



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

Eval 001

Enf. 001

RTZ'd 6 violations

November 13, 2012

Mr. Randy Hill, SDI Operations Manager  
Crown Solutions  
945 South Brown School Road  
Vandalia, Ohio 45377

**RE: CROWN SOLUTIONS (OHR000029561)**

Dear Mr. Hill:

Thank you for accompanying me during Ohio EPA's October 5, 2012, inspection of Crown Solutions in Vandalia, Ohio. Crown Solutions is listed as a recycler of hazardous waste and was inspected 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). Our inspection included a review of company operations and written documentation. I found the following violations of Ohio's hazardous waste laws:

1. **OAC 3745-65-15 (B)(1)(2), General Inspection Requirements:** (1) The owner or operator must develop and follow a written schedule for inspecting all monitoring equipment, safety, and emergency equipment, security devices and operating and structural equipment that are important to preventing, detecting or responding to environmental or human health hazards; (2) The owner or operator must keep this schedule at the facility.

Crown Solutions did not have a written inspection plan as required by this rule. In emails dated October 29, 2012, and November 5, 2012, Crown Solutions submitted updated work instructions for the recycling process and a picture of the additional recycling vessel installed. These updates will allow Crown Solutions to put all the material directly into the recycling process upon arrival at the facility and not be stored on-site under the 72 hour recycling rule. **Based on this information, Crown Solutions is no longer required to comply with this rule.**

2. **OAC 3745-65-15 (D), General Inspection Requirements:** The owner or operator must record inspections in a log or summary. He must keep these records for at least three years.

Crown Solutions did not have an inspection log as required by this rule. In emails dated October 29, 2012, and November 5, 2012, Crown Solutions submitted updated work instructions for the recycling process and a picture of the additional recycling vessel installed. These updates will allow Crown Solutions to put all the material directly into the recycling process upon arrival at the facility and not be stored on-site under the 72 hour recycling rule. **Based on this information, Crown Solutions is no longer required to comply with this rule.**

3. **OAC 3745-65-16(C), Personnel Training:** Facility personnel must take part in an annual review of the initial training required in paragraph (A) of this rule.

Crown Solutions is not conducting annual refresher training as required by this rule. In emails dated October 29, 2012, and November 5, 2012, Crown Solutions submitted updated work instructions for the recycling process and a picture of the additional recycling vessel installed. These updates will allow Crown Solutions to put all the material directly into the recycling process upon arrival at the facility and not be stored on-site under the 72 hour recycling rule. **Based on this information Crown Solutions is no longer required to comply with this rule.**

4. **OAC 3745-66-42, Cost Estimate for Closure:** The owner or operator must have a detailed written estimate, in current dollars, of the cost of closing the facility.

Crown Solutions did not have a written estimate for closure of the facility as required by this rule. In emails dated October 29, 2012, and November 5, 2012, Crown Solutions submitted updated work instructions for the recycling process and a picture of the additional recycling vessel installed. These updates will allow Crown Solutions to put all the material directly into the recycling process upon arrival at the facility and not be stored on-site under the 72 hour recycling rule. **Based on this information, Crown Solutions is no longer required to comply with this rule.**

5. **OAC 3745-66-43, Financial Assurance for Facility Closure:** An owner or operator of each facility must establish financial assurance for closure of the facility.

Crown Solutions did not have financial assurance for closure of facility as required by this rule. In emails dated October 29, 2012, and November 5, 2012, Crown Solutions submitted updated work instructions for the recycling process and a picture of the additional recycling vessel installed. These updates will allow Crown Solutions to put all the material directly into the recycling process upon arrival at the facility and not be stored on-site under the 72 hour recycling rule. **Based on this information, Crown Solutions is no longer required to comply with this rule.**

6. **OAC 3745-66-47, Liability Requirements:** An owner or operator of a hazardous waste treatment, storage, or disposal facility must demonstrate financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operation of the facility.

Crown Solutions did not have the required liability as required by this rule. In emails dated October 29, 2012, and November 5, 2012, Crown Solutions submitted updated work instructions for the recycling process and a picture of the additional recycling vessel installed. These updates will allow Crown Solutions to put all the material directly into the recycling process upon arrival at the facility and not be stored on-site under the 72 hour recycling rule. **Based on this information, Crown Solutions is no longer required to comply with this rule.**

Enclosed is a copy of the checklist that we completed as a result of the inspection. You can find Ohio's hazardous waste rules and other information on the division's webpage at: <http://www.epa.ohio.gov/dhwm/>.

Should you have any questions, please feel free to call me at (937) 285-6070.

Sincerely,



Jeff Smith  
District Representative  
Division of Materials and Waste Management

Enclosure

ec: George Strobel, DMWM, SWDO  
Robyn Winstead, DMWM, SWDO

JS\bp

**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

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

For Ohio EPA use only

Completed verification forms required to be submitted to CO should be e-mailed to [brad.hauser@epa.state.oh.us](mailto:brad.hauser@epa.state.oh.us).

<b>Site EPA ID No.</b> <b>Site Name</b>	EPA ID Number: <b>OHR000029561</b>		Website: (Optional)					
	Name: <b>Crown Solutions</b>							
<b>Site Location Information</b>	Street Address: <b>945 S. Brown School Road</b>							
	City, Town, or Village: <b>Vandalia</b>		State: <b>OH</b>					
<b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	Private	County	District	Federal	Indian	Municipal	State	Other
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Facility Representative</b>  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: <b>Randy</b>		MI:	Last Name: <b>Hill</b>	
	Title: <b>SDI Operations Manager</b>				
	Phone Number: <b>937-665-1509</b>		Phone Number Extension:		
	E-Mail Address: <b>randy.hill@veoliawater.com</b>				
	Fax Number: <b>937-684-9983</b>		Fax Number Extension:		
	Street or P.O. Box:				
City, Town or Village:		State:		Zip Code:	

<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: <b>Crown Solutions</b>		Date Became Owner (mm/dd/yyyy): <b>4/1/2005</b>						
	Owner Type:	Private	County	District	Federal	Indian	Municipal	State	Other
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Street or P.O. Box: <b>945 S. Brown School Road</b>				Owner Phone #: <b>1-800-875-4075</b>				
	City, Town or Village: <b>Vandalia</b>				Country: <b>USA</b> Zip Code: <b>45377</b>				
	State: <b>Ohio</b>		Name of Site's Operator: <b>Crown Solutions</b>		Date Became Operator (mm/dd/yyyy): <b>4/1/2005</b>				
	Operator Type:	Private	County	District	Federal	Indian	Municipal	State	Other
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Street or P.O. Box: <b>945 S. Brown School Road</b>				Operator Phone #: <b>1-800875-4075</b>					
City, Town or Village: <b>Vandalia</b>				Country: <b>USA</b> Zip Code: <b>45377</b>					
State: <b>Ohio</b>									

<b>VIOLATIONS CITED?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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**TYPE OF HANDLER - MARK "X" AS APPROPRIATE**

<input checked="" type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
	<input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.	<input type="checkbox"/> Small Quantity Generator (SQG)
		<input 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 checked="" type="checkbox"/> Recycler of Hazardous Waste         | <input type="checkbox"/> Underground Injection Control Facility            |
| <input type="checkbox"/> 72-Hour Recycler                               | <input checked="" type="checkbox"/> Receives Hazardous Waste from Off-site |

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

- |   |   |
|---|---|
| <input type="checkbox"/> Small Quantity Handler of Universal Waste                                    | <input type="checkbox"/> Destination Facility for Universal Waste |
| <input type="checkbox"/> Large Quantity Handler of Universal Waste<br>(accumulates 5,000 kg. or more) |   |

**CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES**

- Batteries  
 Pesticides  
 Mercury containing equipment  
 Lamps

**USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))**

- Used Oil Generator  
 Used Oil Transporter  
 Used Oil Transfer Facility  
 Used Oil Processor  
 Used Oil Re-refiner  
 Off-Specification Used Oil Burner  
 Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil  
 Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

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

- College or University  
 Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university  
 Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

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

**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:      **Mitch Brown**  
Tanks               Yes     No  
Containers         Yes     No

Name of Inspector(s)

Jeff Smith

Name of Inspector(s)

Date of Inspection/Time

(mm/dd/yyyy) (hh:mm)

10/5/2012

**Comments:**

## 72-HOUR RECYCLE MATERIALS STORAGE REQUIREMENTS

**NOTE 1:** This inspection checklist applies to owners and operators of facilities that store recyclable materials pursuant to OAC rule 3745-51-06(C)(3) without a hazardous waste permit for up to 72 hours before the materials are entered into a recycling process(es).

**NOTE 2:** The terms "recyclable materials" and "hazardous waste" are used interchangeably in this checklist.

### ACCUMULATION TIME

1.	Is recyclable material entered into a recycling process within 72 hours after arrival at the facility? [3745-51-06(C)(1)]&[ORC§3734.02(E)&(F)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
2.	Does the operator/owner (o/o) of the facility maintain an inventory log for 3 years in the operating recording containing the following: [3745-51-06(C)(3)(a)(xiii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Date and time when the recyclable material arrived at the facility?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Quantity of the material received?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Name and address of the facility where the recyclable material shipment originated?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Date and time that the recyclable material was placed into the recycling process?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

### NOTIFICATION REQUIREMENTS

3.	In accordance with 3745-65-11, did the o/o comply with the notification and U.S. EPA I.D. number requirements? [3745-51-06(C)(3)(a)(i)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Was a description of the recycling process included in the comment section of the notification form?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Did the o/o Renotify Ohio EPA when there is a change in the recycling process or when the recycling operations cease?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

**NOTE:** Once the o/o of a 72-hour facility submitted a Notification Form to CO, the Notification Coordinator in CO will forward a copy of the form to DO. If there is no Notification Form in the file for a 72-hour facility, the inspector can contact the Notification Coordinator to see if such a form has been submitted.

### CONTAINER/TANK/CONTAINMENT BUILDING REQUIREMENTS

4.	Does the o/o store the recyclable material in a container(s) which is: [3745-51-06(C)(3)(a)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Closed (except when adding/removing recyclable), as required by 3745-66-73(A)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	In good condition, as required by 3745-66-71?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Compatible with recyclable material stored in it, as required by 3745-66-72?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Handled in a manner which prevents rupture/leakage, as required by 3745-66-73(B)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
e.	Inspected at least weekly, as required by 3745-66-74?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
f.	Located at least 50 feet from the facility's property line when containing ignitable or reactive recyclable material, as required by 3745-66-76?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
g.	Stored separately from each other by means of a dike, berm, wall or other device when containing incompatible recyclable materials, as required by 3745-66-77?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

**NOTE:** "Week" means 7 consecutive days per ORC§1.44(A).

5.	Does the o/o store the recyclable material in a tank(s) which meets 3745-66-90 to 3745-66-96, 3745-66-98, 3745-66-99 and 3745-66-97(A)&(B)? [3745-51-06(C)(3)(a)(iii)] (see LQG Tank Inspection Checklist)	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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6.	Does the o/o store the recyclable material in a containment building(s) that meets 3745-256-100 to 3745-256-102? [3745-51-06(C)(3)(a)(iv)] (see Containment Building Inspection Checklist)		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
<b>SECURITY REQUIREMENTS</b>						
7.	Are security requirements exempt under 3745-65-14(A) because:		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	
	a.	Physical contact with the recyclable material, structures, or equipment will not injure livestock or unknowing or unauthorized persons which may enter the active portion of the facility?; and	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
	b.	Disturbance of the waste or equipment, by the unknowing or unauthorized entry of persons or livestock, will not cause a violation of the requirements of OAC 3745-65 to 3745-69 and 3745-256?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
<i>NOTE: If the answer to either item 7.a or 7.b is "no", the facility is subject to security requirements.</i>						
8.	Does the o/o comply with the security provisions of 3745-65-14(B) by having the following devices? [3745-51-06(C)(3)(a)(v)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	
	a.	A 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility; or	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	
	b.	i.	An artificial or natural barrier which completely surrounds the active portion of the facility; and	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
		ii.	A means to control entry, at all times, through gates or other entrances, to the active portion of the facility.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
9.	In accordance with 3745-65-14(C), does the o/o have signs (legible from a distance of 25 ft) reading "Danger – Unauthorized Personnel Keep Out" posted at each entrance to the active portion of the facility? [3745-51-06(C)(3)(a)(v)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
<i>NOTE: Existing signs with a legend other than "Danger – Unauthorized Personnel Keep Out" maybe used if the legend on the sign indicating only authorized personnel are allowed to enter the active portion, and entry onto the active portion can be dangerous.</i>						
<b>INSPECTION REQUIREMENTS</b>						
10.	Has the o/o developed and followed a written schedule, as required by 3745-65-15(B)? If so, does the schedule: [3745-51-06(C)(3)(a)(vi)]		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	
	a.	Identify the types of problems which are to be looked for during the inspection?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	
	b.	Include the frequency of inspection based on the rate of deterioration of the equipment and the probability of an environmental or human health incident if the deterioration or malfunction or any operator error goes undetected between inspections?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	
11.	Does the o/o keep the inspection schedule at the facility, as required by 3745-65-15(B)(2)? [3745-51-06(C)(3)(a)(vi)]		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	
12.	In accordance with 3745-65-15(C), does the o/o remedy any deterioration or malfunction of equipment or structures based on a schedule ensuring that the problem does not lead to an environmental or human health hazard? [3745-51-06(C)(3)(a)(vi)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
13.	Does the o/o record inspections in an inspection log or summary and keep these records for at least 3 years from the date of inspection, as required by 3745-65-15(D)? [3745-51-06(C)(3)(a)(vi)]		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	
<b>PERSONNEL TRAINING</b>						
14.	Does the o/o have a training program which teaches facility personnel recyclable material management procedures (including contingency plan implementation) relevant to their positions, as required by 3745-65-16(A)(2)? [3745-51-06(C)(3)(a)(vii)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	
15.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving recyclable material by familiarizing them with emergency		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	

	procedures, emergency equipment and emergency systems (where applicable), as required by 3745-65-16(A)(3)? [3745-51-06(C)(3)(a)(vii)]	
<p><i>NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]</i></p>		
16.	Is the personnel training program directed by a person trained in hazardous waste management procedures, as required by 3745-65-16(A)(2)? [3745-51-06(C)(3)(a)(vii)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
17.	Do new employees receive training within six months after the date of hire (or assignment to a new position), as required by 3745-65-16(B)? [3745-51-06(C)(3)(a)(vii)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Does the o/o provide annual refresher training to employees, as required by 3745-65-16(C)? [3745-51-06(C)(3)(a)(vii)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
19.	Does the o/o keep records and documentation of the following items, as required by 3745-65-16(D)? [3745-51-06(C)(3)(a)(vii)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Job titles?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Job descriptions?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Type and amount of training given to each person?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Completed training or job experience required?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
20.	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, as required by 3745-65-16(E)? [3745-51-06(C)(3)(a)(vii)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTES REQUIREMENTS</b>		
21.	If the o/o places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-51-06(C)(3)(a)(viii)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
22.	If the o/o places a recyclable material in an unwashed container that previously held an incompatible material, is it done in accordance with 3745-65-17(B)? [3745-51-06(C)(3)(a)(viii)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>PREPAREDNESS AND PREVENTION REQUIREMENTS</b>		
23.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of recyclable material, as required by 3745-65-31? [3745-51-06(C)(3)(a)(ix)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.	Does the o/o have the following equipment at the facility, if it is required due to actual hazards associated with the recyclable material: [3745-51-06(C)(3)(a)(ix)]	
a.	Internal communications or alarm system, as required by 3745-65-32(A)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Emergency communication device, as required by 3745-65-32(B)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Portable fire control, spill control and decon equipment, as required by 3745-65-32(C)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Water of adequate volume/pressure per documentation or facility rep, as required by 3745-65-32(D)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
25.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency, as required by 3745-65-33? [3745-51-06(C)(3)(a)(ix)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
26.	Are emergency equipment tests (inspections) recorded in a log or summary, as required by 3745-65-33? [3745-51-06(C)(3)(a)(ix)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

27.	As required by 3745-65-34(A), do personnel have immediate access to an internal alarm or emergency communication device when handling recyclable material (unless the device is not required under 3745-65-32)? [3745-51-06(C)(3)(a)(ix)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
28.	As required by 3745-65-34(B), if there is only one employee on the premises, is there immediate access to a device (e.g., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-51-06(C)(3)(a)(ix)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment, as required by 3745-65-35? [3745-51-06(C)(3)(a)(ix)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
30.	Has the o/o attempted to familiarize emergency authorities with possible hazards and facility layouts, as required by 3745-65-37(A)? [3745-51-06(C)(3)(a)(ix)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
31.	Where authorities have declined to enter into arrangements or agreements, has the o/o documented such a refusal, as required by 3745-65-37(B)? [3745-51-06(C)(3)(a)(ix)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

**CONTINGENCY PLAN AND EMERGENCY PROCEDURES REQUIREMENTS**

32.	Does the o/o have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of recyclable material, as required by 3745-65-51(A)? [3745-51-06(C)(3)(a)(x)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
33.	Does the plan describe the following: [3745-51-06(C)(3)(a)(x)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Actions to be taken in response to fires, explosions or any unplanned release of recyclable material, as required by 3745-65-52(A)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Arrangements with emergency authorities, as required by 3745-65-52(C)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator, as required by 3745-65-52(D)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities, as required by 3745-62-52(E)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary, as required by 3745-65-52(F)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate recyclable material management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]*

34.	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, as required by 3745-65-53(A)&(B)? [3745-51-06(C)(3)(a)(x)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
35.	Has the o/o revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan, as required by 3745-65-54? [3745-51-06(C)(3)(a)(x)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
36.	Is an emergency coordinator available at all times (on-site or on-call), as required by 3745-65-55? [3745-51-06(C)(3)(a)(x)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*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 recyclable material(s) 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.*

<b>MANIFEST SYSTEM REQUIREMENTS</b>		
37.	When the facility receives recyclable material accompanied by a manifest, does the o/o do the following, as required by 3745-65-71(A): [3745-51-06(C)(3)(a)(xi)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Sign and date, by hand, each copy of the manifest?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Note any significant discrepancies?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Immediately give one copy of the manifest to the transporter and send one copy to the generator within 30 days?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Retain a copy of the manifest at the facility for at least 3 years?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>NOTE: If shipping papers are used in lieu of manifest, the requirements in question 37 have to be met.</b>		
38.	Has the o/o rejected any recyclable material load or identified a container residue that exceeds the quantity limits for "empty" containers? If so, did the o/o do the following: [3745-51-06(C)(3)(a)(xi)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Consult with the generator prior to forwarding the rejected material to an alternate facility, as required by 3745-65-72(D)(1)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Send the rejected material to an alternate facility or return the rejected material to the generator within 60 days after the rejection, as required by 3745-65-72(D)(1)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	In accordance with 3745-65-72(D)(2), while the o/o is making arrangements for forwarding rejected material to another facility, did the o/o ensure that either the delivering transporter retained custody of the material or did the o/o provide for secure, temporary custody of the material?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Prepare a manifest in accordance with 3745-65-72(E)(1) through (7) for rejected material to be sent to an alternate facility?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
e.	Prepare a manifest in accordance with rules 3745-65-72(F)(1) through (7) for rejected material to be sent back to the generator?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
39.	If the o/o has accepted any unmanifested hazardous waste from off-site sources, has an unmanifested material report containing all the information required by 3745-65-76(A) been submitted to the director within 15 days? [3745-51-06(C)(3)(a)(xvi)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>OPERATING RECORD REQUIREMENTS</b>		
40.	Does the o/o maintain an Operating Record which contains the following information at the facility: [3745-51-06(C)(3)(a)(xii)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Records and results of required waste analysis, as required by 3745-65-73(B)(3)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Summary reports and details of all incidents that required implementation of the contingency plan, as required by 3745-65-73(B)(4)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Records and results of required inspections, as required by 3745-65-73(B)(5)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Monitoring, testing, or analytical data, and corrective action where required, from groundwater monitoring and required monitoring of surface impoundments, landfills, waste piles and land treatment units, as required by 3745-65-73(B)(6)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
e.	All closure estimates and all post-closure estimates (if applicable), as required by 3745-65-73(B)(7)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>ANNUAL REPORT REQUIREMENTS</b>		
41.	Is the o/o complying with annual report requirements set forth in 3745-65-75? [3745-51-06(C)(3)(a)(xv)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
42.	Is the o/o complying with the additional report requirements set forth in 3745-65-77? [3745-51-06(C)(3)(a)(xvii)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

<b>CLOSURE REQUIREMENTS</b>			
43.	If the o/o has closed the facility, has the o/o done the following: [3745-51-06(C)(3)(a)(xviii)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Conducted the closure in accordance with the closure performance standard of 3745-66-11(A)&(B)?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Decontaminated and/or properly disposed of all contaminated equipment, structures and soils, as required by 3745-66-14?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>FINANCIAL ASSURANCE REQUIREMENTS</b>			
44.	Has the following financial assurance documents approved by Ohio EPA prior to storing any material? [3745-51-06(C)(3)(a)(xix)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Cost estimate for facility closure in accordance with 3745-66-42? (Estimate only - adequacy will be evaluated by CO financial assurance personnel)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
b.	Financial assurance documentation that meets the requirements of 3745-66-43?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
c.	Liability coverage documentation that meets the requirements of 3745-66-47?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>ADVANCED NOTICE OF ANTICIPATED NONCOMPLIANCE REQUIREMENTS</b>			
45.	Does the o/o give advance notice to the director of any anticipated noncompliance with the 72-hr time limit for storage that contain the following: [3745-51-06(C)(3)(a)(xx)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Cause of the anticipated noncompliance?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Name, address and telephone number of the o/o?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Name, address and telephone number of the facility?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Date and time of the anticipated noncompliance?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
e.	Name and quantity of material(s) involved?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
f.	Estimated time frame for noncompliance?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>AVAILABILITY, RETENTION AND DISPOSITION OF RECORDS REQUIREMENTS</b>			
46.	As required by 3745-65-74, are records, including plans, made available at all reasonable times for inspection? [3745-51-06(C)(3)(a)(xiv)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: Records and plans include inspection records, training records, contingency plan, manifests, operating records, inventory log, annual reports, and financial assurance documents, etc.</i>			