



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468  
www.epa.state.oh.us

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

**RE: Unarco Material  
Handling, Inc.  
OHD 987 044 807  
Putnam County  
DHWM, NWDO  
Complaint 2635  
Notice of Violation**

January 30, 2008

Mr. Greg Christy  
General Manager  
Unarco Material Handling, Inc.  
407 East Washington Street  
Pandora, OH 45877

Dear Mr. Christy:

Thank you for accompanying Amy Heller and me during the Ohio Environmental Protection Agency's (Ohio EPA's) January 9, 2008, inspection of Unarco Material Handling, Inc.'s (UMHI's) facility located in Pandora, Ohio. We inspected UMHI 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). During the inspection, we also helped you identify ways to prevent pollution by reducing waste.

This letter will explain the violations we found, what you need to do to correct the violations, other general concerns we have, what you need to do to respond to our general concerns, and the pollution prevention opportunities we identified.

UMHI was inspected as a small quantity generator (SQG) of hazardous waste that manufactures and paints steel storage racks. However, UMHI may be a large quantity generator (LQG) of hazardous waste depending on the results of the additional waste evaluations that are required. The hazardous waste stream at UMHI includes paint related wastes from painting and flushing the paint lines (D001).

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We found the following violations of Ohio's hazardous waste laws. In order to correct these violations you must do the following and send me the required information *within 30 days of your receipt of this letter*:

**Violations:**

1. **Ohio Revised Code (ORC) Section 3734.02(E)&(F), Unpermitted Hazardous Waste Treatment, Storage & Disposal:** "No person shall store, treat, or dispose of hazardous waste identified or listed under this chapter and rules adopted under it, regardless of whether generated on or off the premises where the waste is stored, treated, or disposed of, or transport or cause to be transported any hazardous waste identified or listed under this chapter and rules adopted under it to any other premises, except at or to any of the following: (1) A hazardous waste facility operating under a permit issued in accordance with this chapter; (2) A facility in another state operating under a license or permit issued in accordance with the "Resource Conservation and Recovery Act of 1976" 90 Stat. 2806, 42 U.S.C.A. 6921, as amended ..."

During the inspection, it was noted by Ohio EPA that a period of greater than 180 days was found between hazardous waste shipments according to the dates on the hazardous waste manifests. This period was from May 18, 2005, through January 9, 2006. UMHI stated that they would check to see if any other hazardous waste manifests exist for the period in question. On January 10, 2008, you sent an electronic mail that stated no other hazardous waste manifests were found at the facility and that Chemtron Corporation did not have any other manifests in their files either.

According to the manifests on site, 16 55-gallon drums (880 gallons) of hazardous waste (D001) were generated between January 19, 2005 and May 18, 2005. Then, 27 55-gallon drums (1485 gallons) were generated between May 18, 2005, and January 9, 2006. During this span of time, UMHI appears to have been a SQG since the average number of drums generated per month is approximately 3.5 55-gallon drums. This means that approximately 6.5 drums of waste were stored for 56 days past the 180 day limit.

**UMHI has become an unpermitted hazardous waste storage facility by storing hazardous waste at the property for greater than 180 days.**

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**UMHI must immediately cease unpermitted storage of its hazardous waste.**

UMHI must do the following:

- UMHI must immediately begin properly shipping hazardous waste off site within 180 days of the accumulation start date.
- UMHI must create a management plan that describes how their hazardous waste will be managed in the future to ensure storage of waste over 180 days does not happen again. This management plan should include, but is not limited to, the type of container the waste will be stored in, where the waste will be stored at the facility, how the container will be labeled, where UMHI will send the hazardous waste, and how often the hazardous waste will be picked up. This management plan must be sent to Ohio EPA ***within 30 days of receipt of this letter.***

Since UMHI has violated ORC Section 3734.02(E) & (F) by becoming an unpermitted treatment, storage, and disposal facility (TSDF), it is subject to OAC Rules 3745-55-10 through 3745-55-48 and 3745-55-97. Therefore, UMHI may be required to submit a closure plan. A closure plan describes the steps necessary to investigate the extent of contamination and to clean up all contamination found.

UMHI is also subject to all applicable general facility standards, found in OAC Chapters 3745-54 and 55, until such time as UMHI has demonstrated that it has ceased operations as a TSDF. Additionally, at any time, Ohio EPA may assert its right to have UMHI begin facility-wide cleanup, pursuant to the Corrective Action process under Ohio law.

I have enclosed the fact sheet titled A Guide to the Administrative Enforcement Process within the Division of Hazardous Waste Management to help answer any questions you may have regarding this violation and further enforcement actions.

2. **OAC Rule 3745-52-11, Hazardous Waste Determination:** "Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste..."

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UMHI failed to evaluate the following waste streams to determine if they were a hazardous waste in accordance with OAC Rule 3745-52-11, prior to sending them off site:

- A. waste paint filters,
- B. paint related wastes from painting and flushing the lines, and
- C. spent bulbs.

In order to abate this violation, UMHI must do the following:

- UMHI must evaluate the following waste streams for the specified parameters:
  - A. Waste paint filters-A representative sample of the waste paint filters should be taken before they are placed into the oven. If the waste paint filters can be considered a liquid as defined in OAC Rule 3745-51-21, then the flashpoint of the material must be evaluated. Also, the waste paint filters should be evaluated for toxic characteristic leaching procedure (TCLP) volatile organic compounds (VOCs) and TCLP Resource Conservation and Recovery Act (RCRA) metals.
  - B. Paint related wastes from painting and flushing the lines- During the inspection, one of the hazardous waste documents listed this waste stream as having the F003 waste code. This is a listed hazardous waste code. Due to the lack of details listed on the material safety data sheets for the paint and solvent used at the facility, more information is needed from the manufactures to determine if the F003 waste code is valid. UMHI should contact the manufactures of the solvent and paint used at the facility to determine the ingredient lists and the percentage of the ingredients used.

Also, one of the hazardous waste manifests listed this waste stream as having the D001 (ignitability) D007 (chromium) and D008 (lead) characteristic waste codes. However, UMHI has not verified that these are valid waste codes for

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this waste stream. This waste stream should be sampled for TCLP VOCs , TCLP RCRA metals, and flash point to determine if these codes are valid. Based on our January 30, 2008 phone conversation, a sample of this waste stream should be taken at the production paint line and also at the drive in paint line.

- C. Spent bulbs-UMHI did not know how they disposed of the spent bulbs during the inspection. However, in a January 11, 2008, electronic mail, you stated that they are thrown in the trash to be disposed of at the landfill.

UMHI failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility.

UMHI must immediately cease disposing of the fluorescent bulbs as non-hazardous waste until a proper waste evaluation has been completed. Fluorescent bulbs typically contain mercury and other heavy metals which could make them a hazardous waste. Hazardous waste bulbs are considered "spent materials" and remain hazardous waste even when recycled. Hazardous waste lamp generators have the option of handling their lamps as hazardous waste or as universal waste. Managing hazardous waste lamps under the universal waste rules eases certain regulations imposed on generators of spent lamps.

UMHI must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If UMHI decides to sample the bulbs, then UMHI must evaluate all types and brands of lamps at the facility using a TCLP test for RCRA metals. The other alternative is that UMHI can begin to manage spent bulbs as universal waste. Ohio EPA recommends that spent bulbs be managed as a universal waste and recycled.

I have included the following fact sheets on spent bulbs for your information: Universal Waste Rules for Handlers of Lamps, dated June 2005; Fluorescent Lamps: What You Should Know, dated January 2007; and Computer,

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Fluorescent Lamp and Ballast Recyclers, dated December 2007.

If UMHI decides to manage their bulbs as a hazardous waste, then UMHI will need to sample each type and brand of bulb at the facility and submit the analytical results to Ohio EPA. Otherwise, UMHI should submit a bulb management plan that outlines how the spent bulbs will be managed as universal waste and where they will be shipped.

- UMHI must immediately begin evaluating all new waste streams prior to sending them off site.
- UMHI must submit a management plan that states how UMHI will evaluate new waste streams in the future. This should be submitted to Ohio EPA **within 30 days of receipt of this letter**. To assist with this task, I have enclosed the following fact sheets titled Identifying Your Hazardous Waste, dated November 2006 and Use of Generator Knowledge In Complying with OAC Rule 3745-52-11, Hazardous Waste Evaluation dated July 18, 2005.

Due to the cost of TCLP testing, UMHI may instead decide to complete total VOCs and total RCRA metals testing as a screening tool. However, if any of the analytical results from the total VOCs or total RCRA metals tests indicate that the waste stream does contain VOCs or RCRA metals, then a TCLP test will be required for that parameter to determine compliance with the hazardous waste rules and regulations. The analytical results from these tests should be sent to Ohio EPA **within 30 days of receipt of this letter**.

Please contact me five days prior to sampling so that I or another Ohio EPA representative can be present during sampling.

3. OAC Rule 3745-65-34(A), Access to communications or alarm systems: "Whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation shall have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, unless such a device is not required under rule 3745-65-32 of the Administrative Code."

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UMHI failed to have a device, such as a telephone or a hand-held two-way radio immediately available at the scene of the hazardous waste container storage area.

To abate this violation, UMHI must install a telephone or provide a hand-held radio communication device for summoning emergency assistance in the hazardous waste management area. UMHI should submit photographic documentation to Ohio EPA that a device has been provided **within 30 days of receipt of this letter.**

4. **OAC Rule 3745-52-34(C)(1)(b), Accumulation time of hazardous waste:** "A generator may accumulate as much as fifty-five gallons of hazardous waste or one quart of acutely hazardous waste listed in paragraph (E) of rule 3745-51-33 of the Administrative Code in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit and without complying with paragraph (A) of this rule provided he...mark his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers..."

UMHI failed to mark one 55 gallon drum containing paint waste in two of the satellite areas with the words "Hazardous Waste" or with other words that identify the contents of the containers.

In order to abate this violation, UMHI must do the following:

- UMHI must immediately begin properly labeling the containers in the satellite areas.
- UMHI must submit a management plan that states how UMHI will ensure that the containers in the satellite area will be properly labeled from this day forward.
- UMHI must also submit photographic documentation that these containers have been properly labeled. This information should be submitted to Ohio EPA **within 30 days of receipt of this letter.**

5. **OAC Rule 3745-52-34(D)(4), Accumulation time of hazardous waste:** A generator may accumulate hazardous waste that is generated on site, provided that "the date upon which each period of accumulation and/or treatment begins is clearly marked and visible for inspection on each.

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container and while being accumulated and/or treated on-site, each container and tank is labeled or marked clearly with the words "Hazardous Waste"..."

UMHI failed to properly label one drum in the container storage area (CSA) with the words "Hazardous Waste." Additionally, all six drums in the CSA did not have an accumulation start date on them.

In order to abate this violation, UMHI must do the following:

- UMHI must immediately begin to label all drums in the CSA with the words "Hazardous Waste" and the accumulation start date for each drum.
- UMHI must submit a management plan that states how UMHI will ensure that the containers in the CSA will be properly labeled from this day forward.
- UMHI must also submit photographic documentation that all containers in the CSA have been properly labeled with the words "Hazardous Waste" and the accumulation start date for each drum. This information must be submitted to Ohio EPA **within 30 days of receipt of this letter.**

6. **OAC Rule 3745-66-74: Inspections:** "The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The owner or operator must record inspections in an inspection log or summary."

UMHI failed to inspect the less than 180 day hazardous waste storage area and to record the inspections in an inspection log or summary.

In order to abate this violation, UMHI must do the following:

- UMHI must immediately begin inspecting the storage areas every seven days.
- UMHI must also write a management plan outlining how UMHI will ensure that inspections are completed every seven days. This plan must be submitted to Ohio EPA along with copies of four weeks of inspection logs for the storage areas.

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It should be noted that Ohio EPA defines "weekly" as "every seven days" and not a calendar week. This means that if UMHI plans on conducting the weekly inspection on Wednesdays, then every Wednesday an inspection of the CSA should be conducted and not a day later. If UMHI will be shut down for any amount of time that includes a Wednesday, then someone will need to come in to conduct an inspection on the Wednesdays during shutdown. The only exception would be the following scenario:

Assuming Monday through Friday work weeks, if UMHI will be shutdown Wednesday the 23rd through Sunday the 27<sup>th</sup> of this month, then an inspection would need to be conducted on Tuesday the 22<sup>nd</sup>. Seven days from that day would be Tuesday the 29<sup>th</sup>, so an inspection would need to be conducted on the 29<sup>th</sup>. Then to resume the Wednesday inspection schedule, an inspection should also be completed on the 30<sup>th</sup>. Please call me if you have any questions regarding this rule and inspection schedules.

*I have enclosed an example of an inspection log for your convenience. You may use the one I have enclosed or create an inspection log of your own that includes all information included in the cited rule.*

**General Concerns:**

- A. **Emergency Equipment Inspections:** OAC Rule 3745-65-33 states "All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency. The owner or operator must record the inspections in a log or summary."

During the inspection, Ohio EPA did not determine if UMHI was completing emergency equipment inspections and tracking these inspections in a log book in accordance with OAC Rule 3745-65-33. Ohio EPA did note that the fire extinguishers in the CSA area had been recently inspected, but no other equipment was checked during the inspection.

UMHI must submit information that includes the following: if these inspections are being conducted, how often these inspections are being conducted, what equipment is being included in these inspections, and how the inspections are tracked. If UMHI is completing these inspections,

UMHI should also submit a copy of the most recent inspection log. If UMHI is visually completing these inspections but does not track them in a log book, UMHI should describe this process as well. Please submit this information to Ohio EPA **within 30 days of receipt of this letter.**

- B. Episodic Generator Status:** During the inspection, Ohio EPA determined that UMHI is an episodic generator. This means that UMHI's hazardous waste generation fluctuates between two generator categories. In this case, UMHI fluctuates between an SQG and an LQG. According to the hazardous waste manifests, UMHI appears to have been an LQG during the time periods of January 2006 through November 2006 and September 2007 through November 2007. Due to the fact that UMHI was an episodic generator over the past three years, UMHI must be able to produce records that the additional LQG rules and regulations were followed while they were an LQG. Two of the additional requirements for LQGs are yearly personnel training and the maintenance of a contingency plan. These are discussed in more depth in the next two general concerns.

Please note that in the future if UMHI becomes an episodic LQG in any given month, UMHI must comply with all applicable LQG requirements for hazardous wastes generated that month, for as long as that waste remains on site. If UMHI reverts back to SQG status the following month, you must continue to manage the hazardous waste generated during the month you became an LQG according to all applicable LQG requirements. Hazardous waste generated during the month you were an SQG can be managed under SQG requirements. For more information, I have enclosed the fact sheet titled Hazardous Waste Generator Categories and Episodic Generation dated March 2007.

- C. Personnel training:** During the inspection, Ohio EPA determined that UMHI is an episodic generator. One of the additional requirements for LQGs is yearly personnel training.

OAC Rule 3745-65-16(A)(1-3), (B), (C), (D) (1-4), and (E) states that facility personnel must successfully complete training on hazardous waste management procedures. This training must be conducted within six months after the date the employee is hired and an annual review of the training must be completed thereafter. The owner or operator must maintain records including, but not limited to, job title, job description, and training of each employee. Records must be retained for current

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personnel until closure of the facility and for former personnel until at least three years from the date the employee last worked at the facility.

Ohio EPA did not determine if UMHI conducted personnel training while UMHI was an LQG, during the inspection. UMHI must submit records that address all the applicable requirements of this rule as follows:

1. OAC Rule 3745-65-16(A)(1-3)-UMHI must conduct personnel training for employees involved in the handling or management of hazardous waste at the facility. This personnel training must be directed by a person trained in hazardous waste management procedures. This training shall include, but is not limited to, hazardous waste management procedures, instruction in safe equipment operation, emergency procedures, and the implementation of the contingency plan. It must also familiarize employees with procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment.
2. OAC Rule 3745-65-16(B)-UMHI must train all employees that will handle hazardous waste within six months of beginning employment at UMHI on hazardous waste management procedures.
3. OAC Rule 3745-65-16(C)-UMHI must conduct annual refresher hazardous waste management training. Ohio EPA defines annual as at least once every 365 days.
4. OAC Rule 3745-65-16(D)(1-4)-UMHI must maintain personnel training records which include, but are not limited to, employee name, job title, job descriptions, and type and amount of introductory and continuous training for employees responsible for waste handling and spill response duties.
5. OAC Rule 3745-65-16(E)-UMHI must maintain training records on current and former employees.

This information should be submitted to Ohio EPA **within 30 days of receipt of this letter**. If UMHI does not conduct personnel training, then UMHI should submit this process to Ohio EPA as well. Likewise, if UMHI

completes a portion of these requirements, then UMHI should describe which portions have been completed.

- D. Contingency Plan:** During the inspection, Ohio EPA determined that UMHI is an episodic generator. Due to the fact that UMHI was an LQG within the past year, UMHI must be able to produce records that the additional LQG rules and regulations were followed while they were an LQG. One of the additional requirements for LQGs is maintaining an updated contingency plan.

The following rules make up the contingency plan rules for an LQG: OAC Rule 3745-65-51(A), (B): Purpose and Implementation of contingency plan; OAC Rule 3745-65-52(A), (C), (D), (E), (F): Content of contingency plan; OAC Rule 3745-65-53(A), (B): Copies of contingency plan; and OAC Rule 3745-65-55: Emergency coordinator. These combined rules state that a facility shall have a contingency plan which will be implemented during an emergency. The contingency plan must describe the following: actions personnel will take during an emergency, arrangements with emergency responders, current emergency contact and related information for emergency coordinators, emergency equipment location at the facility, and an evacuation plan. A copy of the contingency plan must be maintained at the facility and submitted to entities that may be required to provide emergency services. A facility must have a designated emergency coordinator who is familiar with all aspects of the contingency plan, available to respond to an emergency, and has the authority to commit the resources needed to implement a contingency plan.

Ohio EPA did not determine if UMHI maintained a contingency plan while UMHI was an LQG, during the inspection. UMHI must submit records that address all the applicable requirements of this rule as follows:

1. OAC Rule 3745-65-51(A)-UMHI has a contingency plan.
2. OAC Rule 3745-65-51(B)-UMHI is able to implement such a plan during a fire, explosion, or release of hazardous waste.
3. OAC Rule 3745-65-52(A)-UMHI has a plan that describes actions the personnel must take in response to fires, explosions, or releases of hazardous waste.

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4. OAC Rule 3745-65-52(C)-UMHI has a contingency plan that describes arrangements agreed to by local police departments, fire departments, hospitals, contractors, Ohio EPA, and other local emergency responders.
5. OAC Rule 3745-65-52(D)-UMHI has a contingency plan that lists the names, home addresses, home phone numbers, and office numbers of persons qualified to act as emergency coordinator.
6. OAC Rule 3745-65-52(E)-UMHI has a contingency plan that lists emergency equipment at the facility.
7. OAC Rule 3745-65-52(F)-UMHI has a contingency plan that includes an evacuation plan.
8. OAC Rule 3745-65-53(A)-UMHI has maintained a contingency plan at the facility.
9. OAC Rule 3745-65-53(B)-UMHI has submitted a contingency plan to all local police departments, fire departments, hospitals, Ohio EPA, and local emergency response teams that may be requested to provide emergency services.
10. OAC Rule 3745-65-55-UMHI has designated an emergency coordinator.

This information should be submitted to Ohio EPA **within 30 days of receipt of this letter**. If UMHI does not maintain a contingency plan, then UMHI should submit this information to Ohio EPA as well. However, if UMHI has portions of these requirements met, then this should be explained as well.

- E. **Name/Address Change:** UMHI failed to notify Ohio EPA when the name of the company was changed in March 2007. It should be noted that if UMHI changes names, owners, locations, or any other important information then Ohio EPA should be notified. UMHI should submit an updated notification form to Ohio EPA once this change takes place. The Notification of Regulated Waste Activity Form can be found on our website, which is listed below.

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For more information, I have also included the fact sheet titled Handling Paint Waste from Your Business, dated August 2000 and the booklet titled Managing Your Hazardous Waste, A Guide for Small Businesses, dated July 2002.

As we discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce, or altogether eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs. Ohio EPA also has helpful information about pollution prevention at the following web address:  
<http://www.epa.state.oh.us/ocapp/ocapp.html>. If you would like to be considered for an in-depth on-site pollution prevention assessment, or if you would like more information about pollution prevention assessments, please contact me at (419) 373-3065.

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

Enclosed you will find a copy of the checklists that were completed during the inspection. Should you have any questions, please feel free to call me at (419) 373-3065. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,

*Kara Reynolds*

Kara Reynolds  
Environmental Specialist  
Division of Hazardous Waste Management

/lb

Enclosures

cc: Colleen Weaver, DHWM, NWDO  
Kara Reynolds, DHWM, NWDO  
Cindy Lohrbach, DHWM,

~~DHWM, NWDO, Putnam County File~~

ec: Amy Heller, DHWM, NWDO

**NOTICE:**

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

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

For Ohio EPA use only

E-mail this completed form to  
[tammy.mcconnell@epa.state.oh.us](mailto:tammy.mcconnell@epa.state.oh.us) or mail it to Tammy  
McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OHD 987 044 807								
3. Site Name	Name: Unarco Material Handling, Inc.				Website: <a href="http://www.unarcorack.com">www.unarcorack.com</a> (Optional)				
4. Site Location Information	Street Address: 407 East Washington Street								
	City, Town, or Village: Pandora				State: OH				
	County Name: Putnam				Zip Code: 45877				
5. Site Land Type (check only one)	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"/>	
6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>									
7. Facility Representative  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: Greg		MI:		Last Name: Christy				
	Phone Number: 419-384-3211				Phone Number Extension: 212				
	E-Mail Address: <a href="mailto:gchristy@unarcorack.com">gchristy@unarcorack.com</a>								
	Fax Number: 419-384-7239				Fax Number Extension:				
	Street or P.O. Box:								
	City, Town or Village:			State:		Country:		Zip Code:	
8. 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: Unarco				Date Became Owner (mm/dd/yyyy): 03-31-2007				
	Owner Type:	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"/>
	Street or P.O. Box: 701 16 <sup>th</sup> Avenue								
	City, Town or Village: East Springfield				Owner Phone #: 800-382-2702				
	State: Tennessee				Country: USA		Zip Code: 37172		
	Name of Site's Operator: Unarco Material Handling, Inc.				Date Became Operator (mm/dd/yyyy): 03-31-2007				
	Owner Type:	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"/>
	Street or P.O. Box: 407 East Washington Street								
	City, Town or Village: Pandora				Operator Phone #: 419-384-3211				
	State: Ohio				Country: USA		Zip Code: 45877		
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste					
<input type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)									
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input checked="" type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Underground Injection Control Facility									

10B. 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"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	
<input type="checkbox"/> Destination Facility for Universal Waste			
Check all boxes below that apply for each of the three types of facilities above		10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
	<b>Managed</b>	<input type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
11. 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.			
D001			
12. 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:
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments: Unarco was inspected as an SQG, but may be an LQG based on the waste evaluations.
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Amy Heller		Kara Reynolds	1/9/2008 9:45 AM
14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.			
Signature of Owner, Operator, or an Authorized Representative		Name and Title (Print)	Date (mm/dd/yyyy)

## PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Unarco Material Handling, Inc. Facility Type: LQG SQG CESQG TSD Date of Inspection: 01-09-2008  
 EPA ID#: OHD 987 044 807

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	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	Painting Waste paint related material D001	4-5 drums per month 55 gallon drums container storage area		Chemtron Corporation Ohio		
2	Painting Paint Filters	Unknown 55 gallon drums storage area near paint booths		Send to local solid waste landfill as non-hazardous waste		
3	Maintenance Spent Bulbs	Minimal	Throw in solid waste landfill.			Manage as universal waste.
4	Steel Processing Scrap Steel	Unknown		Omni Source Recycling		
5						
6						

7							
8							
9							

**REMARKS-GENERAL INFORMATION**

**General Process Information:**

See Attached Letter.

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

N/A

**Additional P2 remarks and information:**

I would suggest that the spent bulbs be managed as universal waste. This procedure would not require the waste analysis of each spent bulb type at the facility.

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](mailto:p2mail@epa.state.oh.us) or [www.epa.state.oh.us/ocapp/ocapp.html](http://www.epa.state.oh.us/ocapp/ocapp.html)

**Other:**

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

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

Safety Equipment Used:

**GENERAL REQUIREMENTS**

- |    |   |     |                                     |    |                                     |     |                          |
|----|---|-----|-------------------------------------|----|-------------------------------------|-----|--------------------------|
| 1. | Have all wastes generated at the facility been adequately evaluated? [3745-52-11]   | Yes | <input type="checkbox"/>            | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 2. | Has the generator obtained a U.S. EPA I.D. number? [3745-52-12]   | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/> |
| 3. | Has the generator transported or caused to be transported hazardous waste to <b>other</b> than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)] <b>Compliance unknown, more information has been requested via the NOV.</b>                               | Yes | <input type="checkbox"/>            | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/> |
| 4. | Has the generator disposed of hazardous waste <b>on-site without a permit</b> or at another facility <b>other</b> than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)] <b>Compliance unknown, more information has been requested via the NOV.</b> | Yes | <input type="checkbox"/>            | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/> |
| 5. | Does the generator accumulate hazardous waste?  | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/> |

NOTE: If the SQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements might still apply, e.g. manifest, marking, LDR, etc.

- |    |   |     |                                     |    |                          |     |                          |
|----|---|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| 6. | Has the generator accumulated hazardous wastes <b>in excess of</b> (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
|----|---|-----|-------------------------------------|----|--------------------------|-----|--------------------------|

NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]

- |    |   |     |                          |    |                                     |     |                          |
|----|---|-----|--------------------------|----|-------------------------------------|-----|--------------------------|
| 7. | Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
|----|---|-----|--------------------------|----|-------------------------------------|-----|--------------------------|

NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.

- |    |   |     |                          |    |                          |     |                                     |
|----|---|-----|--------------------------|----|--------------------------|-----|-------------------------------------|
| 8. | Does the generator treat hazardous waste in a:                      |     |                          |    |                          |     |                                     |
|    | a. Container that meets 3745-66-70 to 3745-66-77?                   | Yes | <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 waste is treated to meet LDRs, use LDR checklist.

**MANIFEST REQUIREMENTS**

- |     |  |     |                                     |    |                                     |     |                          |
|-----|--|-----|-------------------------------------|----|-------------------------------------|-----|--------------------------|
| 9.  | Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/> |
| 10. | Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)]   | Yes | <input type="checkbox"/>            | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |

- a. Does the contractual agreement specify the type of waste and frequency of shipment? Yes  No  N/A
- b. Is the transport vehicle owned and operated by the reclaimer? Yes  No  N/A
- c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? Yes  No  N/A

*NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.*

11. Have items 1 through 20 of each manifest been completed?[3745-52-20(A)] Yes  No  N/A

*NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be complete. [3745-52-20 (A)]*

12. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] Yes  No  N/A

*NOTE: The generator may designate on the manifest one alternative facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]*

13. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D) ] Yes  No  N/A

14. Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)] Yes  No  N/A

*NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.*

15. If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? 3745-52-42(B)] Yes  No  N/A

16. Are signed copies of all manifests being retained for at least three years? [3745-52-40] Yes  No  N/A

*NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.*

#### PREPAREDNESS AND PREVENTION

17. Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)] Yes  No  N/A

18. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]

a. Name and telephone number of emergency coordinator? Yes  No  N/A

b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes  No  N/A

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

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

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

21. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31] Yes  No  N/A
22. Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:
- a. Internal Alarm system? [3745-65-32(A)] Yes  No  N/A
- b. Emergency communication device? [3745-65-32(B)] Yes  No  N/A
- c. Portable fire control, spill control and decon equipment? [3745-65-32(C)]? Yes  No  N/A
- d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes  No  N/A
23. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] **Compliance unknown, more information has been requested via the NOV.** Yes  No  N/A
- a. Are inspections recorded in a log or summary? [3745-65-33]? **Compliance unknown, more information has been requested via the NOV.** Yes  No  N/A
24. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (*unless the device is not required under OAC 3745-65-32*)? [3745-65-34(A)] Yes  No  N/A
25. If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32?) [3745-65-34(B)] Yes  No  N/A
26. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes  No  N/A
27. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes  No  N/A
28. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes  No  N/A

#### SATELLITE ACCUMULATION AREA REQUIREMENTS

29. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes  No  N/A
- b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes  No  N/A
- c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes  No  N/A
- d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes  No  N/A
- e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. Yes  No  N/A
- f. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes  No  N/A
30. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:
- a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes  No  N/A

b. Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]

Yes  No  N/A

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

**USE AND MANAGEMENT OF CONTAINERS**

- 31. Has the generator marked containers with the words "Hazardous Waste"[3745-52-34(D)(4)] Yes  No  N/A
- 32. Is the accumulation date on each container? [3745-52-34(D)(4)] Yes  No  N/A
- 33. Are hazardous wastes stored in containers which are:
  - a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes  No  N/A
  - b. In good condition? [3745-66-71] Yes  No  N/A
  - c. Compatible with wastes stored in them? [3745-66-72] Yes  No  N/A
  - d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes  No  N/A

*NOTE: Record location on process summary sheets and photograph the area.*

- 34. Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days. Yes  No  N/A 
  - a. Are inspections recorded in a log or summary? [3745-66-74] Yes  No  N/A
- 35. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes  No  N/A
- 36. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B) 3745-66-77(A)] Yes  No  N/A
- 37. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B) ? [3745-66-77(B)] Yes  No  N/A

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

**PRE-TRANSPORT REQUIREMENTS**

- 38. Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes  No  N/A
- 39. Does each container ≤100 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes  No  N/A
- 40. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes  No  N/A

## LDR CHECKLIST

### GENERAL LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] If so: Yes  No  N/A  RMK# \_\_\_\_\_
- a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)] Yes  No  N/A  RMK# \_\_\_\_\_
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes  No  N/A  RMK# \_\_\_\_\_
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] Yes  No  N/A  RMK# \_\_\_\_\_
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes  No  N/A  RMK# \_\_\_\_\_
4. Does the generator generate a characteristic hazardous waste? If so: Yes  No  N/A  RMK# \_\_\_\_\_
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes  No  N/A  RMK# \_\_\_\_\_

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

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so: Yes  No  N/A  RMK# \_\_\_\_\_
- a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes  No  N/A  RMK# \_\_\_\_\_

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**NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste- F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]**

6. Has the generator correctly determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)] Yes  No  N/A  RMK# \_\_\_\_\_

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**NOTE: Wastes with EPA hazardous waste numbers K174 and K175 (chlorinated aliphatic wastes) have specific requirements in rule 3745-270-33. Waste with EPA hazardous waste numbers**

**K176, K177 and K178 (inorganic chemical wastes) have specific requirements in rule 3745 270-36.**

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] Yes  No  N/A  RMK# \_\_\_\_\_

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**NOTE:** *A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit §402 of CWA, that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non wastewater.[3745-270-03(B)]*

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] Yes  No  N/A  RMK# \_\_\_\_\_

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**NOTE:** *In other words, is combustion a legitimate treatment method.*

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes  No  N/A  RMK# \_\_\_\_\_
10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste? [3745-270-05] If so: Yes  No  N/A  RMK# \_\_\_\_\_
- a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment. [3745-270-05] Yes  No  N/A  RMK# \_\_\_\_\_
11. Does the facility have an extension to allow for a restricted waste to be land disposed? [3745-270-06] If so: Yes  No  N/A  RMK# \_\_\_\_\_
- a. The facility can land dispose of the waste. [3745-270-06] Yes  No  N/A  RMK# \_\_\_\_\_
12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? If so: Yes  No  N/A  RMK# \_\_\_\_\_
- a. Has the facility complied with 3745-270-04? Yes  No  N/A  RMK# \_\_\_\_\_

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**REMARKS**

## NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)] Yes  No  N/A  RMK# \_\_\_\_
14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)] Yes  No  N/A  RMK# \_\_\_\_
15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)] Yes  No  N/A  RMK# \_\_\_\_
16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)] Yes  No  N/A  RMK# \_\_\_\_
17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so: Yes  No  N/A  RMK# \_\_\_\_
- a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes  No  N/A  RMK# \_\_\_\_
- 

**NOTE:** *Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit.(See 270-07(A)(7))*

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

## REMARKS