Yes__ No N/A RMK# ___
- 8. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following:
 - a. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes__ No N/A RMK# ___
 - b. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)] Yes__ No N/A RMK# ___

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

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

Yes ___ No ___ N/A ___ RMK# ___

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

Yes ___ No N/A ___ RMK# ___

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

Yes ___ No N/A ___ RMK# ___

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

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

Yes ___ No ___ N/A ___ RMK# ___

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

Yes ___ No N/A ___ RMK# ___

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

Yes ___ No N/A ___ RMK# ___

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

REMARKS

HAZARDOUS DEBRIS

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)?
Yes ___ No ___ N/A RMK# ___
2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.)
Yes ___ No ___ N/A RMK# ___
3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so:
Yes ___ No ___ N/A RMK# ___
- a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)]
Yes ___ No N/A RMK# ___
- NOTE: If immobilization has been used in a treatment train, it must be the last treatment technology used.**
4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so:
Yes ___ No ___ N/A RMK# ___
- a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)]
Yes ___ No N/A RMK# ___
5. Is the waste a PCB waste under 40 CFR Part 761? If so:
Yes ___ No ___ N/A RMK# ___
- a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)]
Yes ___ No N/A RMK# ___
6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)]
Yes ___ No N/A RMK# ___
7. Does the owner/operator of a treatment facility that claims the debris is excluded from regulation as a hazardous waste under 3745-51-03(F)(1) maintain the following information?
Yes ___ No ___ N/A RMK# ___
- a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)]
Yes ___ No N/A RMK# ___
- b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)]
Yes ___ No N/A RMK# ___
- c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)]
Yes ___ No N/A RMK# ___

8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F)(1) have the following information? [3745-270-07(D)(3)]

Yes ___ No ___ N/A ___ RMK# ___

a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)]

Yes ___ No N/A ___ RMK# ___

b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)]

Yes ___ No N/A ___ RMK# ___

c. Technology used from Table 1? [3745-270-07(D)(1)(c)]

Yes ___ No N/A ___ RMK# ___

9. Has the above notification been sent to the director? [3745-270-07(D)(1)]

Yes ___ No ___ N/A RMK# ___

REMARKS

TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13? [3745-270-07(B)] Yes ___ No N/A RMK# ___

2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)] Yes ___ No N/A ___ RMK# ___

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

3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07? [3745-270-07(B)(3)] Yes ___ No N/A ___ RMK# ___

4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so:**

a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)]

5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? **If so:**

a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)), excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)]

Yes ___ No N/A ___ RMK# ___

b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4) [3745-270-07(B)(6)]

Yes ___ No N/A ___ RMK# ___

c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)]

Yes ___ No N/A ___ RMK# ___

6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)]

Yes ___ No N/A ___ RMK# ___

7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have:

a. Copies of all notices and certifications required in 3745-270?

Yes ___ No N/A ___ RMK# ___

b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49?

Yes ___ No N/A ___ RMK# ___

c. The testing frequency specified in the facility's WAP and have they followed the protocol?

Yes ___ No N/A ___ RMK# ___

REMARKS