



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: Deco Plas Inc.
Williams County
DHWM/NWDO
OHD 084 560 440
Notice of Violation**

August 27, 2007

Mr. Keith Alcini, Engineering Manager
Deco Plas Inc.
700 Randolph Street
Montpelier, Ohio 43543

Dear Mr. Alcini:

Thank you and Greg Dirrim for accompanying Amber Hicks and me during the Ohio Environmental Protection Agency's (Ohio EPA's) August 2, 2007, inspection of Deco Plas Inc.'s (DPI's) facility located in Montpelier, Ohio. We inspected DPI to determine its 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). During the inspection, we also helped you identify ways to prevent pollution by reducing waste.

This letter will explain the violations we found, what you need to do to correct the violations, other general concerns we have, what you need to do to respond to our general concerns, and the pollution prevention opportunities we identified.

DPI is a large quantity generator (LQG) of hazardous waste that paints plastic parts for the automotive industry. The hazardous waste streams at DPI include solvents from painting and flushing the paint lines (D001, D035, F003) and waste paint from unusable raw product (D001).

We 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. **OAC Rule 3745-52-41(A): Annual Report:** "A generator who ships any hazardous waste off-site must prepare and submit to Ohio EPA the "Annual Hazardous Waste Report" by March first of each year. The generator must prepare the "Annual Hazardous Waste Report" using Ohio EPA forms EPA 9027, EPA 9028, and EPA 9029 provided by the director upon the request of the generator..." This report should describe the type and amount of waste generated and shipped off-site in the previous calendar year and include the names and EPA ID numbers of transporters and initial receiving facilities used.

DPI failed to prepare and submit Annual Hazardous Waste Reports for the calendar years 2005 and 2006.

In order to abate this violation, DPI must do the following:

- DPI must immediately prepare and submit to Ohio EPA the Annual Hazardous Waste Reports for the calendar years 2005 and 2006. The Annual Hazardous Waste Reports should be mailed to Ohio EPA-DHWM, Attn: Tammy Heffelfinger, Annual Report Coordinator, P.O. Box 1049, Columbus, Ohio 43216-1049. A copy should also be sent to Ohio EPA-DHWM, Attn: Kara Reynolds, 347 North Dunbridge Road, Bowling Green, Ohio 43402. Forms for these reports can be obtained from Ohio EPA's website, listed at the end of this letter.
- DPI must submit a management plan to Ohio EPA that explains how DPI will ensure that these reports are filed correctly in the future.
- DPI is required to submit annual reports to Ohio EPA in accordance with this rule as long as DPI maintains the LQG status. Since DPI has generated waste in 2007 as an LQG, DPI must submit an Annual Hazardous Waste Report for calendar year 2007 by March 1, 2008.

2. **OAC Rule 3745-52-40(B): Recordkeeping:** "The generator must keep a copy of each annual report and exception report for a period of at least three years from the due date of the report."

DPI failed to retain a copy of each annual report for a period of at least three years from the due date of the report.

In order to abate this violation, DPI must do the following:

- DPI must immediately begin retaining a copy of the annual report for a period of at least three years from the due date of the report.
- DPI must also prepare and submit to Ohio EPA a management plan outlining how the annual reports will be retained for a period of at least three years from the due date of the report.

3. **OAC Rule 3745-52-42(A)(1) and (A)(2): Exception Report:** "A generator...who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within thirty-five days of the date the waste was accepted by the initial transporter shall contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste. A generator...shall submit an exception report to the Ohio EPA if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within forty-five days of the date the waste was accepted by the initial transporter..."

DPI failed to ensure the hazardous waste shipments reached their destination and subsequently file exception reports on several occasions. There were no exception reports available to review at the time of the inspection nor were any submitted to Ohio EPA. DPI violated all the applicable requirements of this rule as follows:

- a. 3745-52-42(A)(1): DPI failed to contact the transporter and/or owner or operator of the designated facility to determine the status of the hazardous waste within 35 days of the date the waste was accepted on the following occasions: manifest 14240, dated September 29, 2005; manifest 83467, dated August 30, 2006; and manifest 0002000, dated December 20, 2006.
- b. 3745-52-42(A)(2): DPI failed to submit exception reports to Ohio EPA for the following manifests after 45 days of the date the waste was accepted: manifest 14240, dated September 29, 2005; manifest 83467, dated August 30, 2006; and manifest 0002000, dated December 20, 2006.

In order to abate this violation, DPI must do the following:

- DPI must immediately begin contacting the transporter and/or owner or operator of the designated facility to determine the status of the hazardous waste if DPI does not receive a manifest with the handwritten signature of the designated facility within 35 days of the date the waste was accepted by the initial transporter.
- DPI must immediately begin filing exception reports with Ohio EPA within 45 days of the date the waste was accepted if manifests are not returned with a handwritten signature from the destination facility.
- DPI must file an exception report for all of the above listed manifests. DPI must also submit copies of the above listed manifests with the designated facility's signature.
- DPI must also submit a management plan outlining how DPI will ensure that the manifests are filled out completely, how the transporter and/or owner or operator will be contacted once 35 days have passed and the certified manifest has not been received, and how the exception report will be completed and filed with Ohio EPA after 45 days from the date the waste was accepted.

I was unable to locate an example of an exception report. However, OAC Rule 3745-52-42(A)(2) states "... the exception report shall include: (a) A legible copy of the manifest for which the generator does not have confirmation of delivery; and (b) A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts." As long as you can provide all information required by rule in an electronic mail, then that option is available to you if you chose not to mail in a hard copy of the exception report.

4. **OAC Rule 3745-65-16(A)(1-3), (B), (C), (D) (1-4), and (E): Personnel training:** Facility personnel must successfully complete training on hazardous waste management procedures. This training must be conducted within six months after the date the employee is hired and an annual review of the training must be completed thereafter. The owner or operator must maintain records including, but not limited to, job title, job description, and training of each employee. Records must be retained for current personnel until closure of the facility and former personnel for at least three years from the date the employee last worked at the facility.

DPI failed to conduct personnel training. There was no training plan available to review at the time of the inspection. DPI violated all the applicable requirements of this rule as follows:

- a. OAC Rule 3745-65-16(A)(1-3)-DPI did not conduct personnel training for employees involved in the handling or management of hazardous waste at the facility. This personnel training must be directed by a person trained in hazardous waste management procedures. This training shall include, but is not limited to, hazardous waste management procedures, instruction in safe equipment operation, emergency procedures, and the implementation of the contingency plan. It must also familiarize employees with procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment. According to you, Rick Alt, all painters, and yourself are the only employees that manage hazardous waste as part of your job duties.
- b. OAC Rule 3745-65-16(B)-DPI did not train Rick Alt, all painters, or yourself within six months of beginning employment at DPI on hazardous waste management procedures.
- c. OAC Rule 3745-65-16(C)-Rick Alt, all painters, or yourself do not receive annual refresher hazardous waste management training. Ohio EPA defines annual as at least once every 365 days.
- d. OAC Rule 3745-65-16(D)(1-4)-DPI does not maintain personnel training records which include, but are not limited to, employee name, job title, job descriptions, and 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)-DPI did not maintain training records on current and former employees.

In order to abate this violation, DPI must do the following:

- DPI must develop a personnel training plan that includes procedures for handling and managing hazardous waste. The training should also include the procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment, what to do in case of fire or explosion 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, procedures for implementing the contingency plan, evacuation routes, and communication and alarm systems. DPI must develop records that document the training has been successfully completed by the appropriate facility personnel.
- Prior to conducting training, a copy of the training program or plan shall be submitted to Ohio EPA for review. DPI must also submit a copy of the instructor's name, credentials, resume, and work experience or OSHA 40-hour certificate which shows they have been trained in hazardous waste management procedures.

- Once Ohio EPA has approved the training program, DPI shall immediately conduct training for all personnel handling and managing hazardous waste. DPI should submit sign-in sheets containing all appropriate personnel signatures showing that they have successfully completed this training.
- DPI 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, DPI shall submit to Ohio EPA a management plan that ensures new employees are properly trained.
- DPI shall immediately establish a written procedure to provide annual refresher training and shall submit a copy of this procedure to Ohio EPA. Annual refresher training must be completed at least once every 365 days.
- DPI must submit to Ohio EPA written job titles, job descriptions, name of each employee filling that position, description of the type and amount of introductory and continued training that will be given to each person in a position, and documentation that all applicable training has been completed for all employees involved in the handling and management of hazardous waste.
- DPI must submit to Ohio EPA a copy of a written internal policy that ensures all personnel training records will be maintained. Specifically, records should be maintained for current employees until facility closure and former employees for three years. DPI must immediately begin maintaining all training information.
- 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.

5. **OAC Rule 3745-65-51(A), (B): Purpose and Implementation of contingency plan; 3745-65-52(A), (C), (D), (E), (F): Content of contingency plan; 3745-65-53(A), (B): Copies of contingency plan; and 3745-65-55: Emergency coordinator:** A facility shall have a contingency plan which will be implemented during an emergency. The contingency plan must describe the following: actions personnel will take during an emergency, arrangements with emergency responders, current emergency contact and related information for emergency coordinators, emergency equipment location at the facility, and 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.

DPI failed to maintain a contingency plan. There was no contingency plan available to review at the time of the inspection. DPI violated all the applicable requirements of this rule as follows:

- a. OAC Rule 3745-65-51(A)-DPI does not have a contingency plan.

- b. OAC Rule 3745-65-51(B)-By not having a contingency plan, DPI is unable to implement such a plan during a fire, explosion, or release of hazardous waste.
- c. OAC Rule 3745-65-52(A)-DPI does not have a plan that describes actions the personnel must take in response to fires, explosions, or releases of hazardous waste.
- d. OAC Rule 3745-65-52(C)-DPI does not have a contingency plan that describes arrangements agreed to by local police departments, fire departments, hospitals, contractors, Ohio EPA, and other local emergency responders.
- e. OAC Rule 3745-65-52(D)-DPI does not have a contingency plan that lists the names, home addresses, home phone numbers, and office numbers of persons qualified to act as emergency coordinator.
- f. OAC Rule 3745-65-52(E)-DPI does not have a contingency plan that lists emergency equipment at the facility.
- g. OAC Rule 3745-65-52(F)-DPI does not have a contingency plan that includes an evacuation plan.
- h. OAC Rule 3745-65-53(A)-DPI does not maintain a contingency plan at the facility.
- i. OAC Rule 3745-65-53(B)-DPI has not submitted a contingency plan to all local police departments, fire departments, hospitals, Ohio EPA, and local emergency response teams that may be requested to provide emergency services.
- j. OAC Rule 3745-65-55-DPI failed to designate an emergency coordinator.

In order to abate this violation, DPI must do the following:

- DPI must immediately prepare a contingency plan and submit a copy to Ohio EPA for review. This plan must include all the contents to demonstrate compliance with this rule.
- DPI must maintain a contingency plan at its facility and submit the plan to agencies or organizations that may be required to provide emergency services. DPI must provide documentation that this has been accomplished by submitting to Ohio EPA a certified mail receipt, signed copy of receipt, or other similar documentation.
- DPI 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.

6. **OAC Rule 3745-65-33: Testing and Maintenance of equipment:** "All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, 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."

DPI does conduct annual fire extinguisher inspections. However, DPI failed to test or maintain other facility emergency equipment such as the contents of the portable spill control buggies to assure emergency equipment is available and in proper working condition in the event of an emergency. DPI also failed to record the emergency equipment inspection in a log or summary. At the time of the inspection, the spill control buggy located in the paint storage/mix room had accumulated multiple buckets and other paint related equipment on top of the buggy, inhibiting the opening of the lid. In the case of an actual emergency, valuable time would have been lost due to the extra time spent on the removal of such equipment before the lid to the buggy could be opened.

In order to abate this violation, DPI must do the following:

- DPI must immediately begin conducting emergency equipment inspections and recording these inspections in a log or summary. 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.
- DPI must submit a management plan outlining how they will assure these inspections are conducted and what frequency the inspections will take place.
- DPI must also submit a copy of a completed inspection log to verify compliance with this rule.

For your convenience, I have enclosed a copy of an example inspection log.

7. **OAC Rule 3745-52-34(C)(1)(b): Accumulation time of hazardous waste:** "A generator may accumulate as much as fifty-five gallons of hazardous waste... provided he... marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers."

DPI failed to mark a five gallon bucket located in the clear paint booth satellite accumulation area of Line A with the words "Hazardous Waste" or other identifying words.

- DPI marked the five gallon drum with the words "Waste Acetone" while Ohio EPA was on site.

This violation was abated on August 2, 2007.

8. **OAC Rule 3745-52-34(A)(2): Accumulation time of hazardous waste:** "... a generator may, for ninety days or less, accumulate... hazardous waste that is generated on-site without an Ohio hazardous waste permit, provided that... the date upon which each period of accumulation... begins is clearly marked and visible for inspection on each container..."

DPI failed to mark the accumulation date on one 55 gallon drum in the less than 90 day storage area.

- **At the time of the inspection, all other drums in the storage area were dated and had been stored for less than 90 days. DPI stated that the unmarked drum was generated during the same time as the other drums in the storage area. All drums in the storage area were picked up by Safety Kleen during the Ohio EPA inspection on August 2, 2007.**

This violation was abated on August 2, 2007.

9. **OAC Rule 3745-66-74: Inspections:** "The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The owner or operator must record inspections in an inspection log or summary."

DPI failed to inspect the less than 90 day hazardous waste storage area and to record the inspections in an inspection log or summary.

In order to abate this violation, DPI must do the following:

- DPI must immediately begin inspecting the storage areas every seven days.
- DPI must also write a management plan outlining how DPI will ensure that inspections are completed every seven days. This plan must be submitted to Ohio EPA along with copies of four weeks of inspection logs for the storage areas.

I have enclosed an example of an inspection log for your convenience.

General Concerns:

- A. **Request for Manifests:** At the time of the inspection, DPI did not have a copy of all hazardous waste manifests, signed by the designated facility, on-site. After reviewing the hazardous waste manifests that DPI maintained on-site, two periods of greater than 90 days storage may have occurred.

These greater than 90 day storage events may have occurred during the following periods: October 13, 2005, (manifest 96861) through February 13, 2006, (manifest 23499) and February 13, 2006, (manifest 23499) through June 8, 2006, (manifest 99301). DPI contacted Safety Kleen during the inspection to send copies of other missing signed manifests. However, Safety Kleen had not responded to DPI prior to Ohio EPA's departure. DPI stated that during part of this time period, production had decreased due to the lack of work orders.

- DPI must submit copies of all hazardous waste manifests, signed by the designated facility, to Ohio EPA for the time period October 13, 2005, through June 8, 2006. DPI should include copies of manifests 96861, 23499, and 99301 in the submittal to Ohio EPA.
- DPI must also submit copies of ordering records for the acetone/solvent and paint utilized during the period of August 1, 2005, through August 1, 2006.

- DPI must describe, to the best of their ability, utilizing as much documentation as necessary, the fluctuation of production during the time period of October 13, 2005, through June 8, 2006.

Once Ohio EPA receives all of the documentation and information from DPI, a decision on the generator status of DPI for these months will be made, which may result in further violations.

B. Spent Lamps: At the time of the inspection, Rick Alt of DPI stated that a closed, 55 gallon drum was used to store spent lamps. These lamps were shoved through a hole, sealed with a rubber flap in the lid of the drum and crushed by a stick. Rick explained that the drum was approximately one third full and had not been sent off-site. However, during the inspection the drum and homemade bulb crusher could not be located. The fact that a drum of potentially hazardous waste could not be located is very concerning.

- DPI should immediately stop crushing spent lamps. Crushed lamps must be managed as hazardous waste. DPI may crush lamps according to the information on the enclosed fact sheets, but Ohio EPA recommends that lamps be managed as a universal waste.
- DPI must locate the drum of crushed lamps, close and label the drum, place it in the 90 day storage area, and manage it as hazardous waste.
- DPI should submit the waste manifest that includes the drum of crushed lamps to Ohio EPA. If the drum is not on-site, then DPI should describe in detail where the drum and bulb crusher are located, how long they have been at that location, how they were transported to their current location, and any other useful information relevant to the drum and homemade bulb crusher.
- DPI should submit to Ohio EPA a management plan that describes how DPI will manage spent lamps, as a hazardous waste or a universal waste. Ohio EPA recommends that DPI manage spent lamps as a universal waste according to OAC Rule 3745-273: Universal Waste Management. This type of management would include, but not be limited to, storing them in a closed container labeled "Universal Waste-Lamps" and dating the container with the first date a spent lamp is placed inside. This type of management would not require DPI to analyze each type of bulb utilized in the plant (which is part of the method for managing spent lamps as hazardous waste), but would manage all spent lamps in the same way.

I have included some fact sheets concerning universal waste lamps and how to manage this waste stream.

As we discussed during the inspection, you may be able to reduce the waste your company generates. 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. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp.html>. If you would like to be considered for an in-depth on-site pollution prevention assessment, or if you would like more information about pollution prevention assessments, please contact me at (419) 373-3065.

Mr. Keith Alcini, Engineering Manager
August 27, 2007
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The Division of Hazardous Waste Management 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 site: www.epa.state.oh.us/dhwm/listserv.html. Please feel free to share this with your colleagues.

Enclosed you will find a copy of the checklists that were completed during the inspection. Should you have any questions, please feel free to call me at (419) 373-3065. 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,



Kara Reynolds
Environmental Specialist
Division of Hazardous Waste Management

Enclosure

cc: Colleen Weaver, DHWM, NWDO, w/o enclosures
Kara Reynolds, DHWM, NWDO, w/o enclosures
Cindy Lohrbach, DHWM, NWDO, w/o enclosures
DHWM, NWDO Williams County File: Deco Plas Inc. (Key Plastics) 1998, with... J
ec: Amber Hicks, DHWM, NWDO

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
tammy.mcconnell@epa.state.oh.us or mail it to Tammy
McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OHD 084 560 440								
3. Site Name	Name: Deco Plas Inc.				Website: www.DecoPlasInc.com (Optional)				
4. Site Location Information	Street Address: 700 Randolph Street								
	City, Town, or Village: Montpelier				State: OH				
	County Name: Williams				Zip Code: 43543				
5. Site Land Type (check only one)	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
6. NAICS code(s) www.census.gov/epcd/www/naics.html									
7. Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Keith			MI:	Last Name: Alcini				
	Phone Number: 419-485-0632				Phone Number Extension:				
	E-Mail Address: alcinik@DecoPlasInc.com								
	Fax Number: 419-485-4286				Fax Number Extension:				
	Street or P.O. Box:								
	City, Town or Village:				State:		Country:		Zip Code:
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Michael Kreps				Date Became Owner (mm/dd/yyyy): 04/05/2005				
	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: 700 Randolph Street								
	City, Town or Village: Montpelier				Owner Phone #:				
	State: OH				Country: USA		Zip Code: 43543		
	Name of Site's Operator: Deco Plas Inc.				Date Became Operator (mm/dd/yyyy): 04/05/2005				
	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: 700 Randolph Street								
	City, Town or Village: Montpelier				Operator Phone #:				
	State: OH				Country: USA		Zip Code: 43543		
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste					
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)									
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Underground Injection Control Facility									

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))			
<input type="checkbox"/> Small Quantity Handler of Universal Waste		<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	
<input type="checkbox"/> Destination Facility for Universal Waste			
Check all boxes below that apply for each of the three types of facilities above		10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
	Managed	<input type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.			
D001	D035	F003	
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.			
Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives: Greg Dirrim
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments:
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Kara Reynolds		Amber Hicks	8/2/2007 10:30
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: Deco Plas Inc. Facility Type: LQG SQG CESQG TSD Date of Inspection: 08-02-2007
 EPA ID#: OHD 084 560 440

Waste Generated		On- or Off-Site Management			P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	Painting Waste flammable liquids from painting/line flushing D001, D035, F003	Varies; 5-10 drums per month 55 gallon drums container storage area		Safety Kleen Systems; Smithfield, KY		
2	Painting Waste paint D001	Varies; 3-8 drums per month 55 gallon drums container storage area		Safety Kleen Systems; Smithfield, KY		
3	Painting Paper/paint filters Non-hazardous	Unknown Dispose of on an as-needed basis.		Solid waste landfill		
4	Maintenance Spent Bulbs	Unknown	Home-made bulb crusher	Have not been disposed of through off-site facility. Drum could not be found during inspection.		Stop bulb crushing and manage as universal waste.

5							
6							
7							
8							
9							

REMARKS-GENERAL INFORMATION

General Process Information:

DPI claims to have crushed bulbs in a homemade bulb crusher. They have not disposed of the crushed bulbs. During the inspection, the one third full drum and homemade bulb crusher could not be located.

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information:

I would suggest that the spent bulbs be managed as universal waste. This procedure would not require the waste analysis of each spent bulb type at the facility.

Would 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 or < 1 Kg. of acutely hazardous waste.

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

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

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

Safety Equipment Used:

GENERAL REQUIREMENTS

- | | | | | | | |
|--|-----|-------------------------------------|----|-------------------------------------|-----|--------------------------|
| 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 4. Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)] Violation cited, no annual reports have been filed. | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] Violation cited, no annual reports have been kept on file. | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 6. Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 7. Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] More information has been requested in the NOV concerning the crushed bulbs that could not be located during the inspection. | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 8. Does the generator accumulate hazardous waste? | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

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

- | | | | | | | |
|---|-----|--------------------------|----|-------------------------------------|-----|--------------------------|
| 9. Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)? More information has been requested in the NOV to determine generator status for two occasions. | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
|---|-----|--------------------------|----|-------------------------------------|-----|--------------------------|

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

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

NOTE: Complete appropriate checklist for each unit.

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

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

MANIFEST REQUIREMENTS

- | | | | | | | |
|---|-----|-------------------------------------|----|-------------------------------------|-----|--------------------------|
| 12. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Violation cited, manifest not signed | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)] | | | | | | |
| 14. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].

15. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes No N/A
16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] Yes No N/A

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

17. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Violation cited, generator did not contact the TSD or transporter. Yes No N/A
18. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Violation cited, no exception report was filed. Yes No N/A
19. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes No N/A

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

PERSONNEL TRAINING

20. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Generator does not conduct personnel training, violation cited for question 20 through 26. Yes No N/A
21. Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes No N/A
22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A
23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes No N/A
24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A
25. Does the generator keep records and documentation of:
- a. Job titles [3745-65-16D(1)]? Yes No N/A
 - b. Job descriptions [3745-65-16D(2)]? Yes No N/A
 - c. Type and amount of training given to each person [3745-65-16D(3)]? Yes No N/A
 - d. Completed training or job experience required [3745-65-16D(4)]? Yes No N/A
26. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes No N/A

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

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

CONTINGENCY PLAN

27. Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Generator does not maintain a contingency plan. Violation cited for question 27 through 31. Yes No N/A

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

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

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

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

EMERGENCY PROCEDURES

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

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

PREPAREDNESS AND PREVENTION

- 33. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes No N/A
- 34. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:
 - a. Internal communications or alarm system? [3745-65-32(A)] Yes No N/A
 - b. Emergency communication device? [3745-65-32(B)] Yes No N/A
 - c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes No N/A
 - d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes No N/A

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

- 35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Violation cited for questions 35 through 36, no inspections conducted. Yes No N/A
- 36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A
- 37. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] Yes No N/A
- 38. If there is only one employee on the premises, is there immediate access to a device (ex.phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] Yes No N/A
- 39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A

40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Volunteer fire department comes in to familiarize themselves with the facility layout. Yes No N/A
41. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes No N/A

SATELLITE ACCUMULATION AREA REQUIREMENTS

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

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

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

44. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes No N/A
45. Is the accumulation date on each container? [3745-52-34(A)(2)] Violation was cited for this but abated during the inspection. Yes No N/A
46. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A
 - b. In good condition? [3745-66-71] Yes No N/A
 - c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A
 - d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A
- NOTE: Record location on process summary sheets, photograph the area, and record on facility map.
47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. No inspections are being conducted. violation cited. Yes No N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] No log or summary is being maintained. violation cited. Yes No N/A
48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes No N/A
49. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes No N/A
50. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] Yes No N/A
51. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] Yes No N/A

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

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

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

PRE-TRANSPORT REQUIREMENTS

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

LDR CHECKLIST-Deco Plas Inc.; OH D 084 560 440; August 2, 2007

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? [3745270-03(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#
-

NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)] Yes No N/A RMK#
14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)] Yes No N/A RMK#
15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)] Yes No N/A RMK#
16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of

3745-270-07? [3745-270-07(A)(9)]

Yes ___ No N/A RMK# ___

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

Yes ___ No N/A ___ RMK# ___

- a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)]

Yes ___ No N/A RMK# ___

NOTE: Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit.(See 270-07(A)(7))

18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)]

Yes No N/A ___ RMK# ___

REMARKS