OhioEPA
State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

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www.epa.state.oh.us

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

Re: Riker products, Inc.
OHD005038153
Lucas County
Hazardous Waste
Notice of Violation/
Return to Compliance

July 27, 2009

Mr. Chad Lehmann
Safety & Environmental Manager
Riker Products, Inc.
4901 Stickney Avenue
Toledo, Ohio 43612

Dear Mr. Lehmann:

Thank you for accompanying me during Ohio EPA's July 15, 2009, compliance evaluation inspection of Riker Products, Inc. (RPI) located at 4901 Stickney Ave. in Toledo, Ohio. I inspected RPI 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). My inspection included observations of facility operations and a review of written documentation.

RPI manufactures mufflers, spark arrestors, stacks, pipes, tubing and elbows for vehicles. Processes include cutting, bending, welding and some painting of tubes. According to you, process refinements have resulted in approximately 94% reduction in hazardous waste generation.

RPI was operating as a small quantity generator at the time of my inspection. RPI generates the following wastes:

1. Paint Waste F003: Some parts are painted in either the manual or automatic spray booths. The spray guns, turbo disc and lines are flushed daily with xylene. The spent xylene is poured into a 55-gallon drum. This spent solvent is poured into a distillation unit on a regular basis. The reclaimed solvent is reused for flushing the painting equipment. The still bottoms are sent off-site as hazardous waste. Approximately two 55-gallon drums of this waste are generated per month. It is shipped by Cousins Waste Control Corp/PSC to Petro-Chem in Detroit, Michigan.

2. Paint Booth Filters: The filters are not hazardous waste. Once a week they are removed, placed into a 55-gallon drum and removed by Cousins Waste Control Corp/PSC.

3. Aerosol Can Waste D001: Cans of spray paint containing acetone, cyclohexane and dimethyl ether are punctured in the unit and the contents are drained into a 55-gallon drum. This is an extremely small quantity of waste and it may take years to fill the satellite accumulation drum.

4. Spent Solvent from Parts Washer: RPI operates one parts washer. The spent material from the unit is managed by Heritage, through a service agreement, and is part of its Continued Use program, so it is not a waste.

5. Spent Coolant: This non-hazardous waste is managed as an industrial waste and is removed by Cousins Waste Control Corp/PSC.

6. Universal Waste Lamps: RPI accumulates spent lamps and ships them to Environmental recycling in Bowling Green, Ohio.

As a result of my inspection, 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. **Satellite Accumulation Area Requirements**
   OAC Rule 3745-52-34(C)(1)(b)

   The generator must mark his satellite accumulation containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

   RPI failed to mark the following containers of spent solvent in the paint room with either the words "Hazardous Waste" or other words to describe the waste: one 55-gallon drum by the manual paint spray booth, one 55-gallon drum by the distillation unit, one 5-gallon pail by the distillation unit and one 55-gallon drum of still bottoms. RPI marked these containers during my inspection. **Therefore, this violation has been corrected.**

2. Universal Waste Labeling - Lamps
OAC Rule 3745-273-14(E)

Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste Lamps", "Waste Lamps" or "Used Lamps".

RPI did not properly label the containers of spent lamps with one of the required phrases. RPI marked these containers during my inspection. **Therefore, this violation has been corrected.**

During the inspection we discussed the concept of counting your hazardous waste. You should be counting the spent solvent when it is generated. I have enclosed copies of some correspondence from Ohio EPA which, along with other issues, indicates that the spent solvent you generate should be counted monthly as hazardous waste. RPI should still be operating as a small quantity generator.

Please be aware that incandescent, fluorescent, metal halide, neon, high-intensity discharge, high-pressure sodium and mercury-vapor lamps could be hazardous waste when discarded. Fluorescent lamps may contain up to 40 milligrams (mg) of mercury, depending on the brand and manufacturer. Lamps may also contain lead and cadmium. Many lamps exhibit a characteristic of toxicity for heavy metals when disposed. During the inspection, I gave you copies of the following documents, to assist you in properly managing your spent lamps: Fluorescent Lamps: What You Should Know and Computer, Fluorescent Lamp and Ballast Recyclers. I recommend that you review these documents carefully and contact me if you have any questions. The first document describes the rules you must follow in order to manage lamps as a universal waste.

You may be able to further 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 your treatment and disposal costs and you may possibly reduce your regulatory requirements. During the inspection, I gave you a copy of Pollution Prevention Opportunities, a worksheet that can help you recognize opportunities for reducing waste and conserving energy at your business. I also gave you a copy of the fact sheet Management of Electronic Waste from Businesses. Please review this information and contact me if you have any questions.

I encourage you to schedule a pollution prevention assessment for your business because there are often many opportunities for businesses like yours to reduce waste and save money.

If you wish to talk about an assessment or if you have other questions about pollution prevention, please feel free to contact the Office of Compliance Assistance and Pollution Prevention (OCAPP) at (614) 644-3469. There is no charge for an assessment.

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

If you have any questions, please feel free to contact me at (419) 373-3074. You can find copies of the rules and other information on the division's web page at http://www.epa.state.oh.us/dhwm. Ohio EPA also has helpful information about pollution prevention at the following web address: http://www.epa.state.oh.us/opp.

Sincerely,

Don North

Don North
District Representative
Division of Hazardous Waste Management

/llr

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
DHWM, NWDO, Lucas County, Riker Products File

ec: Don North, DHWM, NWDO

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

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

For Ohio EPA use only

E-mail this completed form to kristina.durnell@epa.state.oh.us
or mail it to Kristina Durnell, Central Office

Site EPA ID No. **Site Name** **Site Location Information** **Site Land Type** (check only one) **NAICS code(s)** www.census.gov/epcd/www/naics.html	EPA ID Number: **OHD005038153** Name: **Riker Products, Inc.** Website: **www.rikerprod.com** (Optional) Street Address: **4901 Stickney Ave.** City, Town, or Village: **Toledo** State: OH County Name: **Lucas** Zip Code: **43612** Private ☐ County ☐ District ☒ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other ☐
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: **Chad** MI: Last Name: **Lehmann** Phone Number: **419-729-1626** Phone Number Extension: E-Mail Address: **chad.lehmann@rikerprod.com** Fax Number: **419-729-3911** 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: Date Became Owner (mm/dd/yyyy): Owner Type: Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other ☐ Street or P.O. Box: City, Town or Village: Owner Phone #: State: Country: Zip Code: Name of Site's Operator: Date Became Operator (mm/dd/yyyy): Operator Type: Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other ☐ Street or P.O. Box: City, Town or Village: Operator Phone #: State: United States Zip Code:

VIOLATIONS CITED? ☒ Yes ☐ No

TYPE OF HANDLER– A MINIMUM OF ONE BOX MUST BE CHECKED

☐ Not a HW Generator	☐ UNKNOWN: Cited for violation of 3745-52-11	☐ Large Quantity Generator (LQG)
		☒ Small Quantity Generator (SQG)
		☐ Conditionally Exempt Small Quantity Generator
		☐ U.S. Importer of Hazardous Waste
		☐ Mixed Waste (Hazardous and Radioactive) Generator

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

- ☐ Recycler of Hazardous Waste
- ☐ Underground Injection Control Facility
- ☐ Hazardous Waste Transporter
- ☐ Treater, Storer or Disposer of Hazardous Waste
- ☐ Exempt Boiler and/or Industrial Furnace
  - ☐ Small Quantity On-Site Burner Exemption
  - ☐ Smelting, Melting, Refining Furnace Exemption

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY)

- ☒ Small Quantity Handler of Universal Waste
- ☐ Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)
- ☐ Destination Facility for Universal Waste

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. Oil
- ☐ Used Oil Fuel Marketer to Off-Specification Used Oil Burner

Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

F003

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	Other Comments:
Containers	☒ Yes	☐ No	

Name of Inspector(s) **Don North** Name of Inspector(s) _____ Date of Inspection/Time (mm/dd/yyyy) (hh:mm) **07/15/2009**

OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Owner, Operator, or an Authorized Representative _____ Name and Title (Print) _____ Date (mm/dd/yyyy) _____

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Riker Products, Inc. **Facility Type:** ☐LQG ☒SQG ☐CESQG ☐TSD **Date of Inspection:** 7-15-09 **EPA ID#:** OHD005038153

***Waste* Generated**				***On- or Off-Site Management***		**P2 Activities**	
	Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	**Waste Description** (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and **EPA Waste Code, if applic.**	**QTY Generated per Month, Type of** Accumulation (container, tank, etc) and location of waste accumulation area	**Type of On-Site Treatment** (recycle, wwt, etc)	**Name, state, and type of activity occurring at the off-site facility.**	**Current P2 Activities**	**P2 Opportunities**
1	Cleaning paint spray equipment	Solvent paint waste F003	100 gallons	spent solvent is distilled on-site	NA	Recycled	
2	Painting operations	Paint booth filters Non-hazardous	small amount	None	Cousins Waste Control Corp./PSC		
3	Painting	Aerosol can waste D001	extremely small amount	None	Satellite accumulation		
4	Cleaning parts	Spent solvent from parts washer Non-hazardous	16 gallons	None	Heritage Crystal Clean, LLC	Re-used	
5	Cutting and machining metal parts	Spent coolant	greater than 100 gallons	None	Cousins Waste Control Corp./PSC		
6							

7							
8							
9							

REMARKSBGENERAL INFORMATION

General Process Information:

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

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? ☐ Yes* ☐ No *If yes, refer promptly to your district P2 coordinator.
Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other:

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 ☒ 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 ☐
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 in excess of (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)]		Yes ☐ No ☒ N/A ☐
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 ☐ No ☒ N/A ☐
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 ☐ No ☐ N/A ☒
	b.	Tank that meets 3745-66-101?	Yes ☐ No ☐ N/A ☒
	c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes ☐ No ☐ N/A ☒
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes ☐ No ☐ N/A ☒
NOTE: Complete appropriate checklist for each unit.			
NOTE: If waste is treated to meet LDRs, use LDR checklist.			

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 ☒ No ☐ N/A ☐
10.	Are wastes reclaimed under a contractual agreement? If so: [3745-52-0(E)]		Yes ☐ No ☐ N/A ☒
	a.	Does the contractual agreement specify the type of waste and frequency of shipment?	Yes ☐ No ☐ N/A ☒
	b.	Is the transport vehicle owned and operated by the reclaimer?	Yes ☐ No ☐ N/A ☒

	c.	Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement?	Yes ☐ No ☐ N/A ☒
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 ☒ No ☐ N/A ☐
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be 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 ☒ No ☐ N/A ☐
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 ☐ 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 ☐
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 ☐ No ☐ N/A ☒
16.	Are signed copies of all manifests being retained for at least three years? [3745-52-40]		Yes ☒ No ☐ N/A ☐
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.			
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 nonsudden release of hazardous waste? [3745-65-31]		Yes ☒ No ☐ N/A ☐
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 ☒ No ☐ N/A ☐
	b.	Emergency communication device? [3745-65-32(B)]	Yes ☒ No ☐ N/A ☐

	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]?	Yes ☒ No ☐ N/A ☐
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes ☒ No ☐ N/A ☐
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 OAC 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)]		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)]	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)]	Yes ☐ No ☒ N/A ☐
30.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:		Yes ☒ No ☐ N/A ☐
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes ☒ No ☐ N/A ☐
	b.	Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.			
USE AND MANAGEMENT OF CONTAINERS			
31.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(D)(4)]		Yes ☒ No ☐ N/A ☐
32.	Is the accumulation date on each container? [3745-52-34(D)(4)]		Yes ☒ No ☐ N/A ☐

33.	Are hazardous wastes stored in containers which are:		
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes ☒ No ☐ N/A ☐
	b.	In good condition? [3745-66-71]	Yes ☒ No ☐ N/A ☐
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes ☒ No ☐ N/A ☐
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes ☒ No ☐ N/A ☐
NOTE: Record location on process summary sheets and photograph the area.			
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)]		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 ☒
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 ☒ No ☐ N/A ☐
39.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]		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 ☐

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

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

Safety Equipment Used:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]		Yes ☒ No ☐ N/A ☐
2.	Has the generator obtained a U.S. EPA 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 ☐
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 in excess of (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)]		Yes ☐ No ☒ N/A ☐
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 ☐ No ☒ N/A ☐
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 ☐ No ☐ N/A ☒
	b.	Tank that meets 3745-66-101?	Yes ☐ No ☐ N/A ☒
	c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes ☐ No ☐ N/A ☒
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes ☐ No ☐ N/A ☒
NOTE: Complete appropriate checklist for each unit.			
NOTE: If waste is treated to meet LDRs, use LDR checklist.			

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 ☒ No ☐ N/A ☐
10.	Are wastes reclaimed under a contractual agreement? If so: [3745-52-0(E)]		Yes ☐ No ☐ N/A ☒
	a.	Does the contractual agreement specify the type of waste and frequency of shipment?	Yes ☐ No ☐ N/A ☒
	b.	Is the transport vehicle owned and operated by the reclaimer?	Yes ☐ No ☐ N/A ☒

	c.	Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement?	Yes ☐ No ☐ N/A ☒
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 ☒ No ☐ N/A ☐
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be 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 ☒ No ☐ N/A ☐
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 ☐ 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 ☐
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 ☐ No ☐ N/A ☒
16.	Are signed copies of all manifests being retained for at least three years? [3745-52-40]		Yes ☒ No ☐ N/A ☐
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.			
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 nonsudden release of hazardous waste? [3745-65-31]		Yes ☒ No ☐ N/A ☐
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 ☒ No ☐ N/A ☐
	b.	Emergency communication device? [3745-65-32(B)]	Yes ☒ No ☐ N/A ☐

	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]?	Yes ☒ No ☐ N/A ☐
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes ☒ No ☐ N/A ☐
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 OAC 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)]		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)]	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)]	Yes ☐ No ☒ N/A ☐
30.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:		Yes ☒ No ☐ N/A ☐
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes ☒ No ☐ N/A ☐
	b.	Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.			
USE AND MANAGEMENT OF CONTAINERS			
31.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(D)(4)]		Yes ☒ No ☐ N/A ☐
32.	Is the accumulation date on each container? [3745-52-34(D)(4)]		Yes ☒ No ☐ N/A ☐

33.	Are hazardous wastes stored in containers which are:		
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes ☒ No ☐ N/A ☐
	b.	In good condition? [3745-66-71]	Yes ☒ No ☐ N/A ☐
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes ☒ No ☐ N/A ☐
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes ☒ No ☐ N/A ☐
NOTE: Record location on process summary sheets and photograph the area.			
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)]		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 ☒
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 ☒ No ☐ N/A ☐
39.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]		Yes ☒ No ☐ N/A ☐
40.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]		Yes ☒ No ☐ N/A ☐

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 ☐ No ☐ N/A ☒
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)]		Yes ☒ No ☐ N/A ☐
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).			
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 ☒ No ☐ N/A ☐
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 ☒ No ☐ N/A ☐
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,		Yes ☐ No ☒ N/A ☐
	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 ☐ No ☐ N/A ☒
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.			
6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]		Yes ☐ No ☐ N/A ☒
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 >10% TOC) D001 wastes or listed HWs.			
NOTE: Written documentation of this determination is not required.			
7.	Did the generator treat his HW /soil on-site to meet the LDR treatment standard?		Yes ☐ No ☐ N/A ☒
NOTE If "Yes" see question #16.			
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 ☒ No ☐ N/A ☐
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 ☐ No ☐ N/A ☒
10.	Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)]		Yes ☒ No ☐ N/A ☐
	a.	Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes ☒ No ☐ N/A ☐
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 ☒ No ☐ N/A ☐
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	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 ☒ No ☐ N/A ☐
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)].	Yes ☒ No ☐ N/A ☐

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 ☐ No ☐ N/A ☒
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 ☐ No ☐ N/A ☒
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 ☒ No ☐ N/A ☐
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 ☐ No ☒ N/A ☐
13.	Is the HW a metal-bearing HW?			Yes ☐ No ☒ N/A ☐
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 **one** of the following conditions apply. [3745-270-03(c)]		
		i.	Contains > 1% TOC?	Yes ☐ No ☐ N/A ☒
		ii.	Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes ☐ No ☐ N/A ☒
		iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes ☐ No ☐ N/A ☒
		iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes ☐ No ☐ N/A ☒
		v.	Co-generated with a HW that must be combusted?	Yes ☐ No ☐ N/A ☒
	b.	If all responses to 14 a.i. through 14 a.v. are ANo@, HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?		Yes ☐ No ☐ N/A ☒
15.	Was the HW treated by wastewater treatment?			Yes ☐ No ☒ N/A ☐
	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 ☐ No ☐ N/A ☒
NOTE: If Yes, HW is improperly being treated by dilution.				
	b.	Does the waste carry the D001 code <u>and</u> contain ≥10% TOC?		Yes ☐ No ☐ N/A ☒
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?		Yes ☐ No ☐ N/A ☒
NOTE: If the answers to b & c are Ayes@ and Ano@, 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 [3745-270-40(A)]?				Yes ☐ No ☒ N/A ☐
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?				Yes ☐ No ☐ N/A ☒
	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 ☐ No ☐ N/A ☒
	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 ☐ No ☐ N/A ☒
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 ☐ No ☐ N/A ☒
	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 ☐ No ☐ N/A ☒
	e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]			Yes ☐ No ☐ N/A ☒
	f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]			Yes ☐ No ☐ N/A ☒
NOTIFICATION FORM FOR GENERATOR TREATMENT					
17.	a.	Contains all information in #11 a-g above and			Yes ☐ No ☐ N/A ☒
	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 ☐ No ☐ N/A ☒
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:			
		i.	Send a one-time notification to the director?[3745-270- 09 (D)]		Yes ☐ No ☐ N/A ☒
		ii.	Maintain a copy of the notice onsite?[3745-270-09(D)]		Yes ☐ No ☐ N/A ☒
		iii.	Include in the notification: [3745-270-09(D)(1)(a)]		
			1.	Name & address of receiving landfill?	Yes ☐ No ☐ N/A ☒
			2.	Description of HW when generated?	Yes ☐ No ☐ N/A ☒
			3.	HW code when generated?	Yes ☐ No ☐ N/A ☒
			4.	Treatability group when generated?	Yes ☐ No ☐ N/A ☒
			5.	Underlying hazardous constituents present when generated?	Yes ☐ No ☐ N/A ☒
		iv.	Contain the certification statement as required by 3745-70-07(B)(4)?		Yes ☐ No ☐ N/A ☒