



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Hazardous Waste
Biro Manufacturing Company
Ottawa County
OHD 005 040 431
Notice of Violation

April 6, 2007

Mr. Jon Boesel
Biro Manufacturing Company
1114 W. Main Street
Marblehead, Ohio 43440-2099

Dear Mr. Boesel:

On October 12, 2006, Ohio EPA conducted a hazardous waste compliance evaluation inspection (CEI) of the Biro Manufacturing Company (Biro) located at 1114 W. Main Street, Marblehead, Ohio. This inspection was conducted to determine Biro's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC), and Ohio's hazardous waste regulations as adopted under Chapter 3745. of the Ohio Administrative Code (OAC). Biro was represented by yourself. Ohio EPA was represented by Amy Heller and the writer. The inspection included a tour of facility operations and a review of facility paperwork. This letter will explain the violations I found, what you need to do to correct these violations, and other general comments.

Biro is a manufacturer of meat processing equipment. Biro notified Ohio EPA on February 5, 1998, as a conditionally exempt small quantity generator of hazardous waste. Hazardous waste generated at Biro is spent trichlorethylene (F001, F002, D040) from a degreasing tank utilized to clean parts. This tank is emptied (thus hazardous waste is generated) once a calendar year. Biro is currently operating as an episodic large quantity generator of hazardous waste. Below is a breakdown of Biro's hazardous waste generation:

- **June 22, 2004** - 220 gallons of spent trichlorethylene (F001, F002, D040) - Biro was operating as an episodic small quantity generator of hazardous waste in 2004.
- **July 11, 2005** - 275 gallons of spent trichlorethylene (F001, F002, D040) - Biro was operating as an episodic small quantity generator of hazardous waste in 2005.
- **July 21, 2006** - 330 gallons of spent trichlorethylene (F001, F002, D040) - Biro was operating as an episodic large quantity generator of hazardous waste in 2006.

Other wastes generated at Biro include spent fluorescent bulbs and used oil.

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For any month that you are operating as a large quantity generator (LQG) of hazardous waste, you must adhere to all applicable LQG requirements.

During the inspection, you stated that you will from this point forward ensure that the degreasing tank is only filled with 275 gallons of product. Thus, when the tank is emptied Biro would be a small quantity generator of hazardous waste. I have enclosed the publication Managing your Hazardous Waste - A Guide for Small Businesses which will provide you information on the requirements for a small quantity generator of hazardous waste. You can also find additional information on our website at <http://www.epa.state.oh.us/dhwm>.

During the inspection, I provided you with the following materials: a document listing the generation limits for the three categories of hazardous waste generators, the characteristics of a hazardous waste, and Table 1 out of OAC Rule 3745-51-24 listing toxicity characteristic wastes (D004-D043) and their respective maximum concentrations; a list of computer, fluorescent lamp and ballast recyclers; and the Ohio EPA Fact Sheets: Universal Waste Rules for Handlers of Lamps, The Regulation of Used Oil: An Overview for Ohio Businesses, Used Oil Generators.

I have enclosed two additional fact sheets which you may find useful: Hazardous Waste Generator Categories - November 2005 (guidance on episodic generation); Hazardous Waste Requirements for Large Quantity Generators.

I found the following 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.

Biro failed to have waste evaluation documentation for the fluorescent bulbs generated at the facility.

Biro is currently disposing of their fluorescent bulbs in the trash. Biro must cease disposing of their fluorescent bulbs as non-hazardous waste in the local landfill until a proper waste evaluation has been completed.

The waste evaluation can be conducted through the following option: Biro 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. Biro must ensure that the laboratory chosen to perform this sampling utilizes the proper method(s) to evaluate these bulbs. Biro must sample the fluorescent bulbs to determine the concentrations of mercury (D009), lead (D008), and cadmium (D006) as listed in OAC Rule 3745-51-24 following the methods as outlined in U.S. EPA's SW-846. Biro may run a totals concentration for these constituents as a screening tool. If the

concentration(s) are detected for any of these constituents at or above the regulatory limit, a TCLP may be required to ensure these constituent(s) are not present above the Ohio EPA regulatory level.

If the bulbs are determined to be hazardous through a proper waste evaluation, Biro will have to manage their bulbs either as 1) a universal waste (OAC Chapter 3745-273), or 2) as a hazardous waste under Ohio's generator standards (OAC Chapter 3745-52). Biro may recycle their bulbs if they are hazardous or non-hazardous. Ohio EPA would encourage this option as a pollution prevention alternative.

In lieu of conducting a waste evaluation, Biro may choose to manage their bulbs as a universal waste as outlined in OAC Chapter 3745-273. Please consult the fact sheet Universal Waste Rules for Handlers of Lamps for more information. If you choose this option, please provide me an outline of your universal waste management plan.

To abate this violation, please submit to me your waste evaluation of your lamps or an outline of your universal waste management plan (indicating how you will manage, label, send off-site within one year, recycle lamps, etc.)

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. **Personnel Training.**
OAC Rule 3745-65-16(A)(1-3), (B), (C), (D), (1-4), and (E).

Facility personnel must complete training on hazardous waste management procedures.

Biro does not conduct personnel training. There was no training plan available to review at the time of the inspection. Biro violated all the applicable requirements of this rule as follows:

(a) OAC Rule 3745-65-16(A)(1-3) - Biro did not conduct personnel training for

employees involved in the handling or management of hazardous waste at the facility. The training shall include, but is not limited to, instruction in safe equipment operation, emergency procedures and the generator's contingency plan. It must also familiarize employees with procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment. The personnel training must be directed by a person trained in hazardous waste management procedures. Currently, Tom Zywiec and yourself are the only employees that manage hazardous waste as part of your job duties.

(b) OAC Rule 3745-65-16 (B) - Biro did not train yourself or Tom Zywiec within six months of beginning employment at Biro on hazardous waste management procedures.

(c) OAC Rule 3745-65-16 ©) - Tom Zywiec or yourself do not receive annual refresher hazardous waste management training. Ohio EPA defines annually as at least once every 365 days.

(d) OAC Rule 3745-65-16 (D) (1-4) - Biro does not maintain personnel training records which include employee name, job title, job descriptions, type and amount of introductory and continuous training for employees responsible for waste handling and spill response duties.

(e) - OAC Rule 3745-65-16(E) - Biro did not maintain training records on current and former employees.

- Biro must develop a personnel training plan that includes procedures for using, inspecting, repairing, and replacing emergency & monitoring equipment, what to do in case of fire in a hazardous waste area, what wastes are considered hazardous, how to label hazardous wastes, what to do in case of waste spills, how to inspect waste storage areas, contingency plan evacuation routes, and communication/alarm systems.
- Prior to conducting training, a copy of the training program or plan shall be submitted to Ohio EPA for review. Biro must also submit a copy of the instructor's name and credentials, resume, work experience or OSHA 40-hour certificate which shows they have been trained in hazardous waste management procedures.
- Biro must immediately begin to train new employees within six months of their initial date of employment or switching to a new position involving hazardous waste management. To demonstrate a return to compliance, Biro shall submit to Ohio EPA, NWDO, a copy of a written internal policy that ensures new employees are properly trained.
- Biro shall immediately establish a written procedure to provide annual refresher training and shall submit a copy of this procedure to Ohio EPA, NWDO. Annual refresher training must be completed at least once every 365 days.

- Biro must submit to Ohio EPA, NWDO, written job titles, job descriptions, name of each employee filling that position and documentation that all applicable training has been completed for all employees involved in the handling and management of hazardous waste.
- Biro must submit to Ohio EPA, NWDO, a copy of a written internal policy that ensures all personnel training records will be maintained. Specifically, current employees until facility closure and former employees for three years.
- This violation will be abated once the personnel training has been completed and class sign-in sheets from those attending have been received by Ohio EPA.

I have enclosed an example of a Sample Personnel Training Plan which you may find useful.

3. **Contingency Plan.**
OAC Rules 3745-65-51(A) and (B); 3745-65-52 (A), (C), (D), (E) and (F);
3745-65-53(A) and (B); and 3745-65-55

A facility shall have a contingency plan which will be implemented during an emergency. The contingency plan must describe the actions personnel will take during an emergency, describe arrangements with responders, list the emergency contact and related information, list emergency equipment, and include an evacuation plan. A copy of the contingency plan must be maintained at the facility and submitted to entities that may be required to provide emergency services. A facility must have a designated emergency coordinator who is familiar with all aspects of the contingency plan, available to respond to an emergency and has the authority to commit the resources needed to implement a contingency plan.

Biro has violated all the applicable rules associated with the contingency plan requirements as follows:

- (a) 3745-65-51(A) - The facility does not have a contingency plan.
- (b) 3745-65-51(B) - By not having a contingency plan, the facility is unable to implement such a plan during a fire, explosion, or release of hazardous waste.
- (c) 3745-65-52(A) - The facility does not have a plan that describes actions the personnel must take.
- (e) 3745-65-52(C) - The facility does not have a contingency plan that describes arrangement agreed to by local police departments, fire departments, hospitals, contractors, Ohio EPA, and local emergency responders.
- (f) 3745-65-52(D) - The facility does not have a contingency plan that lists the home addresses, home phone numbers, and office numbers of persons qualified to act as emergency coordinator.

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(g) 3745-65-52(E) - The facility does not have a contingency plan that lists emergency equipment.

(h) 3745-65-52(F) - The facility does not have a contingency plan that includes an evacuation plan.

(i) 3745-65-53(A) - The facility does not maintain a contingency plan.

(j) 3745-65-53(B) - The facility has not submitted a contingency plan to all local police departments, fire departments, hospitals, and Ohio EPA and local emergency response teams, that may be requested to provide emergency services.

(k) 3745-65-55 - The facility did not designate an emergency coordinator.

Biro must prepare a contingency plan and submit a copy to this office for review. This plan must include all the contents to demonstrate compliance with this rule. Biro must maintain a contingency plan at its facility and submit such plan to agencies or organizations that may be required to provide emergency services. Biro must designate an emergency coordinator and identify this person in its contingency plan. The contingency plan must demonstrate compliance with this rule.

I have enclosed an example of a Sample Contingency Plan which you may find useful.

4. **Required Equipment.**
OAC Rule 3745-65-32 (C)

All facilities shall be equipped with spill control equipment, and decontamination equipment.

Biro did not have any spill control equipment located in the trichloroethylene (TCE) tank area. Although this area has a pit where some spillage may be contained, Biro should have absorption equipment which can contain any spills that occur and do not drain into the tank pit area.

Biro must submit photographic documentation showing that spill control equipment has been placed in the TCE tank area, and describe what equipment is available there.

5. **Testing and maintenance of equipment.**
OAC Rule 3745-65-33

All facility communications or alarm systems, spill control equipment and decontamination equipment must be tested and maintained as necessary to assure its proper operation in time of emergency. The owner or operator must record the inspections in a log or summary.

Biro does conduct annual fire extinguisher inspections. However, Biro does not test or

maintain other emergency equipment such as absorption equipment, etc. to assure emergency equipment is available and in proper working condition in the event of an emergency. These tests must be recorded in a log. It is recommended that the log include the following information: date and time of test, name of person conducting the test, observations made and date/nature of any repairs.

To abate this violation, Biro must submit a copy of an internal policy regarding the testing and maintenance of all emergency equipment and the frequency of the inspections. Biro must also submit a copy of a completed inspection log to verify compliance with this rule. I have enclosed a copy of an example inspection log.

**6. Off-site shipments of used oil by generators.
OAC Rule 3745-279-24**

Generators shall ensure that their used oil is transported only by transporters who have obtained U.S. EPA identification numbers.

Biro stated that their used oil is not being picked up by a transporter with a U.S. EPA identification number. Currently, a man is picking up Biro's used oil and burns it in his furnace. Biro may be considered a used oil marketer (see general comment number 1 below). Used oil generators have one of two options for handling their used oil: 1) Generators must have their used oil transported by an entity that has a U.S. EPA identification number and ensure their used oil is recycled or 2) Generators may transport less than 55-gallons of their own used oil to a registered used oil collection center. I have enclosed a copy of registered used oil collection centers in the state. Biro should consult the Used Oil fact sheet given to them during the CEI.

In order to abate this violation, Biro must either 1) submit a copy to me of a contract or some type of documentation indicating a transporter with a U.S. EPA identification number will be picking up Biro's used oil or 2) a disposal receipt from the off-site shipment of their used oil (if the facility is due for a pick-up) indicating that a transporter with a U.S. EPA identification number is now transporting their used oil and that the used oil is taken to an appropriate recycling facility or 3) Biro must submit a copy of a receipt from the drop-off of their used oil at a registered used oil collection center.

General Comments:

1. Shipping used oil off-site to burn.

Biro shall note that they may be considered a used oil marketer if they continue to allow their used oil to be burned off-site. As a used oil marketer, Biro would be required to determine if their used oil was on or off specification, notify Ohio EPA of their marketing activities, and retain records of the analysis of the used oil. Based on whether the used oil was determined to be on or off specification, other requirements such as ensuring the used oil burner has a U.S. EPA identification number and ensuring delivery of the used oil to the burner may apply. The specific requirements can be found in OAC Rule 3745-279-70 through 3745-279-74 at the following web address:
http://www.epa.state.oh.us/dhwm/l_ruom.html

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2. Container storage.

You stated that your spent solvent is picked up by Philips for disposal the same day that it is pumped into containers, thus you do not actually store waste. Please be advised that if this material is stored you will have to follow all applicable storage and container requirements as listed in OAC Rules 3745-52-34, 3745-66-70 thru 3745-66-74, 3745-66-76, and 3745-66-77. At the time of inspection, you did not have any containers of waste. Please note that if you do not accumulate waste on-site that some regulations (3745-52-34) may not be applicable to your facility (see page 6 of the fact sheet Hazardous Waste Generator Categories included with this letter). I contacted Philips several times over the last several months inquiring as to whether Philips pumps directly from your tank to their tanker. However, they were unable to confirm or deny this.

3. Annual Report.

Please note that in accordance with OAC Rule 3745-52-41, Biro is required to have filed an annual report by March 1, 2007, for the year 2006, as Biro was a large quantity generator of hazardous waste in 2006. You can find additional information about the annual report at the following website:
http://www.epa.state.oh.us/dhwm/ann_report.html.

We asked you if you had explored alternatives to utilizing TCE for vapor cleaning. You stated that orange based cleaners had not worked very well. If you would like information on possibly finding an alternative, please contact me or our Office of Compliance Assistance and Pollution Prevention at 1-800-329-7518. If you find 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. Ohio EPA has helpful information about pollution prevention at the following web address:
<http://www.epa.state.oh.us/ocapp/ocapp.html>.

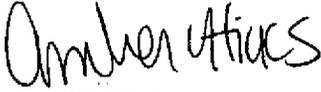
The Division of Hazardous Waste Management (DHWM) has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information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

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.

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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

/lb

Enclosures

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
~~DHWM, NWDO File: Biro Manufacturing Company (w/ original checklists)~~

ec: John Pasquarette, DHWM, NWDO
Amber Hicks, DHWM, NWDO

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

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

For Ohio EPA use only

2. Site EPA ID No. **EPA ID Number:** OHD 005 040 431

3. Site Name **Name:** Biro Manufacturing Company **Website (optional):** www.birosaw.com

4. Site Location Information
Street Address: 1114 W. Main Street
City, Town, or Village: Marblehead **State:** OH
County Name: Ottawa **Zip Code:** 43440-2099

5. Site Land Type (check only one)

Private	County	District	Federal	Indian	Municipal	State	Other
X							

6. NAICS code(s) www.census.gov/epcd/www/naics.html

A.	B.
C.	D.

7. Facility Representative: **First Name:** Jon **MI:** **Last Name:** Boesel
Phone Number: 419-798-4451 **Phone Number Extension:**
E-Mail Address: jboesel@birosaw.com
Fax Number: 419-798-9106 **Fax Number Extension:**
Street or P.O. Box:
City, Town or Village:
State: **Country:** **Zip Code:**

8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.

A. Name of Site's Legal Owner: **Date Became Owner (mm/dd/yyyy):**

Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other

Street or P.O. Box:
City, Town, or Village: **Owner Phone #:**
State: **Country:** **Zip Code:**

B. Name of Site's Operator: **Date Became Operator (mm/dd/yyyy):**

Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other

Street or P.O. Box:
City, Town, or Village: **Operator Phone #:**
State: **Country:** **Zip Code:**

9. Violations Cited? Yes No

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)
 Not Regulated

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

A. Hazardous Waste Activities	
(choose only one of the following categories)	
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> 3. Treater, Storer or Disposer of Hazardous Waste
<input checked="" type="checkbox"/> a. Large Quantity Generator (LQG):	<input type="checkbox"/> 4. Recycler of Hazardous Waste
<input type="checkbox"/> b. Small Quantity Generator (SQG)	<input type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/> a. Small Quantity On-site Burner Exemption
<input type="checkbox"/> d. United States Importer of Hazardous Waste	<input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/> 6. Underground Injection Control Facility

B. Universal Waste Activities		C. Used Oil Activities	
<input type="checkbox"/> 1. Small Quantity Handler of Universal Waste	<input checked="" type="checkbox"/> 1. Used Oil Generator	2. Used Oil Transporter Indicate Type(s) of Activity(ies)	
(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):		<input type="checkbox"/> Transporter	
<input type="checkbox"/> 2. Large Quantity Handler of Universal Waste		<input type="checkbox"/> Transfer Facility	
(accumulates 5,000 kg or more).		3. Used Oil Processor and/or Re-refiner	
<input type="checkbox"/> 3. Destination Facility for Universal Waste		Indicate Type(s) of Activity(ies)	
(Check all boxes below that apply for each of the three types of facilities above.)		<input type="checkbox"/> Processor	
		<input type="checkbox"/> Re-refiner	
		4. Off-Specification Used Oil Burner	
		5. Used Oil Fuel Marketer -	
		Indicate Type(s) of Activity(ies)	
		<input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Oil	
		<input type="checkbox"/> b. Used Oil to Off-Specification Used Oil Burner	

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your 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.

D040	F001	F002			
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12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

N	Announced ?	Additional Facility Representatives:
N	Tanks?	Other comments:
N	Containers?	

13.	Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
	Amber Hicks	Amy Heller	10-12-06; 10:49-12:37

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)

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Biro Manufacturing Company **Facility Type:** LQG** episodic generator **Date of Inspection:** 10-12-06 **EPA ID#:** OHD005040431

Waste Generated			On- or Off-Site Management		P2 Activities		
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On- Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities	
1	Degreasing parts	Spent solvent (F001, F002, D040)	~330 gallons (generated once a year)	NA	Petro-Chem Processing, Inc. - MI	Have tried "orange" based cleaners, but did not work as well.	Facility is going to ensure keep degreasing tank product below 300-gallons so as to not generate as much spent solvent and to be an SQG.
2	Lubrication for machines	Hydraulic oil	?	NA	"A guy" is taking used oil. **cited OAC Rule 3745- 279-24		Recycle oil through a licensed recycler.
3	Lighting	Fluorescent bulbs	?	NA	Dispose in trash.**cited 52-11.		Recycle.
4							
5							
6							
7							
8							
9							

REMARKS-GENERAL INFORMATION

General Process Information:

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information:

● Should this facility be interested in a P2 assessment? Yes* No *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:

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

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

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

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

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

Safety Equipment Used:

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A
2. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes No N/A
3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] Yes No N/A
4. 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
5. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] Yes No N/A
6. Does the generator accumulate hazardous waste? Yes No N/A

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

7. Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)? Yes No N/A

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

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

NOTE: Complete appropriate checklist for each unit.

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

9. Does the generator export hazardous waste? If so: Yes No N/A
 - a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] Yes No N/A
 - b. Has the generator complied with special manifest requirements? [3745-52-54] Yes No N/A
 - c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] Yes No N/A

d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes No N/A

e. Are export related documents being maintained on-site? [3745-52-57(A)] Yes No N/A

MANIFEST REQUIREMENTS

10. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes No N/A

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 completed. [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 alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].

13. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes No N/A

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

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity of the waste they generate.

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

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

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

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

PERSONNEL TRAINING

18. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes No N/A

19. Does the personnel training program include instructions to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes No N/A

20. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A
21. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes No N/A
22. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A
23. Does the generator keep records including: job titles [D(1)], job descriptions [D(2)], type and amount of training given to each person [D(3)] and documentation of completed training or job experience required [D(4)]? [3745-65-16(D)] Yes No N/A
24. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes No N/A

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

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date Trained</u>
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CONTINGENCY PLAN

25. Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes No N/A
26. Does the plan describe the following:
- a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes No N/A
 - b. Arrangements with emergency authorities [3745-65-52(C)]. Yes No N/A
 - c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes No N/A
 - d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes No N/A
 - e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes No N/A

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

27. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes No N/A

28. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] Yes No N/A
29. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes No N/A

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

EMERGENCY PROCEDURES

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

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

PREPAREDNESS AND PREVENTION

31. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes No N/A
32. 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 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? [3745-65-32(D)] Yes No N/A

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

33. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes No N/A
34. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A
35. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-34(A))? [3745-65-34(A)] Yes No N/A

36. 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
37. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
38. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes No N/A
39. 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

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

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

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

42. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes No N/A
**** No containers of waste were in storage during the inspection.****
43. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No N/A
44. 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.*
45. Is the container accumulation areas(s) inspected 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
46. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes No N/A
47. 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
48. 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
49. 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.

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

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

PRE-TRANSPORT REQUIREMENTS

51. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes No N/A
52. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A
53. 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

USED OIL INSPECTION CHECKLIST (Short Version)

NOTE: *This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.*

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes No N/A RMK#
- Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes No N/A RMK#
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No N/A RMK#
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes No N/A RMK#

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes No N/A RMK#
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 RMK#
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes No N/A RMK#
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 RMK#
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 RMK#
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 RMK#
- b. Contained the release? Yes No N/A RMK#

- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A RMK#
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A RMK#
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes No N/A RMK#
- 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 RMK#
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A RMK#
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A RMK#
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes No N/A RMK# 1

USED OIL 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 RMK#
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes No N/A RMK#
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 RMK#

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes No N/A RMK# 2

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REMARKS

- 1 - Biro stated that their used oil is not being picked up by a transporter with a U.S. EPA identification number. Currently, a guy is picking up Biro's used oil and burns it in his furnace.
- 2 - Biro failed to have waste evaluation documentation for the fluorescent bulbs generated at the facility.

LDR CHECKLIST

GENERAL LDR REQUIREMENTS

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

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

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

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

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

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

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] Yes No N/A RMK#

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

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] Yes No N/A RMK#

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

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes No N/A RMK#

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] If so: Yes No N/A RMK#

- a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05] Yes No N/A RMK#

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] If so: Yes No N/A RMK#

- a. The facility can land dispose of the waste. [3745-270-06] Yes No N/A RMK#

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

Yes ___ No N/A ___ RMK# ___

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

Yes ___ No N/A RMK# ___

REMARKS

NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)]

Yes ___ No N/A RMK# ___

14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)]

Yes ___ No N/A RMK# ___

15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)]

Yes ___ No N/A RMK# ___

16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)]

Yes ___ No N/A RMK# ___

17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so:

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# ___