



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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

December 15, 2008

**SCIOTO COUNTY
SFI OF OHIO LLC
DHWM/SEDO
OHR000124008**

Mr. Terry Shope, Safety Manager
SFI of Ohio LLC
3880 Grace Street
New Boston, Ohio 45662

Dear Mr. Shope:

On December 3, 2008, Melody Stewart and I inspected SFI of Ohio LLC (SFI), located at 3880 Grace Street in New Boston, to determine your company's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). This letter will explain any violations that were discovered during the inspection and what you need to do to correct them, as well as any general comments or concerns we have and how you can address them.

We found the following violation of Ohio's hazardous waste laws:

(1) OAC Rule 3745-3745-52-34(C)(1)(b), Accumulation Time of Hazardous Waste – Labeling of Containers.

A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste in containers at or near a point of generation (i.e., "satellite accumulation") without an Ohio hazardous waste permit, provided that the conditions of (C)(1)(a) and (C)(1)(b) of this rule are met. Containers in satellite accumulation areas must be marked with the words "Hazardous Waste" or other words identifying their contents.

At the time of the inspection, one 55-gallon drum that contained waste paint sludge, located near the paint gun wash reclaiming, was not labeled with the words "Hazardous Waste" or other words that identified its contents.

During the inspection, SFI appropriately labeled the satellite accumulation drum containing waste paint sludge. **SFI has therefore returned to compliance with this rule and no further action is necessary.**

We also inspected SFI as a follow up on a previous inspection that was conducted on July 1, 2008. As a result of the July 2008 inspection, Ohio EPA sent Notice of Violation (NOV) letters to your company on July 11 and August 12, 2008. Ohio EPA received SFI's responses to these NOV letters on August 5, and September 16, 2008. Based on our December 3, 2008

inspection, **Ohio EPA has determined that SFI has now abated all violations resulting from the July 1, 2008 hazardous waste inspection, which includes the following:**

- (1) OAC Rule 3745-52-11, Waste Evaluation;
- (2) OAC Rule 3745-65-16, Personnel Training;
- (3) OAC Rule 3745-65-51(A), Purpose and Implementation of Contingency Plan;
- (4) OAC Rule 3745-65-52, Content of Contingency Plan;
- (5) OAC Rule 3745-65-53, Copies of Contingency Plan;
- (6) OAC Rule 3745-65-31, Maintenance and Operation of Facility;
- (7) OAC Rule 3745-65-33, Testing and Maintenance of Equipment;
- (8) OAC Rule 3745-52-34 (C)(2), Accumulation Time of Hazardous Waste;
- (9) OAC Rule 3745-66-73(B), Management of Containers; and
- (10) OAC Rule 3745-66-74, Inspections.

General Comments:

- (a) Spill Response/Clean up Kits.
As we discussed during the inspection, Ohio EPA recommends that SFI place a spill response/clean up kit near the <180 day hazardous waste container storage area. You may also wish to place a spill kit near the satellite accumulation area where paint sludge is collected from the gun wash reclaimers.
- (b) Annual Hazardous Waste Report for Reporting Year 2008.
Since SFI was operating as a Large Quantity Generator at some point during 2008, your company must complete and file an Annual Hazardous Waste Report for reporting year 2008. Please note that the 2008 annual hazardous waste report must be filed by March 1, 2009. The form and instructions are available online at http://www.epa.state.oh.us/dhwm/ann_report.html. For more information and assistance, please contact Mary Ann Silagy in our central office, at MaryAnnSilagy@epa.state.us.us or (614) 644-2891.
- (c) "Episodic" Generator Requirements.
In general, your hazardous waste generator category is determined by the total weight of hazardous waste that you produce in any given calendar month; but your category can also change due to the total amount of hazardous waste that you have on-site at any given time. There are instances where your company may fall into another generator category unexpectedly, or as the result of a one-time occurrence (i.e., off-specification product inventory clean outs, spills of hazardous waste or product that become hazardous waste when spilled, etc.) If the weight or amount of hazardous waste you generate/accumulate causes your company to fluctuate between hazardous waste generator categories (i.e., SQG to LQG) your company is an "episodic generator".

As we discussed, SFI is normally an SQG, but due to an episodic event may become an LQG. SFI must comply with all applicable generator requirements for hazardous wastes generated that month for as long as that waste remains on-site. If your company reverts back to SQG status the following month, you must continue to manage the hazardous waste generated during the month you became an LQG according to all applicable LQG requirements (contingency plan, personnel training, etc.). Hazardous waste generated during the month you were an SQG can be managed under SQG requirements.

For further information, please refer to Ohio EPA's fact sheet, *Hazardous Waste Generator Categories and Episodic Generation*, which is available at [http://www.epa.state.oh.us/dhwm/pdf/Episodic Generation.pdf](http://www.epa.state.oh.us/dhwm/pdf/Episodic%20Generation.pdf), and the *Hazardous Waste Generator Handbook*, located at http://www.epa.state.oh.us/dhwm/pdf/gen_handbook.pdf. An example Contingency Plan is located in Appendix 3 in the back of this handbook. As we discussed, I have enclosed a corrected copy of this example Contingency Plan for your reference.

(d) Fluorescent Lamps.

Because all fluorescent lamps contain mercury, Ohio EPA recommends that you manage your spent lamps under the Universal Waste Rule. Managing spent lamps under the Universal Waste Rule eliminates many regulatory requirements such as waste evaluation, manifesting, and record keeping. As we discussed during the inspection, if you manage your spent lamps as universal waste and they will be recycled, you do not have to determine if they are hazardous waste. However, if you do not have your spent fluorescent lamps recycled, then you must evaluate the lamps to determine if they are hazardous prior to their disposal. For further information please see Ohio EPA's fact sheet, *Universal Waste Rules for Handlers of Lamps*, which is available at [http://www.epa.state.oh.us/dhwm/pdf/Universal Waste Rules for Handlers of Lamps.pdf](http://www.epa.state.oh.us/dhwm/pdf/Universal%20Waste%20Rules%20for%20Handlers%20of%20Lamps.pdf). I have enclosed our fact sheet, *Fluorescent Lamps, What You Should Know*, which is also available at <http://www.epa.state.oh.us/dhwm/pdf/LampGuidance.pdf>, as well as a list of Fluorescent Lamp Recyclers.

(e) Pollution Prevention (P2) Site Assessment.

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides a variety of on-site assistance services that are free and non-regulatory in nature, including pollution prevention (P2) assessments. A P2 assessment is an on-site survey of a company's operations to identify and evaluate potential opportunities to reduce wastes and pollution. OCAPP's P2 assessments can help companies who lack the available time or resources to identify and evaluate potential opportunities to reduce costs associated with waste generation and disposal; so if your company is looking to improve both economic and environmental performance you may wish to consider an OCAPP P2 assessment. Further information about this is available on Ohio EPA's website, at <http://www.epa.state.oh.us/ocapp/p2/p2assmnt.html>. If you are interested in a free, on-site pollution prevention assessment, you can contact OCAPP at p2mail@epa.state.oh.us, or contact Michael Kelley at (614) 644-3469. I have enclosed a fact sheet on this program for your convenience.

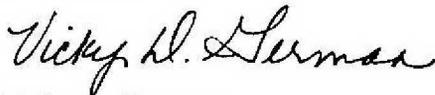
Mr. Terry Shope
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- (f) I have also enclosed a fact sheet regarding USEPA Hazardous Waste ID numbers for your reference.

Enclosed, you will find a copy of the checklists that were completed during the inspection. You can find copies of the hazardous waste rules and other information on our division's web page at <http://www.epa.state.oh.us/dhwm>. Compliance assistance information and pollution prevention information can be found at <http://www.epa.state.oh.us/ocapp/ocapp.html>.

If you should have any questions regarding this letter, please feel free to call me at (740) 380-5237.

Sincerely,



Vicky D. German
Environmental Specialist
Division of Hazardous Waste Management
Ohio EPA, Southeast District Office

VDG/mlm

Enclosure

NOTICE:
Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

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

For Ohio EPA use only

E-mail this completed form to kristina.durnell@epa.state.oh.us or mail it to Kristina Durnell, Central Office

Site EPA ID No.	EPA ID Number: OHR000124008								
Site Name	Name: SFI of Ohio LLC (fka New Boston Redevelopment Project)					Website (Optional): http://www.sffab.com/ohio.php			
Site Location Information	Street Address: 3880 Grace Street								
	City, Town, or Village: New Boston					State: OH			
	County Name: Scioto					Zip Code: 45662			
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"/>	
NAICS code(s) www.census.gov/epcd/www/naics.html	332999			333923					
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is <i>different than the site address</i>	First Name: Terry			MI: L.	Last Name: Shope				
	Phone Number: (740)259-6722				Phone Number Extension:				
	E-Mail Address: terry.shope@sffab.com								
	Fax Number: (740)259-6747				Fax Number Extension:				
	Mailing Address, Street or P.O. Box: same as above								
	City, Town or Village:					Zip Code:			
	State:								
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: Donald Hadsell					Date Became Owner (mm/dd/yyyy): 3/23/2007			
	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: 230 Rowe Lane								
	City, Town or Village: Wheelersburg					Owner Phone #: unlisted/unavailable			
	State: OH					Country: Zip Code: 45694			
	Name of Site's Operator: SFI of Ohio LLC					Date Became Operator (mm/dd/yyyy): 1/2/2008			
	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 as above									
City, Town or Village:					Operator Phone #:				
State:					United States		Zip Code:		

VIOLATIONS CITED? Yes No

TYPE OF HANDLER - A MINIMUM OF ONE BOX MUST BE CHECKED

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
		<input checked="" type="checkbox"/> Small Quantity Generator (SQG)
		<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
		<input type="checkbox"/> U.S. Importer of Hazardous Waste
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)	
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Underground Injection Control Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPE OF ACTIVITY)	
<input type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	

MARK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES	
<input type="checkbox"/> Batteries	
<input type="checkbox"/> Pesticides	
<input type="checkbox"/> Mercury containing equipment	
<input type="checkbox"/> Lamps	

USED OIL ACTIVITIES (INDICATE TYPE OF ACTIVITY)	
<input checked="" type="checkbox"/> Used Oil Generator	
<input type="checkbox"/> Used Oil Transporter	
<input type="checkbox"/> Used Oil Transfer Facility	
<input type="checkbox"/> Used Oil Processor	
<input type="checkbox"/> Used Oil Re-refiner	
<input type="checkbox"/> Off-Specification Used Oil Burner	
<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil	
<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner	

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 RCRA Info source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

D001	D007	F003				
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COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.			
Announced	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments: Reinspection as follow-up to company's response to NOV.
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

Name of Inspector(s):	Name of Inspector(s):	Date of Inspection/Time: (mm/dd/yyyy) (hh:mm)
Vicky German, DHWM-SEDO	Melody Stewart, DHWM-SEDO	12/03/2008 9:45 a.m.

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 Authorized Representative	Name and Title (Print)	Date (mm/dd/yyyy)

WASTE ACTIVITIES SUMMARY

SFI of Ohio LLC

SQG

OHR000124008

Description of Waste				On-Site Management			Off-Site Management
Process Generating Waste	Waste Generated	EPA Waste Code	QTY Generated per Month	Type of Accumulation/ Storage	Type of On-Site Treatment	Waste Location	Name, state, and type of activity
Steel fabrication (cutting, burning, machining)	Spent mill coolant (Charcool 2200)	NA	300 G	300-G used oil tank	NA	Inside facility near machining/drilling area	United Waste Removal Cincinnati OH
Steel fabrication (sandblasting and de-burring with Pangborn blaster)	Pangborn dust	NA Non-hazardous	Varies	Bins inside facility	NA	Bins inside facility	Solid waste
Steel fabrication (machining; large and small drilling)	Metal shavings and scraps	NA Non-hazardous	Varies	Bins/hoppers inside facility	NA	Bins/hoppers inside facility	RLS Corporation Iron & Metal Chillicothe OH
Painting and coating	Waste paint sludge from gun wash solvent recycler	D001 D007 F003	1600 P	55-gallon drums	NA	SAA, then moved to outside <180 day hazardous waste storage area	Veolia Environmental West Carrollton OH
Painting and coating	Spent paint booth filters	NA Non-hazardous	NA	Bins inside facility	NA	Bins inside facility	Solid waste

WASTE ACTIVITIES SUMMARY

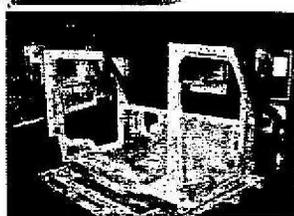
SFI of Ohio LLC

SQG

OHR000124008

<i>Description of Waste</i>				<i>On-Site Management</i>			<i>Off-Site Management</i>
Process Generating Waste	Waste Generated	EPA Waste Code	QTY Generated per Month	Type of Accumulation/ Storage	Type of On-Site Treatment	Waste Location	Name, state, and type of activity
General part cleanup	Parts washer solvent	NA	~15 G every 3 months	NA	NA	NA	Environmental Specialists McDonald OH CONTINUED USE
Pollution control equipment	Baghouse dust	NA Non-hazardous	NA	NA	NA	NA	Solid waste
Building maintenance	Spent fluorescent lamps	D009 unless recycled	Varies	Original containers	NA	NA	Currently collected awaiting recycling program – will begin to manage as universal waste

PROCESS DESCRIPTION



SFI of Ohio LLC (SFI) is a 125,000 square steel fabrication business that opened at the New Boston, Ohio location in March 2008. The company specializes in heavy and medium gauge steel fabrication of components for equipment manufacturers in the agricultural, construction, industrial, and transportation industries. SFI also fabricates parts for the military defense industry, including armor plate components for MRAP (Mine Resistant Ambush Protected) vehicles that are used to transport military troops.

The company receives flat plate metal steel. Plate steel is cut into basic part shapes by the company's two plasma and laser burners; the plate steel is placed on the burn table and the parts are cut out robotically as programmed. Cut plates are then formed by pressing or rolling, and machined with metal lathes, mills, drills, and other metal working tools. The formed and machined parts are then loaded on carts and transported to the welding area where they are assembled and welded. After the welds have cooled, the part is usually sandblasted or deburred, and then primed and painted if required by customer specifications. Some parts receive specialty coatings (such as bullet-proof military vehicle parts), some parts are painted, and some parts are left as a metal finish with no painting or coating added. After final assembly, the finished parts are inspected and prepared for shipment.

WASTE MANAGEMENT INFORMATION

Wastes generated from company operations include non-hazardous spent mill coolant (managed as a used oil); metal shavings and scraps (managed via metal scrap dealer); hazardous paint waste solids generated from an on-site paint gun wash solvent reclaimer, non-hazardous paint booth filters, and non-hazardous baghouse dust from pollution control equipment.

The company operates a satellite accumulation area near the paint mixing area, for collection of paint sludge from the paint gun wash reclaimer. Wastes from satellite accumulation areas are moved to an outdoor hazardous waste container storage area for < 180 day storage prior to off-site shipment. The container storage area consists of a concrete pad inside a chain link fence directly against the outside of the building.

REGULATORY HISTORY

SFI was last inspected for compliance with Ohio's hazardous waste rules on 7/1/2008; at that time the facility was operating as a Large Quantity Generator (LQG) of hazardous waste. It was determined during the current inspection that the company is currently operating as a Small Quantity Generator (SQG) of hazardous waste.

Process Description References: In addition to information gathered during the facility inspection, the following resources were used:
<http://www.sifab.com>
[http://en.wikipedia.org/wiki/Fabrication_\(metal\)](http://en.wikipedia.org/wiki/Fabrication_(metal))

SMALL QUANTITY GENERATOR REQUIREMENTS

CESQG: <100Kg. (Approximately 25-30 gallons or under 220 pounds) of waste in a calendar month.

SQG: Between 100 and 1,000 Kg. (About 25 gallons to under 300 gallon or 220 to 2200 pounds) of waste in a calendar month.

LQG: >1,000 Kg. (>300 gallons or >2200 pounds) of waste in a calendar month, or >1 Kg. of acutely hazardous waste in a calendar month.

GENERAL REQUIREMENTS			
1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> NA <input type="checkbox"/>
2.	Has the generator obtained a U.S. EPA I.D. number? [3745-52-12]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> NA <input type="checkbox"/>
3.	Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)]	Yes <input checked="" type="checkbox"/>	No <input checked="" type="checkbox"/> NA <input type="checkbox"/>
4.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)]	Yes <input checked="" type="checkbox"/>	No <input checked="" type="checkbox"/> NA <input type="checkbox"/>
5.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>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.</i>			
6.	Has the generator accumulated hazardous wastes <u>in excess of</u> (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)]	Yes <input checked="" type="checkbox"/>	No <input checked="" type="checkbox"/> NA <input type="checkbox"/>
<i>NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]</i>			
7.	Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)]	Yes <input checked="" type="checkbox"/>	No <input checked="" type="checkbox"/> NA <input type="checkbox"/>
<i>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.</i>			
8.	Does the generator treat hazardous waste in a:		
	a. Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/>	No <input type="checkbox"/> NA <input checked="" type="checkbox"/>
	b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)?	Yes <input type="checkbox"/>	No <input type="checkbox"/> NA <input checked="" type="checkbox"/>
	c. Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/>	No <input type="checkbox"/> NA <input checked="" type="checkbox"/>
	d. Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/>	No <input type="checkbox"/> NA <input checked="" type="checkbox"/>
<i>NOTE: Complete appropriate checklist for each unit. NOTE: If waste is treated to meet LDRs, use LDR checklist.</i>			

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 <input checked="" type="checkbox"/>	No <input type="checkbox"/> NA <input type="checkbox"/>
10.	Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Does the contractual agreement specify the type of waste and frequency of shipment?	Yes <input type="checkbox"/>	No <input type="checkbox"/> NA <input checked="" type="checkbox"/>
	b. Is the transport vehicle owned and operated by the reclaimer?	Yes <input type="checkbox"/>	No <input type="checkbox"/> NA <input checked="" type="checkbox"/>

c.	Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.				
11.	Have items 1 through 20 of each manifest been completed?[3745-52-20(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be complete. [3745-52-20 (A)]				
12.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternative facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]				
13.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
14.	Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.				
15.	If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? 3745-52-42(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
16.	Are signed copies of all manifests being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.				

PREPAREDNESS AND PREVENTION

17.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
18.	Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]			
a.	Name and telephone number of emergency coordinator?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
b.	Location of fire and spill control equipment, and, if present, fire alarm(s)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
c.	Telephone number of local fire department?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
19.	Are employees familiar with waste handling and emergency procedures [3745-52-34(D)(5)(c)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
20.	Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
21.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

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

SATELLITE ACCUMULATION AREA REQUIREMENTS

29.	Does the generator ensure that satellite accumulation area(s):			
a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <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"/>	NA <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"/>	NA <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"/>	NA <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 checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
f.	Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>

At the time of the inspection, one 55-gallon drum (approximately 75% full) that held waste paint sludge, located near the waste paint reclaimer, was not labeled with the words "Hazardous Waste" or other words that identified its contents. The facility labeled the drum containing waste paint sludge during the inspection.

30.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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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 checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
b.	Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <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

31.	Has the generator marked containers with the words "Hazardous Waste"[3745-52-34(D)(4)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
32.	Is the accumulation date on each container? [3745-52-34(D)(4)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
33.	Are hazardous wastes stored in containers which are:			
a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
b.	In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
34.	Is the container accumulation area(s) inspected at least weekly? [3745-66-74]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

Note: Per ORC§1.44(A) "Week" means 7 consecutive days.

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

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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
39.	Does each container >100 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
40.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

LDR REQUIREMENTS

GENERAL 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
2.	Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2), See Table 1]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
3.	Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), See Table 1]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
4.	Does the generator generate a characteristic hazardous waste? If so:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
a.	The facility can dispose of hazardous waste in a on-site landfill or surface impoundment. [3745-270-05]			
11.	Does the facility have an extension to allow for a restricted waste to be land disposed? [3745-270-06] If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
a.	The facility can land dispose of the waste. [3745-270-06]			
12.	Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
a.	Has the facility complied with 3745-270-04?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
15.	If a generator's 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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

GENERATORS TREATING HAZARDOUS WASTE

1.	Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
2.	If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)]			
a.	A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
3.		Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
4.		Has the generator followed their WAP [3745-270-07(A)(5)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
5.		Have the treated wastes met the applicable treatment standards in 3745-270-40?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
6.		Has the generator sent a notification and certification with the initial shipment of waste? [3745-270-07(A)(5)(c)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	b.	A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	a.	Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
	b.	Has the director been notified of such changes? [3745-270-09(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
11.		Does each notification/certification form completed, contain the information found in Table 1? [3745-270-07(A)(3)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
NOTE: If the waste will be treated and monitored for all constituents, there is no need to put them all on the LDR notice.					

HAZARDOUS DEBRIS

1.		Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
3.		Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so:			
	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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)]			
5.	Is the waste a PCB waste under 40 CFR Part 761? If so:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	b. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
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?			
	a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
	b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
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)]			
	a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
	b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
	c. Technology used from Table 1? [3745-270-07(D)(1)(c)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
9.	Has the above notification been sent to the director? [3745-270-07(D)(1)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>

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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
4.	Are wastes or treatment residues being sent to another TSD to be further managed? If so:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
5.	Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? If so:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>

	b.	Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4)[3745-270-07(B)(6)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
	c.	Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	b.	Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
	c.	The testing frequency specified in the facility's WAP and have they followed the protocol?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>

**USED OIL GENERATOR
COLLECTION CENTER, AND AGGREGATION POINT REQUIREMENTS**

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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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The company accumulates spent mill coolant, which is managed as a used oil, in one approximately 300-gallon tank located inside the facility near the drilling and cutting machines.

7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]			
a.	Stopped the release?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Contained the release?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

	d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	c. Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

GENERATOR TRANSPORTATION

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

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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
13.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

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.