



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

RE: Anderson & Vreeland, Inc.  
OHD 017 556 853  
Williams County  
DMWM, NWDO  
Notice of Violation

September 8, 2011

Mr. Rick Hubert  
Anderson & Vreeland, Inc.  
P. O. Box 527  
Bryan, Ohio 43506

Dear Mr. Hubert:

Thank you for accompanying Ed Pulido and me during the Ohio Environmental Protection Agency's (Ohio EPA's) July 26, 2011, compliance evaluation inspection at Anderson & Vreeland, Inc.'s (A&V's) facility located at 15348 State Route 127EW, Bryan, Ohio. I did not complete my inspection on July 26, 2011, therefore, Colleen Weaver and I visited the site on August 1, 2011, to complete the inspection. We inspected A&V 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).

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 the general concerns, and the pollution prevention opportunities we identified.

Ninety percent of A&V's business at this location is distributing printing supplies and equipment. Generally, very little hazardous waste is generated from the distribution process, however, the facility conducted an inventory clean-out in May 2011 which generated hazardous waste. Several other processes at the facility generate waste on a regular basis. A&V assembles and tests printing plate machines, manufactures ADA board through a coating and laminating process, manufactures matrix board through a phenolic powder process, slices large rolls of tape utilizing a slitter machine, and conducts testing, research, and design on different resins for the printing process.

Based upon hazardous waste manifests and process discussions with the facility, A&V is a small quantity generator (SQG) of hazardous waste. The known hazardous waste streams at the facility are lacquer thinner (D001, F003, F005), ADA adhesive coating (D001, D035), crushed fluorescent lamps (D009), and solvent wash from the in-line wash unit also known as AV Solve and AV Solve II (D001). A&V has several unevaluated waste streams that could potentially be hazardous waste as well. A&V also generates a small amount of used oil.

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 receipt of this letter.**

**Violations:**

1. **Ohio Revised Code (ORC) Section 3734.02(E)&(F), Unpermitted Hazardous Waste Treatment, Storage & Disposal:** "No person shall store, treat, or dispose of hazardous waste

identified or listed under this chapter and rules adopted under it, regardless of whether generated on or off the premises where the waste is stored, treated, or disposed of, or transport or cause to be transported any hazardous waste identified or listed under this chapter and rules adopted under it to any other premises, except at or to any of the following: (1) A hazardous waste facility operating under a permit issued in accordance with this chapter; (2) A facility in another state operating under a license or permit issued in accordance with the "Resource Conservation and Recovery Act of 1976"..."

- a. During the inspection, it was noted by Ohio EPA that a period of greater than 180 days was found between hazardous waste shipments according to the dates on the hazardous waste manifests. Hazardous waste was shipped off-site from A&V on August 29, 2006, and again on May 25, 2011, a span of 1,730 days. You stated that these were the only two shipments of hazardous waste that had been disposed of in the past several years.

According to the manifests, on August 29, 2006, 1,100 gallons of hazardous waste (220 gallons of lacquer thinner (D001, F003, F005) and 880 gallons of ADA Adhesive (D001, D035)) was shipped off site. Then on May 25, 2011, 20,713 pounds of hazardous waste was shipped off site. The manifests associated with the May 25, 2011, shipment consisted of 18 different line items of waste streams with waste codes including D001, D002, D007, D009, D035, F002, U080, and U226. You stated that the waste shipment on May 25, 2011, included both process wastes generated on a monthly basis and wastes generated from an inventory clean-out.

Based on the monthly generation rates of the process wastes, the most frequent hazardous waste generated at A&V is the ADA adhesive coating (D001, D035) which is generated at a rate of approximately 11-15 gallons per month. Nineteen 55-gallon drums of this waste stream were disposed of on May 25, 2011. During the inspection, you stated that you consider a 55-gallon drum full when it contains approximately 45-50 gallons of waste. Based on this information (45 gallons of waste per drum), 855 gallons of ADA adhesive waste was shipped off site on May 25, 2011, (45 gallons of waste per drum multiplied by 19 drums of waste shipped off-site). The monthly generation rate of this waste stream, based on the amount shipped out on May 25, 2011, is 15 gallons per month (855 gallons divided by 58 months). If A&V was filling a drum full of waste (55 gallons), it would take approximately 3.6 months (108 days) to fill a drum full of ADA adhesive waste. Therefore, 108 days after the August 29, 2006, shipment of waste (December 15, 2006) A&V would have the first full drum of hazardous waste in the satellite accumulation area. This first drum of waste would have been moved to the container storage area by December 18, 2006. As a SQG, A&V has 180 days to store hazardous waste on site. Therefore, the first drum of waste should have been shipped off site on June 16, 2007. However, A&V failed to ship the hazardous waste off-site until May 25, 2011. A&V continued to generate and store hazardous waste for greater than 180 days from June 16, 2007, until May 25, 2011. The first drum of waste generated by A&V was stored on site for 1,619 days. Upon May 25, 2011, there was 20,713 pounds of hazardous waste on-site.

**A&V has become an unpermitted hazardous waste storage facility by storing hazardous waste for greater than 180 days. A&V must immediately cease unpermitted storage of its hazardous waste.**

- b. As a SQG A&V can store hazardous waste on site for 180 days or less without an Ohio hazardous waste permit, provided that the quantity of hazardous waste accumulated on-site never exceeds 6,000 kilograms.

According to the manifests associated with the May 25, 2011, shipment of hazardous waste, A&V accumulated 20,713 pounds (9395 kilograms) of hazardous waste on site.

**A&V has become an unpermitted hazardous waste storage facility by accumulating hazardous waste in quantities greater than 6,000 kilograms. A&V must immediately cease unpermitted storage of hazardous waste.**

A&V must immediately begin properly shipping hazardous waste off site within 180 days of the accumulation start date. A&V must describe in their response how the hazardous waste will be managed in the future to ensure that storage of waste over 180 days does not happen again.

Since A&V has violated ORC Section 3734.02(E) & (F) by becoming an unpermitted treatment, storage, and disposal facility (TSDF), it is subject to OAC Rules 3745-55-10 through 3745-55-48 and 3745-55-97. Therefore, A&V may be required to submit a closure plan for this area. A closure plan describes the steps necessary to investigate the extent of contamination and to clean up all contamination found.

A&V is also subject to all applicable general facility standards, found in OAC Chapters 3745-54 and 55, until such time as A&V has demonstrated that it has ceased operations as a TSDF. Additionally, at any time, Ohio EPA may assert its right to have A&V begin facility-wide cleanup, pursuant to the Corrective Action process under Ohio law.

I have enclosed the fact sheet titled A Guide to the Administrative Enforcement Process within the Division of Hazardous Waste Management to help answer any questions you may have regarding this violation and further enforcement actions.

2. **Ohio Revised Code (ORC) Section 3734.02 (F), Unlawful transportation of a hazardous waste:** "No person shall store, treat, or dispose of hazardous waste identified or listed under this chapter and rules adopted under it, regardless of whether generated on or off the premises where the waste is stored, treated, or disposed of, or transport or cause to be transported any hazardous waste identified or listed under this chapter and rules adopted under it to any other premises, except at or to any of the following: (1) A hazardous waste facility operating under a permit issued in accordance with this chapter; (2) A facility in another state operating under a license or permit issued in accordance with the "Resource Conservation and Recovery Act of 1976"..."

A&V caused hazardous waste to be unlawfully transported to an unauthorized facility for disposal.

During the inspection, Ohio EPA received copies of the hazardous waste manifests from the May 25, 2011, waste shipment and a list of wastes shipped off-site. On August 9, 2011, Ohio EPA received material safety data sheets (MSDSs) for some of the wastes shipped off-site and a spreadsheet that listed which wastes were shipped out under each line of each manifest. Review of these documents shows that the following hazardous waste streams were shipped off-site as non-hazardous wastes: 2 quarts Agfa process starter (ZRC Starter) (D002), 135 gallons lactic

acid (D002), 8 quarts Logetronics fixer sys cleaner (liquid) (D002), 1 gallon McLube 1700 (D001), 5 gallons Red Top Spray Developer (Magnesium Developer) (D001), 4 gallons Safe React (D002), 5 gallons OHB (Ofsmopur H) (this is a typo on the lists of materials and should be Desmodur HL according to A&V) (D001), 192 gallons A&V Polysafe II (D001), and 18 drums of ADA adhesive (D001, D035).

The Agfa process starter, lactic acid, Logetronics fixer sys cleaner, McLube, Red Top Spray Developer, Safe React, and OHB (Ofsmopur H) shipped out under line 9, "Non-hazardous, non-RCRA regulated solids and liquids", of manifest 008270779JJK. The A&V Polysafe II and ADA adhesive waste was shipped out under line 3, "Non-hazardous, non-RCRA regulated liquid waste", of manifest 008270780JJK. These waste streams were sent to EQ Detroit, Inc. in Detroit, Michigan where they were not treated to meet land disposal restrictions. These wastes were then sent to Veolia ES Arbor Hills Landfill, LLC in Northville, Michigan, a subtitle D landfill for ultimate disposal.

**A&V unlawfully transported hazardous waste to an unpermitted treatment, storage, or disposal facility.**

A&V must immediately begin properly storing, treating, and disposing of their hazardous waste. A&V must describe how their hazardous waste will be managed in the future. This includes the type of container the waste will be stored in, where the waste will be stored at the facility, how the container will be labeled, where A&V will send the hazardous waste to be disposed, and how often the hazardous waste will be picked up.

3. **Ohio Administrative Code (OAC) Rule 3745-52-11, Hazardous Waste Determination:** "Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste..."

A&V failed to adequately evaluate the waste streams listed below to determine if they were a hazardous waste in accordance with OAC Rule 3745-52-11, prior to sending them off site.

- a) Old inventory waste – Please refer to Attachment A for a full list of wastes included in this listing
- b) Waste paint
- c) Paint booth filters
- d) Bag house dust
- e) Hard reclaim/mfg powder/pressure tank clean-out waste from the phenolic powder process
- f) Photopolymer solids from Orbital X machine
- g) Recirculated water (Cosmolight water) from Orbital X machine
- h) Photopolymer solids from laser machine

- i) Liquid Resin plus flexowash A waste
- j) Lubricant waste from slitter machine
- k) Solids removed from the lubricant waste from the slitter machine
- l) ADA laminator overspray
- m) AV Solve
- n) AV Solve II
- o) Print tight solution from the testing department
- p) Testing department Cosmolight solution
- q) Testing department AV Solve
- r) Testing department liquid resin waste
- s) Water-based black ink
- t) ADA adhesive

A&V provided Ohio EPA with some waste evaluation documentation for several waste streams listed above. However, the documentation submitted to Ohio EPA is incomplete. For a list of the documentation provided, please refer to Attachment B.

In order for A&V to determine whether these wastes exhibit any hazardous waste characteristics, A&V must obtain a chemical analysis of a representative sample of the wastes. A&V will need to contract the services of an environmental laboratory to analyze these materials. A&V must determine the concentrations of toxicity characteristic leaching procedure (TCLP) volatile organic compounds (VOCs), TCLP semi-volatile organic compounds (SVOCs), and TCLP Resource Conservation and Recovery Act (RCRA) metals of the wastes. If the wastes can be considered a liquid, then A&V must also determine the pH and flashpoint of the wastes.

To abate this violation A&V shall submit the analytical results indicating the proper evaluation of the wastes for Ohio EPA's review. The results must document if the waste is hazardous or not and, if hazardous, whether it is restricted from land disposal. If the waste is hazardous, A&V must also submit information as to what treatment, storage, or disposal facility the waste will be sent to. For inventory wastes that no longer will be generated, please submit MSDSs for the wastes located on Attachment A.

Once Ohio EPA acknowledges A&V's proper characterization of the wastes, A&V must dispose of the wastes at a proper disposal facility. A&V must then submit the appropriate manifest documents or shipping papers indicating proper disposal of the wastes to Ohio EPA.

Please notify me at least five days prior to sampling so that I may be present.

If the waste is hazardous, I will determine the status of your compliance with other hazardous waste laws and notify you of my findings in a separate letter.

For more information on waste evaluations I have enclosed the fact sheets titled Commercial Environmental Laboratories, printed August 23, 2011, Violations Most Frequently Cited by Division of Hazardous Waste Management Inspectors, printed August 23, 2011, Use of Generator Knowledge In Complying with OAC rule 3745-52-11 Hazardous Waste Evaluation, dated July 18, 2005, and Identifying Your Hazardous Waste, dated April 2010. I have also included the fact sheets titled Painting and Coatings Pollution Prevention, dated January 2007 and Handling Paint Waste from Your Business, dated April 2010 for more information about paint waste.

4. **OAC Rule 3745-52-20(A)(1), Manifest - general requirements:** "A generator who transports, or offers for transport a hazardous waste for offsite treatment, storage, or disposal, or a treatment, storage, and disposal facility who offers for transport a rejected hazardous waste load, must prepare a manifest..."

A&V failed to ship the hazardous waste Agfa process starter (ZRC Starter) (D002), lactic acid (D002), Logetronics fixer sys cleaner (liquid) (D002), McLube 1700 (D001), Red Top Spray Developer (Magnesium Developer) (D001), Safe React (D002), OHB (Ofsmopur H) (this is a typo on the lists of materials and should be Desmodur HL according to A&V) (D001), A&V Polysafe II (D001), and ADA adhesive (D001, D035) off site, listing them as a hazardous waste on a hazardous waste manifest.

In order to abate this violation, A&V must begin shipping all hazardous waste streams off site to an appropriate hazardous waste TSDF utilizing hazardous waste manifests. A&V must submit information to describe how A&V will meet this rule in the future. If A&V will not generate these waste streams in the future, then A&V should explain why these waste streams will not be generated in the future.

5. **OAC Rule 3745-270-07(A)(1), Testing, tracking, and recordkeeping requirements for generators, treaters, and disposal facilities:** "A generator of a hazardous waste must determine if the waste has to be treated before it can be land disposed..."

A&V failed to determine if the hazardous waste Agfa process starter (ZRC Starter) (D002), lactic acid (D002), Logetronics fixer sys cleaner (liquid) (D002), McLube 1700 (D001), Red Top Spray Developer (Magnesium Developer) (D001), Safe React (D002), OHB (Ofsmopur H) (this is a typo on the lists of materials and should be Desmodur HL according to A&V) (D001), A&V Polysafe II (D001), and ADA adhesive (D001, D035) needed to be treated prior to shipping it off site for disposal.

In order to abate this violation, A&V must determine if these waste streams need to be treated prior to disposal. A&V must submit documentation that shows these waste streams have been evaluated and determine if they need to be treated prior to disposal. This documentation can include a completed land disposal restriction form from the disposal of these waste streams. If A&V will not generate these waste streams in the future, then A&V should explain why these

waste streams will not be generated in the future and why they will not be evaluated to determine treatment needs prior to disposal.

6. **OAC Rule 3745-270-07(A)(2), Testing, tracking, and recordkeeping requirements for generators, treaters, and disposal facilities:** "If the waste or contaminated soil does not meet the treatment standards, or if the generator chooses not to make the determination of whether his waste must be treated, with the initial shipment of waste to each treatment or storage facility, the generator must send a one-time written notice to each treatment or storage facility receiving the waste, and place a copy in the generator's files..."

A&V failed to send a one-time written notice to the treatment or storage facility receiving the hazardous waste Agfa process starter (ZRC Starter) (D002), lactic acid (D002), Logetronics fixer sys cleaner (liquid) (D002), McLube 1700 (D001), Red Top Spray Developer (Magnesium Developer) (D001), Safe React (D002), OHB (Ofsmopur H) (this is a typo on the lists of materials and should be Desmodur HL according to A&V) (D001), A&V Polysafe II (D001), and ADA adhesive (D001, D035).

In order to abate this violation, A&V must send a one-time written notice to the treatment or storage facility receiving the waste. A&V must submit documentation that shows this notice has been properly sent to the treatment or storage facility.

7. **OAC Rule 3745-52-34(D)(1), Accumulation time of hazardous waste:** "A generator who generates greater than one hundred kilograms but less than one thousand kilograms of hazardous waste in a calendar month may, for one hundred eighty days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit, provided that...the quantity of waste accumulated on-site never exceeds six thousand kilograms..."

A&V exceeded the six thousand kilogram limit of hazardous waste that was accumulated on-site at one time. A&V accumulated 9395 kilograms of hazardous waste on-site prior to shipment in May 2011.

In order to abate this violation, A&V must describe how they will ensure that they do not exceed six thousand kilograms of hazardous waste on-site at any time in the future.

8. **OAC Rule 3745-52-34(D)(5)(b), Accumulation time of hazardous waste:** "A generator who generates greater than one hundred kilograms but less than one thousand kilograms of hazardous waste in a calendar month may, for one hundred eighty days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit, provided that...the generator must post the following information next to the telephone...the name and telephone number of the emergency coordinator... location of fire extinguishers and spill control material, and, if present, fire alarm(s); and...the telephone number of the fire department, unless the facility has a direct alarm..."

A&V failed to post the name and telephone number of the emergency coordinator, location of fire extinguishers, spill control material, and, fire alarms, and the telephone number of the fire department next to the phones throughout the facility.

In order to abate this violation, A&V must post this information next to all phones near hazardous waste generation or storage areas. A&V must submit to Ohio EPA the information that will be posted in the designated areas. A&V must also submit photographs showing this information has been properly posted by all relevant telephones.

9. **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."

A&V failed to keep inspections of emergency equipment in a log or summary.

In order to abate this violation, A&V must begin keeping emergency equipment inspections in a log or summary. A&V must submit this log or summary showing that all equipment has been inspected. I have enclosed Emergency Equipment Inspection Log OAC Rule 3745-65-33 as a sample of the log needed to be kept by A&V.

10. **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."

A&V failed to keep inspections of the container storage area and the lamp crushing area in a log or summary.

In order to abate this violation, A&V must begin keeping container storage area and lamp crushing area inspections in a log or summary. A&V must submit this log or summary showing that the container storage area and lamp crushing area have been inspected at least once, every seven days to Ohio EPA. One consecutive month of inspection logs should be sent to Ohio EPA in order to abate this violation. I have enclosed SQG Container Inspection Log-OAC Rule 3745-66-74 as a sample of the log needed to be kept by A&V.

11. **OAC Rule 3745-52-34(D)(5)(c), Accumulation time of hazardous waste:** "A generator who generates greater than one hundred kilograms but less than one thousand kilograms of hazardous waste in a calendar month may, for one hundred eighty days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit, provided that...the generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies."

A&V failed to train their employees on proper waste handling and emergency procedures including the official designation of emergency coordinators and proper emergency protocol in contacting these emergency coordinators.

In order to abate this violation, A&V must submit information to Ohio EPA that all employees handling hazardous waste have been properly trained in waste handling and emergency procedures. This information could be in the form of a sign-in sheet for a training held on this topic with printed and signed names of each employee and the information reviewed during the training.

12. **OAC Rule 3745-52-34(D)(4), Accumulation time of hazardous waste:** "A generator who generates greater than one hundred kilograms but less than one thousand kilograms of hazardous waste in a calendar month may, for one hundred eighty days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit, provided that...the date upon which each period of accumulation and/or treatment begins is clearly marked and visible for inspection on each container...[and]...each container... is labeled or marked clearly with the words "Hazardous Waste..."

A&V failed to mark the fiber drum containing approximately 10 four-foot lamps and 15 eight-foot lamps waiting to be crushed with an accumulation start date or the words "Hazardous Waste". A&V also failed to mark the 55-gallon drum attached to the lamp crushing unit with an accumulation start date or the words "Hazardous Waste".

In order to abate this violation, A&V must label the drums with accumulation start dates and the words "Hazardous Waste" and submit photographs showing the proper labels to Ohio EPA. Due to the generator treatment rules and requirements, the container of spent lamps waiting to be crushed and the container of crushed lamps are not considered satellite accumulation containers and can only be stored on site for less than 180 days. Therefore, the accumulation start date should reflect the date the first lamp or crushed lamp enters the containers. A&V then has 180 days from that date to ship the wastes off site.

13. **OAC Rule 3745-66-73(A), Management of containers:** "A container holding hazardous waste shall always be closed during storage..."

A&V failed to close the fiber drum containing approximately 10 four-foot lamps and 15 eight-foot lamps waiting to be crushed.

In order to abate this violation, A&V should close the container holding the lamps and send photographic documentation to Ohio EPA showing the container is closed. A&V may need to construct a different container to hold the spent lamps prior to crushing to ensure they are not crushed or broken prematurely and that the container can be completely closed during storage.

#### **General Concerns:**

1. **Emergency Coordinator:** OAC Rule 3745-52-34(D)(5)(a), Accumulation time of hazardous waste, states "A generator who generates greater than one hundred kilograms but less than one thousand kilograms of hazardous waste in a calendar month may, for one hundred eighty days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit, provided that...at all times there must be a at least one employee either on the premises or on call...with the responsibility for coordinating all emergency response measures...this employee is the emergency coordinator..."

Gary Goll stated that you were the "unofficial" emergency coordinator. A&V needs to officially designate an emergency coordinator and a list of back-up emergency coordinators in case of your absence. All employees should be trained on who these emergency coordinators are and where the list will be kept in case of an emergency.

In order to address this concern, A&V should submit a list to Ohio EPA of all employees designated to act as emergency coordinators on-site.

2. **Emergency Communication Device:** OAC Rule 3745-65-34(A), Access to communications or alarm systems states "Whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation shall have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee..."

It is unclear if A&V meets this hazardous waste rule in each area of the facility in which hazardous waste is handled. During the inspection, A&V stated that emergency communication devices were not used by all personnel.

In order to address this general concern, A&V shall list all areas where hazardous waste is generated, the employees that could handle hazardous waste in each area, and how A&V meets this rule for each employee in each area.

3. **Used Oil:** OAC Rule 3745-279-24, Off-site shipments of used oil by generators, states "...generators must ensure that their used oil is transported only by transporters who have obtained U.S. EPA identification numbers."

During the inspection, you stated that approximately 2 gallons of used oil is generated during the year from maintenance of air compressors. This used oil is given to an employee to be burned in their personal garage/shop. As a business, A&V cannot give used oil to an employee to transport to his home to be burnt in his personal space heater.

In order to address this general concern, A&V should submit information as to how used oil will be managed in the future and where it will be recycled and through what company.

For more information the following fact sheets have been enclosed: The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil, dated April 2006, Used Oil Recyclers, printed August 22, 2011, and Registered Used Oil Collection Centers, printed August 22, 2011.

4. **Waste Codes:** A&V needs to be sure that the hazardous waste codes associated with all waste streams are correct. In 2006 A&V shipped lacquer thinner off site utilizing the waste codes D001 (ignitability), F003 (spent non-halogenated solvents), and F005 (spent non-halogenated solvents). However, in 2011 A&V shipped lacquer thinner off site utilizing the waste code D001. A&V did not submit MSDSs for the paint and lacquer thinner associated with this waste stream to Ohio EPA. Therefore, Ohio EPA cannot verify which coding is correct in this instance.

In a similar instance, A&V shipped ADA adhesive waste off site in 2006 utilizing the waste codes D001 (ignitability) and D035 (methyl ethyl ketone). However, in 2011 A&V shipped the same waste off site utilizing only the waste code D001. An MSDS received by Ohio EPA on August 16, 2011, shows that methyl ethyl ketone is an ingredient in vylon 30SS which is used in the ADA adhesive. Therefore, the waste code D035 may still be relevant in regards to the ADA adhesive waste stream.

According to the information received from A&V, manifest 008270779JJK, line 6 "waste toxic, liquid organic" utilized the waste codes U226 and U080. One item included in this waste stream was Desmodur HL. According to the MSDS for Desmodur HL, this waste stream should carry the waste code D001 (ignitability). Since this waste does not fall under the waste codes U226 or U080, it should have been shipped off site as D001.

According to the information received from A&V, manifest 008270780JJK, line 1 "waste dichloromethane" utilized the waste code F002. One item included in this waste stream was a drum of 100% perchloroethylene. This waste stream should carry the waste code U210 as a commercial chemical product. Since this waste does not fall under the waste codes F002, it should have been shipped off site as U210.

In order to address this general concern, A&V should explain how they will ensure that the correct waste codes are utilized for all waste streams in the future. A&V should also submit information as to which codes are correct for the lacquer thinner and the ADA adhesive since these wastes will be generated in the future.

5. **Satellite Accumulation Area:** OAC Rule 3745-52-34(C)(1)(a), Accumulation time of hazardous waste, states "A generator may accumulate as much as fifty-five gallons of hazardous waste... in containers at or near any point of generation... which is under the control of the operator...without a permit...provided...[the] container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste..."

During the inspection, Ohio EPA noted one open drum of waste in the satellite accumulation area in the laboratory. This drum had an open bung. A&V must keep all satellite accumulation area containers closed at all times unless waste is being added to the container.

To address this general concern, A&V should submit a description of how they will ensure all satellite accumulation area drums will be kept closed in the future. For more information, I have enclosed the fact sheets titled Satellite Accumulation Under Ohio Hazardous Waste Rules, dated July 2004, and Are You Properly Managing Your Hazardous Waste Containers?, dated November 2010.

6. **Large Quantity Generator of Hazardous Waste:** During the inspection, you stated that a large cleanout of old inventory was conducted. This old inventory waste was disposed of in May 2011. Each item in the inventory became a waste when A&V decided they could no longer use the item and that it needed to be disposed. A&V did not keep a log of when each item was considered a waste. A&V may have become a large quantity generator (LQG) of hazardous waste during the inventory cleanout by generating more than 2200 pounds (1000 kilograms) of hazardous waste in a calendar month. At that time, A&V should have been following all rules and regulations for an LQG including, but not limited to, less-than-90-day storage of hazardous waste on-site, annual personnel training, and completion of a contingency plan. If A&V generates more than 2200 pounds (1000 kilograms) of hazardous waste in a calendar month in the future, then A&V will be required to follow all rules and regulations for an LQG as long as they stay in that hazardous waste generator category.

To ensure that A&V does not become an LQG in the future, Ohio EPA recommends that A&V change their inventory cleanout procedures so that they do not generate more than 2200 pounds

(1000 kilograms) of hazardous waste in a calendar month. For more information, I have enclosed the fact sheets titled Hazardous Waste Generator Categories And Episodic Generation, dated March 2007, and the Hazardous Waste Generator Handbook, dated October 2009.

7. **Distillation Unit:** During the inspection, you stated that A&V is in the process of putting in a distillation unit however, it had not yet been completed and was not yet being used. Six drums of waste laminating solution were being stored in the container storage area that you stated are going to be distilled on-site once the unit is working.

A&V needs to be aware that distillation of a hazardous waste on-site may be considered generator treatment of a hazardous waste. A&V must know whether each waste stream placed into the distillation unit is a hazardous waste or non-hazardous waste before the waste stream is distilled. A&V will also need to know if the waste generated from the distillation unit (the still bottoms) is a hazardous waste or non-hazardous waste after the unit has completed a cycle and waste is generated.

Ohio EPA strongly encourages A&V not to use the distillation unit until all wastes at the facility have been adequately evaluated per OAC Rule 3745-52-11. For more information I have enclosed the fact sheet titled Generator Treatment, dated November 2006.

#### **Pollution Prevention:**

1. **Fluorescent Lamps:** During the inspection, you stated that A&V manages spent fluorescent lamps as a hazardous waste and disposes of them through EQ Detroit, Inc. Ohio EPA recommends that this waste stream be managed as universal waste and recycled instead of being managed as hazardous waste and disposed. Managing spent lamps as universal waste does not count towards A&V's hazardous waste generator category and may reduce A&V's regulatory burden for this waste stream. For more information on universal waste the following fact sheets have been enclosed: Universal Waste Rules for Handlers of Lamps, dated June 2005, Fluorescent Lamps: What You Should Know, dated January 2007, Computer, Fluorescent Lamp and Ballast Recyclers, dated January 2011, Universal Waste, dated December 2004, and an Answer Place email Subject: fluorescent lamp management, dated May 3, 2007.
2. **Aerosol Cans:** During the inspection, Ohio EPA noted that A&V does not recycle their spent aerosol cans as scrap metal. Ohio EPA recommends that all scrap metal be recycled to reduce waste. For additional information I have enclosed the Ohio Hazardous Waste Notifier dated Winter 2002, a letter dated October 13, 2005, Subject: Aerosol Can Management, and a fact sheet titled Refillable Spray Bottles, dated November 1999.

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 as well as regulatory requirements. Ohio EPA has helpful information about pollution prevention at the following web address: <http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/ocapp>. If you would like to be considered for a free, non-regulatory on-site pollution prevention assessment, or if you would like more information about pollution prevention assessments, please contact me at the number listed below. The Ohio Department of Development's Office of Energy Efficiency may also be able to help with energy efficiency issues. Their website is at <http://www.development.ohio.gov/cdd/oeef/>.

Mr. Rick Hubert  
September 8, 2011  
Page 13

The Division of Materials and 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 link: <http://ohioepa.custhelp.com/ci/documents/detail/2/subscriptionpage>. 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.ohio.gov/Default.aspx?tabid=55>.

Please send all correspondence **within 30 days of receipt of this letter**, to Ohio EPA, Northwest District Office, Attn: Kara Reynolds, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,

*Kara Reynolds*

Kara Reynolds  
Environmental Specialist  
Division of Materials and Waste Management

/cs

Enclosures

pc: Colleen Weaver, DMWM, NWDO  
Kara Reynolds, DMWM, NWDO  
Cindy Lohrbach, DMWM, NWDO  
DMWM/HW-NWDO-Williams.County.File:\_General\_

**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.

## Attachment A

### List of Old Inventory Wastes

1. Photofix XHF-147 (Allied)
2. Rapid Access Hard Dot Fixer (Agfa)
3. Agfa Activator CP296B
4. SLM-AL Activator (Silvermaster)
5. Photographic Solution (Sodium dichromate)
6. CuAdd76 (SD Graphics) Only the first page of this MSDS was submitted.
7. Filmstar 2(Xante)
8. Rust VE (EF Houghton)
9. SCM-ST Stabilizer (Silvermaster)
10. Skytone LX135
11. Sta Bond Adhesive
12. 2-(2-Butoxy-Ethoxy) Ethanol
13. Agfa Lith Developer part B
14. Caustic Potash (Oxychem)
15. Intertek Ca66 (Sasol Chemicals)
16. Merigraph VP7300 Dev. (powder, solid)
17. PR4
18. W1695 Detergent Solution
19. AV QD
20. Super wash from Nupro
21. Alcohol
22. 2300 flocculant
23. Defoamer W6200
24. PR6
25. TMulz 844
26. Black Fill-in powder
27. CuAdd 13a (SD Graphics) Only the first page of this MSDS was submitted.

## Attachment B

### List of Waste Evaluation Documentation for each Waste Stream

- a) Old inventory waste-Please refer to Attachment A, In general no information was received for these waste streams.
- b) Waste paint-None
- c) Paint booth filters-None
- d) Bag house dust-Material safety data sheets (MSDSs) for Plenco 02300 and Plenco 02300 Green
- e) Hard reclaim, mfg powder, pressure tank clean-out waste from the phenolic powder process-MSDS for Plenco 02300
- f) Photopolymer solids from Orbital X machine-None
- g) Recirculated water (Cosmolight water) from Orbital X machine-MSDS for "Cosmolight Water" (Cosmolight, Printing Plate)
- h) Photopolymer Solids from Laser machine-None
- i) Liquid Resin waste plus flexowash A-MSDS for "Flexowash A Dirty" (Flexowash A)
- j) Lubricant and water mixture from slitter machine-MSDS for Lubricit D7 and pH and flashpoint analytical results dated June 22, 2011, for "Slitter Solution, #500"
- k) Solids removed from slitter machine-None
- l) ADA laminator overspray-pH and flashpoint analytical results dated June 22, 2011, for "Laminating Process Solution #2, #400" and pH and flashpoint analytical results dated May 26, 2011, for "Laminating Process Solution"
- m) AV Solve-MSDSs for AV Solve Solution containing "Flint" Flexographic Plate Material and AV Solve Flexographic Developer Solvent
- n) AV Solve II-MSDSs for AV Solve II Solution containing "Flint" Flexographic Plate Material and AV Solve II+ Solution
- o) Print tight solution-pH and flashpoint analytical results dated May 26, 2011, for "Print Tight Washout Solution"
- p) Testing Department Cosmolight Solution-None
- q) Testing Department AV Solve-None
- r) Testing Department Liquid Resin Waste-MSDS for "XP54 Flexo Resin"
- s) Water based black ink-MSDS for "HK GCMI 90 Black"
- t) ADA Adhesive-MSDSs for "Vylon 30SS", "Polycat SA-102 Catalyst", "Desmodur HL", "SR444", "Ethyl Acetate 99%", "Cyclohexanone 98%"

Send to Central Office <input checked="" type="checkbox"/>	<b>Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM</b>	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to [brad.hauser@epa.state.oh.us](mailto:brad.hauser@epa.state.oh.us).

<b>Site EPA ID No.</b> <b>Site Name</b>	EPA ID Number: <b>OHD017556853</b>		Website: <b>www.andersonvreeland.com</b> (Optional)		
<b>Site Location Information</b>	Name: <b>Anderson &amp; Vreeland Inc.</b>				
	Street Address: <b>15348 State Route 127EW</b>				
<b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	City, Town, or Village: <b>Bryan</b>		State: <b>OH</b>		
	County Name: <b>Williams</b>		Zip Code: <b>43506</b>		
	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>
	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>		

<b>Facility Representative</b>	First Name: <b>Rick</b>	MI:	Last Name: <b>Hubert</b>
Additional names can be recorded in number 12	Title: <b>Facilities Manager and Safety Administrator</b>		
	Phone Number: <b>419-636-5002</b>		Phone Number Extension:
Only provide address information if it is different than the site address	E-Mail Address: <b>rhubert@andvre.com</b>		
	Fax Number: <b>419-636-4334</b>		Fax Number Extension:
	Street or P.O. Box: <b>P.O. Box 527</b>		
	City, Town or Village: <b>Bryan</b>		Zip Code: <b>43506</b>
	State: <b>Ohio</b>		

<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: <b>Anderson &amp; Vreeland Inc.</b>		Date Became Owner (mm/dd/yyyy):		
	Owner Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>
		Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: <b>P.O. Box 527</b>		Owner Phone #: <b>866-282-7697</b>		
	City, Town or Village: <b>Bryan</b>		Country: <b>USA</b>		
	State: <b>Ohio</b>		Zip Code: <b>43506</b>		
	Name of Site's Operator: <b>Anderson &amp; Vreeland Inc.</b>		Date Became Operator (mm/dd/yyyy):		
	Operator Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>
		Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: <b>P.O. Box 527</b>		Operator Phone #: <b>866-282-7697</b>		
	City, Town or Village: <b>Bryan</b>		Country: <b>USA</b>		
	State: <b>Ohio</b>		Zip Code: <b>43506</b>		

<b>VIOLATIONS CITED?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
--------------------------	---

**TYPE OF HANDLER - MARK "X" AS APPROPRIATE**

<input type="checkbox"/> Not a HW Generator	<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
	<input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.	<input checked="" type="checkbox"/> Small Quantity Generator (SQG)
		<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
		<input type="checkbox"/> U.S. Importer of Hazardous Waste
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

**TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)**

- |   |  |
|---|--|
| <input type="checkbox"/> Hazardous Waste Transporter                    | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace       |
| <input type="checkbox"/> Hazardous Waste Transfer Facility              | <input type="checkbox"/> Small Quantity On-Site Burner Exemption       |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Recycler of Hazardous Waste                    | <input type="checkbox"/> Underground Injection Control Facility        |
| <input type="checkbox"/> 72-Hour Recycler                               | <input type="checkbox"/> Receives Hazardous Waste from Off-site        |

**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"/> Destination Facility for Universal Waste |
| <input type="checkbox"/> Large Quantity Handler of Universal Waste<br>(accumulates 5,000 kg. or more) |   |

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

- Batteries  
 Pesticides  
 Mercury containing equipment  
 Lamps

**USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))**

- Used Oil Generator  
 Used Oil Transporter  
 Used Oil Transfer Facility  
 Used Oil Processor  
 Used Oil Re-refiner  
 Off-Specification Used Oil Burner  
 Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil  
 Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

**Eligible Academic Entities with Laboratories:** Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

- College or University  
 Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university  
 Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

**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 or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

**D001      D002      D009      D035      F003      F005**

**COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.**

Announced       Yes     No      Additional Facility Representatives:      **Gary Goll, Purchasing/Logistics Director**

Tanks               Yes     No  
 Containers         Yes     No

Name of Inspector(s)  
**Kara Reynolds**

Name of Inspector(s)  
**Ed Pulido**  
**Colleen Weaver**

Date of Inspection/Time  
 (mm/dd/yyyy) (hh:mm)  
**07-26-2011 12:45 PM**  
**08-01-2011 ~10:00 AM**

**Comments:**

**This facility is a small quantity generator on a regular basis but may be a large quantity generator depending on the waste evaluation outcome.**

## PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Anderson & Vreeland Inc. Facility Type:

Date of Inspection: 07-26-2011 EPA ID#: OHD017556853

Waste Generated			On-or-Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, bag house, 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/Paint Booth	Lacquer Thinner F003, F005	~1.5 gallons per month 5 gallon bucket Engineering Dept.		EQ Detroit, Inc., Michigan, H141		
2 Painting/Paint Booth	Paint Booth Filters	~25 gallons every 6 months (18 filters each ~18" by ~24") Engineering Dept.		Williams County Landfill		
3 Painting/Paint Booth	Waste paint that has hardened	~0.5 gallons per month Various containers Engineering Dept.		Williams County Landfill		
4 Facility Maintenance	Filters from bulb crusher D009	1 HEPA filter and 1 other filter changed every 6 months 55 gallon drum Engineering Bldg	Placed in drum with crushed lamps	EQ Detroit, Inc., Michigan, H111		
5 ADA Adhesive Coating	ADA Adhesive (ethyl acetate) D001, D035	~15 gallons per month 55 gallon drum ADA Roll Coating		EQ Detroit, Inc., Michigan, H141		

6	Maintenance of Air Compressors	Used Oil	~2 gallons per year		Given to employee to be burnt in a space heater at employee's garage		Manage as used oil and recycle
7	Phenolic Powder Process (Coating Matrix Board)	Overspray	Varies Container Manufacturing Bldg	Reused on site in process			
8	Phenolic Powder Process (Coating Matrix Board)	Bag house Dust	25 gallons per year 55 gallon drum Outside container storage area		EQ Detroit, Inc., Michigan		
9	Phenolic Powder Process (Coating Matrix Board)	Floor sweepings, pressure tank clean-out, hard reclaim, mfg powder	55 gallon drum		EQ Detroit, Inc., Michigan		
10	Orbital X Machine in Laboratory	Photopolymer Solids (Cosmolight)	~3 pounds per month Container Laboratory	Mix with Diatomaceous Earth	Williams County Landfill		
11	Orbital X Machine in Laboratory	Recirculated Water (Cosmolight Water)	~25 gallons every 6 months Container Laboratory	Mix with Diatomaceous Earth	Williams County Landfill		
12	Laser Machine in Laboratory	Photopolymer Solids	~2.5 pounds per month Container Laboratory	Mixed with diatomaceous earth	Williams County Landfill		
13	Liquid Photopolymer Resin Process in Production Area (pump cleaning)	Liquid Resin Waste Plus Flexowash A (aka Flexowash waste) from pump cleaning	30-40 gallons per year 55 gallon drum Outside container storage area				
14	Facility Maintenance	Crushed Lamps D009	55 gallons per year 55 gallon drum Engineering Bldg		EQ Detroit, Inc., Michigan, H111		Manage as Universal Waste and Recycle

15

15	Slitter Machine	Used Lubricant/Water Mixture (LUBRICIT D7)	~55 gallons per year 55 gallon drum Engineering Bldg		Waste was previously going to local WWTP but is now being stored on site & will be distilled		
16	Slitter Machine	Solids screened out from waste	Unknown Container Engineering Bldg		Williams County Landfill		
17	ADA Laminator	Excess water (overspray) which hasn't been introduced to the process and hasn't touched the material being adhered	Unknown Container ADA Area	Reused in process			
18	ADA Laminator	Overspray that has been in contact with the process	220-275 gallons per month 55 gallon drums Outside container storage area		Waste was previously going to local WWTP but is now being stored on site & will be distilled		
19	In-Line Wash Unit/Solvent Wash Solution	AV Solve or AV Solve II D001	9-14 gallons per month 55 gallon drum Laboratory		EQ Detroit, Inc., Michigan, H141		
20	Testing Department	Printight Solution	~35 gallons per month Container Testing Dept.		Sent down drain to local WWTP		
21	Testing Department	Cosmolight Solution	~35 gallons per month Container Testing Dept.	Mix with Diatomaceous Earth	Williams County Landfill		
22	Testing Department	AV Solve D001	2.5 gallons per month 55 gallon drum Testing Dept.		EQ Detroit, Inc., Michigan, H141		

23	Testing Department	Liquid Resin Waste (flexowash waste)	55 gallons per month 55 gallon drum Liquid resin room		EQ Detroit, Inc., Michigan		
24	ADA Processes	Rags	Unknown Container ADA area			Laundered by Cintas and reused	
25	Phenol/Matrix Board	Rags	Unknown Container Manufacturing Bldg		Williams County Landfill		
26	Grain Marking Matrix Board in Manufacturing	Water Based Black Ink	~25 gallons per year		EQ Detroit, Inc., Michigan		
27	Facility Maintenance	Lead acid batteries	Minimal		Core exchange with different facilities		
28	Facility Maintenance	Spent aerosol cans	Varies		Williams County Landfill		Recycle as scrap metal
29							
30							

### REMARKS/GENERAL INFORMATION

**General Process Information:** See Letter

**Regulatory/Enforcement History** (if applicable): N/A

**Additional P2 remarks and information:** N/A

Would this facility be interested in a P2 assessment? **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](mailto:p2mail@epa.state.oh.us) or [www.epa.state.oh.us/ocapp/ocapp.html](http://www.epa.state.oh.us/ocapp/ocapp.html)

Other: N/A

**SMALL QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

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 type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
2.	Has the generator obtained a U.S. EPA I.D. number? [3745-52-12]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.	Has the generator transported or caused to be transported hazardous waste to <b>other</b> than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Has the generator disposed of hazardous waste <b>on-site without a permit</b> or at another facility <b>other</b> than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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

6.	Has the generator accumulated hazardous wastes <u>in excess of (180/270) days</u> without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
----	---	--

*NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]*

7.	Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
----	---	--

*NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.*

8.	Does the generator treat hazardous waste in a:	
	a. Container that meets 3745-66-70 to 3745-66-77?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Tank that meets 3745-66-101?	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.*

**MANIFEST REQUIREMENTS**

9.	Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
10.	Are wastes reclaimed under a contractual agreement? If so: [3745-52-0(E)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	a. Does the contractual agreement specify the type of waste and frequency of shipment?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. Is the transport vehicle owned and operated by the reclaimer?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

c.	Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.		
11.	Have items 1 through 20 of each manifest been completed? [3745-52-20(A)(1)] & [3745-52-27(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be complete. [3745-52-20(A)(1)]		
12.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternative facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]		
13.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
14.	Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.		
15.	If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? [3745-52-42(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
16.	Are signed copies of all manifests being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.		
<b>PREPAREDNESS AND PREVENTION</b>		
17.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]	
a.	Name and telephone number of emergency coordinator?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
b.	Location of fire and spill control equipment, and, if present, fire alarm(s)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
c.	Telephone number of local fire department?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
19.	Are employees familiar with waste handling and emergency procedures? [3745-52-34(D)(5)(c)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
20.	Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
21.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:	
a.	Internal Alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
23.		Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a.	Are inspections recorded in a log or summary? [3745-65-33]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
24.		Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
25.		If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance (unless not required under OAC 3745-65-32)? [3745-65-34(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
26.		Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
27.		Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
28.		Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>SATELLITE ACCUMULATION AREA REQUIREMENTS</b>			
29.		Does the generator ensure that satellite accumulation area(s):	
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	f.	Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
30.		Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.			
<b>USE AND MANAGEMENT OF CONTAINERS</b>			
31.		Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(D)(4)] No hazardous waste in container storage area during inspection however there were 2 drums of spent lamps in lamp crushing area.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
32.		Is the accumulation date on each container? [3745-52-34(D)(4)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

33.	Are hazardous wastes stored in containers which are:		
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	b.	In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: Record location on process summary sheets and photograph the area.*

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

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

**PRE-TRANSPORT REQUIREMENTS**

38.	Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
39.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
40.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

**GENERATOR LDR CHECKLIST  
DOES NOT APPLY TO CESQGS**

**GENERAL REQUIREMENTS**

1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07(A)(7)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).</i></p>		
3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<p><i>FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.</i></p>		
6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains &gt;10% TOC) D001 wastes or listed HWs.</i></p> <p><i>NOTE: Written documentation of this determination is not required.</i></p>		
7.	Did the generator treat his HW /soil on-site to meet the LDR treatment standard?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE: If "Yes" see question #16.</i></p>		
8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
i.	Applicable HW codes?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
ii.	Manifest number of the first shipment to the TSD?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
iii.	A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination.?"	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
10.	Does the generator have a copy of the LDR notification form/notice on file? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**NOTIFICATION FORM**

11.	Does the LDR Notification form contain the following information:		
	a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.*

	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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*NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories*

	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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*NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.*

	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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*NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.*

**PROHIBITED DILUTION**

12.	Is the HW treated by burning? If "No" go to #15.		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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13.	Is the HW a metal-bearing HW?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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*NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.*

14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless <u>one</u> of the following conditions apply. [3745-270-03(c)]	
	i.	Contains > 1% TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	ii.	Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	v.	Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

15.	Was the HW treated by wastewater treatment?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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<i>NOTE: If "Yes", HW is improperly being treated by dilution.</i>		
b.	Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].*

*NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.*

**GENERATOR TREATMENT**

16.	Does the generator treat to meet LDRs on-site?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to <u>meet</u> the LDR treatment standard?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	If "Yes"... complete the rest of the checklist. If "No"... stop... you are done.	
a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*NOTE: This is a laboratory analysis but it does not have to be kept by the generator.*

c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

**NOTIFICATION FORM FOR GENERATOR TREATMENT**

17.	a.	Contains all information in #11 a-g above and	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	If the treated HW/soil is listed.....notification contains the following certification statement:  "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:	
	i.	Prepare a one-time notification? [3745-270-09 (D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	ii.	Maintain a copy of the notice onsite? [3745-270-09(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iii.	Include in the notification: [3745-270-09(D)]	
	1.	Name & address of receiving landfill?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	2.	Description of HW when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	3.	HW code when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

		4.	Treatability group when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
		5.	Underlying hazardous constituents present when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
		iv.	Contain the certification statement as required by 3745-270-07(B)(4)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>