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State of Ohio Environmental Protection Agency
Northeast District Office

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

Corr.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

May 29, 2009

Ryan Carroll, President
Lake City Plating
1701 Lake Avenue
Ashtabula, Ohio 44004

RE: LAKE CITY PLATING, PLANT #1 – OHD 004 186 656, PLANT #2 – OHR 000 137 034, RCRA/LQG, ASHTABULA COUNTY, COMPLIANCE EVALUATION INSPECTION, NOTICE OF VIOLATION

Dear Mr. Carroll:

On April 16, 2009, Ohio EPA Division of Hazardous Waste Management (DHWM) conducted a compliance evaluation inspection at both Lake City Plating (LCP) Plants #1 and #2, located at 1701 and 1700 Lake Avenue respectively, in Ashtabula, Ohio. Both LCP facilities are electroplating operations and qualify as Large Quantity Generators (LQG) of hazardous waste. Hazardous waste generated at Plant #1 includes an electroplating wastewater treatment sludge (F006) and electroplating wastes (D002, D006, D007, D008). Plant #2 generates filter cartridges contaminated with solids filtered from a cyanide containing cadmium plating bath (F008, D006), and sludge generated from waste water treatment plant (F006).

The purpose of these inspections was to determine LCP's compliance with Ohio's hazardous waste laws and regulations as found under the Ohio Revised Code and Ohio Administrative Code ("ORC" and "OAC" respectively). LCP was represented by you and Jeff Drake the facility Systems Engineer, and while Ohio EPA was represented by me. Ohio EPA's inspections included an inspection of both LCP Plants #1 and #2 and a review of written documentation. Ohio EPA also documented portions of the inspections using digital photography. Violations for LCP Plant #1 and Plant #2 will be addressed separately in this Notice of Violation (NOV) letter. Violations observed at LCP Plant #1 will be cited first, while violations observed at LCP Plant #2 will be cited in a second section of this letter.

Based on this inspection, Ohio EPA has determined that **LCP Plant #1** has violated the following state hazardous waste regulations:

1. ***OAC Rule 3745-66-73(A) Management of containers:*** *A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.*

   At the time of this inspection, Ohio EPA observed one open fifty-five gallon container of hazardous waste described as "cleaner sludge solution" by LCP representatives. The container of waste was located in the area containing the F006 filter press and was approximately one-third full.

   To demonstrate abatement of this violation, LCP must submit to this office documentation in the form of a photograph demonstrating that the container of waste has either been closed or transferred to another container for shipment off-site. LCP must also submit a brief narrative regarding how the waste is generated and managed while on site.

2 ***OAC Rule 3745-52-34(A)(3) Labeling:*** *A generator may, for ninety days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit, provided that while being accumulated and/or treated on-site, each container and tank is labeled or marked clearly with the words "Hazardous Waste".*

At the time of this inspection, Ohio EPA observed one super-sack of F006 waste being accumulated in Plant #1's hazardous waste accumulation area, which was not labeled with the words *"Hazardous Waste".*

Upon being informed of this violation, LCP immediately placed a label containing the words "Hazardous Waste" on the container of F006 waste. Ohio EPA therefore considers this violation abated at the time of this inspection.

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

At the time of this inspection, Ohio EPA observed one super-sack of F006 waste being accumulated in Plant #1's hazardous waste accumulation area, which was not labeled with an accumulation start date.

Upon being informed of this violation, LCP immediately placed a label containing an accumulation start date on the container of F006 waste. Ohio EPA therefore considers this violation abated at the time of this inspection.

4. ***OAC Rule 3745-65-52(E) Content of contingency plan:***
(E) The contingency plan must include a list of all emergency equipment at the facility, including, but not limited to, [such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment], where this equipment is required. This list must be kept up to date. In addition, the contingency plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

The facility contingency plan does not include a list of the emergency equipment which includes the location and a physical description of each item on the list, and a brief outline of its capabilities.

To demonstrate abatement of this violation, LCP will update the contingency plan to include a list of the emergency equipment which lists the location and a physical description of each item on the list, including a brief outline of its capabilities. LCP will submit a copy of the revised pages to this office for review.

LCP will also send a copy of the revised pages of the contingency plan to all local police departments, fire departments, hospitals, and local emergency response teams that may be requested to provide emergency services. LCP must document that this has been done and submit said documentation to this office.

5. ***OAC Rule 3745-65-16(A), (C) and (D) Personnel training:***

(A) *(1) Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Chapters 3745-65 to 3745-69 and 3745-256 of the Administrative Code. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (D)(3) of this rule.*

(C) *Facility personnel must take part in an annual review of the initial training required in paragraph (A) of this rule.*

(D) *The owner or operator must maintain the following documents and records at the facility:*

(4) *Records that document that the training or job experience required under paragraph (A), (B), and (C) of this rule has been given to, and completed by, facility personnel.*

At the time of this inspection, LCP listed Ryan Carroll as an emergency coordinator in the facility contingency plan. Mr. Carroll also signs hazardous waste manifests. However LCP could not produce records demonstrating Ryan Carroll had received hazardous waste training relevant to his position as an emergency coordinator and signing the generator certification on hazardous waste manifests.

Furthermore, LCP could not produce training documentation from 2007, demonstrating that employees involved in the management of hazardous waste receive annual hazardous waste refresher training.

In addition, LCP is overdue in performing the annual hazardous waste refresher training for 2009. The last training event was performed on March 12, 2008.

To demonstrate compliance, LCP will submit to this office documentation that *all* employees involved with hazardous waste have received annual hazardous waste refresher training for the year 2009, and training in the facility contingency plan. Furthermore, LCP must amend the job titles and descriptions to include Ryan Carroll's position. The facility will submit to this office:

- A list of positions which involve the management of hazardous waste at the facility.
- A list of employees which fill the positions that manage hazardous waste at the facility.
- Documentation in the form of sign in sheets demonstrating employees filling those positions which manage hazardous waste have been trained in hazardous waste relative to their job position, and the facility contingency plan. Sign in sheets must be legible and include the position of each employee trained, the date the employee received said training, and the printed name and signature of the person performing the training.

6. ***OAC Rule 3745-52-41(A)(5) Annual Report:***

(A) A generator who ships any hazardous waste off-site must prepare and submit to Ohio EPA the "Annual Hazardous Waste Report" by March first of each year. The generator must prepare the "Annual Hazardous Waste Report" using Ohio EPA forms EPA9027, EPA9028, and EPA9029 provided by the director upon the request of the generator.

The "Annual Hazardous Waste Report" must cover generator activities during the previous year, and must include the following information:

(5) A description, EPA hazardous waste number (from rules 3745-51-20 To 3745-51-24 or 3745-51-30 to 3745-51-35 of the Administrative Code), U.S. DOT department of transportation hazard class, and quantity of each hazardous waste shipped off-site for shipments to a treatment, storage, or disposal facility. This information must be listed by U.S. EPA identification number of each such off-site facility to which waste was shipped.

At the time of the April 16, 2009 inspection, a review of LCP #1's shipping documentation reveals that LCP #1 has not been accurately reporting hazardous waste generated at the facility in its annual hazardous waste report. LCP #1 has been reporting all the hazardous waste generated on site as only one waste stream (F006, D002, D006, D007 & D008) being shipped to four different permitted facilities. This information does not match manifests reviewed during this inspection, or information supplied by the facility and observations made at the time of this inspection.

To demonstrate abatement of this violation, LCP must submit to Ohio EPA an accurate version of LCP #1's annual hazardous waste report which correctly identifies each separate waste stream including the correct waste code and quantity. LCP must contact MaryAnn Silagy at Ohio EPA's Information Services at (614) 644-2891, to coordinate with her regarding how to best correct your 2008 annual hazardous waste report and how to avoid making the same mistake in future annual reports. LCP must send a copy of the corrected report to this office.

Based on this inspection, Ohio EPA has determined that **LCP Plant #2** has violated the following state hazardous waste regulations:

1. ***OAC Rule 3745-66-73(A) Management of containers:*** *A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.*

At the time of this inspection, Ohio EPA observed the following open containers of hazardous waste at the LCP#2 facility:

A. One open super sack of F006 filter cake located next to the shipping dock and was approximately one-third full.

B. Two (2) open 30 gallon steel drums containing spent filter elements from the cadmium/cyanide plating bath (F008, D006). The open containers of hazardous waste were located in the waste water treatment area of LCP #2, adjacent to the cadmium plating line.

C. One open super sack of F006 filter cake located under the filter press. Information provided by the facility revealed the last pressing had occurred approximately one and a half days before Ohio EPA's inspection, yet the supersack had not been closed while not adding waste to the container.

Upon being informed of these violations, LCP immediately closed and properly containerized the open containers of hazardous waste. Ohio EPA therefore considers this violation abated at the time of this inspection.

2 ***OAC Rule 3745-52-34(A)(3) Labeling:*** *A generator may, for ninety days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit, provided that while being accumulated and/or treated on-site, each container and tank is labeled or marked clearly with the words "Hazardous Waste".*

A. The open super sack of F006 filter cake located next to the shipping dock cited in Violation #1A was not labeled with the words "Hazardous Waste".
B. The two (2) open 30 gallon steel drums containing spent filter elements from the cadmium/cyanide plating bath (F008, D006) cited in Violation #1B was not labeled with the words "Hazardous Waste".

Upon being informed of this violation, LCP immediately placed a label containing the words "Hazardous Waste" on the containers of hazardous waste. Ohio EPA therefore considers this violation abated at the time of this inspection.

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

A. The open super sack of F006 filter cake located next to the shipping dock cited in Violation #1A was not labeled with the words "Hazardous Waste".
B. The two (2) open 30 gallon steel drums containing spent filter elements from the cadmium/cyanide plating bath (F008, D006) cited in Violation #1B was not labeled with the words "Hazardous Waste".

Upon being informed of this violation, LCP immediately placed a label containing an accumulation start date on the containers of hazardous waste. Ohio EPA therefore considers this violation abated at the time of this inspection.

4. ***OAC Rule 3745-65-51 Purpose and implementation of contingency plan:***

(A) Each owner or operator shall have a contingency plan for the facility. The contingency plan shall be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

(B) The provisions of the contingency plan shall be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

At the time of the April 16, 2009 inspection, LCP did not have a separate contingency plan for LCP #2. The facility had been using the contingency plan for LCP #1 in conjunction with an evacuation plan for LCP #2. LCP #2 is a separate facility with different processes and hazardous wastes streams.

To demonstrate abatement of this violation, LCP must develop a separate contingency plan for LCP #2. The plan must be designed specifically for the management and response to spills, fires and explosions involving hazardous waste generated at LCP #2. Once finalized, LCP must send a copy of the plan to this office and the local police department, fire department, hospital, and local emergency response teams that may be requested to provide emergency services. LCP must document that this has been done and submit said documentation to this office.

5. ***OAC Rule 3745-65-16(A), (C) and (D) Personnel training:***

(A) (1) Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Chapters 3745-65 to 3745-69 and 3745-256 of the Administrative Code. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (D)(3) of this rule.

(C) Facility personnel must take part in an annual review of the initial training required in paragraph (A) of this rule.

(D) The owner or operator must maintain the following documents and records at the facility:

(4) Records that document that the training or job experience required under paragraph (A), (B), and (C) of this rule has been given to, and completed by, facility personnel.

During an inspection of LCP #2's shipping documentation, Ohio EPA noted Ryan Carroll had been signing hazardous waste manifests. However LCP could not produce records demonstrating Ryan Carroll had received hazardous waste training relevant to his position signing the generator certification on hazardous waste manifests.

Furthermore, LCP could not produce training documentation from 2007, demonstrating that employees involved in the management of hazardous waste at LCP #2 had received annual hazardous waste refresher training.

In addition, LCP #2 is overdue in performing the annual hazardous waste refresher training for 2009. The last hazardous waste refresher training was performed on March 12, 2008.

To demonstrate compliance, LCP will submit to this office documentation that *all* employees involved with hazardous waste management at LCP #2 have received annual hazardous waste refresher training for the year 2009, and training in the facility (LCP #2) contingency plan. Furthermore, LCP must amend the job titles and descriptions to include Ryan Carroll's position. The facility will submit to this office:

- A list of positions which involve the management of hazardous waste at the facility.
- A list of employees which fill the positions that manage hazardous waste at the facility.
- Documentation in the form of sign in sheets demonstrating employees filling those positions which manage hazardous waste have been trained in hazardous waste relative to their job position, and the facility contingency plan. Sign in sheets must be legible and include the position of each employee trained, the date the employee received said training, and the printed name and signature of the person performing the training.

Please note, LCP may perform the hazardous waste training for both facilities, LCP #1 and LCP #2, at the same time. However, it must be made clear in the training documentation, which plant the employee works in and has been trained for (including the contingency plan).

Ohio EPA has the following concerns which must be addressed:

1. LCP personnel inspect the hazardous waste accumulation areas and emergency equipment in both LCP #1 and LCP #2 on the same inspection log sheet and do not distinguish between the two facilities unless there is an issue. Ohio EPA strongly recommends using separate inspection log sheets for each of the two facilities and for each of the hazardous waste accumulation areas. This will eliminate confusion regarding which units have been inspected and help to facilitate the future closure of any of the hazardous waste accumulation areas in both plants. Ohio EPA discussed this issue with you at the time of the inspection.

   ☞ To address this concern, please submit to this office a brief discussion summarizing how LCP plans to resolve this issue. Example inspection log sheets can be found on Ohio EPA's website at: http://www.epa.state.oh.us/dhwm/formslistchklist.html

   If LCP would prefer an electronic version of the inspection log sheet in MSWord format, please contact me at my e-mail address below, so that I may forward it to you electronically:

   Suzanne.Prusnek@epa.state.oh.us

2. LCP #2 generates spent filter cartridges from its cadmium/cyanide plating bath. At the time of this inspection, the facility was managing the spent filters by placing them in the cyanide destruct tank of the onsite Waste Water Treatment Unit (WWTU) prior to shipping them off site in the F006 filter cake super sacks. Ohio EPA has determined that these spent filter cartridges meet the listing for an F008 listed waste and, based upon statements from LCP representatives, would be characteristically hazardous for cadmium (D006) based upon generator knowledge. Ohio EPA recommends the filter cartridges be managed as a separate waste stream and manifested as an F008, D006 waste stream with its own Land Disposal Restriction (LDR) form.

   Because an F008 waste is listed for toxicity, the spent filter cartridges would remain an F008 listed waste whether placed in the cyanide destruct tank or not, due to the "Derived from Rule". Treating the filter cartridges from the cadmium/cyanide plating bath may also be contributing to LCP #2's difficulty in meeting the cadmium discharge limits set forth in the facility discharge permit by the local sewer district.

   Ohio EPA discussed this issue with you at the time of this inspection and provided you with Ohio EPA's April 2008 guidance document on the Mixture/Derived from Rule.

   ☞ Please submit to this office a brief discussion regarding the how LCP #2 will be managing the spent filter cartridges from the cadmium/cyanide plating bath.

3. At the time of this inspection, Ohio EPA observed LCP #2 had at least six (6) super sacks of F006 filter cake located in different areas of the facility, five of which were being accumulated in the same area as the process chemicals. Ohio EPA recommends LCP #2 distinguish **one area** as the accumulation area for the management of containers of hazardous waste once they have been filled and dated (this does not include the filter press area, which is also an accumulation area). Not only will this make inspections easier, it will also ensure that the facility will be able to discern between a spill of process chemicals and a spill of hazardous waste, and respond appropriately.

LCP #2 should include this area in the contingency plan as a hazardous waste accumulation area. Ohio EPA reminds the facility they must maintain aisle space in the hazardous waste accumulation area in order to facilitate the use of emergency equipment in the case of an emergency involving hazardous waste.

- Ohio EPA discussed this with you at the time of this inspection. Please submit to this office a brief discussion regarding how LCP plans to address this issue and manage the containers of hazardous waste in LCP #2.

Enclosed you will find copies of the checklists completed at the time of the inspection. Please submit all of the requested documentation to my attention within thirty (30) days of receipt of this letter demonstrating that all issues have been addressed.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (*i.e.* source reduction). For those wastes and pollutants that are generated, the second is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets or U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92/088), please contact the Ohio EPA Pollution Prevention Section at (614) 644-3469.

The Division of Hazardous Waste Management 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

Failure to list specific deficiencies in this communication does not relieve LCP from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve LCP from liability for any past or present violations of the state's hazardous waste laws.

Should you have any questions, please feel free to call me at (330) 963-1181.

Sincerely,

Suzanne Prusnek
Environmental Specialist
Division of Hazardous Waste Management

SP:ddw

Enclosures

cc: Natalie Oryshkewych, DHWM, NEDO, OEPA
MaryAnn Silagy, DHWM, CO, OEPA
ec: Frank Popotnik, DHWM, NEDO, OEPA
Harry Sarvis, DHWM, CO, OEPA

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.	EPA ID Number: **OHR000137034**
Site Name	Name: **Lake City Plating Plant 2** Website: (Optional)
Site Location Information	Street Address: **1700 Lake Avenue** City, Town, or Village: **Ashtabula** State: OH County Name: **Ashtabula** Zip Code: **44004**
Site Land Type (check only one)	Private ☒ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other ☐
NAICS code(s) www.census.gov/epcd/www/naics.html	**332813**
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: **Ryan** MI: **J** Last Name: **Carroll** Phone Number: **4404870487** Phone Number Extension: E-Mail Address: **ryan@lakecityplating.com** 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: **Lake City Real Estate** Date Became Owner (mm/dd/yyyy): **08/08/2005** Owner Type: Private ☒ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other ☐ Street or P.O. Box: **1701 Lake Avenue** City, Town or Village: **Ashtabula** Owner Phone #: **4404870487** State: **OH** Country: **USA** Zip Code: Name of Site's Operator: **Lake City Plating** Date Became Operator (mm/dd/yyyy): **08/08/2005** Operator Type: Private ☒ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other ☐ Street or P.O. Box: **Same as owner** City, Town or Village: Operator Phone #: **4404870487** 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.

D006 F006 F008

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: **Jeff Drake, Systems Engineer**
Tanks	☐ Yes	☒ No	Other Comments:
Containers	☒ Yes	☐ No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Suzanne Prusnek OEPA/DHWM/NEDO		**4/16/2009 9 am**

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) _____

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used: Safety glasses + steel toed boots

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11] see NOV regarding spent cad/cn filters		Yes ☑*	No ☐	N/A ☐
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]		Yes ☑	No ☐	N/A ☐
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]		Yes ☑	No ☐	N/A ☐
4.	Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)]		Yes ☑	No ☐	N/A ☐
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]		Yes ☑	No ☐	N/A ☐
6.	Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]		Yes ☐	No ☑	N/A ☐
7.	Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)]		Yes ☐	No ☑	N/A ☐
8.	Does the generator accumulate hazardous waste?		Yes ☑	No ☐	N/A ☐
NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.					
9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)?		Yes ☐	No ☑	N/A ☐
NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G) & (H).					
10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]				
	a.	Container that meets 3745-66-70 to 3745-66-77?	Yes ☐	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 waste is treated to meet LDRs, use LDR checklist.					
11.	Does the generator export hazardous waste? If so:		Yes ☐	No ☑	N/A ☐
	a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes ☐	No ☐	N/A ☑
	b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes ☐	No ☐	N/A ☑
	c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes ☐	No ☐	N/A ☑
	d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes ☐	No ☐	N/A ☑

	e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes ☐ No ☐ N/A ☑
MANIFEST REQUIREMENTS			
12.		Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes ☑ No ☐ N/A ☐
13.		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 completed. [3745-52-20(A)(1)]			
14.		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 alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].			
15.		If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes ☐ No ☐ N/A ☑
16.		Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)]	Yes ☐ No ☐ N/A ☑
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.			
17.		If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes ☐ No ☐ N/A ☑
18.		If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes ☐ No ☐ N/A ☑
19.		Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes ☑ No ☐ N/A ☐
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.			
PERSONNEL TRAINING			
20.		Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes ☑ No ☐ N/A ☐
21.		Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)]	Yes ☑ No ☐ N/A ☐ Ryan Carroll needs to be trained
22.		Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes ☑ No ☐ N/A ☐
23.		Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes ☑ No ☐ N/A ☐
24.		Does the generator provide annual refresher training to employees? [3745-65-16(C)] 2009 is late + no docs for 2007	Yes ☐ No ☑ N/A ☐
25.		Does the generator keep records and documentation of:	
	a.	Job titles? [3745-65-16D(1)]	Yes ☑ No ☐ N/A ☐

	b.	Job descriptions? [3745-65-16D(2)]	Yes ☑	No ☐	N/A ☐
	c.	Type and amount of training given to each person? [3745-65-16D(3)]	Yes ☑	No ☐	N/A ☐
	d.	Completed training or job experience required? [3745-65-16D(4)]	Yes ☐	No ☑	N/A ☐
26.		Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes ☑	No ☐	N/A ☐

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

Job Performed	Name of Employee	Date Trained

CONTINGENCY PLAN

27.		Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Need for Plant #2 specifically	Yes ☐	No ☑	N/A ☐
28.		Does the plan describe the following: SEE NOV letter			
	a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes ☐	No ☐	N/A ☑
	b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes ☐	No ☐	N/A ☑
	c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes ☐	No ☐	N/A ☑
	d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes ☐	No ☐	N/A ☑
	e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes ☑	No ☐	N/A ☐

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

29.		Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] No Plan for #2	Yes ☐	No ☐	N/A ☑
30.		Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes ☐	No ☐	N/A ☑
31.		Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes ☑	No ☐	N/A ☐

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

EMERGENCY PROCEDURES

32.		Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes ☐	No ☐	N/A ☑
	a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes ☐	No ☐	N/A ☑

	b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes ☐	No ☐	N/A ☑
	c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)?	Yes ☐	No ☐	N/A ☑
NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.					
PREPAREDNESS AND PREVENTION					
33.		Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes ☑	No ☐	N/A ☐
34.		Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:			
	a.	Internal communications or alarm system? [3745-65-32(A)]	Yes ☑	No ☐	N/A ☐
	b.	Emergency communication device? [3745-65-32(B)]	Yes ☑	No ☐	N/A ☐
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes ☑	No ☐	N/A ☐
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes ☑	No ☐	N/A ☐
NOTE: Verify that the equipment is listed in the contingency plan.					
35.		Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes ☑	No ☐	N/A ☐
36.		Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Need to separate #1 from #2	Yes ☑	No ☐	N/A ☐
37.		Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes ☑	No ☐	N/A ☐
38.		If there is only one employee on the premises, is there immediate access to a device (eg.,phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes ☑	No ☐	N/A ☐
39.		Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes ☑	No ☐	N/A ☐
40.		Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes ☑	No ☐	N/A ☐
41.		Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes ☐	No ☐	N/A ☑
SATELLITE ACCUMULATION AREA REQUIREMENTS					
42.		Does the generator ensure that satellite accumulation area(s):			
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes ☐	No ☐	N/A ☑
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes ☐	No ☐	N/A ☑
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes ☐	No ☐	N/A ☑
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes ☐	No ☐	N/A ☑
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes ☐	No ☐	N/A ☑
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes ☐	No ☐	N/A ☑

43.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:		Yes ☐ No ☐ N/A ☑
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes ☐ No ☐ N/A ☑
	b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded?[3745-52-34(C)(2)]	Yes ☐ No ☐ N/A ☑

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

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

44.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]		Yes ☐ No ☑ N/A ☐
45.	Is the accumulation date on each container? [3745-52-34(A)(2)]		Yes ☐ No ☑ N/A ☐
46.	Are hazardous wastes stored in containers which are:		
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes ☐ No ☑ N/A ☐
	b.	In good condition? [3745-66-71]	Yes ☑ No ☐ N/A ☐
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes ☑ No ☐ N/A ☐
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes ☑ No ☐ N/A ☐

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

47.	Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days.		Yes ☑ No ☐ N/A ☐
	a.	Are inspections recorded in a log or summary? [3745-66-74] Need to separate #1 from #2	Yes ☑ No ☐ N/A ☐
48.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]		Yes ☑ No ☐ N/A ☐
49.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]		Yes ☐ No ☐ N/A ☑
50.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]		Yes ☐ No ☐ N/A ☑
51.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]		Yes ☐ No ☐ N/A ☑

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

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

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

PRE-TRANSPORT REQUIREMENTS				
53.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes ☑	No ☐	N/A ☐
54.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes ☑	No ☐	N/A ☐
55.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes ☑	No ☐	N/A ☐

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) using gen. knowledge	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 ☑