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OhioEPA

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P.O. Box 1049
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October 19, 2007

Re: Abbott Laboratories
OHD987047214 *Franklin County*
***SQG* [NOV-PRTC]**

Mr. J. R. Rao
Abbott Nutrition
6480 Busch Blvd.
Columbus, OH 43229

Dear Mr. Rao:

Thank you and your fellow staff for your time and assistance during my inspection visit to Abbott Laboratories Ross Park facility at 3300 Stelzer Road in Columbus on September 20, 2007. The purpose was to review your facility's generation and management of hazardous waste and universal waste. Ohio's laws under Chapter 3745 of the Ohio Administrative Code and Chapter 3734 of the Ohio Revised Code establish a system for safe and responsible management of this waste. This letter summarizes the inspection findings. Follow-up actions taken by Abbott personnel at the time of the inspection, and afterwards as documented in your letter to me which was received on October 1, 2007, are also taken into account. The following violations were noted:

1. ***Container Marking, OAC rule 3745-52-34(A)(2)***: Containers of hazardous waste must be marked with the accumulation start date.

   Numerous small containers of waste expired laboratory chemicals in the central accumulation area lacked any accumulation start date marking.

   Your follow-up letter described how corrections were made to resolve this violation.

2. ***Container Marking, OAC rule 3745-52-34(A)(3)***: Containers of hazardous waste must be marked with the words "Hazardous Waste".

   Numerous small containers of waste expired laboratory chemicals on a shelf in the central accumulation area lacked the required markings.

   Your letter indicates all of these small containers are now inside larger tubs/containers with the proper markings. The violation is considered resolved.

3. ***Closed Containers, OAC rule 3745-34(C)(1)(a)*** [This rule references OAC rule 3745-66-73(A), which specifies]: Containers accumulating hazardous waste must be kept closed when waste is not being added to them.

   A jug of liquid methoxide hazardous waste in a fume hood at Lab # 2125 had an open funnel in the top. A jug for accumulating hazardous HPLC solvent waste in Lab # 2278 under a newer instrument lacked a vapor-reducing cap because a slightly larger tube was plumbed into it (these units generate waste intermittently). Three accumulation drums for waste aerosol cans had open tops cut in them.

The problem with the jug in Lab #2125 was resolved before we left the area during my visit. Your follow-up letter described how corrections were made to resolve the aerosol can collection container problems. Please correct the HPLC waste jug cap/lid problem by using a lid with a properly sized hole to minimize evaporation losses from such containers, as is already being done with similar containers to which smaller diameter tubing is emptying.

4. ***Satellite Container Marking, OAC rule 3745-52-34(C)(1)(b)***: Containers of hazardous waste must be marked with the words, "Hazardous Waste", or other words identifying the contents.

   Some of the jugs of HPLC waste in the labs lacked the required marking. One of the drums of waste aerosols also lacked this required marking.

   Your follow-up letter described how corrections were made to resolve this violation.

5. ***Satellite Container Start Date Marking, OAC rule 3745-52-34(C)(2)***: Containers of hazardous waste must be marked with the accumulation start date when the amount in the area exceeds 55 gallons.

   Three drums full of waste aerosols lacked the required start date marking.

   Your follow-up letter described how corrections were made to resolve this violation.

6. ***Closed Containers of Universal Waste Lamps, OAC rule 3745-273-13(D)(1)***: Universal waste lamps must be accumulated in containers which are kept closed when waste is not being added or removed.

   A container of small universal waste lamps was open. The lid did not fit because two longer tubes (too big for the container) were sticking out of it.

   Your follow-up letter described how corrections were made to resolve this violation.

7. ***Broken Waste Lamps, OAC rule 3745-273-13(D)(2)***: Waste lamps that show evidence of breakage must be immediately cleaned up and placed into an intact compatible container.

   At the time of the inspection, broken lamp fragments were present on the floor of the waste lamp central accumulation area.

   A worker cleaned up the material at the time of the inspection visit, resolving this problem.

8. ***Marking of Universal Waste Lamps, OAC rule 3745-273-14(E)***: Lamps or containers or packages of waste lamps must be labeled with the words "Universal Waste- Lamp(s)" or "Waste Lamp(s)", or "Used Lamp(s)".

   Two containers of waste lamps in the waste lamp central accumulation area were unmarked .

   Some extra labels were found on the floor beneath a pallet in this area and were placed on the containers in question, at the time of my visit. This problem is considered resolved.

9. ***Employee Training for Universal Waste handling practices, OAC rule 3745-273-16***: Employees who may handle universal waste must be informed of waste handling/emergency responsibilities relative to their job duties.

   The worker who cleaned up the broken lamp pieces in the waste lamp central accumulation area, thought it was okay to throw them in the garbage can, and was unaware they should be handled as potential hazardous waste.

Please take steps to ensure that workers have sufficient training to properly handle any broken lamps that may from time to time incidentally occur.

Please take any other actions necessary to address violations #3 and #9 above, and send a follow-up letter describing compliance achieved in 30 days after your receipt of this letter. In addition, I also offer the following comments, concerns and/or suggestions:

- You indicated that contents of some blue buckets marked as "CIM 1000" and several propane cylinders in the central hazardous waste accumulation room, are still considered usable products and that they will be stored separately from the hazardous wastes in that area.
- Because all of the waste aerosol cans generated on-site are all being managed as hazardous waste, and due to the inherent difficulties in verifying if some of these containers are in fact empty, it is unclear what if any value is obtained from having two drums for these cans side by side. The satellite accumulation requirements may be applied to quantities up to one 55-gallon drum full of the cans.
- Enclosed are fact sheets describing proper management practices for universal waste lamps and batteries, which may be useful to improve some practices at your facility.
- Pollution Prevention Assessments are a free service offered by Ohio EPA's Office of Compliance Assistance and Pollution Prevention. If Abbott Laboratories would like to arrange for this additional on-site technical assistance at either or both the Ross Park and/or the Columbus Plant, feel free to contact them at 1-800-329-7518 or p2mail@epa.state.oh.us and / or view their website at www.epa.state.oh.us/ocapp/ocapp.html .

Enclosed is a copy of the checklist that was completed for this inspection, as well as a fact sheet on handling universal waste lamps. Our website, www.epa.state.oh.us/dhwm, provides links to copies of Ohio hazardous waste rules. Should you have any questions, please feel free to call me at (614) 728-3885. **I look forward to receiving other follow-up information from you in about 30 days, as described above.**

Sincerely,

J. David Hohmann
Environmental Specialist
Division of Hazardous Waste Management
Central District Office

Enclosure

c: Tammy McConnell/CO
CDO File

JDH/nsm Abbott Ross Park NOV PRTC

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

Abbott Laboratories — Ross Park

SMALL QUANTITY GENERATOR REQUIREMENTS

(COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET)

SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month
Safety Equipment Used: safety glasses and steel toed shoes, earplugs

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes ☒	No ☐	N/A ☐
2.	Has the generator obtained a U.S. EPA I.D. number? [3745-52-12]	Yes ☒	No ☐	N/A ☐
3.	Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)]	Yes ☐	No ☒	N/A ☐
4.	Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)]	Yes ☐	No ☒	N/A ☐
5	Does the generator accumulate hazardous waste?	Yes ☒	No ☐	N/A ☐
6.	Has the generator accumulated hazardous wastes <u>in excess of</u> (180/270) days without a permit or extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)]	Yes ☐	No ☒	N/A ☐
7.	Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)]	Yes ☐	No ☒	N/A ☐
8.	Does the generator treat hazardous waste in a: *[N/A—no treatment on site]*			

MANIFEST REQUIREMENTS

9.	Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)]	Yes ☒	No ☐	N/A ☐
10.	Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)] *[N/A]*	Yes ☐	No ☒	N/A ☐
11.	Have items 1 through 20 of each manifest been completed? [3745-52-20(A)]	Yes ☒	No ☐	N/A ☐
12.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes ☒	No ☐	N/A ☐
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 ☐	No ☐	N/A ☒
14.	Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)]	Yes ☒	No ☐	N/A ☐
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 ☐	No ☐	N/A ☒
16.	Are signed copies of all manifests being retained for at least three years? [3745-52-40]	Yes ☒	No ☐	N/A ☐

PREPAREDNESS AND PREVENTION

17.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)]	Yes ☒	No ☐	N/A ☐
18.	Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]			
	a. Name and telephone number of emergency coordinator?	Yes ☒	No ☐	N/A ☐
	b. Location of fire and spill control equipment, and, if present, fire alarm(s)	Yes ☒	No ☐	N/A ☐

c. Telephone number of local fire department? Yes ☒ No ☐ N/A ☐

19. Are employees familiar with waste handling and emergency procedures [3745-52-34(D)(5)(c)] Yes ☒ No ☐ N/A ☐

20. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)] Yes ☒ No ☐ N/A ☐

21. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste? [3745-65-31] Yes ☒ No ☐ N/A ☐

22. Does the generator have the following at the facility if required due to actual hazards associated with the waste:

a. Internal Alarm system? [3745-65-32(A)] Yes ☒ No ☐ N/A ☐

b. Emergency communication device? [3745-65-32(B)] Yes ☒ No ☐ N/A ☐

c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes ☒ No ☐ N/A ☐

d. Water of adequate volume/pressure? [3745-65-32(D)] Yes ☒ No ☐ N/A ☐

23. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes ☒ No ☐ N/A ☐

a. Are inspections recorded in a log or summary? [3745-65-33] Yes ☒ No ☐ N/A ☐

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 ☒ No ☐ N/A ☐

25. If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32?) [3745-65-34(B)] Yes ☒ No ☐ N/A ☐

26. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes ☒ No ☐ N/A ☐

27. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] **RMK:** *The Fire Chief has toured the facility, and some drills may be scheduled here with fire department personnel in the near future.* Yes ☒ No ☐ N/A ☐

28. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes ☐ No ☐ N/A ☒

SATELLITE ACCUMULATION AREA REQUIREMENTS

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 ☒ No ☐ N/A ☐

b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes ☒ No ☐ N/A ☐

c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes ☒ No ☐ N/A ☐

d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes ☒ No ☐ N/A ☐

e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. **RMK:** *A jug of waste solvent in a hood in lab #2125 had an open funnel sticking out of it, and an HPLC waste jug in lab #2276 had no cap to prevent evaporation of the waste contents..* Yes ☐ No ☒ N/A ☐

f. Containers are marked with the words "Hazardous Waste" <u>or</u> other words identifying the contents? [3745-52-34(C)(1)(b)] **RMK:** *A couple of unmarked jugs, were fixed by facility personnel on the day of my inspection visit.* Yes ☐ No ☒ N/A ☐

30. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? **RMK:** *There were three drums full of used aerosol cans being managed as hazardous waste.* If so: Yes ☒ No ☐ N/A ☐

a. Did the generator comply w 3745-52-34(A)(1) through (4) or other ap ble generator requirements within three days? [3745-52-34(C)(2)] Yes ☐ No ☒ N/A ☐

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 ☐ No ☒ N/A ☐

USE AND MANAGEMENT OF CONTAINERS

31. Has the generator marked containers with the words "Hazardous Waste" [3745-52-34(D)(4)] **RMK:** *Three drums of Used Aerosols and about 20 small containers of waste expired laboratory chemicals on two shelves in the central accumulation area, lacked this marking.* Yes ☐ No ☒ N/A ☐

32. Is the accumulation date on each container? [3745-52-34(D)(4)] Yes ☐ No ☒ N/A ☐

RMK: *Three drums of Used Aerosols and about 20 small containers of waste expired laboratory chemicals on two shelves in the central accumulation area, lacked this marking.*

33. Are hazardous wastes stored in containers which are:

a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes ☐ No ☒ N/A ☐

RMK: *Three full drums of waste used aerosols had square holes cut in their tops.*

b. In good condition? [3745-66-71] Yes ☒ No ☐ N/A ☐

c. Compatible with wastes stored in them? [3745-66-72] Yes ☒ No ☐ N/A ☐

d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes ☒ No ☐ N/A ☐

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 ☒ No ☐ N/A ☐

a. Are inspections recorded in a log or summary? [3745-66-74] Yes ☒ No ☐ N/A ☐

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)] **RMK:** *Plastic toter tubs were used to segregate small containers of incompatible laboratory chemicals.* Yes ☒ No ☐ N/A ☐

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 ☐ No ☐ N/A ☒

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 ☐ No N/A

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 ☒ No ☐ N/A ☐

39. Does each container ≤100 gallons have a completed hazardous waste label? [3745-52-32(B)] **RMK:** *Yes, prior to shipping.* Yes ☒ No ☐ N/A ☐

40. Before off-site transportation, does the generator placard <u>or</u> offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes ☒ No ☐ N/A ☐

<u>SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS</u> - BATTERIES AND LAMPS

Small Quantity Handler (SQUWH) = 5,000 Kg or less

Prohibitions

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] **RMK:** *Not on-site.* Yes ☐ No ✓ N/A
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes ☐ No ✓ N/A ___ RMK#

Waste Management & Labeling and Marking

UNIVERSAL WASTE BATTERIES *[Questions #3-7 = N/A]*

RMK: *None of these were being accumulated at the time of the inspection. Lead acid batteries from power backup systems are handled by equipment vendors who maintain that equipment.*

UNIVERSAL WASTE LAMPS

8. Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] — Yes ___ No ✖ N/A
   RMK: *An open 5-gallon bucket had two tubes sticking out of it, at risk of breaking.*
9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] — Yes ___ No ✖ N/A
   RMK: *Broken lamp fragments were on the floor in the main accumulation area for the universal waste lamps. After calling this to the attention of workers, the pieces were swept up...*
10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)] — Yes ___ No ✖ N/A
    RMK: *A 5-gallon bucket and a tall fiber container for waste lamps, were unmarked. Labels were found on the floor underneath a pallet, and were applied to the containers by workers to correct this problem.*

ACCUMULATION TIME

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: *[N/A]*
12. Is the length of time the universal waste is stored documented by **one** of the following: [3745-273-15(C)]
    a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] — Yes___ No N/A
    b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] — Yes___ No N/A
    c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] — Yes___ No N/A
    d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] — Yes___ No___ N/A
    e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] — Yes___ No___ N/A
    f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] **RMK:** *Veolia takes all waste lamps off site frequently, about every 2 months.* — Yes ✓ No___ N/A

EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] **RMK:** *The worker who swept up the broken fluorescent lamp tube fragments was unaware of how they should be handled for proper disposal at that point.* — Yes ___ No ✖ N/A

RESPONSE TO RELEASES *[N/A– no "releases" (i.e. to the outdoor environment) were noted*

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] — Yes ___No ☐ N/A
15. Is the material released characterized? [3745-273-17(B)] — Yes ___No ☐ N/A
16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] — Yes ___ No ☐ N/A

OFF-SITE SHIPMENTS

If a SQUWH self-transports waste, they must comply with Universal Waste transporter requirements.

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] **RMK:** *Veolia takes them to a permitted hazardous waste facility for consolidation prior to shipping to another destination facility for reclamation.* Yes ✔ No ☐ N/A
18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes ✔ No ☐ N/A
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes ✔ No ☐ N/A
20. If the universal waste shipped off-site is rejected by another handler or destination facility ... *[N/A]*
21. If a handler rejects a partial or full load from another handler... *[N/A]*
22. If the handler received a shipment of hazardous waste... *[N/A]*
23. If the handler received a shipment of nonhazardous, non-universal waste... *[N/A]*

EXPORTS

24. Is waste being sent to a foreign destination? If so: *[N/A]* Yes___ No ✔ N/A

LDR CHECKLIST

GENERAL REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] If so: Yes ✔ No ☐ N/A
   a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)] Yes ✔ No ☐ N/A
   b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes ✔ No ☐ N/A
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] Yes ✔ No ☐ N/A
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes ✔ No ☐ N/A
4. Does the generator generate a characteristic hazardous waste? If so: Yes ✔ No__ N/A
   a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] ***REMARK:*** *not required for D001 for CMBST* Yes__ No ☐ N/A ✔

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

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so: Yes ✔ No__ N/A
   a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] ***REMARK:*** *not required for D001 destined for CMBST* Yes__ No ☐ N/A ✔
6. Has the generator correctly determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)] Yes ✔ No ☐ N/A
7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] Yes ✔ No ☐ N/A
8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] Yes ☐ No ✔ N/A
9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes__ No ☐ N/A
10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] If so: *[N/A]* Yes__ No ✔ N/A

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

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? If so: *[N/A]* — Yes__ No ✔ N/A

NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated soil does not meet the treatment standards; does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)] — Yes ✔ No☐ N/A

14. If a generator's waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)] — Yes__ No☐ N/A ✔

15. If a generator's' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)] — Yes__ No☐ N/A ✔

16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)] — Yes ✔ No☐ N/A

17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so: *[N/A]* — Yes__ No ✔ N/A

18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)] — Yes ✔ No☐ N/A

GENERATORS TREATING HAZARDOUS WASTE *[N/A]*

HAZARDOUS DEBRIS *[N/A]*

TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS *[N/A]*