

**Environmental
Protection Agency**

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

Re: Tiffin Foundry and Machine, Inc.
Hazardous Waste
Complaint # 3170
OH0000076513
Seneca County
NOV/PRTC/Request for Information

October 11, 2012

Mr. Jay Salamone, Owner
Mr. Steven Sobol, Owner
Tiffin Foundry and Machine, Inc.
423 West Adams Street
Tiffin, Ohio 44883

Dear Mr. Salamone and Mr. Sobol:

On August 29, 2012, I conducted a hazardous waste compliance inspection (CEI) at Tiffin Foundry and Machine, Inc. (Tiffin Foundry) located at 423 West Adams Street, Tiffin, Ohio. I inspected Tiffin Foundry to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC), and Ohio's hazardous waste regulations as adopted under Chapter 3745. of the Ohio Administrative Code (OAC). Tiffin Foundry was represented by Steven Sobol and Jay Salamone. Ohio EPA was represented by the writer. This inspection was a follow-up to the complaint investigation I conducted on June 26, 2012. The inspection included a tour of facility operations and a review of facility paperwork. This letter will explain the violations I found and a request for additional information.

Tiffin Foundry is a foundry which provides castings for die casts and a machine shop. Tiffin Foundry is a conditionally exempt small quantity generator of hazardous waste (CESQG). Hazardous waste generated at the facility is hydrochloric acid (HCL) (D002, D007, D008). Tiffin Foundry had a one-time removal of all HCL waste in the fall of 2010. At this time, Tiffin Foundry became an episodic large quantity generator of hazardous waste (the facility has since only been a CESQG). During the CEI on August 29, 2012, you stated that HCL would now only be utilized intermittently when absolutely necessary (if requested by the customer or if the casting is plugged). The goosenecks would not routinely be cleaned and thus Tiffin Foundry estimates in the future that they will be generating even less HCL waste. Other wastes include used oil, fluorescent bulbs and caustic soda ash. Tiffin Foundry also generates non-hazardous spent foundry sand which is picked up by Kurtz Brothers Inc. and utilized in soil blending and concrete production under an application for beneficial re-use.

I issued a Notice of Violation/Partial Return to Compliance letter (NOV/PRTC) on July 23, 2012, to Tiffin Foundry based on my June 26, 2012, complaint investigation. In this letter I cited

1) Treatment, Storage or disposal of a hazardous waste – ORC Section 3734.02 (E) & (F).
Tiffin Foundry has since provided documentation which refutes this violation as listed below:

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- A. Mr. Sobol provided inventory receipts (including a spread sheet) on August 14, 2012, which documents the amount of HCL waste purchased from 2007 through 2012.
 - B. Based on our phone conversations on August 1, 2012, and my CEI on August 29, 2012, you all stated that in October of 2010, Tiffin Foundry decided to discontinue the use of HCL as a cleaner for goosenecks. Tiffin Foundry would then be utilizing caustic soda ash to clean the goosenecks. At this time, you decided to ship off all product HCL acid. Thus on November 1, 2010, Tiffin Foundry had a one-time cleanout and thus a shipment of all HCL waste (a total of 10 drums).
 - C. The facility then experimented with the use of caustic soda ash as a cleaner and only recently began utilizing HCL again as the caustic soda ash was proven to not be effective. The facility did not generate any HCL waste until August of 2012 (after they began to use HCL again).
- ***Thus Ohio EPA is rescinding this violation as cited in the July 23, 2012, NOV/PRTC.***

The Request for Information section from the July 23, 2012, NOV/PRTC was satisfied as follows:

- I. On 8-29-12, you provided the Material Safety Data Sheet (MSDS) for your waste caustic soda.
- II. On 8-29-12, you stated that the HCL waste is manifested for lead (D008) since some castings may contain lead and manifested for chromium (D007) as you add chromium as an alloy in your mixing.
- III. On 8-14-12 and 8-29-12 you provided information (inventory-receipts, spread sheet) which documents your generation rate as a CESQG.
- IV. N/A - See violation below.
- V. On 8-29-12, you provided the MSDS for your zinc alloy.

August 29, 2012, CEI

Tiffin Foundry decided in October of 2010 to remove all product HCL since the facility was switching to caustic soda ash for cleaning. At this time, ten drums (550 gallons) of HCL waste (D002, D007, D008) was generated and thus subsequently picked up by Chemtron Corporation (Chemtron) on November 1, 2010. Thus Tiffin Foundry became an episodic (one-time) large quantity generator (LQG) for the month of October 2010 and would have to follow all applicable LQG requirements in that month, and as long as the hazardous waste remained on-site. Tiffin Foundry did not comply with the following LQG requirements until the waste left the facility on November 1, 2010.

Therefore, based on the August 29, 2012, CEI I found the following violations of Ohio's hazardous waste laws. ***These violations are historical and are considered abated as of August 29, 2012:***

1. Personnel Training – OAC Rule 3745-65-16(A)(1)

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2. Contingency Plan – OAC Rule 3745-65-51(A)
3. Emergency Coordinator - OAC Rule 3745-65-55
4. Emergency Equipment testing – OAC Rule 3745-65-33
5. Emergency Equipment inspections recorded in a log – OAC Rule 3745-65-33
6. Familiarize emergency authorities – OAC Rule 3745-65-37(A)
7. Container storage inspections – OAC Rule 3745-66-74
8. Container storage inspections recorded in a log – OAC Rule 3745-66-74

- Since October of 2010, Tiffin Foundry has been operating as a CESQG. ***Since Tiffin Foundry immediately returned to being a CESQG, and has since been a CESQG, these violations are abated.*** Please reference the information provided to you with the July 23, 2012, letter (Generator Handbook) as well as the fact sheet on episodic hazardous waste generation I provided to you via email on September 20, 2012, to ensure compliance in the future.

Tiffin Foundry does remain in violation of the following violation of Ohio's hazardous waste laws. You need to immediately take the necessary measures to return to compliance with Ohio's environmental laws. **Within 14 days of receipt of this letter**, you are requested to provide documentation to this office including the steps taken to abate the outstanding violation cited below. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to amber.hicks@epa.ohio.gov.

**9. Failed to submit an annual report.
OAC Rule 3745-52-41**

LQGs that ship hazardous waste off-site must prepare and submit to Ohio EPA an Annual Report by March first of each year.

Tiffin Foundry failed to submit an annual report for their hazardous waste activities for 2010 to Ohio EPA by March 1, 2011. Though this violation is historical in nature, Tiffin Foundry must still comply with this requirement.

- To abate this violation, please submit your 2010 Annual Report to Ohio EPA upon receipt of this letter. Below is the link to Ohio EPA's web page for Annual Reports which will include directions for submitting an annual report (including where to submit) and the form which must be completed.
<http://www.epa.ohio.gov/dmwm/Home/HWAnnualReportProgram.aspx>
- If you need any assistance in completing and/or submitting this form, please contact Mary Ann Silagy, Division of Materials and Waste Management, Central Office, Columbus, OH at (614) 644-2891 or maryann.silagy@epa.ohio.gov. *Once you have completed and submitted this form, please submit documentation to me verifying your submittal.*

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Please be advised that the violation cited above will continue until the violation has been properly abated. Failure to comply with Chapter 3734. of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, Tiffin Foundry is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

Request for Information

- I. On September 26, 2012, I emailed Mr. Sobol pertaining to the waste evaluation/characterization of the waste caustic soda which you previously utilized at your facility. Based on the MSDS provided during the August 29, 2012, CEI, this material is a liquid with a pH greater than 14 (which would make this a hazardous waste – D002 – upon disposal). However, based on information I reviewed during the June 26, 2012, complaint investigation and information provided by Mr. Sobol on August 14, 2012, it appears this waste was characterized and managed as a non-hazardous waste in the past (you have stated on several occasions that the facility will no longer be utilizing caustic soda).

Please provide the following additional information within **14 days of receipt of this letter**:

- Chemtron has two profiles for caustic soda ash – one is Soda Ash IPH (granular) and the other is Sodium Carbonate & Zinc Liquid/Sludge. What is the difference in these two waste streams? How are they both generated? Are they both managed as non-hazardous?
- Please explain the process of utilizing the caustic soda. Do you use a liquid form of caustic soda (as indicated by the MSDS provided to me) and then this material becomes a solid? Do you add water or anything to the caustic soda in the cleaning process you used to perform? If so at what ratio? Is the waste a liquid or solid upon disposal? Have you conducted a pH test on this waste prior to disposal? From the pictures I have from my June 26, 2012, complaint investigation the caustic soda material appears to be both liquid (within the drum) and some parts of it are solid (granular) along the inside/outside of the drum.
- In a 7-16-12, email to me, Mr. Salomone stated that two drums of used soda ash were to be picked up by Chemtron. However, they were not listed on the 8-2-12, manifest. Did Chemtron pick up this material or it is still on-site?
- If the waste HCL acid was characterized as D007 and D008 due to the fact that castings that were cleaned may contain lead and some of the alloys you mix may contain chromium, why was the caustic soda ash likewise not characterized as a D007 and D008 hazardous waste since it was used to clean the same thing (the goosenecks) as the HCL?

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Based on this information submitted, I will notify you of your compliance with Ohio's hazardous waste laws in another letter.

Although you stated that you will only utilize the HCL acid intermittently, it still may be worthwhile to inquire to the Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) as they may be able to assist you in finding an alternative for this material. In addition, as discussed during the August 29, 2012, CEI, OCAPP provides a pollution prevention assessment which may be beneficial for other parts of your operations as well. If you would like a free, non-regulatory on-site pollution prevention assessment or if you would like more information about pollution prevention, including a possible alternative to HCL, please contact me at (419) 373-3082 or Ron Nabors with OCAPP. OCAPP also provides regulatory assistance to small businesses. Mr. Nabors' contact information is (419) 373-3147 and ron.nabors@epa.state.oh.us. Ohio EPA has helpful information about this at the following web address: <http://www.epa.ohio.gov/ocapp/>. If you find ways to recycle, reduce, or altogether eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs. Furthermore, you may possibly reduce your regulatory requirements.

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

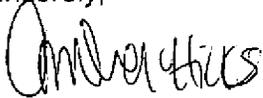
The Division of Materials and Waste Management (DMWM) has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information at the following Web link http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage. Please feel free to share this information with your colleagues.

Enclosed you will find a copy of the checklists that I completed during the inspection. Please address all correspondence to Amber Hicks, Ohio EPA, 347 N. Dunbridge Road, Bowling Green, Ohio 43402. Should you have any questions, please feel free to call me at (419) 373-3082 or email me at amber.hicks@epa.ohio.gov.

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You can find copies of the rules and other information on the division's web page at
<http://www.epa.ohio.gov/dmwm.aspx>.

Sincerely,



Amber M. Hicks
Division of Materials and Waste Management

//lr

pc: Cindy Lohrbach, DMWM, NWDO
Colleen Weaver, DMWM, NWDO

ec: Amber Hicks, DMWM, NWDO
Colleen Weaver, DMWM, NWDO

NOTICE:

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

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

Site EPA ID No.	EPA ID Number: OH0000076513	
Site Name	Name: Tiffin Foundry and Machine, Inc.	Website: (Optional)
Site Location Information	Street Address: 423 W. Adams	
Site Land Type (check only one)	City, Town, or Village: Tiffin	State: OH
NAICS code(s) www.census.gov/epcd/www/naics.html	County Name: Seneca	Zip Code: 44883
	Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	
	333511	

Facility Representative	First Name: Jay	MI:	Last Name: Salamone
Additional names can be recorded in number 12.	Title: Owner		
Only provide address information if it is different than the site address	Phone Number: 440-984-1664		Phone Number Extension:
	E-Mail Address: jay@tiffinfoundry.com		
	Fax Number: 419-447-7969		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 <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>		
	Street or P.O. Box:			
	City, Town or Village:		Owner Phone #:	
	State:		Country:	Zip Code:
	Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):	
	Operator Type:	Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>		
	Street or P.O. Box:			
	City, Town or Village:		Operator Phone #:	
	State:		Country:	Zip Code:

VIOLATIONS CITED?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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TYPE OF HANDLER - MARK "X" AS APPROPRIATE		
<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input checked="" type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). <i>Check the box for the applicable generator status and provide a comment.</i>	<input type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator <input type="checkbox"/> U.S. Importer of Hazardous Waste <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)	
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Hazardous Waste Transfer Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility
<input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Receives Hazardous Waste from Off-site

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY))	
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES	
<input type="checkbox"/> Batteries	
<input type="checkbox"/> Pesticides	
<input type="checkbox"/> Mercury containing equipment	
<input checked="" type="checkbox"/> Lamps	

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))	
<input checked="" type="checkbox"/> Used Oil Generator	
<input type="checkbox"/> Used Oil Transporter	
<input type="checkbox"/> Used Oil Transfer Facility	
<input type="checkbox"/> Used Oil Processor	
<input type="checkbox"/> Used Oil Re-refiner	
<input type="checkbox"/> Off-Specification Used Oil Burner	
<input type="checkbox"/> Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil	
<input type="checkbox"/> Used Oil Fuel Marketer who first claims the Used Oil meets the specifications	

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

<input type="checkbox"/> College or University	
<input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university	
<input type="checkbox"/> Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university	

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

D002 D007 D008

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

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:	Steven Sobol, Owner; steven@tiffinfoundry.com
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Amber Hicks		8/29/2012 11:00

Comments:
 Facility is routinely a CESQG. Facility had a product clean-out of HCL waste (October 2010) and in that month became an episodic LQG (one-time event). Facility returned to being a CESQG the next month and has been a CESQG since.

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Tiffin Foundry Facility Type: LQG SQG CESQG TSD Date of Inspection: 8-29-12 EPA ID#: OH0000076513

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 of die castings	HCL waste	~10-12 gallons		Chemtron Corporation - Avon, OH - stored, bulked, transferred off-site.		Facility is currently trying to decrease their usage of this material by only utilizing if absolutely necessary. Facility has experimented with other products in the past, but to no avail. Facility may be interested in OCAPP assistance in finding a replacement for HCL.
2	Cleaning of die castings.	Waste caustic soda ash - facility manages as a non-hazardous waste.	Facility is no longer utilizing this material.		Chemtron Corporation - Avon, OH - stored, bulked, transferred off-site.	Facility tried this product as a replacement for utilizing HCL but this material was not effective so facility has currently discontinued use of this material.	
3	Machine maintenance	Used oil	~1-1.5 drums/year		Chemtron Corporation - Avon, OH - stored, bulked, transferred off-site.	Recycled.	
4	Sand casting/molds for metal casting	Spent foundry sand - non-hazardous	~250 tons/year		Kurtz Brothers - Independence, OH	Beneficial re-use - sand is soil blended and used in concrete	

					production.	
5	Lighting	Fluorescent Lamps	Several per year.		Environmental Recycling - Bowling Green, OH.	Recycled.
6	Cleaning of die castings	HCL waste	10 drums/550 gallons/one time cleanout.		Chemtron Corporation - Avon, OH - stored, bulked, transferred off-site.	
7						
8						
9						

REMARKS GENERAL INFORMATION

General Process Information:

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information:

This facility may be interested in assistance for replacement of HCL.

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:

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

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
 LQG: ≥ 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:

WASTE EVALUATION

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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GENERATOR CLASSIFICATION

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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TREATMENT OF HAZARDOUS WASTE

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

NOTE: Complete appropriate checklist for each unit.

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

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

MIX HAZARDOUS WASTE WITH USED OIL

5.	Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

