



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

May 6, 2008

RE: PERMATEX
OHR 000 037 564
CUYAHOGA COUNTY
NOTICE OF VIOLATION /
PARTIAL RETURN TO COMPLIANCE

Denise Boyd
Permatex
6875 Parkland Blvd.
Solon, OH 44139

Dear Ms. Boyd:

On April 15, 2008, Ohio EPA Division of Hazardous Waste Management, represented by Edward D'Amato and Robert Almquist, inspected Permatex for compliance with Ohio hazardous waste laws and regulations found in Chapters 3734 of the Ohio Revised Code (ORC) and 3745 of the Ohio Administrative Code (OAC).

You represented Permatex during the inspection.

This letter will explain the violations we found, other general concerns we have, and what you need to do to respond to them. We found the following violations. In order to correct them you must do the following and send me all requested information **within 30 days** of the date of this letter:

**1. Used Oil Storage Requirements for Generators (Labels)
OAC 3745-279-22(C)**

Containers and above ground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil"

There were two drums not labeled per this rule: one drum in the boiler room and one drum in the less-than-90-day accumulation area. This violation was abated when you e-mailed photographs to this office on April 16, 2008 and April 21, 2008 showing the drums had been labeled.

**2. Universal Waste Management Standards—Containers
OAC 3745-13(D)**

A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage...such containers must be kept closed and must lack evidence of leakage, spillage or damage

There were 4 spent fluorescent lamps in the less-than-90-day hazardous waste accumulation area that were not in containers. This violation was abated on April 17, 2008 when you e-mailed a photograph showing the lamps have been boxed and labeled.

**3. Personnel Training
OAC 3745-65-16(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 requirements

The following employees of Permatex have not been trained per this rule: Renny Blakkolb, Dan Valentine and Dan Kehoe. You explained in an April 25, 2008 e-mail that these employees will be trained in June 2008 when annual training is given to other employees. To abate this violation, you must submit documentation following the June training that shows these three employees have been trained.

In addition to the above violation, the following concern was also noted:

1. Weekly inspections of the hazardous waste accumulation area are being done on log photocopied, "pre-checked" log sheets. This practice is not acceptable as it can call into question whether or not actual inspections are being completed. It is in the best interest of Permatex and the employees performing the inspection to fill out the checklist each time an inspection occurs.

This concern was addressed on April 17, 2008 when you e-mailed a new inspection form showing an actual, completed inspection and an explanation that the checklist will be filled out from now on in ink.

You may be able to reduce operating costs with waste minimization/pollution prevention practices. The Ohio EPA offers pollution prevention assessments to help you decide which practices would benefit your operations. If you would like to have a pollution prevention assessment, or would like more information, please contact Adrienne LaFavre at (330) 963-1250. The Office of Compliance Assistance and Pollution Prevention website at: <http://www.epa.state.oh.us/ocapp/ocappmain.html> is also a good source of information.

Enclosed are copies of the checklists used for the inspection.

Failure to list specific deficiencies in this communication does not relieve Permatex from the responsibility of complying with all applicable Ohio EPA laws and regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Please feel free to contact me at (330) 963-1170 if you have any questions.

Sincerely,



Edward J. D'Amato
Environmental Specialist
Division of Hazardous Waste Management

EJD:ddw

Enclosures

cc: Natalie Oryshkewych, DHWM, NEDO
ec: Frank Popotnik, DHWM, NEDO
Robert Almquist, DHWM, NEDO

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
McCConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OHR 000 037 564								
3. Site Name	Name: Permatex				Website: www.permatex.com (Optional)				
4. Site Location Information	Street Address: 6875 Parkland Blvd								
	City, Town, or Village: Solon				State: OH				
	County Name:				Zip Code: 44139				
5. Site Land Type (check only one)	<u>Private</u> X	County	District	Federal	Indian	Municipal	State	Other	
6. NAICS code(s) www.census.gov/epcd/www/naics.html									
7. Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Denise			MI:	Last Name: Boyd				
	Phone Number: (440) 914-3571				Phone Number Extension:				
	E-Mail Address: Denise.boyd@permatex.com								
	Fax Number: (440) 914-3500				Fax Number Extension:				
	Street or P.O. Box:								
	City, Town or Village:				State:		Country:		Zip Code:
8. 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: Permatex				Date Became Owner (mm/dd/yyyy): unknown				
	Owner Type:	<u>Private</u> X	County	District	Federal	Indian	Municipal	State	Other
	Street or P.O. Box: 10 Columbus Blvd								
	City, Town or Village: Hartford				Owner Phone #: (860) 543-7500				
	State: CT				Country:		Zip Code:		
	Name of Site's Operator:				Date Became Operator (mm/dd/yyyy):				
	Owner Type:	Private	County	District	Federal	Indian	Municipal	State	Other
	Street or P.O. Box:								
	City, Town or Village:				Operator Phone #:				
	State:				Country:		Zip Code:		
9. Violations Cited?	Yes								
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				<input type="checkbox"/> United States Importer of Hazardous Waste					
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)									
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Underground Injection Control Facility									

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))	
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)
<input type="checkbox"/> Destination Facility for Universal Waste	

Check all boxes below that apply for each of the three types of facilities above		10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
	Managed	<input checked="" 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 checked="" 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, D003, F007, U112). 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 RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

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

13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
<i>Ed D'Amato</i>	<i>Robert Almqvist</i>	<i>4/15/2008 ~10⁰⁰ AM</i>

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 manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

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

LA 3 QUANTITY GENERATOR REQUIREMENTS
 COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

Permatex 4/09

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 No N/A
2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] Yes No N/A
3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes No N/A
4. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] Yes No N/A
5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] Yes No N/A
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 No N/A
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 No N/A
8. **Does the generator accumulate hazardous waste?** Yes No N/A

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 No N/A

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 No N/A
- b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? 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 LDR checklist.

- 11 Does the generator export hazardous waste? If so: Yes No N/A
- a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] Yes No N/A
- b. Has the generator complied with special manifest requirements? [3745-52-54] Yes No N/A
- c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] Yes No N/A
- d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes No N/A
- e. Are export related documents being maintained on-site? [3745-52-57(A)] Yes No N/A

MANIFEST REQUIREMENTS

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

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these

situations items (21) through (35) must also be completed. [3745-52-20(A)]

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

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 No N/A

- 16 Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (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 a program in place to reduce the volume and toxicity waste they generate.

- 17 If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes No N/A

- 18 If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes No N/A

- 19 Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes No N/A

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

PERSONNEL TRAINING

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

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

Job Performed	Name of Employee	Date Trained

CONTINGENCY PLAN

- 27 Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes No N/A

28 Does the plan describe the following:

- a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes No N/A
- b. Arrangements with emergency authorities [3745-65-52(C)]. Yes No N/A
- c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes No N/A
- d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes No N/A
- e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes No N/A

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

- 29 Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes No N/A
- 30 Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] Yes No N/A
- 31 Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes No N/A

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

EMERGENCY PROCEDURES

- 32 Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes No N/A
- a. Was the contingency plan implemented? [3745-65-51(B)] Yes No N/A
- b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes No N/A
- c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes No N/A

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

PREPAREDNESS AND PREVENTION

- 33 Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes No N/A
- 34 Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:
- a. Internal communications or alarm system? [3745-65-32(A)] Yes No N/A

- b. **Emergency communication device?** [3745-65-32(B)] Yes No N/A
- c. **Portable fire control, spill control and decon equipment?** [3745-65-32(C)] Yes No N/A
- d. **Water of adequate volume/pressure per documentation or facility rep?** [3745-65-32(D)] Yes No N/A

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

- 35 **Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency?** [3745-65-33] Yes No N/A
- 36 **Are emergency equipment tests (inspections) recorded in a log or summary?** [3745-65-33] Yes No N/A
- 37 **Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)?** [3745-65-34(A)] Yes No N/A
- 38 **If there is only one employee on the premises, is there immediate access to a device (ex.phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32)** [3745-65-34(B)] Yes No N/A
- 39 **Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment?** [3745-65-35] Yes No N/A
- 40 **Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts?** [3745-65-37(A)] Yes No N/A
- 41 **Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal?** [3745-65-37(B)] Yes No N/A

SATELLITE ACCUMULATION AREA REQUIREMENTS

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

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

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

44 Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes No N/A

45 Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No N/A

46 Are hazardous wastes stored in containers which are:

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, photograph the area, and record on facility map.

47 Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. Yes No N/A

a. **Are inspections recorded in a log or summary? [3745-66-74]** Yes No N/A

48 Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes No N/A

49 Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes No N/A

50 If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] Yes No N/A

51 If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] Yes No N/A

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

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

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

PRE-TRANSPORT REQUIREMENTS

- 53 Does the generator package label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes No N/A
- 54 Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A
- 55 Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes No N/A