



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Central District Office

MAILING ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 728-3778 FAX: (614) 728-3898
www.epa.state.oh.us

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

October 9, 2007

Re: **Abbott Laboratories**
OHD004283115 Franklin County
SQG [NOV-RTC]

Ms. Shanna Schmiesing
Abbott Nutrition Columbus Manufacturing
Dept 32130, Columbus Plant
585 Cleveland Avenue
Columbus, OH 43215-1724

Dear Ms. Schmiesing:

Thank you for your time and assistance during my inspection visit to Abbott Laboratories Columbus Plant at 585 Cleveland Avenue in Columbus on September 19, 2007. The purpose was to review your facility's generation and management of hazardous waste. Ohio's laws under Chapter 3745 of the Ohio Administrative Code and Chapter 3734 of the Ohio Revised Code establish a system for safe and responsible management of this waste. This letter summarizes the inspection findings. Follow-up actions taken by Abbott personnel at the time of the inspection, and afterwards as documented in your memo to me which was received on September 26, 2007, are also taken into account. The following violations were noted:

1. **Closed Containers, OAC rule 3745-34(C)(1)(a):** Containers accumulating hazardous waste must be kept closed when waste is not being added to them.

A beaker of liquid solvent waste in a laboratory fume hood, was left open and was evaporating.

This violation was resolved during my inspection visit when a worker transferred the waste contents to a jug in the same area which had a proper lid. You also indicated that procedures have been reviewed to ensure this problem does not reoccur.

2. **Hazardous Satellite Container Marking, OAC rule 3745-52-34(C)(1)(b):** Containers of hazardous waste must be marked with the words, "Hazardous Waste", or other words identifying the contents.

A label identifying contents of container of hazardous waste ink from the video jet printing process, was obscured by drippage of the ink.

You indicated this has been replaced with a legible version and that all other such containers are properly marked. This violation is considered resolved.

3. **Closed Containers of Universal Waste Lamps, OAC rules 3745-273-13(D)(1) and D(2):** Universal waste lamps, including any broken lamps, must be accumulated in containers which are closed.

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

Two containers of universal waste lamps were not properly closed. One round fiber container had a square lid that did not fit. A square container with lamp residues inside lacked a lid.

You indicated that these wastes were properly containerized and shipped off-site to a permitted receiving facility on September 24, 2007. This violation is considered resolved.

At this time, Abbott Laboratories Columbus Plant is considered returned to compliance on the violations noted during this inspection.

In addition, I also offer the following comments, concerns and/or suggestions:

- A satellite accumulation container of waste aerosol cans which are managed as hazardous waste, mistakenly had an additional label marking it as "scrap metal" which you indicated has now been removed.
- We discussed the possibility of using refillable aerosol cans, which may enable reduction of generation of some of the most commonly used types of aerosols. Reduced costs may be realized by buying liquid contents in bulk, as well as avoiding costs of hazardous waste disposal of the single-use cans.
- One hazardous waste manifest, number 05002 to Onyx Environmental Services dated 7/25/2005, had not been properly completed in box 2 where the presence of a second page should have been noted. However, it was evident from your records that the second page had evidently accompanied the shipment since the proper return page had been received back with the first page, from the receiving facility, after the shipment.
- The housekeeping at your facility was generally very good.

Enclosed is a copy of the checklist that was completed for this inspection, as well as a fact sheet on handling universal waste lamps. Our website, www.epa.state.oh.us/dhwm, provides links to copies of Ohio hazardous waste rules. Should you have any questions, please feel free to call me at (614) 728-3885.

Sincerely,



J. David Hohmann
Environmental Specialist
Division of Hazardous Waste Management
Central District Office

Enclosure

c: Tammy McConnell/CO
CDO File

JDH/nsm AbbaT NOV-RTC

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

Abbott Laboratories—Cleveland Avenue
SMALL QUANTITY GENERATOR REQUIREMENTS
 (COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET)

SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month
 Safety Equipment Used: safety glasses and steel toed shoes, earplugs

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 checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 3. | Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input 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 checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 6. | Has the generator accumulated hazardous wastes <u>in excess of (180/270) days</u> without a permit or extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 7. | Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 8. | Does the generator treat hazardous waste in a: <i>[N/A—no treatment on site]</i> | | | | | | |

MANIFEST REQUIREMENTS

- | | | | | | | | |
|-----|--|-----|-------------------------------------|----|-------------------------------------|-----|--------------------------|
| 9. | Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 10. | Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)] <i>[N/A]</i> | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 11. | Have items 1 through 20 of each manifest been completed? [3745-52-20(A)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |

Remark: Page 1 of Manifest number AL072505 box 2 did not indicate there was a second page (2 page manifest), and page #2 did not indicate at the top that it was # 2 of 2. The obligation to complete manifests properly is jointly shared by the Generator and Transporter, according to Ohio rules. The shipment appears to have been properly transported and received; and the deficiency appears to have been a one time event, so it is being noted as a comment at this time.

- | | | | | | | | |
|-----|---|-----|-------------------------------------|----|--------------------------|-----|-------------------------------------|
| 12. | Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 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 | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 14. | Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 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 | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 16. | Are signed copies of all manifests being retained for at least three years? [3745-52-40] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

PREPAREDNESS AND PREVENTION

- | | | | | | | | |
|-----|--|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| 17. | Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
|-----|--|-----|-------------------------------------|----|--------------------------|-----|--------------------------|

18. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]
- a. Name and telephone number of emergency coordinator? Yes No N/A
- b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes No N/A
- c. Telephone number of local fire department? Yes No N/A
19. Are employees familiar with waste handling and emergency procedures [3745-52-34(D)(5)(c)] Yes No N/A
20. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)] Yes No N/A
21. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31] Yes No N/A
22. Does the generator have the following at the facility if required due to actual hazards associated with the waste:
- a. Internal Alarm system? [3745-65-32(A)] *Fire alarm* Yes No N/A
- b. Emergency communication device? [3745-65-32(B)] *Phone, radios, pagers* 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? [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] *Preventive maintenance inspections*
- 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
- An open beaker found in the lab hood was emptied by a worker.*
- f. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] *A container of video jet ink waste had a label whose legibility was obscured by ink drips.* 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

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
34. Is the container accumulation area(s) inspected at least weekly? [3745-66-74] *Per ORCS 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

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

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

Small Quantity Handler (SQUWH) = 5,000 Kg or less

Prohibitions

- 1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No N/A RMK#
- 2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes No N/A RMK#

Waste Management & Labeling/Marking

UNIVERSAL WASTE BATTERIES

- 3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes No N/A RMK#
- 4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes No N/A RMK#
- 5. Does the SQUWH conduct any of the following activities:
 - a. Sort batteries by type? Yes No N/A RMK#
 - b. Mix battery types in one container? Yes No N/A RMK#
 - c. Discharge batteries to remove the electric charge? Yes No N/A RMK#
 - d. Regenerate used batteries? Yes No N/A RMK#
 - e. Disassemble them into individual batteries or cells? Yes No N/A RMK#
 - f. Remove batteries from consumer products? Yes No N/A RMK#
 - g. Remove the electrolyte from the battery? Yes No N/A RMK#If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] Yes No N/A RMK#
- 6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] [a., b. = N/A] Yes No N/A RMK#
- 7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)] Yes No N/A RMK#

UNIVERSAL WASTE LAMPS

- 8. Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] Yes No N/A RMK# a.
- 9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps; and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes No N/A RMK#
- 10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)] Yes No N/A RMK#

Accumulation Time

- 11. Is the waste accumulated for less than one year? [3745-273-15(A)] Yes No N/A RMK#
If not: N/A

NOTE: Accumulation is defined as date generated or date received from another handler.

Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)]
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes No N/A RMK#
 - b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes No N/A RMK#
 - c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes No N/A RMK#
 - d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes No N/A RMK#
 - e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes No N/A RMK#
 - f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes No N/A RMK#

EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] Yes No N/A RMK#

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes No N/A RMK#
15. Is the material released characterized? [3745-273-17(B)] Yes No N/A RMK#
16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes No N/A RMK#

OFF-SITE SHIPMENTS

If a SQUWH self-transport waste, they must comply with Universal Waste transporter requirements.

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes No N/A RMK#
18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes No N/A RMK#
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No N/A RMK#
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following: [N/A—has not been rejected]
21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following: [N/A] Yes No N/A RMK#
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes No N/A RMK#
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes No N/A RMK#

EXPORTS [N/A]

24. Is waste being sent to a foreign destination? Yes No N/A RMK#

REMARKS

- a. A round half-height fiberboard container with u-shaped fluorescent tubes inside, had a square lid that did not fit properly.
- b. A square fiberboard container held lamp residues and lacked a lid. However, it might have qualified as RCRA-empty due to the small amount of contents. It was not possible to visually assess whether any mercury was present therein at the time of the inspection.

LDR CHECKLIST

GENERAL REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] If so: Yes No N/A
RMK# _____
- a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)] Yes No N/A
RMK# _____
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes No N/A
RMK# _____
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] Yes No N/A
RMK# _____
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes No N/A
RMK# _____
4. Does the generator generate a characteristic hazardous waste? If so: Yes No N/A RMK# _____
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes No
REMARK: not required for D001 for CMBST N/A RMK# _____
- If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*
5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so: Yes No N/A
RMK# _____
- a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes No N/A
REMARK: not required for D001 destined for CMBST RMK# same as above
6. Has the generator correctly determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)] Yes No
N/A RMK# _____
7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] Yes No
N/A RMK# _____
8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] Yes No
N/A RMK# _____
9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes No
N/A RMK# _____
10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste? [3745-270-05] If so: [N/A] Yes No
N/A RMK# _____
11. Does the facility have an extension to allow for a restricted waste to be land disposed? [3745-270-06] If so: [N/A] Yes No
N/A RMK# _____
12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? If so: [N/A] Yes No
N/A RMK# _____

NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)] Yes No
N/A RMK# _____
14. If a generator's waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)] Yes No
N/A RMK# _____
15. If a generator's waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)] Yes No
N/A RMK# _____
16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)] Yes No
N/A RMK# _____

17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so: [N/A] Yes No
N/A RMK#
18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)] Yes No N/A
RMK#

GENERATORS TREATING HAZARDOUS WASTE [N/A]

HAZARDOUS DEBRIS [N/A]

TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS [N/A]

