



State of Ohio Environmental Protection Agency

FILE COPY

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P.O. Box 1049
Columbus, OH 43216-1049

May 5, 2008

Mr. John W. Seifert
Seifert Construction, Inc.
225 Logan Thornville Rd.
Bremen, OH 43107

**Re: Seifert Construction, Inc.
Small Quantity Generator
Non-Notifier
Fairfield County, CDO
Notice of Violation**

Dear Mr. Seifert:

Thank you for accompanying Melissa Musko and me during Ohio EPA's April 23, 2008 inspection of Seifert Construction, Inc.'s facility in Bremen, Ohio. We inspected Seifert Construction, Inc. 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). The inspection was conducted as the result of a complaint received by Ohio EPA on March 4, 2008. The complainant stated that paint waste is stored in drums at the rear of the facility and paint is deliberately disposed on site. We did not observe any drums of hazardous waste stored on-site. Mr. Seifert stated that he did not have any drums of hazardous waste stored on-site. We did not observe any evidence of disposal of paint waste on the ground at the site.

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:

1. **OAC Rule 3745-52-12 (B), Generator Identification Numbers:** A generator must not store, transport, or offer for transportation hazardous waste without having received a U.S. EPA identification number from U.S. EPA or Ohio EPA. A generator who has not received a U.S. EPA identification number must obtain one by applying to Ohio EPA using Ohio EPA form EPA9029.

3745-52-12(B) – Seifert Construction, Inc. has failed to obtain a U.S. EPA identification number. Mr. Seifert indicated during the inspection that about one 55-gallon drum of ignitable hazardous waste is the current rate of hazardous waste generation each month at Seifert Construction, Inc. Generators of greater than 220 pounds of hazardous waste in a calendar month are classified as Small Quantity Generators (SQG's). SQG's must obtain a U.S. EPA identification number.

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

As a Small Quantity Generator (SQG) of hazardous waste, Seifert Construction, Inc. must immediately obtain a U.S. EPA identification number from U.S. EPA or Ohio EPA. During the April 23, 2008, inspection we showed Mr. Seifert where to access the paperwork on-line necessary to obtain a U.S. EPA identification number.

[See <http://www.epa.state.oh.us/dhwm/notiform.html>]

2. **OAC Rule 3745-52-34(C)(1)(a), Satellite Accumulation :** Containers being used to accumulate hazardous waste must be closed, unless waste is being added or removed.

Seifert Construction, Inc. failed to close two satellite accumulation containers which were being used to accumulate hazardous waste.

Seifert Construction, Inc. must immediately close satellite accumulation containers when hazardous waste is not being added. A photograph of each of the two satellite accumulation areas should be provided to this office to document abatement of the violation.

3. **OAC Rule 3745-52-34(C)(1)(b), Satellite Accumulation:** Containers being used to accumulate hazardous waste must be labeled with the words "Hazardous Waste", or with other words identifying the contents.

Seifert Construction, Inc. failed to label satellite accumulation drums being used to accumulate hazardous waste with the words "Hazardous Waste", or with other words identifying the contents.

Seifert Construction, Inc. must immediately label all satellite containers with the words "Hazardous Waste", or with other words identifying the contents. A photograph of each of the two satellite accumulation areas should be provided to this office to document abatement of the violation.

General Comments

1. In the past, Seifert Construction, Inc. transported hazardous waste to Westerman Companies. That transportation and delivery to Westerman will be handled under separate cover.

Please note that since Seifert is now operating as a SQG, transportation of their hazardous waste must be conducted by a registered hazardous waste transporter. Confirm to me **within 30 days** of your receipt of this letter that all transportation related requirements found at OAC Rules 3745-52-30 through 3745-52-33 [See <http://www.epa.state.oh.us/dhwm/rules.htm#generator>] will be met each time hazardous waste is transported off-site to a permitted facility.

2. During the inspection you mentioned that the hazardous waste you generate from cleaning paint spray guns is classified as an ignitable D001 hazardous waste. You also mentioned that solvents used to clean painting equipment at your site include xylene and methyl ethyl ketone. We observed 55-gallon drums of both xylene and methyl ethyl ketone at your business.

Describe to me **within 30 days** of receipt of this letter each waste stream generated from each painting operation. Include the raw materials (paints) used, along with the solvents used to clean the painting equipment from each process. Include the Material Safety Data Sheet (MSDS) for each of the paints and also for the cleaning agents used.

Include the process detail requested above for the waste stream which you have classified as an ignitable hazardous waste. Also include the same process information for the waste generated when both xylene and methyl ethyl ketone are used in the process. Waste generated from the use of these two products may be characterized as listed hazardous waste. Chapter 1 of the Generator Handbook is dedicated to waste evaluation.

3. During the inspection you indicated that TCLP analytical results for the shot blast material indicate that it is not classified as a characteristic hazardous waste. The shot blast material is generated from one of two processes where miscellaneous parts, dry dock hoists, and new steel parts are blasted. Provide **within 30 days** of receipt of this letter the most recent TCLP analytical results available for the blasting material. You indicated that the blasting material is transported off-site by Falcon Transport.
4. During the inspection Mr. Seifert stated that all hazardous waste generated at Seifert Construction, Inc., Logan Thornville Rd., Bremen is transported to Westerman Companies located at 245 N. Broad St., Bremen. Westerman Companies facility which is located in Bremen does not have a permit to receive hazardous waste which is generated off-site, nor to store that same waste.

Seifert Construction, Inc. must immediately arrange to ship all hazardous waste generated at Seifert Construction, Inc. to a properly permitted treatment, storage, and disposal facility. A list of commercial treatment, storage, and disposal facilities located in Ohio is found at <http://www.epa.state.oh.us/dhwm/pdf/accepting.pdf> Seifert Construction, Inc. must also provide copies of each of the completed signed hazardous waste manifests, once returned by the destination facility, to this office for the remainder of the calendar year.

As a Small Quantity Generator (SQG), Seifert Construction, Inc must ship all hazardous waste off-site accompanied by a manifest. In addition to manifesting hazardous waste off-site, Small Quantity Generators are required to comply with additional hazardous waste requirements; including Preparedness and Prevention, Use and Management of Containers, and Pre-Transport Requirements. [See http://www.epa.state.oh.us/dhwm/dhwmrules/megasetrules_final/3745-52-34.pdf for the standards applicable to SQG's].

Enclosed you will find a copy of the checklists that we completed as a result of the inspection. Should you have any questions, please feel free to call me at 614.278.3882.

Mr. John W. Seifert
Seifert Construction, Inc.
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The time you spent with us is appreciated. I am available to assist you if you have any questions and I look forward to your response. You can find copies of the rules and other guidance on the division's web page at: <http://www.epa.state.oh.us/dhwm>.

Sincerely,



Andy Kubalak
Environmental Specialist
Hazardous Waste Management
Central District Office

Enclosure

c: Terry A McGhee, President, CEO, Westerman Companies
Tammy McConnell, DHWM
Olen Ackman, DAPC, CDO
CDO File

AK/nsm seifertNOV042B08

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 or mail it to Tammy
McCConnell, Central Office

2. Site EPA ID No.	EPA ID Number:										
3. Site Name	Name: Seifert Construction, Inc.						Website: (Optional)				
4. Site Location Information	Street Address: 225 Logan Thornville Road										
	City, Town, or Village: Bremen						State: OH				
	County Name: Fairfield						Zip Code: 43107				
5. Site Land Type (check only one)	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>			
6. NAICS code(s) www.census.gov/epcd/www/naics.html											
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: John			MI: W		Last Name: Seifert					
	Phone Number: 740.569.4160					Phone Number Extension:					
	E-Mail Address:										
	Fax Number:					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: John and Connie Seifert						Date Became Owner (mm/dd/yyyy): 07/xx/92				
	Owner Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>		
	Street or P.O. Box:										
	City, Town or Village:						Owner Phone #:				
	State:						Country:			Zip Code:	
	Name of Site's Operator:						Date Became Operator (mm/dd/yyyy):				
	Owner Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>		
	Street or P.O. Box:										
	City, Town or Village:						Operator Phone #:				
	State:						Country:			Zip Code:	
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 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 checked="" type="checkbox"/> Small Quantity Generator (SQG)											
<input type="checkbox"/> Hazardous Waste Transporter					<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace						
<input 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))	
	Managed	<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 RCRA info source record, you do not need to list them all. Instead just indicate the date of the most recent source record.			
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 type="checkbox"/> No	Other Comments:
Containers	<input 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)
Andy Kubalak		Melissa Musko	4/23/2008 1:00pm
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)

**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 checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 2. | Has the generator obtained a U.S. EPA I.D. number? [3745-52-12] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 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 | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 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 | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 5. | Does the generator accumulate hazardous waste? | Yes | <input type="checkbox"/> | No | <input checked="" 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 <u>in excess of (180/270) days</u> without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" 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 type="checkbox"/> | N/A | <input checked="" 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 type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 10. | Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| | a. Does the contractual agreement specify the type of waste and frequency of shipment? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |

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- 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

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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]
- a. Are inspections recorded in a log or summary? [3745-65-33]? 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