



Environmental
Protection Agency

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

Re: Smitty's Custom Automotive
Seneca County
CESQG
NOV
OHR 000 166 058

February 11, 2011

Mr. Chris Smith
Smitty's Custom Automotive
2961 West Township Road 98
Tiffin, Ohio 44883

Dear Mr. Smith:

Thank you for accompanying me during the January 20, 2011, hazardous waste compliance evaluation inspection (CEI) of Smitty's Custom Automotive (Smitty's) located at 2961 West Township Road 98, Tiffin, Ohio. This inspection was conducted to determine Smitty's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC), and Ohio's hazardous waste regulations as adopted under Chapter 3745. of the Ohio Administrative Code (OAC). The inspection included a tour of facility operations and a review of facility paperwork.

Smitty's is a body shop that paints vehicles. At the time of inspection, Ohio EPA considered Smitty's a conditionally exempt small quantity generator (CESQG) of hazardous waste due to the fact that they did not produce over 220 pounds (approximately 25-30 gallons) of hazardous waste in a calendar month. Hazardous waste generated onsite includes spent waste paint solvent (D001, F003, F005). Smitty's generates approximately five (5) gallons of spent waste paint solvent every six (6) months. Smitty's distills the paint related waste in an onsite distillation unit in order to recycle the solvent.

Smitty's has been accepting spent waste paint solvent (D001, F003, F005) from Tin Lizzy Collision located at 4600 West U.S. 224, Tiffin, Ohio and placing it in their distillation unit to recycle the solvent (approximately five (5) gallons every six (6) months). Smitty's has been accepting this waste for approximately three (3) years.

I found the following violations of Ohio's hazardous waste laws. In order to correct these violations you must do the following and send me the required information within 30 days of your receipt of this letter:

**1. Unpermitted Storage, Treatment, and Disposal
Ohio Revised Code Section 3734.02 (E)&(F)**

ORC Section 3734.02 (E) states in part that, "... No person shall establish or operate a hazardous waste facility. . . without a hazardous waste installation and operation permit. . ."

ORC Section 3734.02 (F) states in part that, "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 . . . except at or to any of the following: (1) A hazardous waste facility operating under a permit in accordance with this chapter . . ."

1a. Unpermitted Treatment

Smitty's is currently accepting spent paint related waste (D001, F003, F005) from Tin Lizzy Collision and placing it in their distillation unit to recycle the solvent. Smitty's has been accepting approximately five (5) gallons of this waste every six (6) months for three (3) years and has generated approximately one (1) gallon of still bottoms from the spent paint related waste that has been recycled through the distillation unit.

During the inspection, Smitty's was instructed to stop accepting spent solvent from Tin Lizzy Collision for recycling in their distillation unit. Smitty's is not a permitted hazardous waste facility and therefore cannot accept waste from other businesses.

Smitty's is no longer accepting spent paint related waste from Tin Lizzy. **Therefore, this violation has been abated.**

1b. Unpermitted Disposal

Smitty's is currently disposing of their distillation still bottoms (F003, F005) in the solid waste dumpster. Smitty's currently throws away approximately one (1) block of solids from the distillation unit every year.

During the inspection, Ohio EPA instructed Smitty's to stop placing the distillation solids in the solid waste dumpster.

Smitty's is no longer disposing of their still bottoms. Smitty's provided documentation to me on February 4, 2011, stating Chemtron Corporation will be managing their hazardous waste in order to ensure delivery to an off-site hazardous waste storage, treatment, or disposal facility. **Therefore, this violation has been abated.**

Since Smitty's violated ORC §3734.02(E) and (F), Smitty's is subject to all applicable general facility standards found in OAC chapters 3745-54 and 55. Additionally, at any time Ohio EPA may assert its right to have Smitty's begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

Although no further action is being required by Ohio EPA at this time, be advised that due to the nature of the violation Ohio EPA may require closure pursuant to OAC rules 3745-55-11 through 3745-55-20 and OAC rules 3745-55-42 through 3745-55-47 at this site.

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

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

2a. Paint Filters

Smitty's failed to evaluate the spent paint booth filters generated from the paint booth.

To properly evaluate the above waste stream Smitty's must do one of two options: 1) Smitty's must take a representative sample of this waste to properly evaluate this waste stream through a laboratory analysis which lists constituents present and at what concentration. Smitty's must sample the spent paint booth filters to determine the concentration of Toxicity Characteristic Leaching Procedure (TCLP) RCRA metals, excluding Mercury, and TCLP VOC as listed in the Ohio Administrative Code Rule 3745-51-24 following the method as outlined in U.S. EPA's SW-846, or 2) Smitty's must apply generator knowledge of the hazardous characteristic(s) of the waste in light of the materials or the processes used through adequate documentation.

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

2b. Fluorescent Bulbs

Smitty's failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility. Smitty's must immediately cease disposing of the fluorescent bulbs as non-hazardous waste until a proper waste evaluation has been completed.

Fluorescent bulbs typically contain mercury and other heavy metals which could make them a hazardous waste. Hazardous waste bulbs are considered "spent materials" and remain hazardous waste even when recycled. Hazardous waste lamp generators have the option of handling their lamps as hazardous waste or as universal waste. Managing hazardous waste lamps under the universal waste rules eases certain regulations imposed on generators of spent lamps.

Smitty's submitted documentation on February 4, 2011, stating they will be managing their fluorescent bulbs as universal waste through Chemtron Corporation. **Therefore, this violation has been abated.**

2c. Still bottoms

Smitty's failed to evaluate the still bottoms generated from the distillation unit.

To properly evaluate the above waste stream Smitty's must do one of two options: 1) Smitty's must take a representative sample of this waste to properly evaluate this waste stream through a laboratory analysis which lists constituents present and at what concentration. Smitty's must sample the still bottoms to determine the concentration of Toxicity Characteristic Leaching Procedure (TCLP) RCRA metals, excluding Mercury, as listed in the Ohio Administrative Code Rule 3745-51-24 following the method as outlined in U.S. EPA's SW-846, or 2) Smitty's must apply generator knowledge of the hazardous characteristic(s) of the waste in light of the materials or the processes used through adequate documentation.

Smitty's submitted documentation on February 4, 2011, stating they will be managing their still bottoms through Chemtron Corporation. **Therefore, this violation has been abated.**

2d. Waste paint solvent

Smitty's failed to evaluate the waste paint solvent generated from cleaning paint guns.

To properly evaluate the above waste stream Smitty's must do one of two options: 1) Smitty's must take a representative sample of this waste to properly evaluate this waste stream through a laboratory analysis which lists constituents present and at what concentration. Smitty's must sample the waste paint solvent to determine the concentration of Toxicity Characteristic Leaching Procedure (TCLP) RCRA metals, excluding Mercury, and TCLP VOC as listed in the Ohio Administrative Code Rule 3745-51-24 following the method as outlined in U.S. EPA's SW-846, or 2) Smitty's must apply generator knowledge of the hazardous characteristic(s) of the waste in light of the materials or the processes used through adequate documentation.

Smitty's submitted documentation on February 4, 2011, stating they will be managing their waste paint solvent through Chemtron Corporation. **Therefore, this violation has been abated.**

Ohio EPA will issue an EPA ID number to track our inspection activity at Smitty's. Smitty's cannot use this number for manifesting hazardous waste shipments.

If Smitty's wants to use an EPA ID number for manifesting and other hazardous waste, used oil or universal waste activities, Smitty's must complete and submit a Notification of Regulated Waste Activity form (EPA Form 9029 (Rev. 11/2002)) to Ohio EPA.

This form is available on our Web page at <http://www.epa.ohio.gov/dhwm/notiform.aspx> or Smitty's can call me at (419) 373-3058 or the Division of Hazardous Waste Management, Central Office, RIS at (614) 644-2977 and we will mail you a copy.

Mr. Chris Smith
February 11, 2011
Page 5

If you find ways to recycle, reduce, or altogether eliminate the amount of waste your company generates you may be able to reduce treatment and disposal costs. Furthermore, you may possibly reduce your regulatory requirements.

Ohio EPA has helpful information about pollution prevention at the following web address:
<http://www.epa.ohio.gov/ocapp/>.

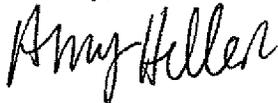
The Ohio Department of Development's Office of Energy Efficiency may be able to help with energy efficiency issues. Their website is at: <http://www.development.ohio.gov/cdd/oeef/>.

The division has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage

Enclosed you will find a copy of the checklists that I completed as a result of the inspection. Please address all correspondence to Amy Heller, Ohio EPA, 347 N. Dunbridge Road, Bowling Green, Ohio 43402.

Should you have any questions, please feel free to call me at (419) 373-3058. You can find copies of the rules and other information on the division's web page at:
<http://www.epa.ohio.gov/dhwm/>

Sincerely,



Amy Heller
Division of Hazardous Waste Management

/llr

Enclosures

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
DHWM, NWDO File: Seneca County, Smitty's Custom Automotive
ec: Amy Heller, 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.

Send to Central Office <input type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
--	---	-----------------------

Completed verification forms required to be submitted to CO should be e-mailed to paula.canter@epa.state.oh.us.

Site EPA ID No. Site Name	EPA ID Number: n/a Name: Smitty's Custom Automotive		Website: (Optional)								
Site Location Information	Street Address: 2961 W TR 98		State: OH								
	City, Town, or Village: Tiffin		Zip Code: 44883								
	County Name: Seneca			<table style="width:100%; border-collapse: collapse;"> <tr> <td style="border: 1px solid black; text-align: center;">Private <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">County <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">District <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">Federal <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">Indian <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">Municipal <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">State <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">Other <input type="checkbox"/></td> </tr> </table>	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"/>
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"/>				

Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Chris MI: Last Name: Smith Title: Phone Number: 419-448-8080 Phone Number Extension: E-Mail Address: Fax Number: Fax Number Extension: Street or P.O. Box: City, Town or Village: State: Zip Code:
--	---

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: <table style="width:100%; border-collapse: collapse;"> <tr> <td style="border: 1px solid black; text-align: center;">Owner Type:</td> <td style="border: 1px solid black; text-align: center;">Private <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">County <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">District <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">Federal <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">Indian <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">Municipal <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">State <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">Other <input type="checkbox"/></td> </tr> </table> Street or P.O. Box: City, Town or Village: State: Zip Code:	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"/>	Date Became Owner (mm/dd/yyyy): <table style="width:100%; border-collapse: collapse;"> <tr> <td style="border: 1px solid black; text-align: center;">Federal <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">Indian <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">Municipal <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">State <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">Other <input type="checkbox"/></td> </tr> </table> Owner Phone #: Country: Zip Code:	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
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"/>								
Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>												
Name of Site's Operator: <table style="width:100%; border-collapse: collapse;"> <tr> <td style="border: 1px solid black; text-align: center;">Operator Type:</td> <td style="border: 1px solid black; text-align: center;">Private <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">County <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">District <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">Federal <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">Indian <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">Municipal <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">State <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">Other <input type="checkbox"/></td> </tr> </table> Street or P.O. Box: City, Town or Village: State: Zip Code:	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"/>	Date Became Operator (mm/dd/yyyy): <table style="width:100%; border-collapse: collapse;"> <tr> <td style="border: 1px solid black; text-align: center;">Federal <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">Indian <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">Municipal <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">State <input type="checkbox"/></td> <td style="border: 1px solid black; text-align: center;">Other <input type="checkbox"/></td> </tr> </table> Operator Phone #: Country: Zip Code:	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
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"/>								
Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>												

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

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <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 type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input checked="" 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 (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 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:
 Tanks Yes No
 Containers Yes No

Name of Inspector(s) Amy Heller	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm) 01/20/2011
---	----------------------	--

Comments:
Operating as an unpermitted TSDf by accepting offsite solvent for their distillation unit.

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name:	Facility Type: CESQG	Date of Inspection:	EPA ID #:
Smitty's		1/20/2011	N/A

<i>Waste Generated</i>			<i>On- or Off-Site Management</i>		<i>P2 Activities</i>	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation <small>(container, tank, etc) and location of waste accumulation area</small>	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	Distillation solids F003 F005	1 block of solids every year		Chemtron		
2	Spent waste paint solvent D001 F003 F005	5 gallon every 6 months		Distilled on site		
3	Fluorescent Bulbs 52-11	varies		Chemtron		
4	Paint filters 52-11	Generates every 3 to 4 months				
5						

**CONDITIONALLY EXEMPT 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: \leq 1,000 Kg. (~300 gallons) of waste in a calendar month or \leq 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:

WASTE EVALUATION

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A

GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes No N/A

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes No N/A

TREATMENT OF HAZARDOUS WASTE

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

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

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

REMARKS