



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

October 23, 2012

WASHINGTON COUNTY  
GENERAL FILE  
(SEWAH STUDIOS)  
DMWM/SEDO  
OHR000026633

Mr. Brad Smith  
Sewah Studios  
190 Mill Creek Road  
Marietta, Ohio 45750

Dear Mr. Smith:

On October 3, 2012, Ohio EPA inspected Sewah Studios ("Sewah") in Marietta, Ohio. The purpose of the inspection was to determine 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 violations I found, what you need to do to respond to the violations, and my requests for additional information.

I found the following violations of Ohio's hazardous waste laws:

1. **Ohio Revised Code (ORC) § 3734.02(E) and (F), Establishing and Operating a Hazardous Waste Facility:** (E) No person shall establish or operate a hazardous waste facility without a hazardous waste facility installation and operation permit. (F) No person shall treat, store or dispose of hazardous waste or transport or cause hazardous waste to be transported to any other premises except to or at a hazardous waste permitted facility (TSD).

Sewah established and operated a hazardous waste treatment facility without a hazardous waste installation and operation permit, in violation of ORC § 3734.02(E) and (F), by treating ignitable hazardous waste paint filters (D001) onsite by open burning prior to disposing of the ash as a solid waste. During the inspection, three burn barrels containing burned paint filters, as well as several trash bags of ashes, were observed. Sewah stated that the filters are treated this way because they will spontaneously combust.

In addition, since 2007, in the process of operating a solvent distillation unit, Sewah has caused hazardous waste to be transported and disposed of as a solid waste by disposing of hazardous waste solvent still bottoms (D001/F003/F005) in their dumpster.

As discussed in our October 4, 2012 telephone call, Sewah must take immediate steps to cease burning the filters. As discussed, Sewah must also more fully evaluate the filters per #2 below to determine if the filters also contain regulated

quantities of metals and voc's before a determination can be made regarding whether the filters can be managed as a solid or hazardous waste. Please note that as we discussed, any additional waste streams generated by Sewah as a result of managing the spent filters must be evaluated per #2 below and results submitted to Ohio EPA for review.

Regarding the still bottoms, as discussed during the inspection, Sewah must begin to containerize them when removed from the still, and manifest them offsite for disposal to a hazardous waste treatment, storage or disposal (TSD) facility. Please submit to this office a copy of a company policy and detailed procedures for the proper management of spent paint filters and still bottoms as a hazardous waste.

Please be advised that due to the nature of the violations Ohio EPA may take escalated enforcement action against Sewah. In addition, because Sewah has violated ORC §3734.02(E) and (F), Sewah is subject to all applicable general facility standards found in OAC chapters 3745-54 and 55. Additionally, at any time Ohio EPA may assert its right to have Sewah begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

2. **OAC Rule 3745-52-11, Hazardous Waste Determination:** Any person who generates a waste, as defined in rule 3745-51-02 of the Ohio Administrative Code, must determine if that waste is a hazardous waste using the following method: (A) He should first determine if the waste is excluded from regulation under rule 3745-51-04 of the Administrative Code (B) He must then determine if the waste is listed as a hazardous waste in rules 3745-51-30 to 3745-51-35 of the Administrative Code. (C) For purposes of compliance with Chapter 3745-270 of the Administrative Code, or if the waste is not listed as a hazardous waste in rules 3745-51-30 to 3745-51-35 of the Administrative Code, the generator must then determine whether the waste is identified in rules 3745-51-20 to 3745-51-24 of the Administrative Code by either: (1) Testing the waste according to the methods set forth in rules 3745-51-20 to 3745-51-24 of the Administrative Code, or according to an equivalent method approved by the Region V Administrator of U.S. EPA pursuant to 40 CFR 260.21; or (2) Applying knowledge of the hazardous characteristic of the waste in light of the materials or the processes used.

Sewah failed to adequately evaluate the following wastes:

- a. **Spent paint booth filters.** Sewah determined using process knowledge that its paint filters will spontaneously combust and was burning the filters to avoid combustion, therefore Sewah has made the determination that they are a D001 ignitable hazardous waste. However, Sewah has not yet determined if the filters are characteristically hazardous for metals or voc's. In order to abate this violation, Sewah must perform a full characterization per the above

rule and submit the evaluation to Ohio EPA. Should the filters be hazardous, they must be managed as such.

- b. **Ash from burning spent paint booth filters.** Sewah must adequately evaluate this per the above rule and submit the evaluation to Ohio EPA.
- c. **Still bottoms.** Sewah made the erroneous determination that the still bottoms were not a hazardous waste and were managing them as a solid waste. Based on process knowledge, still bottoms are an F003/F005 hazardous waste and must be manifested offsite as a hazardous waste to a TSD.
- d. **Foundry wastes (other than aluminum production wastes).** Sewah has been sending this waste offsite to John Epler Company for many years, where the waste has been illegally disposed of on the ground at the Epler foundry site. Sewah first must determine if this waste is non hazardous by adequately evaluating it per the above rule and submitting the evaluation to Ohio EPA. After this determination, Sewah should work with John Epler to remove and properly dispose of all wastes sent to the Epler site.
- e. **Aluminum production wastes.** Sewah failed to determine if aluminum production wastes, including "skimmings" (referred to as "dross" by Sewah Studios in a December 2, 1997 letter to Ohio EPA), are a hazardous waste. Note that if these wastes are being legitimately recycled, they are considered a byproduct, and not subject to hazardous waste evaluation. However, if being disposed of, they are a waste and must be evaluated per the above rule. If nonhazardous, Ohio law prohibits the disposal of aluminum production wastes anywhere except an approved solid waste landfill. Because at least some of Sewah's aluminum production wastes were not being legitimately recycled by John Epler Company, Sewah must adequately evaluate this per the above rule and submit the evaluation to Ohio EPA.

Due to Sewah's practice of sending foundry wastes and aluminum production wastes to John Epler Company, and the resulting disposal of these wastes, Sewah is in violation of illegal disposal. All wastes that Sewah has sent to the Epler site must be removed for proper disposal. The level of remediation will be dependent on the waste sampling results which we expect to receive in early November. These results will determine if the waste is hazardous or nonhazardous. We will notify you of this when the results are received. If the wastes are nonhazardous, they are solid wastes, and Sewah is in violation of OAC 3745-27-05(C) for open dumping solid wastes.

#### **GENERAL COMMENTS and REQUEST for ADDITIONAL INFORMATION**

- A. Please provide a detailed summary of all of Sewah's waste disposal practices including types, characteristics, and amounts of waste, including disposal

locations and timeframes involved. Please also determine the volume of spent solvents and still bottoms that you have generated each month since the solvent still was placed in operation. See page four of the enclosed fact sheet, "On-site Solvent Recycling Equipment", for an explanation of how to calculate the monthly volume.

- B. We received your e-mail dated October 4, 2012 which stated that Sewah has determined that a bucket identified as concrete additive located near the sand blasting shed contained water. Therefore, a waste evaluation is not needed for that material.
- C. Sewah should take all necessary steps to contain sandblasting media inside the sandblasting shed. During the inspection, sandblasting media was observed on the ground around the exterior of the shed and on the upper edge of the stream bank, which is located within a few feet of the shed. Released sandblasting media should be immediately cleaned up so as not to affect soil or water quality, or cause illegal disposal. Please describe your actions taken to correct this.
- D. All unusable paint remaining in paint cans should be managed as a hazardous waste by immediately pouring it into the drum containing spent solvent/paint waste. Waste paint is an ignitable hazardous waste (D001) and should not be allowed to dry in open cans, as this can be considered illegal treatment of a hazardous waste.
- E. Sewah has decided to soak spent paint booth filters in water, so the filters are no longer a D001 ignitable hazardous waste. Be advised that by treating a hazardous waste using this method, Sewah also needs to comply with the land disposal requirements in OAC 3745-270-40 (DEACT) and meet the standards for underlying hazardous constituents (UHCs). Alternatively, Sewah may meet the standards in the debris rules specified in OAC 3745-270-45 by using water washing or spraying (no UHC requirements apply). If so, Sewah will also need to develop a waste analysis plan found in OAC 3745-270-07. The treated filters can be disposed of as solid wastes as long as there are no free liquids present. An absorbent or cement could be used if free liquids are an issue.

You must immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within **21 days** of the date of this letter, you are requested to provide documentation to this office including the steps taken to abate the violations cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to [donna.goodman@epa.state.oh.us](mailto:donna.goodman@epa.state.oh.us).

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the

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abatement of violations, Sewah is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

Enclosed, you will find a copy of the checklists that were completed as a result of the inspection. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. If you have any questions, please contact me by telephone at (740) 380-5293 or by e-mail at [donna.goodman@epa.state.oh.us](mailto:donna.goodman@epa.state.oh.us).

Sincerely,



Donna Goodman  
Inspector  
Division of Materials and Waste Management

Enclosure

DG/mr

cc: Joe Holland, DMWM  
Christina Wieg, DAPC  
Dean Ponchak, DAPC

**NOTICE:**

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

Send to Central Office <input checked="" type="checkbox"/>	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE</b> <b>IDENTIFICATION/VERIFICATION FORM</b>	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to [brad.hauser@epa.state.oh.us](mailto:brad.hauser@epa.state.oh.us).

<b>Site EPA ID No.</b> <b>Site Name</b>	EPA ID Number: <b>OHR000026633</b>		Website: (Optional)					
	Name: <b>Sewah Studios</b>							
<b>Site Location Information</b>	Street Address: <b>190 Mill Creek Road</b>							
	City, Town, or Village: <b>Marietta</b>		State: <b>OH</b>					
	County Name: <b>WASHINGTON</b>		Zip Code: <b>45750</b>					
<b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	<b>332999</b>							

<b>Facility Representative</b>  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: <b>Brad</b>		MI:	Last Name: <b>Smith</b>	
	Title: <b>Owner</b>				
	Phone Number: <b>740-373-2087</b>			Phone Number Extension:	
	E-Mail Address:				
	Fax Number:			Fax Number Extension:	
	Street or P.O. Box:				
	City, Town or Village:				
	State:			Zip Code:	

<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner:				Date Became Owner (mm/dd/yyyy):				
	Owner Type: <input type="checkbox"/>	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: <b>Sewah Studios</b>				Date Became Operator (mm/dd/yyyy):				
	Operator Type: <input checked="" type="checkbox"/>	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:		

<b>VIOLATIONS CITED?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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<b>TYPE OF HANDLER - MARK "X" AS APPROPRIATE</b>		
<input type="checkbox"/> Not a HW Generator	<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
	<input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.	<input type="checkbox"/> Small Quantity Generator (SQG)
		<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
		<input type="checkbox"/> U.S. Importer of Hazardous Waste
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

**TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)**

- |   |  |
|---|--|
| <input type="checkbox"/> Hazardous Waste Transporter                    | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace       |
| <input type="checkbox"/> Hazardous Waste Transfer Facility              | <input type="checkbox"/> Small Quantity On-Site Burner Exemption       |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Recycler of Hazardous Waste                    | <input type="checkbox"/> Underground Injection Control Facility        |
| <input type="checkbox"/> 72-Hour Recycler                               | <input type="checkbox"/> Receives Hazardous Waste from Off-site        |

**UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED)**

(CHECK ALL BOXES THAT APPLY)

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

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

- Batteries  
 Pesticides  
 Mercury containing equipment  
 Lamps

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

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

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

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

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

**F003                      F005                      D001**

**COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.**

- |            |   |  |                                      |
|------------|---|--|--------------------------------------|
| Announced  | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | Additional Facility Representatives: |
| Tanks      | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No |                                      |
| Containers | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            |                                      |

Name of Inspector(s)  
**Donna Goodman**

Name of Inspector(s)  
**Rich Stewart**

Date of Inspection/Time  
 (mm/dd/yyyy) (hh:mm)  
**10/3/2012 10:30 AM**

**Comments:**

## PROCESS, WASTE, P2 SUMMARY SHEET

**Facility Name:** Sewah Studios **Facility Type:** Not yet determined **Date of Inspection:** 10/3/2012 **EPA ID#:** OHR000026633

Waste Generated		On- or Off-Site Management			P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	Casting  aluminum production wastes including gates and skimmings.  Unevaluated	accumulated outdoors in covered area adjacent to the pouring room.		John Epler Company, Lowell, Ohio. Some is remelted by Epler. Some is mixed with spent foundry sand and placed in waste piles.		
2	Casting  Spent foundry sand. Unevaluated	4-5 5-gallon buckets per week, Accumulated outdoors in covered area adjacent to pouring room.		John Epler Company, Lowell, Ohio. Mixed with aluminum production wastes and placed in waste piles.		
3	Painting  Spent paint booth filters D001 per company process knowledge but not fully evaluated	25 25"x25" filters per mo. Changed out every day.	open burned in 3 burn barrels daily	Ashes placed in dumpster and sent to Rumpke Beech Hollow landfill		re-usable paint filters or switch to powder coating
4	Painting  Spent solvent and still bottoms	spent solvent is placed in solvent still	solvent recycled	still bottoms placed in dumpster, sent ot		Switch to powder coating.

5	Painting	F003/F005/ D001  Paint/Solvent waste from gilding room D001//F003/ F005	in paint booth. Monthly quantity not yet determined,  Placed in drum in "haz mat" closet. Approx. 55-gallons per 6 mos.	onsite.	Rumpke Beech Hollow landfill.  Veolia		
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### REMARKS/GENERAL INFORMATION

**General Process Information:**

Sewah Studio casts aluminum historical marker signs that are seen on roadways and historic sites throughout the country. It is one of only three companies in the US that manufacture such signs. Sewah purchases Ingots from several aluminum suppliers. Lettering is assembled onto sign molds. Aluminum is melted in a furnace and poured into the mold which has been packed with a "green sand", a clay-ey topsoil which is used as green foundry sand. After the sign cools, it is ground to remove uneven edges, painted in a paint booth, dried in an oven, the letters are then painted and gilded by hand, and the finished sign is shipped after curing for 24 hours. Old signs returned to the company for refurbishing are sandblasted in a shed and then repainted. Foundry sand is re-used onsite until the clay content has been depleted. Spent foundry sand is then placed in -5-gallon buckets, stored outside under roof and sent offsite to a contractor who buries them at his foundry site in Lowell, Ohio. Aluminum production wastes are also stored outside under roof and sent to the same contractor who remelts some and buries some with the foundry sand. Spontaneously combustible paint filters are burned onsite in burn barrels, and ashes are disposed of as a solid waste. Spent solvent is recycled in a small still; hazardous waste still bottoms are disposed of as a solid waste.

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

Sewah was last inspected on November 10, 1997 by DMWM as part of the DWATT initiative. They were cited in a November 24, 2011 NOV for failure to evaluate paint filters which they were managing as a solid waste, according to the inspection report. The company submitted analytical results indicating the filters were nonhazardous, and they were returned to compliance on December 8, 1997. Ohio EPA also recommended that dross, which was being managed outdoors on the ground, be managed under roof to protect it from precipitation. The company responded in a December 2, 1997 letter and indicated that they would be constructing a covered area for "protection of aluminum dross being held for recycling."

**Additional P2 remarks and information:**

It was recommended to the company that they contact OCAPP for assistance with powder coating considerations, reusable paint filters and other painting issues. They have since contacted OCAPP.

Would this facility be interested in a P2 assessment?  Yes\*  No \*If yes, refer promptly to your district P2 coordinator.  
Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or [p2mail@epa.state.oh.us](mailto:p2mail@epa.state.oh.us) or [www.epa.state.oh.us/ocapp/ocapp.html](http://www.epa.state.oh.us/ocapp/ocapp.html)

**Other:**

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

CESQG: ≤100Kg. (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:

**WASTE EVALUATION**

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11] <b>Company failed to evaluate spent paint filters, still bottoms, aluminum production wastes and foundry waste.</b>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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**GENERATOR CLASSIFICATION**

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] <b>Unknown</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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*NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.*

**OFF-SITE SHIPMENT OF HAZARDOUS WASTE**

3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Hazardous waste still bottoms are disposed of as a solid waste.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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**TREATMENT OF HAZARDOUS WASTE**

4.	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 the CESQG conducts treatment they are subject to the LQG requirements.*

*NOTE: If waste is treated to meet LDRs, use LDR checklist.*

**MIX HAZARDOUS WASTE WITH USED OIL**

5.	Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>