



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

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www.epa.state.oh.us

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

Re: M.A. Harrison Mfg. Co., Inc.
OHD 986 988 954
Hazardous Waste
Erie County
RTC / NOV

February 7, 2008

Mr. Walter Denham
M.A. Harrison Mfg. Co., Inc.
14307 Route 113
Birmingham, Ohio 44816

Dear Mr. Denham:

Thank you for your responses to Ohio EPA's February 28, 2007, Notice of Violation letter (NOV). The following occurred on the dates below:

- February 22, 2007- You faxed to me two Material Safety Data Sheets (MSDS) for the oil (coolants) used in your facility processes.
- March 12, 2007 - Response to NOV with the description of your two waste coolants processes and information stating that you manage your lamps as a universal waste.
- March 20, 2007 - Sampling of coolant from machining process and coolant from grindings (Ohio EPA was represented by me and Chris Maslo for this sampling event).
- April 2, 2007 - I received the analytical from the 3-20-07, sampling event.
- April 12, 2007 - Site visit by Ohio EPA to your facility to discuss issues at the facility including the possible recycling of grindings and filter paper (D008) and the management of your waste coolant. Ohio EPA was represented by Colleen Weaver, NWDO; Mitch Mathews, CO; Chris Maslo, NWDO; and myself.
- January 31, 2008 - I received a fax stating that you are managing your waste coolant as used oil and that Heartland Petroleum, LLC would be transporting your used oil. In addition, this fax included a non-hazardous waste disposal receipt from Heartland Petroleum, LLC, for a pick-up of your used oil.

Return to Compliance

My review of this documentation reveals that M.A. Harrison has adequately demonstrated abatement of the following violations discovered during the February 1, 2007, compliance evaluation inspection (CEI) as listed below:

1. OAC Rule 3745-52-11, Waste Evaluation.

(A.) *This portion of the violation was abated with the February 22, 2007, and March 12, 2007, responses and the analytical I received on April 2, 2007.*

(B.) *This portion of the violation was abated with the March 12, 2007, response.*
2. OAC Rule 3745-279-24, Off-site shipments of used oil by generators. *This violation was abated with your January 31, 2008, response.*

Notice of Violation

Please note that at the time of the 2-1-07, CEI, M.A. Harrison was operating as a small quantity generator (SQG) of hazardous waste (D008 grindings and filter paper, D008 cutting oils/coolants, D007/D008 silicon carbide).

Based on the February 1, 2007, CEI; additional information received to date; and the April 12, 2007, site visit, I found the following additional violations of Ohio's hazardous waste laws. In order to correct these violations you must do the following and send me the required information **within 30 days** of your receipt of this letter:

1. **Waste Evaluation.**
OAC Rule 3745-52-11

Any person who generates a waste must determine if that waste is a hazardous waste in accordance with the criteria for hazardous waste as set forth in Chapter 3745-51 of the Administrative Code.

M.A. Harrison has failed to evaluate their paper wipers to determine if they are hazardous. During the 4-12-07, site visit these wipers were observed in the trash. M.A. Harrison is currently disposing of this waste stream in the local landfill.

To properly evaluate the above waste stream, M.A. Harrison must do one of three options: 1) M.A. Harrison must take a representative sample of this waste to properly evaluate this waste stream through a laboratory analysis which lists constituents present and at what concentration. M.A. Harrison must sample their wipers to determine the concentrations of the Resource Conservation and Recovery Act (RCRA) constituents that may be present in light of the materials or the processes used to generate this waste stream as listed in the Ohio Administrative Code Rule 3745-51-24 following the methods as outlined in U.S. EPA's SW-846. At a minimum, M.A. Harrison should sample these wipers for lead (D008) based on the analytical results from the waste coolant generated on-site.

M.A. Harrison may run total concentrations for these constituents as a *screening tool*. If the concentrations are detected for the constituents at or above the regulatory limit, a TCLP may be required to ensure this constituent is not present above the Ohio EPA regulatory level, or 2) M.A. Harrison must apply generator knowledge of the hazardous characteristic(s) of the waste in light of the materials or the processes used through adequate documentation, or 3) a combination of one and two.

To abate this violation, M.A. Harrison must submit the analytical information or the documentation for generator knowledge to me. Your results must document if the waste is hazardous or not and whether it is restricted from land disposal. If it is hazardous, you must explain what treatment, storage, or disposal facility you will send it to. If the waste is hazardous, I will determine the status of your compliance with other hazardous waste laws and notify you of my findings in a separate letter.

If you perform sampling, Ohio EPA will use the data you provide, in addition to other documentation, to make regulatory decisions concerning the wastes tested. The data you submit should be reviewed using a data review process, referred to as data validation, to confirm the validity of your data prior to submission. Data validation includes a review of the following components: laboratory test methods, laboratory data completeness, documentation of holding time(s), chain(s) of custody, and quality assurance/quality control (QA/QC) data. To confirm the validity of your data, you may use Ohio EPA's tier 1 data validation plan review form which can be obtained from Ohio EPA's web page: http://www.epa.state.oh.us/dhwm/tier_i_data_validation_manual.html. Ohio EPA may request the documentation needed to confirm the validity of the data submitted.

Please submit a brief narrative of each sampling event which includes: process generating the waste, point in the process the sample was obtained, sampling techniques used to obtain the sample and a description of how this sample was determined to be a representative sample of the waste tested.

In addition, if sampling is performed, please notify me at least seven days prior to taking the samples so that I or an Ohio EPA representative may be present.

**2. Container Management
OAC Rule 3745-52-34 (C) (1) (a)**

In order to avoid the need for a hazardous waste storage permit, a small quantity generator accumulating hazardous waste in a satellite accumulation container must always maintain the container in the closed position, except when it is necessary to add or remove waste.

M.A. Harrison failed to comply with the above mentioned condition for a permit exemption at the satellite accumulation area for the grindings and filter paper.

A lid was placed on this satellite container during the February 1, 2007, inspection.

This violation was abated at the time of the inspection.

**3. Hazardous Waste Label
OAC Rule 3745-52-34 (C) (1) (b)**

All containers at or near the point of generation where wastes initially accumulate (satellite containers) must be labeled or clearly marked with the words "Hazardous Waste" or other words that identify the contents of the container.

M.A. Harrison failed to mark the words "Hazardous Waste" or other identifying words on satellite containers where the following two separate waste streams are accumulated: grindings and filter paper and silicon carbide.

A hazardous waste label was placed on each satellite container during the February 1, 2007, inspection.

This violation was abated at the time of the inspection.

**4. Personnel Training.
OAC 3745-52-34 (D) (5) (c)**

A generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their positions.

M.A. Harrison has not trained their employees on the proper waste handling and emergency procedures, relevant to their positions.

Since M.A. Harrison is now operating as a conditionally exempt small quantity generator (CESQG) there is no need to address this violation. M.A. Harrison shall note that if in the future, they do become a SQG of hazardous waste they will be required to conduct proper personnel training.

Your facility had been operating as a CESQG since the spring of 2007 (approximately March/April/May of 2007). On 2-1-08, I received an email from you stating that M.A. Harrison was, in fact, a CESQG.

Based on the current facility status as a CESQG, as of 2-1-08, this violation has been corrected.

**5. Used oil storage requirements - proper labels.
OAC 3745-279-22 (C) (1)**

Containers used to store used oil shall be labeled or marked clearly with the words "Used Oil."

During the 4-12-07, site visit it was observed that M.A. Harrison failed to mark the containers storing waste coolant with the words "Used Oil".

To abate this violation, please submit to me a statement indicating that since you have been and will be managing your waste coolant as used oil that all containers storing the waste coolant will be properly labeled "Used Oil".

General Comments:

- **SQG Requirements.**

M.A. Harrison shall note that during the 2-1-07, CEI, several areas of concern were observed. Please note the following:

- ❖ M.A. Harrison failed to conduct container storage inspections during the holiday shutdown. M.A. Harrison had conducted inspections properly (weekly) prior to this time period and up to the date of the CEI. However, M.A. Harrison failed to conduct the weekly inspections in the container storage area during the holiday shut down although there were hazardous waste containers in the storage area.
- ❖ M.A. Harrison did have some posted emergency information (the name and telephone numbers of all emergency coordinators and the telephone number of the local fire department) near the telephone. However, M.A. Harrison did not have the location of fire extinguishers and spill control material, and, if present, fire alarms posted directly by the telephone. This information was posted across the hall and it had fallen down.

M.A. Harrison shall note that if in the future, they do become a SQG of hazardous waste they will be required to ensure that these listed above and all SQG requirements are satisfied.

- **Filter paper grindings – excluded scrap metal.**

M.A. Harrison machines aluminum and bronze alloy parts. Large grinders are utilized for the polishing operations. The waste that is generated from this grinding operation is very fine grindings (swarf). Coolant is utilized in the grinding process. The coolant is run over filter paper (paper approximately the thickness of a coffee filter) to remove the fine grindings. The coolant is then re-used in the machine. The swarf must be filtered out or it plugs up the equipment. When the filter paper became saturated with grindings, M.A. Harrison would remove the entire paper and place into a drum. This drum was then disposed as a D008 hazardous waste.

M.A. Harrison found a recycler which can reclaim the copper and other metals from this waste stream. The recycler can reclaim these metals from this waste as it is generated (with filter paper). The filter is a spent material; however, the metal on the filter paper has value and can be reclaimed.

Thus, the grindings and the filter paper would meet the definition of scrap metal under OAC Rule 3745-51-01 – a “prompt” scrap metal. Under OAC Rule 3745-51-06, scrap metals are excluded from being called wastes if they are recycled. Thus, the filter paper grindings would be excluded from hazardous waste regulations as long as this material is recycled by a legitimate metals reclaimer.

- **Rough grinding operation.**

In the rough grinding operation a cyclonic separator drops coolant into a decant barrel. M.A. Harrison should consider constructing higher sides (shields) on the cyclone to minimize splash. Especially since based on the facility’s own analysis of this material, this coolant contains high levels of lead.

- **Spill Prevention, Control and Countermeasure (SPCC) program.**

M.A. Harrison may wish to review the SPCC regulations as it pertains to their storage and management of used oil. I am not sure if M.A. Harrison would fall under the purview of this program, however, it may be something M.A. Harrison should investigate.

This program is managed by the Division of Emergency and Remedial Response (DERR) in the Northwest District Office. You can contact DERR at 419-352-8461. For additional information, below is the District's SPCC website: <http://www.epa.state.oh.us/nwdo/spcc.html>.

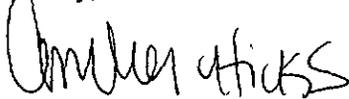
Pollution Prevention:

- After conducting a proper waste evaluation of their paper wipers, M.A. Harrison should consider switching to cloth rags which can be laundered, as a pollution prevention option. If your paper wipers are determined to be a hazardous waste, switching to cloth rags would exclude them from being considered a hazardous waste once they are spent, thus reducing your hazardous waste generation. Even if your paper wipers are determined to be non-hazardous, laundering cloth rags is still a viable option.
- M.A. Harrison has greatly reduced their generator status within the last year. They now manage their waste coolant as used oil and send it off-site for recycling with Heartland Petroleum, LLC. In addition, the facility now recycles their traditionally largest hazardous waste stream - the filter paper grindings. This waste stream is being recycled via metals recovery by Buckeye Metal Co. The facility now only generates approximately one drum a year of hazardous waste (silicon carbide) and has gone from a small quantity generator to a conditionally exempt small quantity generator. The facility is in process of trying to procure a recycler for the silicon carbide hazardous waste stream, thus reducing their generator status even further.
- If you find additional ways to recycle, reduce, or altogether eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs. Furthermore, you may possibly reduce your regulatory requirements. You can find helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp.html>.

Enclosed you will find a copy of the checklists that I completed during the inspection. Please address all correspondence to Amber Hicks, Ohio EPA, 347 N. Dunbridge Road, Bowling Green, Ohio 43402. Should you have any questions, please feel free to call me at (419) 373-3082.

You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,



Amber M. Hicks
Division of Hazardous Waste Management

/llr

Enclosures

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
•DHWM; NWDO File: M.A. Harrison Mfg. Co., Inc. (w/ original checklists)•
ec: Amber Hicks, DHWM, NWDO

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 No.	EPA ID Number: OHD 986 988 954								
3. Site Name	Name: M.A. Harrison mfg. co., Inc.					Website: (Optional)			
4. Site Location Information	Street Address: 14307 Route 113								
	City, Town, or Village: Birmingham					State: OH			
	County Name: Erie					Zip Code: 44816			
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) 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: Walter			MI:	Last Name: Denham				
	Phone Number: 440-965-4306				Phone Number Extension:				
	E-Mail Address: wdenham@maharrisonmfg.com								
	Fax Number: 440-965-5134				Fax Number Extension:				
	Street or P.O. Box:								
	City, Town or Village:					Country: USA		Zip Code:	
	State:								
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:					Date Became Owner (mm/dd/yyyy):			
	Owner Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box:								
	City, Town or Village:					Owner Phone #:			
	State:					Country:		Zip Code:	
	Name of Site's Operator:					Date Became Operator (mm/dd/yyyy):			
	Owner Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box:								
	City, Town or Village:					Operator Phone #:			
	State:					Country:		Zip Code:	
9. Violations Cited?	<input 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 checked="" 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 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 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.			
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: Chad Harrison
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments: Facility CEI date = 2-1-07; NOV for 52-11 sent on 2-28-07. Site visit on 4-12-07. Facility is now operating as a CESQG. This letter reflects additional violations observed during the 2-1-07, CEI and the 4-12-07, site visit.
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)
Amber Hicks		Chris Maslo	2/1/2007 11:00-13:25
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)

**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 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. 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, it is not subject to 52-34 standards. All other requirements might still apply, e.g. manifest, marking, LDR, etc.

6. Has the generator accumulated hazardous wastes in excess of (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)] Yes 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:
 - 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.

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

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 [ID number]
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- 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

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

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

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 the generator have the following equipment at the facility if it is required to actual hazards associated with the waste:
- a. Internal 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
23. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]
- a. Are inspections recorded in a log or summary? [3745-65-33]? Yes No N/A
24. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)] Yes No N/A
25. If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32?) [3745-65-34(B)] Yes No N/A
26. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
27. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes No N/A
28. 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

29. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes 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 the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
30. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:
- 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

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

31. Has the generator marked containers with the words "Hazardous Waste" [3745-52-34(D)(4)] Yes No N/A
32. Is the accumulation date on each container? [3745-52-34(D)(4)] Yes No N/A
33. 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 and photograph the area.

34. Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days. Yes No N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
35. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes No N/A
36. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B) 3745-66-77(A)] Yes No N/A
37. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B) ? [3745-66-77(B)] Yes 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

38. Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes No N/A
39. Does each container \leq 100 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A
40. 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

REMARKS-GENERAL INFORMATION

General Process Information:

- Waste coolant meets definition of used oil, so facility is now recycling this material as used oil versus managing as a hazardous waste as they had done previously (D008 – to Ross Incineration).
- In addition, facility's paper filters/grindings fall under the scrap metal exemption, thus the facility is now reclaiming this material. This material then no longer counts as part of their hazardous waste stream. Only hazardous waste currently being generated is the 1-2 drums per year of silicon carbide.
- At the time of the 2-1-07, CEI facility was a SQG. Now, facility is a CESQG.
- CEI occurred on 2-1-07, NOV sent on 2-28-07, citing 52-11. 4-12-07, site visit determined that facility may manage waste coolant as used oil and filter paper/grindings as scrap metal. This letter, process sheet, and checklists reflect additional violations and comments observed during the 2-1-07; CEI (facility then operating as a SQG); the 4-12-07, site visit; and additional information received to date.
- As of the spring of 2007 to date the facility is operating as a CESQG.

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information: Facility would like an assessment and/ or information pertaining to if the grinding filters are eligible for recycling to reduce their generator status.

Would this facility be interested in a P2 assessment? Yes* No X *If yes, refer promptly to your district P2 coordinator.
Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other:

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: M.A. Harrison **Facility Type:** SQG (at time of CEI), now facility is a CEQ **Date of Inspection:** 2-1-07 **EPA ID#:** OHD 986 988 954

Waste Generated			On- or Off-Site Management		P2 Activities		
<i>Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</i>	<i>Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</i>	<i>QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area</i>	<i>Type of On-Site Treatment (recycle, wwt, etc)</i>	<i>Name, state, and type of activity occurring at the off-site facility.</i>	<i>Current P2 Activities</i>	<i>P2 Opportunities</i>	
1	Machining / Grinding operations (prior to entering evaporator)	Waste coolant/oil	Unknown	Material run through an evaporator.	Heartland Petroleum, LLC – Ohio	Recycling as used oil.	
2	Machining / Grinding operations / material processed through evaporator	Coolant/oil sludge	~ 0.5 drum	NA	Heartland Petroleum, LLC – Ohio	Recycling as used oil.	
3	Lighting	Fluorescent bulbs	Unknown	NA	Recycling facility.	Recycling.	
4	Grinding operations	Silicon carbide/ D007, D008	~ 1-2 drums per year	NA	Ross Incineration - Ohio		
5	Grinding operations	Filters	~ 1-3 drums	NA	Buckeye Metal Co. – Ohio	Recycling as scrap metal.	
6	Hydraulics	Used oil	Unknown	NA	Heartland Petroleum, LLC – Ohio	Recycling as used oil.	
7							

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS

1. Does the generator manage used oil in a surface impoundment or waste pile? If yes: Yes No N/A
- a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] Yes No N/A
2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes No N/A
3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? Yes No N/A

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil? If so, Yes No N/A
- a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] Yes No N/A

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes No N/A

NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

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

9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes No N/A
- b. Contained the release? Yes No N/A
- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A

ON-SITE BURNING IN SPACE HEATER

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: Yes No N/A
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes No N/A
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A

GENERATOR TRANSPORTATION

11. If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] Yes No N/A
- a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24] Yes No N/A
- b. Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24] Yes No N/A

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes No N/A
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes No N/A
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes No N/A

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.

Keyword: UsedOilChecklistforGenerators.Oct.2007.doc

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# _1_

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:
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: Yes__ No N/A RMK#__
- 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__NoN/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__NoN/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__NoN/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__NoN/A RMK#__

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

Yes__NoN/A RMK#__

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

Yes__NoN/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__NoN/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__NoN/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__NoN/A RMK#__

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

Yes ___ No N/A RMK# ___

REMARKS

1 - For all questions marked with N/A, the facility does not do this activity or does not generate the waste applicable to the question.