OhioEPA

State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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Certified: 7006 3450 0001 9056 3281

September 15, 2008

ATHENS COUNTY
OHIO UNIVERSITY
DHWM/SEDO

Mr. Lawrence Gingerich
Ohio University
Department of Environmental Health and Safety
Hudson Health Center
Athens, OH 45701

Dear Mr. Gingerich:

On August 12 and 15, 2008, I inspected the eleven hazardous waste generation areas at Ohio University's (OU) Athens, Ohio campus to determine OU's 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).

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

For the following Conditionally Exempt Small Quantity Generators inspected, no violations of Ohio's Hazardous waste laws were identified:

- Culter Hall Area 2 OHD982628430
- Innovation Center Area 4 OHD982628505
- Porter Area 5 OHD982628513
- Irvine Area 6 OHD982628521
- Receiving Area 9 OHD982628554

For the following areas, violations of Ohio's hazardous waste laws were found as detailed below: With the exception of Physical Plant Area 7, all of these areas were small quantity generators. In order to correct these violations you must do the following and send me the required information **within 20 days** of your receipt of this letter:

- Hudson Health Center Area 1 OHD980586226
- Clippinger Area 3 OHD982628422
- Physical Plant Area 7 OHD982628539
- Airport Area 8 OHD982628547

- The Ridges Area 10 OHD986975068
- South Green Area 11 OHD98697173

(1) ***OAC Rule 3745-52-34(D)(5)(b), Accumulation Time of Hazardous Waste:*** Small Quantity Generators of Hazardous Waste must post the following information next to the telephone: The name and telephone number of the emergency coordinator; location of fire extinguishers and spill control material, and, if present, fire alarm(s); and the telephone number of the fire department, unless the facility has a direct alarm.

The following areas did not have the required emergency information posted in the areas where hazardous waste is managed: Hudson Health Center Area 1, Clippinger Area 3, Airport Area 8, and The Ridges Area 10.

In order to return to compliance with this rule, OU must post the required information by the telephones in the labs and maintenance areas where hazardous waste is generated and accumulated and in the hazardous waste storage areas. In storage areas where telephones are not immediately available, the information must still be posted so that it is available for use with the cellular phone. Provide this office with a copy of the posting to demonstrate abatement of this violation.

(2) ***OAC Rule 3745-65-32(C), Required Equipment:*** All facilities shall be equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below: Portable fire extinguishers, fire control equipment (including, but not limited to, special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment.

The following areas did not have the required emergency equipment available in the hazardous waste storage areas: Hudson Health Center Area 1, Clippinger Area 3, and Airport Area 8.

In order to return to compliance with this rule, OU must place the required emergency equipment in the hazardous waste storage areas of Hudson Health Center Area 1 and the Airport Area 8. To demonstrate abatement of this violation, provide this office with photographs that show the emergency equipment in place.

(3) ***OAC Rule 3745-65-33, Testing and Maintenance of Equipment:*** 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.

In the following Small Quantity Generator areas, OU failed to conduct emergency equipment inspections and record the inspections in a log: Hudson Health Center Area 1, Clippinger Area 3, Airport Area 8, and The Ridges Area 10. OU must immediately begin conducting these required inspections. To demonstrate abatement of this violation, provide this office with a copy of two weeks of completed inspection logs.

(4) ***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.

In the following Small Quantity Generator areas, OU failed to conduct weekly inspections of the container storage areas and record the inspections in a log: Hudson Health Center Area 1, Clippinger Area 3, Airport Area 8, and The Ridges Area 10.

OU must immediately begin conducting weekly inspections of all the hazardous waste container storage areas in Hudson Health Center Area 1, Clippinger Area 3, Airport Area 8, and The Ridges Area 10. To demonstrate abatement of this violation, provide this office with a copy of two weeks of completed inspection logs.

(5) ***OAC Rule 3745-52-34(C)(1)(a), Accumulation Time of Hazardous Waste:*** Generators who engage in satellite accumulation of hazardous waste must comply with OAC Rule 3745-66-73(A) which states that containers holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

In Airport Area 8, a 55-gallon drum accumulating D008 oil in the maintenance hanger had an open locking drum funnel in the bung hole.

During the inspection, the lid on the drum funnel was closed, returning the facility to compliance with this rule. OU should make all employees in the airport maintenance facility aware of the requirement to keep hazardous waste accumulation containers in the hangers closed at all times when waste is not being added or removed from the containers.

(6) ***OAC Rule 3745-52-34(C)(1)(b), Accumulation Time of Hazardous Waste:*** Generators who engage in satellite accumulation of hazardous waste must mark the accumulation containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

In Airport Area 8, a 55-gallon drum accumulating D008 oil in the maintenance hanger was not labeled to identify its contents.

In order to return to compliance with this rule, OU must label all hazardous waste satellite accumulation containers with the words "Hazardous Waste" or with other words that identify the contents of the containers. In order to demonstrate that OU has abated this violation, submit photographs showing that the containers have been properly labeled.

(7) ***OAC Rule 3745-52-34(D)(4), Accumulation Time of Hazardous Waste:*** Small Quantity Generators of hazardous waste may, for one hundred eighty days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit, provided that: the generator complies with the requirements of paragraphs (A)(2) and (A)(3)of this rule. Paragraphs (A)(2) and (A)(3) require the following: The date upon which each period of accumulation and/or treatment

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

In the Airport Area 8 hazardous waste storage outbuilding, OU failed to have a 5-gallon can of D008 oil labeled "Hazardous Waste" or marked with an accumulation date. At The Ridges Area 10 hazardous waste storage area in Building 32, OU failed to label and date cans of waste paint and a box of acid that were being stored.

In order to return to compliance with this rule, OU must label the containers in the Airport storage building and Building 32 with the words "Hazardous Waste" and with the accumulation start date. In order to demonstrate that OU has abated this violation, submit photographs showing that the containers have been properly labeled.

(8) ***OAC Rule 3745-66-71, Conditions of Containers:*** If a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator must transfer the hazardous waste from such container to a container that is in good condition or manage the waste in another manner that complies with the requirements of Chapters 3745-65 to 3745-69 and 3745-2483745-256 of the Administrative Code.

In the Airport Area 8 hazardous waste storage outbuilding, OU was storing D008 oil in a 5-gallon metal can that was in poor condition. The sides of the container were extremely rusted, such that a layer of the metal was flaking off. In violation of the above rule, OU failed to transfer the hazardous waste from the container that was not in good condition to a container that was in good condition.

In The Ridges Area 10 Building 32 storage area, OU was storing hazardous waste acid in its original packaging of an inner liner within a cardboard box. The cardboard box was in poor condition, from what appeared to be damage caused by contact with a liquid. Because of the damage, the cardboard container was no longer structurally sound. In violation of this rule, OU failed to transfer the waste from the container that was not in good condition to a container that was in good condition.

In order to return to compliance with this rule, OU must transfer the hazardous waste in the rusted metal can and the hazardous waste in the damaged cardboard box into containers that are in good condition. In order to demonstrate that OU has abated this violation, submit photographs documenting that the waste has been transferred to containers that are in good condition.

(9) ***OAC Rule 3745-52-11, Hazardous Waste Determination:*** Any person who generates a waste, must evaluate the waste to determine if that waste is a hazardous waste in accordance with the criteria set forth in OAC Rule 3745-51.

In The Ridges Area 10, OU failed to evaluate five lab sink traps being stored in Building 32. Each of the trap containers appeared to have material inside them. During the inspection, you reported that traps were in the building in 2003 when you started working for OU EHS and that their contents were unknown.

OU must immediately evaluate these waste sink traps to determine if they are a listed or a characteristic hazardous waste. As detailed in OAC Rule 3745-52-11(C), waste determination may be made either by testing or by generator knowledge. In order to return to compliance with this rule, submit documentation of your waste determination to this office for review.

(10) ***ORC §3734.02(E) and (F), Prohibitions:*** (E) No person shall establish or operate a hazardous waste facility, or use a solid waste facility for the storage, treatment, or disposal of any hazardous waste, without a hazardous waste facility installation and operation permit issued in accordance with section 3734.05 of the Ohio Revised Code.

(F) 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 facility not authorized to manage the hazardous waste.

OU has established an unpermitted hazardous waste facility at The Ridges Area 10 Building 32 by illegally storing, disposing, and transporting hazardous waste as detailed below.

Storage and Transport
OU has used Building 32 to store D001 waste paint and D008 waste paint chips that were not generated in The Ridges Area 10. OU has had a practice of allowing their painting department to transport waste paint and waste paint chips to Building 32 for storage, even though the waste was generated from other generator ID areas of campus. OU also used Building 32 to store a D001 waste gasoline and diesel fuel mixture that was generated by OU's golf course, which is located in the South Green Area 11. This D001 waste was also illegally transported by OU from the golf course to Building 32.

Disposal
During the inspection, waste paint in thirteen 1-gallon, three 1-pint, and one 1-cup size paint cans in Building 32 was being disposed of on-site by evaporation to the air. The paint cans had varying amounts of waste in them from several inches to nearly empty. All the lids had been removed from the cans, which were stacked in a pyramid fashion to facilitate drying.

To abate these violations, OU must cease their practice of transporting and storing hazardous waste from other generator areas of campus in Building 32. In addition, OU must immediately close all containers of hazardous waste paint that are being evaporated. OU should demonstrate their compliance with this law by providing a plan that describes how OU will properly manage, transport, and dispose of their hazardous waste.

Ohio EPA considers these violations to be very serious in nature. Since OU The Ridges Area 10 violated ORC §3734.02(E) and (F), The Ridges Area 10 is subject to all applicable general facility standards found in OAC chapters 3745-54 and 55. Be advised that due to the nature of the violation Ohio EPA may require closure pursuant to

OAC rules 3745-55-11 through 3745-55-20 and OAC rules 3745-55-42 through 3745-55-47at this site. Additionally, at any time Ohio EPA may assert its right to have The Ridges Area 10 begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

(11) ***OAC Rule 3745-52-20(A), Manifest - General Requirements:*** A generator who transports, or offers for transportation, hazardous waste for off-site treatment, storage, or disposal must prepare a uniform hazardous waste manifest, U.S. EPA form 8700-22, and if necessary, U.S. EPA form 8700-22A (the continuation sheet) before transporting the hazardous wastes off-site. Completion of items one through twenty and items twenty-one through thirty-five, respectively, on these forms must be accomplished by the generator, transporter, or owner/operator.

The South Green Area 11 transported or offered for transportation 100 gallons of D001 waste gasoline and diesel fuel mixture, to The Ridges Area 10 Building 32 without a hazardous waste manifest.

This waste was later manifested from The Ridges Area 10 for off-site disposal at a permitted disposal facility. OU is not a registered hazardous waste transporter nor are any of OU's generator areas permitted treatment, storage or disposal facilities; therefore, in the future OU must not transport their hazardous between generator areas. At this time, no further action is necessary to abate this violation.

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

At the time of the inspection of The Ridges Area 10, there were in thirteen 1-gallon, three 1-pint, and one 1-cup size open cans of waste paint in the Building 32 storage area.

In order to return to compliance with this rule, OU must immediately close or place in a closed container all open paint cans containing hazardous waste. In order to demonstrate that OU has abated this violation, submit photographs showing how the containers are being stored.

(13) ***OAC Rule 3745-273-14(A), Labeling/Marking - Standards for Small Quantity Handlers of Universal Waste:*** Universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)."

OU was storing universal waste batteries in The Ridges Area 10 Building 32. None of the batteries or the containers holding the batteries was labeled as required by the rule.

In order to return to compliance with this rule, OU must label or mark clearly, either each individual battery or the containers holding the batteries with any one of the following

phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)." In order to demonstrate that OU has abated this violation, submit photographs showing the labeled batteries or containers.

(14) ***OAC Rule 3745-273-13(D)(1), Waste management - Standards for Small Quantity Handlers of Universal Waste:*** A small quantity handler of universal waste must manage lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment, as follows: A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

In The Ridges Area 10, OU was storing universal waste lamps in cardboard containers that were open and that were not structurally sound. The boxes of lamps were stacked and piled in the room in a carless fashion that would tend to lead to breakage as lamps could spill out of the containers or the containers could be knocked over and have their contents broken. There were shards from broken lamps on the floor of the storage room, indicating that the lamps were not being managed in a way that prevented releases to the environment.

In order to return to compliance with this rule, OU must immediately place all universal waste lamps in closed containers that are structurally sound. In order to demonstrate that OU has abated this violation, submit photographs of the universal waste lamp storage area.

(15) ***OAC Rule 3745-273-13(D)(2), Waste management - Standards for Small Quantity Handlers of Universal Waste:*** A small quantity handler of universal waste must immediately clean up and place in a container any lamp that is broken and must place in a container any lamp that shows evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous constituents to the environment. Containers must be closed, structurally sound, compatible with the contents of the lamps, and must lack evidence of leakage, spillage, or damage that could cause leakage or releases of mercury or other hazardous constituents to the environment under reasonably foreseeable conditions.

OU failed to cleanup and contain broken lamps in The Ridges Area 10 universal waste lamp storage area. This failure was evidenced by shards from broken lamps on the floor of the storage room.

In order to return to compliance with this rule, OU must immediately clean up and place in a container any pieces of broken lamps and any lamps that are broken. The containers used for the cleanup must be closed, structurally sound, compatible with the contents of the lamps. Waste from the cleanup must then be evaluated to determine if it is and hazardous waste and then managed accordingly. In order to demonstrate that OU has abated this violation, submit photographs of the universal waste storage area floor and the containerized lamp waste.

(16) ***OAC Rule 3745-273-14(E), Labeling/Marking- Standards for Small Quantity Handlers of Universal Waste:*** Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)."

OU was storing universal waste lamps in a storage room at The Ridges Area 10. None of the lamps or the containers holding the lamps were labeled as required by the rule.

In order to return to compliance with this rule, OU must label or mark clearly, either each individual lamp or the containers holding the lamps with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)." In order to demonstrate that OU has abated this violation, submit photographs showing the labeled lamps or containers.

(17) ***OAC Rule 3745-273-16, Employee training for small Quantity Handlers of Universal Waste:*** A Small Quantity Handler of universal waste shall inform all employees who handle or have responsibility for managing universal waste. The information shall describe proper handling and emergency procedures appropriate to the types of universal waste handled at the facility.

In The Ridges Area 10, OU failed to inform their employees, who handle universal waste lamps and batteries, of the proper handling and emergency procedures. This is evidenced by the following: neither the batteries or lamps were properly labeled; lamps were stored in open containers that were not structurally sound; and broken lamps in the storage area had not been cleaned up.

In order to return to compliance with this rule, OU must provide documentation to this office that they have informed all employees who handle universal waste of the proper handling and emergency procedures.

(18) ***OAC Rule 3745-273-17(A), Response to Releases- Standards for Small Quantity Handlers of Universal Waste:*** A small quantity handler of universal waste must immediately contain all releases of universal wastes and other residues from universal wastes.

OU failed to contain the broken lamps in The Ridges Area 10 universal waste storage area. This failure was evidenced by shards from broken lamps on the floor of the storage room.

In order to return to compliance with this rule, OU must immediately contain the residues from the broken lamps in the universal waste storage area. Waste from the cleanup must then be evaluated to determine if it is and hazardous waste and then managed accordingly. In order to demonstrate that OU has abated this violation, submit photographs of the universal waste storage area floor and the containerized lamp waste.

(19) OAC Rule 3745-273-17(B), Response to Releases- Standards for Small Quantity Handlers of Universal Waste: A small quantity handler of universal waste must determine whether any material resulting from the release is hazardous waste, and if so, must manage the hazardous waste in compliance with all applicable requirements of Chapters 3745-50 to 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code. The handler is considered the generator of the material resulting from the release, and must manage it in compliance with Chapter 3745-52 of the Administrative Code.

OU had broken lamps in The Ridges Area 10 universal waste storage area and failed to determine whether any material resulting from the broken lamps is hazardous waste.

In order to return to compliance with this rule, OU must evaluate the broken lamp material to determine if it is a hazardous waste and manage it accordingly. In order to demonstrate that OU has abated this violation, submit documentation of the waste characterization to this office.

(20) OAC Rule 3745-279-22(C) Used Oil Storage Requirements for Generators: Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

Initially, the used oil tank and portable used oil containers at the Service Garage located in Physical Plant Area 7 were not labeled "used oil." The tank and containers were labeled during the inspection, returning the facility to compliance with this rule during the inspection.

Comments

(a) OAC Rule 3745-273-15 limits the accumulation time for universal waste to no longer than one year from the date the universal waste is generated, or received from another handler. Those accumulating universal waste are required to be able to demonstrate the length of time that the universal waste has been accumulated. There can be an exception to the one year storage time limit if the longer storage time is solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal. The handler bears the burden of proving that such activity is solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal. As required by this rule, OU should be prepared to provide information in the future, if requested, that will document the length of time that universal waste has been stored on-site. OU should also be prepared, if applicable, to provide proof of the necessity to store their universal waste beyond the one year time limit.

(b) On the first day of the inspection, August 12, 2008, it was observed that in Physical Plant Area 7, used oil had been spilled on the ground next to the Service Garage's used oil tank and oil dry had been placed on the spill to absorb the oil. On August 15, 2008, the second day of the inspection, it was observed that spilled oil had been completely

cleaned up. Please note that OAC Rule 3745-279-22(D) requires the following "Upon detection of a release of used oil to the environment that is not subject to the requirements of Chapter 1301:7-9 of the Administrative Code and which has occurred after October 20, 1998, a generator shall/must perform the following cleanup steps: (1) Stop the release; (2) Contain the released used oil; (3) Clean up and manage properly the released used oil and other materials; and (4) If necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service."

(c) During the inspection, a Frog Ranch salsa jar was observed in the Clippinger hazardous waste storage area. This jar contained a cloudy green liquid and was labeled with a piece of masking tape as uranylacetate waste. You stated that uranylacetate is a radioactive waste. Please verify with OU's radioactive waste management plan whether or not this is an acceptable storage practice for radioactive waste.

(d) During the inspection, a white powder was observed in the bottom of one of the four flammable material storage cabinets located in the Boyd Hall hazardous waste storage area for Irvine Area 6. (At the time of the inspection, Irvine Area 6 was a conditionally exempt small quantity generator of hazardous waste.) The white powder had a circular imprint in it that gave the appearance that a round container of some sort had been in that spot in the cabinet and leaked. OU should cleanup the spilled material, evaluate whether or not it is a hazardous waste, and properly manage the waste according to its waste evaluation. Please submit a response to this office as to what the material was determined to be and how it was managed.

(e) During the inspection of the Corrosion Center in Receiving Area 9, a metal 5-gallon Isopropanol container with a corroded bottom was found sitting in an open 55-gallon drum of what appeared to be used oil dry. On close examination of the container, it was found to have "LVT 200 waste oil" faintly penned on it. During the inspection, Al Schubert, of the Corrosion Center, could not confirm what the material in the container was or how it was going to be managed. Please submit a response to this office that provides an explanation of what the materials in the 5-gallon and 55-gallon containers are, waste evaluations for both containers, and an explanation of how the materials will be managed.

(f) During the inspection of the Corrosion Center in Receiving Area 9 it was stated that the Corrosion Center has in the past disposed of oil waste using Safety-Kleen. Please submit documentation of past disposals with Safety-Kleen to confirm whether the oil waste has been manifested as hazardous waste or as used oil.

(g) During the inspection of the Corrosion Center in Receiving Area 9, an area of dead grass was observed directly outside on of the facilities exit doors. Mr. Schubert stated that the dead grass was probably from dumping salt water used in the Corrosion Center experiments. The dumping of waste of any kind outside onto the ground is an unacceptable practice and must be immediately stopped. OU should take steps to educate all those working in the center that waste is not be dumped outside.

(h) During the inspection, we walked through OU's painting department located in the Physical Plant Area 7. At the time of our visit, no one in the painting department was available to discuss the operations in their shop. The paint shop had a Uni-Ram solvent distillation unit. Please submit the following information about the paint shop's solvent usage: type of solvent that is used, number of gallons of solvent that is distilled at a time, the frequency of solvent distillation, how the still bottoms from the unit are disposed of, and the amount of still bottoms that are generated by the unit.

(i) During the inspection of the Airport Area 8 hazardous waste storage building, I observed a dried black stain on the floor which ran from the back corner of the building to the floor drain in the center of the building. At the time of our visit, neither you nor Todd McGuire, of the OU Airport, were able to identify what the staining was from. Please look into the matter further and report to this office any additional information you can obtain about what was spilled or leaked on the floor. OU must also provide information on where the floor drain leads. Ohio EPA strongly recommends that OU consider sealing the floor drain, to prevent any accidental releases of waste to the environment, which could lead to a costly cleanup.

(j) To help hazardous waste generators comply with Ohio's hazardous waste regulations, Ohio EPA offers the *Hazardous Waste Generator Handbook* on our web site at the following link: http://www.epa.state.oh.us/dhwm/pdf/gen_handbook.pdf. The handbook summarizes the requirements by generator size. You may find this break down of requirements by generator size to be helpful. As OU experiences fluctuations in waste generation amounts generator requirements can change. For example, generator areas that were conditionally exempt during this inspection will need to follow small quantity generator requirements if their generation amount exceeds 220 pounds in a given month. In addition to using the handbook, please feel free to contact me with any questions you might have about applying the regulations to OU's operations.

(k) During the inspection, we spoke with Ron Ritchie at OU's Service Garage. Mr. Ritchie expressed interest in alternatives to the current solvent based parts washer unit that is used by the Service Garage. Enclosed with this letter is *Ohio EPA's Parts Washer Handbook* which may be useful to Mr. Ritchie as he evaluates changing the garage's parts washing practices.

(l) Ohio EPA would like to encourage OU to look for ways to reduce the amount of waste generated on campus. If OU finds ways to recycle, reduce or altogether eliminate certain waste streams OU may be able to reduce treatment and disposal costs, and may possibly reduce their regulatory requirements. Ohio EPA has a pollution prevention program that can provide free, non-regulatory assistance with reducing both solid and hazardous waste generation. 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, please contact Ohio EPA's Donna Goodman at 740 380-5293. Ohio EPA also has helpful information about pollution prevention at the following web address: http://www.epa.state.oh.us/ocapp/ocapp.html.

Enclosed you will find a copy of the checklists that completed for the inspection. Should you have any questions, please feel free to call me at (740) 380-5248. 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,

Elizabeth A. Herron

Elizabeth A. Herron
Environmental Specialist
Division of Hazardous Waste Management

EAH/mlm

Enclosures

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.

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Sent To: Lawrence Gingerich, Ohio Univ.
Street, Apt. No.; or PO Box No.: Hudson Health Ctr.
City, State, ZIP+4: Athens, OH 45701

PS Form 3800, August 2006 — See Reverse for Instructions

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1. Article Addressed to:

Mr. Lawrence Gingerich
Ohio University
Dept. of Envir. Health & Safety
Hudson Health Ctr.
Athens, OH 45701

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X J Roedel — ☒ Agent ☐ Addressee

B. Received by (Printed Name): J ROEDEL
C. Date of Delivery: 9-15-08

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

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Ohio Environmental Protection Agency

RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM

For Ohio EPA use only

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

Site EPA ID No.	**EPA ID Number: OHD982628422**							
Site Name	**Name: Ohio University Clippinger Area 3**					**Website: (Optional)**		
Site Location Information	**Street Address: Clippinger Area 3 , Ohio University**							
	City, Town, or Village: Athens					**State: OH**		
	County Name: Athens					**Zip Code: 45701**		
Site Land Type (check only one)	**Private** ☐	**County** ☐	**District** ☐	**Federal** ☐	**Indian** ☐	**Municipal** ☐	**State** ☒	**Other** ☐
NAICS code(s) www.census.gov/epcd/www/naics.html								
Facility Representative	**First Name: Lawrence**			**MI:**		**Last Name: Gingerich**		
	Phone Number: 740 593-1663					**Phone Number Extension:**		
Additional names can be recorded in number 12	**E-Mail Address:**							
	Fax Number:					**Fax Number Extension:**		
	Street or P.O. Box: Ohio University Hudson Health Center							
Only provide address information if it is different than the site address	**City, Town or Village: Athens**							
	State: OH			**Country: USA**		**Zip Code: 45701**		
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: Ohio University**			**Date Became Owner (mm/dd/yyyy):**				
	Owner Type:	**Private** ☐	**County** ☐	**District** ☐	**Federal** ☐	**Indian** ☐	**Municipal** ☐	**State** ☒	**Other** ☐
	Street or P.O. Box:							
	City, Town or Village:			**Owner Phone #:**				
	State:			**Country:**		**Zip Code:**		
	Name of Site's Operator:			**Date Became Operator (mm/dd/yyyy):**				
	Owner Type:	**Private** ☐	**County** ☐	**District** ☐	**Federal** ☐	**Indian** ☐	**Municipal** ☐	**State** ☐	**Other** ☐
	Street or P.O. Box:							
	City, Town or Village:			**Operator Phone #:**				
	State:			**Country:**		**Zip Code:**		
Violations Cited?	☒ **Yes** ☐ **No**							

Type of Generator	
☐ **Not Regulated**	☐ **Conditionally Exempt Small Quantity Generator**
☐ **UNKNOWN**: Cited for violation of 3745-52-11	☐ **United States Importer of Hazardous Waste**
☐ **Large Quantity Generator (LQG)**	☐ **Mixed Waste (Hazardous and Radioactive) Generator**
☒ **Small Quantity Generator (SQG)**	

Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)	
☐ **Recycler of Hazardous Waste**	☐ **Exempt Boiler and/or Industrial Furnace**
☐ **Underground Injection Control Facility**	☐ **Small Quantity On-Site Burner Exemption**
☐ **Hazardous Waste Transporter**	☐ **Smelting, Melting, Refining Furnace Exemption**
☐ **Treater, Storer or Disposer of Hazardous Waste**	

Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply)	
☐ **Small Quantity Handler of Universal Waste**	☐ **Large Quantity Handler of Universal Waste** (accumulates 5,000 kg. or more)
☐ **Destination Facility for Universal Waste**	

(Check all boxes below that apply for each of the three types of facilities above)		Used Oil Activities (Indicate Type(s) of Activity(ies)	
	Managed	☐ **Used Oil Generator**	☐ **Off-Specification Used Oil Burner**
Batteries	☐	☐ **Used Oil Transporter**	☐ **Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil**
Pesticides	☐	☐ **Used Oil Transfer Facility**	☐ **Used Oil Fuel Marketer to Off-Specification Used Oil Burner**
Mercury containing equipment	☐	☐ **Used Oil Processor**	
Lamps	☐	☐ **Used Oil Re-refiner**	

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, D002, D003, D005,	**D006, D007, D008, D009,**	**D010, D021, D022, D011,**	F002, F003, F005,	**P105, P098,**	**U098, U133, U144**	

Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

Announced	☐ **Yes**	☒ **No**	**Additional Facility Representatives:**	
Tanks	☐ **Yes**	☒ **No**	**Other Comments:**	
Containers	☒ **Yes**	☐ **No**		

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Elizabeth Herron		**08/12/08 10:30-4 PM** **08/15/08 11:00-5 PM**

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 DESCRIPTION

The Ohio University (OU) campus has been divided up into 11 Areas that have US EPA ID numbers for the generation of hazardous waste. When hazardous waste is generated in a department, that department fills out an internal form called the Chemical Waste Disposal Form. The form is designed to collect information on the amount and type of waste and its characteristics. Under OU's waste management system the department generating the waste is also expected to label the waste with a hazardous waste label provided by OU's Department of Environmental Health and Safety (EHS). The form is then forwarded to EHS to trigger a pickup of the waste by EHS. EHS then transfers the waste to the designated waste storage area for the part of campus where the waste was generated. Hazardous waste is transported off-site site for disposal twice a year (June and December) by Chemical Analytics of Romulus, Michigan. Information provided on the Chemical Waste Disposal Form is used by Chemical Analytics to classify the waste and determine which hazardous waste codes apply to the waste. Alternately, if warranted by the quantity of waste generated, EHS will have Chemical Analytics pick the waste up directly from the generator, rather than first moving it to a designated waste storage area.

OU manages their waste lamps and batteries as a universal waste. The lamps which are generated campus wide are stored in a storage room at the Ridges. Waste batteries, also from all areas of campus, are stored in at the Ridges in Building 32. OU acts as a small quantity handler and self transporter of universal waste. OU self transports their universal waste from around campus to the storage areas in the Ridges.

WASTE ACTIVITIES

Clippinger Area 3 hazardous waste is generated by geology and physics labs in the Clippinger building. Waste is mainly generated as lab packs for wastes such as D001, D002, D003, D005, D006, D007, D008, D009, D010, D021, D022, D011, F002, F003, F005, P098, P105, U098, U133, U144. Waste generation types and quantities are highly variable dependant upon the school year, type of classes/work being conducted in classes offered. Approximately 3050 pounds of hazardous waste was generated by this area over the course of the last six months. The area is a Small Quantity Generator of Hazardous Waste. A flammable materials storage cabinet is used for the areas hazardous waste storage. The cabinet is located at Clippinger in a locked storage room adjacent to the loading dock. The storage area had a 55-gallon drum that was labeled as a spill kit and contained items that would be used for spill cleanup.

Regulatory/Enforcement History (if applicable):

This facility was last inspected in 1996 and 1991 and 1988. OU's waste management practices were the subject of Director's Final Findings and Orders dated January 4, 1990 which resulted in a closure action at OU's airport facility.

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes*__x__No____*
If yes, refer promptly to your district P2 coordinator. Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

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.*

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]		Yes ☒ No ☐ N/A ☐
2.	Has the generator obtained a U.S. EPA I.D. number? [3745-52-12]		Yes ☒ No ☐ N/A ☐
3.	Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)]		Yes ☐ No ☒ N/A ☐
4.	Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)]		Yes ☐ No ☒ N/A ☐
5.	Does the generator accumulate hazardous waste?		Yes ☒ No ☐ N/A ☐
NOTE: If the SQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements might still apply, e.g. manifest, marking, LDR, etc.			
6.	Has the generator accumulated hazardous wastes in excess of (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)]		Yes ☐ No ☒ N/A ☐
NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]			
7.	Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)]		Yes ☐ No ☒ N/A ☐
NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.			
8.	Does the generator treat hazardous waste in a:		
a.	Container that meets 3745-66-70 to 3745-66-77?		Yes ☐ No ☐ N/A ☒
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)?		Yes ☐ No ☐ N/A ☒
c.	Drip pads that meet 3745-69-40 to 3745-69-45?		Yes ☐ No ☐ N/A ☒
d.	Containment building that meets 3745-256-100 to 3745-256-102?		Yes ☐ No ☐ N/A ☒
NOTE: Complete appropriate checklist for each unit.			
NOTE: If waste is treated to meet LDRs, use LDR checklist.			

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

	c.	Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement?	Yes ☐ No ☐ N/A ☒
NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.			
11.	Have items 1 through 20 of each manifest been completed?[3745-52-20(A)]		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 ☐
	OU's emergency coordinator is Jill Harris.		
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 ☐
	The required emergency information was not posted.		
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 ☐
	Portable fire control equipment was not available in the hazardous waste storage area.		
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes ☒ No ☐ N/A ☐
23.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]		Yes ☐ No ☒ N/A ☐
	a.	Are inspections recorded in a log or summary? [3745-65-33]	Yes ☐ No ☒ N/A ☐
	Emergency equipment is not being tested/inspected and inspections are not recorded in a log.		
24.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (*unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)]*		Yes ☒ No ☐ N/A ☐
25.	If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance (*unless not required under OAC 3745-65-32*)? [3745-65-34(B)]		Yes ☒ No ☐ N/A ☐
26.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]		Yes ☒ No ☐ N/A ☐
27.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)]		
28.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]		Yes ☐ No ☐ N/A ☒
SATELLITE ACCUMULATION AREA REQUIREMENTS			
29.	Does the generator ensure that satellite accumulation area(s):		
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes ☐ No ☐ N/A ☒
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes ☐ No ☐ N/A ☒
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes ☐ No ☐ N/A ☒
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes ☐ No ☐ N/A ☒
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes ☐ No ☐ N/A ☒
	f.	Containers are marked with the words "Hazardous Waste" <u>or</u> other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes ☐ No ☐ N/A ☒
30.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:		Yes ☐ No ☐ N/A ☒
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes ☐ No ☐ N/A ☒
	b.	Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes ☐ No ☐ N/A ☒
	Satellite accumulation is marked N/A because satellite accumulation area(s) were not observed during the inspection.		

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 ☐
	Inspections of the container accumulation area are not being done.		
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 ☒
	At the time of the inspection, no waste was in the storage area.		
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 <u>or</u> offer the appropriate DOT placards to the initial transporter? [3745-52-33]		Yes ☐ No ☐ N/A ☒
	No waste shipments were observed during the inspection.		

GENERATOR LDR CHECKLIST DOES NOT APPLY TO CESQGS			
GENERAL REQUIREMENTS			
1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs do not apply and where the HW went? [3745-270-07 (A)(7)]		Yes ☐ No ☐ N/A ☒
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)]		Yes ☒ No ☐ N/A ☐
NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07 (A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).			
3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]		Yes ☒ No ☐ N/A ☐
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]		Yes ☒ No ☐ N/A ☐
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,		Yes ☒ No ☐ N/A ☐
	a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)	Yes ☒ No ☐ N/A ☐
FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.			
6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]		Yes ☒ No ☐ N/A ☐
NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.			
NOTE: Written documentation of this determination is not required.			
7.	Did the generator treat his HW /soil on-site to meet the LDR treatment standard?		Yes ☐ No ☒ N/A ☐
NOTE If "Yes" see question #16.			
8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility?[3745-270-07(A)(2)]		Yes ☒ No ☐ N/A ☐
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]		Yes ☒ No ☐ N/A ☐
10.	Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)]		Yes ☒ No ☐ N/A ☐
	a.	Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes ☒ No ☐ N/A ☐
NOTIFICATION FORM			
11.	Does the LDR Notification form contain the following information:		
	a.	Manifest number of the first waste shipment to the TSD?[3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	d.	A designation whether the HW is a wastewater or non-wastewater?	Yes ☒ No ☐ N/A ☐

			[3745-270-07(A)(2)].	
NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.				
	e.		Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories				
	f.		A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.				
	g.		If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for?[3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.				
PROHIBITED DILUTION				
12.			Is the HW treated by burning? If "No" go to #15.	Yes ☐ No ☐ N/A ☒
13.			Is the HW a metal-bearing HW?	Yes ☐ No ☐ N/A ☒
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.				
14.	a.		Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless **one** of the following conditions apply. [3745-270-03(c)]	
		i.	Contains > 1% TOC?	Yes ☐ No ☐ N/A ☒
		ii.	Contains organic constituents or cyanide at levels greater than the UST levels?	Yes ☐ No ☐ N/A ☒
		iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes ☐ No ☐ N/A ☒
		iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes ☐ No ☐ N/A ☒
		v.	Co-generated with a HW that must be combusted?	Yes ☐ No ☐ N/A ☒
	b.		If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes ☐ No ☐ N/A ☒
15.			Was the HW treated by wastewater treatment?	Yes ☐ No ☒ N/A ☐
	a.		Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes ☐ No ☐ N/A ☒
NOTE: If Yes, HW is improperly being treated by dilution.				
	b.		Does the waste carry the D001 code <u>and</u> contain ≥10% TOC?	Yes ☐ No ☐ N/A ☒
	c.		Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes ☐ No ☐ N/A ☒
NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B) and 3745-270-40(A)(3)].				

GENERATOR TREATMENT					
16.	Does the generator treat to meet LDRs on-site [3745-270-40(A)]?				Yes ☐ No ☒ N/A ☐
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?				Yes ☐ No ☐ N/A ☒
	If "Yes"...complete the rest of the checklist. If "No"...stop...you are done.				
	a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]			Yes ☐ No ☐ N/A ☒
	b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]			Yes ☐ No ☐ N/A ☒
NOTE: This is a laboratory analysis but it does not have to be kept by the generator.					
	c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]			Yes ☐ No ☐ N/A ☒
	d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]			Yes ☐ No ☐ N/A ☒
	e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]			Yes ☐ No ☐ N/A ☒
	f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]			Yes ☐ No ☐ N/A ☒
NOTIFICATION FORM					
17.	a.	Contains all information in #11 a-g above and			Yes ☒ No ☐ N/A ☐
	b.	If the treated HW/soil is listed.....notification contains the following certification statement: "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or trough knowledge of the waste, to support this certification that the waste complies with the treatment stands specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."			Yes ☐ No ☐ N/A ☒
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:			
		i.	Send a one-time notification to the director?[3745-270- 09 (D)]		Yes ☐ No ☐ N/A ☒
		ii.	Maintain a copy of the notice onsite?[3745-270-09(D)]		Yes ☐ No ☐ N/A ☒
		iii.	Include in the notification: [3745-270-09(D)(1)(a)]		
			1.	Name & address of receiving landfill?	Yes ☐ No ☐ N/A ☒
			2.	Description of HW when generated?	Yes ☐ No ☐ N/A ☒
			3.	HW code when generated?	Yes ☐ No ☐ N/A ☒
			4.	Treatability group when generated?	Yes ☐ No ☐ N/A ☒
			5.	Underlying hazardous constituents present when generated?	Yes ☐ No ☐ N/A ☒
		iv.	Contain the right certification statement as required by 3745-70-07(b)(4)?		Yes ☐ No ☐ N/A ☒