



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](http://www.epa.state.oh.us)

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

October 16, 2007

**RE: ART GALVANIZING  
OHD 004 166 575  
LARGE QUANTITY GENERATOR OF  
HAZARDOUS WASTE  
NOTICE OF VIOLATION**

Adrienne Klein  
Art Galvanizing Works, Inc.  
3935 Valley Rd.  
Cleveland, OH 44109

Dear Ms. Klein:

The Ohio EPA Division of Hazardous Waste Management conducted an inspection of Art Galvanizing located at 3935 Valley Rd., Cleveland, OH on 9-17-07. The purpose was to determine if Art Galvanizing had violations of Ohio's hazardous waste and used oil laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC).

This letter will document any violations and concerns found and outline what you need to do to correct them. A written response to these issues is required within 30 days.

Please see the attached Process, Waste, and Pollution Prevention Summary for my understanding of how the various wastes are managed.

Another purpose of the inspection was to look for ways Art Galvanizing may be able to reduce its waste generation, conserve energy, and save money. An attachment to this letter covers these issues.

The following violations were found: (These follow the order of the enclosed checklists.)

1. OAC rule 3745-52-11 – Hazardous waste determination.  
This rule requires that any person who generates a waste must determine if that waste is a hazardous waste. The following documents give more information regarding this:

Identifying Your Hazardous Waste, November 2006

<http://www.epa.state.oh.us/ocapp/sb/publications/identifyingwaste.pdf>

Use of Generator Knowledge in Complying with OAC 3745-52-11, July 2005

<http://www.epa.state.oh.us/dhwm/pdf/GeneratorKnowledge6.pdf>

Art Galvanizing violated this rule by disposing of waste lamps (including fluorescent lamps) with regular trash without determining whether or not they are a hazardous waste. The fluorescent lamps seen used in the office were the Alto model made by Phillips. You may be able to obtain information from Phillips that indicates this type of lamp is not hazardous waste when spent. Ohio EPA encourages the recycling of all lamps. A list of local lamp recyclers is enclosed.

**Please respond with a description of how you will comply with this rule and/or have your waste lamps recycled.**

2. OAC rule 3745-65-52(E) – Contingency plan emergency equipment.  
This rule requires the contingency plan to include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications, and alarm systems), where this equipment is required. Included must be the location, physical description, and capabilities of each item on the list.

Art Galvanizing violated this rule by not including in its contingency plan the locations of eyewashes and safety showers. In addition a description of the materials in the spill kits was not included in the contingency plan. **This information must be added and a copy of the revised page(s) sent to me. It is suggested that this equipment be marked on a map of the facility which is included in the contingency plan. I also suggest that you add a revision date to the contingency plan.**

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.

Art Galvanizing violated this rule by storing outside the metal bins that had been used for the dry skimmings that come off of the zinc kettle. Some of these had holes in them and had residues of the skimmings in them. I believe you told me that the unusable bins will be sent to a metal scrap facility. The storage of these residues in these bins outside and over soil could lead to contamination of the soil with the hazardous constituents of cadmium, chromium, and lead and to contamination with zinc. **The bins with holes and skimmings residue must now be shipped (for example, to a scrap metal facility) or stored in a manner that prevents any contamination. Please send me documentation when this has been completed.**

4. OAC rule 3745-52-34(C)(1)(a) – Satellite accumulation area.  
This rule requires that containers in satellite accumulation areas follow certain rules including being kept closed except when necessary to add or remove waste. The drum used to collect the oil skimmings off the acid tank can be considered a satellite accumulation area.

Art Galvanizing violated this rule by not having this drum closed. **This drum must now be closed. Please send me a description of how you plan to ensure this drum will be kept closed in the future.**

More information regarding satellite areas can be found at:  
[http://www.epa.state.oh.us/dhwm/pdf/Satellite\\_Accumulation\\_Guidance.pdf](http://www.epa.state.oh.us/dhwm/pdf/Satellite_Accumulation_Guidance.pdf)

5. OAC rule 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.

Art Galvanizing violated this rule by not labeling the drum used to collect the oil skimmings off the acid tank as required. **Please label this container and send documentation of that to me.**

Concerns:

1. The waste generated from your air pollution control device is currently allowed to drop to the ground and then shoveled up to be disposed of as a solid waste. You have provided analysis data of a sample of this waste collected on July 6, 2004 that shows it to be a non hazardous waste and have stated the process generating this waste hasn't changed since then. To avoid possible environmental contamination and, most likely, reduce your costs (such as labor costs) you should obtain containers that can be used to collect this waste directly from the output of the air pollution control device. Bags that connect directly to this outlet pipe are readily available and might work well for this. **Please inform me as to how you have addressed this concern.**
2. As parts and baskets of parts are brought out of the caustic cleaning tank and taken by overhead crane to the acid tank they drip onto the concrete floor between these tanks. This is evident by the staining and pitting of the concrete in this area. You should investigate possible ways to avoid this contamination. One possible way is to increase the time these parts/baskets are allowed to drain over the caustic tank. This could be combined with or replaced by a water spray rinse of the parts/baskets over the caustic tank. If this caustic tank is heated then the amount of water used in this spray rinse could be matched to that lost from

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Art Galvanizing Works, Inc.  
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the tank due to evaporation. Such a rinse may also make the acid tank solution last longer. Instead of, or in addition to the above, a shallow tank or pan could be put on the floor in this area to contain drips from the parts/baskets. The collected liquid may be suitable for putting back into the caustic tank. **Please inform me as to how you have addressed this concern.**

3. You had two drums containing spill control equipment located near your tanks. I suggest that these be more clearly labeled as spill kits.

**Please send a written response to this letter within 30 days of the date of this letter including the documentation required above.**

Suggestions:

It appears the oil skimmings off the acid tanks were shipped with the hazardous waste codes of D002, D006, D007, and D008 on January 11, 2006, and with the waste code of D002 on October 18, 2006. The hazardous waste levels for these waste codes are listed on the enclosed table. The analysis you provided of a sample of this waste taken on May 5, 2003, does not show that all these hazardous waste codes apply to this waste. The lead level is hard to read on this analysis and may be above or below the 5 mg/l level that would make it a hazardous waste. The analysis also does not show whether the waste is actually a D002 hazardous waste. You may wish to evaluate this waste to see what, if any, hazardous waste codes apply.

The land disposal restriction notification dated 12-3-04 for the waste sulfuric acid lists silver as an underlying hazardous constituent. The two analysis reports you provided (dated 10-14-03 and 10-19-04) for this waste did not detect silver. Therefore, you may want to remove silver as an underlying hazardous constituent on this notification unless more recent testing or knowledge indicates silver in the waste.

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides compliance and pollution prevention assistance on environmental issues related to air, land, and water. They can be contacted at (800) 329-7518, or <http://www.epa.state.oh.us/ocapp/ocapp.html>. In June 2006 they published a 56 page Small Business Environmental Compliance Self-Assessment Guide which can be found at: <http://www.epa.state.oh.us/ocapp/sb/publications/selfgde.pdf>.

The Division of Hazardous Waste Management has created an email service to provide updates on events and news related to hazardous waste activities in Ohio. You can find more information and sign up at: <http://www.epa.state.oh.us/dhwm/listserv.html>.

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

Sincerely,



Robert Almquist  
Division of Hazardous Waste Management

RA:cl  
Enclosures

- cc. Natalie Oryshkewych, DHWM, NEDO
- ec. Frank Popotnik, DHWM, NEDO  
Harry Sarvis, 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.

Process, Waste, and Pollution Prevention Summary for:

Art Galvanizing Works, OHD 004 166 575, LQG, 9-17-07 inspection

#	Process generating the waste	Waste description and haz. codes	Profile #	Date of last analysis	Date of last LDR	Amount generated	On-site management	Off-site management	Current pollution prevention	Possible pollution prevention
1	Cleaning parts before galvanizing in a sodium hydroxide tank	Waste caustic cleaner, D002	6367	5-5-03	Sent with 9-18-07 shipment	431 G shipped on 9-18-07, last time shipped was 9-17-04	Pumped directly out of cleaning tank	Envirite of Ohio, Canton, OH		Put a containment pan on the floor to catch drips from parts as they come out of the caustic tank.
2	Skimming oil off of acid tank	Oil Skimmings, D002 and possibly D006, D007, D008	6369	5-5-03	1-11-06	Shipped two drum during 2006, none shipped yet in 2007	Stored in satellite drum near acid tank	Envirite of Ohio, Canton, OH		
3	Cleaning parts before galvanizing in a sulfuric acid tank	Waste sulfuric acid, D002, D006, D007, D008	1397	10-19-04	12-3-04	For 2007 up to and including shipment made on 9-17-07, 15111 G was shipped	Stored in totes and pumped directly out of acid tank	Envirite of Ohio, Canton, OH	Use a steel shot blaster to clean some parts so that the acid does not have to be used.	Look into cost analysis of a crystallization unit. Look into other places that may be able to reuse or recycle the spent acid possibly using: <a href="http://www.aor-omex.org/omex/">http://www.aor-omex.org/omex/</a> Try to use more of the

									Tried an acid additive and filtering but didn't work well. Detergent used to keep acid fumes down.	low lead zinc.
4	Fluxing of parts before galvanizing	Zinc ammonium chloride sludge, D008	5608	4-8-05	5-13-05	So far in 2007 2077 P were shipped on 1-17-07.	Pumped directly from flux tank	Envirite of Ohio, Canton, OH		Look into buying a raw material with lower lead levels
5	Galvanizing	Ash, Not a waste because it is a characteristic byproduct that is being reclaimed			NA	47,788 P shipped on 4-2-07	Collected in open metal bins which when are full they are stored inside	US Zinc, Monaca, PA		
6	Galvanizing	Dross, basically parts that fall out of the basket			NA	Clean out the dross once a week	Sent to a scrap yard			



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](mailto:tammy.mcconnell@epa.state.oh.us) or mail it to Tammy  
McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OHD004166575								
3. Site Name	Name:					Website: <a href="http://artgalvanizing.com/">http://artgalvanizing.com/</a> (Optional)			
4. Site Location Information	Street Address: 3935 Valley Rd.								
	City, Town, or Village: Cleveland					State: OH			
	County Name: Cuyahoga					Zip Code: 44109			
5. Site Land Type (check only one)	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>									
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: Adrienne			MI:	Last Name: Klein				
	Phone Number: 216-749-0020				Phone Number Extension:				
	E-Mail Address: <a href="mailto:artgalv@aol.com">artgalv@aol.com</a>								
	Fax Number:				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: Art Galvanizing Works				Date Became Owner (mm/dd/yyyy): 06/08/1942				
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: same								
	City, Town or Village:				Owner Phone #:				
	State:			Country:		Zip Code:			
	Name of Site's Operator: James Klein				Date Became Operator (mm/dd/yyyy): 12/16/1972				
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: same								
	City, Town or Village:				Operator Phone #:				
	State:			Country:		Zip Code:			
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
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 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 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))	
	<b>Managed</b>	<input type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input 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.			
D002	D006	D007	D008
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:
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments:
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Robert Almquist		Sherry Slone	9/17/2007
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)

**LARGE QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: ≥1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

**GENERAL REQUIREMENTS**

- |   |     |                          |    |                          |                              |
|---|-----|--------------------------|----|--------------------------|------------------------------|
| 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11]  | Yes | No                       | X  | N/A                      | <input type="checkbox"/>     |
| 2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)]   | Yes | X                        | No | <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 3. Has the generator obtained a U.S. EPA identification number? [3745-52-12]  | Yes | X                        | No | <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 4. Were annual reports filed with Ohio EPA on or before March 1 <sup>st</sup> ? [3745-52-41(A)]   | Yes | X                        | No | <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)]   | Yes | X                        | No | <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 6. Has the generator transported or caused to be transported hazardous waste to <b>other</b> than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]                                   | Yes | <input type="checkbox"/> | No | X                        | N/A <input type="checkbox"/> |
| 7. Has the generator disposed of hazardous waste <b>on-site without a permit</b> or at another facility <b>other</b> than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] | Yes | <input type="checkbox"/> | No | X                        | N/A <input type="checkbox"/> |
| 8. Does the generator accumulate hazardous waste?   | Yes | X                        | No | <input type="checkbox"/> | N/A <input type="checkbox"/> |

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

- |  |     |                          |    |   |                              |
|--|-----|--------------------------|----|---|------------------------------|
| 9. Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)? | Yes | <input type="checkbox"/> | No | X | N/A <input type="checkbox"/> |
|--|-----|--------------------------|----|---|------------------------------|

NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G) & (H).

- |   |     |                          |    |   |                              |
|---|-----|--------------------------|----|---|------------------------------|
| 10. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)] |     |                          |    |   |                              |
| a. Container that meets 3745-66-70 to 3745-66-77?                       | Yes | <input type="checkbox"/> | No | X | N/A <input type="checkbox"/> |
| b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)?     | Yes | <input type="checkbox"/> | No | X | N/A <input type="checkbox"/> |
| c. Drip pads that meet 3745-69-40 to 3745-69-45?                        | Yes | <input type="checkbox"/> | No | X | N/A <input type="checkbox"/> |
| d. Containment building that meets 3745-256-100 to 3745-256-102?        | Yes | <input type="checkbox"/> | No | X | N/A <input type="checkbox"/> |

NOTE: Complete appropriate checklist for each unit.

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

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

**MANIFEST REQUIREMENTS**

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

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]

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

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.*

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date Trained</u>
All employees are training in hazardous waste management duties since all employees may do hazardous waste management. All employees are trained for all jobs over time and no distinct job titles for each employee are given.		

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

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

- |   |     |                                     |    |                          |     |                                     |
|---|-----|-------------------------------------|----|--------------------------|-----|-------------------------------------|
| 35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]  | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/>            |
| 36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]  | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/>            |
| 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 | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/>            |
| 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 | <input type="checkbox"/>            | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 39. 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"/>            |
| 40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]  | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/>            |
| 41. 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 checked="" type="checkbox"/> |

#### **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 | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/>            |
| b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]  | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/>            |
| c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]  | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/>            |
| d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]   | Yes | <input type="checkbox"/>            | No | <input type="checkbox"/>            | N/A | <input checked="" type="checkbox"/> |
| e. Containers are closed, in good condition and compatible with wastes stored in them?[3745-52-34(C)(1)(a)]   | Yes | <input type="checkbox"/>            | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/>            |
| f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]                                      | Yes | <input type="checkbox"/>            | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/>            |
| 43. 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 checked="" type="checkbox"/> | N/A | <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"/>            |
| b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded?[3745-52-34(C)(2)] | Yes | <input type="checkbox"/>            | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/>            |

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

#### **USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS**

- |  |     |                          |    |                          |     |                                     |
|--|-----|--------------------------|----|--------------------------|-----|-------------------------------------|
| 44. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 45. Is the accumulation date on each container? [3745-52-34(A)(2)]                           | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 46. Are hazardous wastes stored in containers which are:                                     |     |                          |    |                          |     |                                     |

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

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) Yes  No  N/A 
  - "Week" means 7 consecutive days.
  - 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

## Land Disposal Restriction Requirements

Facility Name: Art Galvanizing ID #: OHD 004 166 575 Inspection Date: 9-17-07

### 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)(a)] Yes  No  N/A  RMK#
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)(b)] 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#

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**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#

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**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#

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**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#

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**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#

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**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# \_\_\_

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**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: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- 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# \_\_\_

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**REMARKS**