

Mike DeWine, Governor Jon Husted, Lt. Governor Laurie A. Stevenson, Director

December 20, 2019

Penn-Ohio Waste LLC P.O. Box 310 7555 North Street Negley, Ohio 44441

Re: PennOhio Waste LLC

**Director's Final Findings and Orders (DFFO)** 

**DFFO** 

**Construction & Demolition Debris** 

**Columbiana County** 

CDDL018903

Subject: Final Findings and Orders of the Director

Dear Sir or Madam:

Transmitted herewith are the Final Findings and Orders of the Director concerning the matter indicated for Penn-Ohio Waste LLC..

You are hereby notified that this action of the Director of Ohio EPA (Director) is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 made payable to "Treasurer, State of Ohio." The Commission, in its discretion, may reduce the fee if by affidavit it is demonstrated that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission 30 East Broad Street, 4th Floor Columbus, Ohio 43215

If you have any questions, please contact Janine Maney at (614) 644-3037.

Sincerely.

Jeri Main, Administrative Professional Unit Division of Materials & Waste Management

**Enclosure** 

ec: Teri Finfrock, Legal, CO
Aaron Shear, DMWM, CO
Vlad Cica, Chief, DMWM, CO
Rick Carleski, Assistant Chief, DMWM, CO
Aaron Shear, DMWM, CO
Kelly Jeter, DMWM, CO
Bruce McCoy, DMWM, CO

#### **BEFORE THE**

#### **OHIO ENVIRONMENTAL PROTECTION AGENCY**

In the Matter of:

Penn-Ohio Waste LLC P.O. Box 310 7555 North Street Negley, Ohio 44441

**Director's Interim Findings** 

and Orders

## **PREAMBLE**

It is agreed by the parties hereto as follows:

Ohio EPA DEC 20'19 Entered Directors Journal

#### I. JURISDICTION

These Director's Interim Findings and Orders ("Orders") are issued to Penn-Ohio Waste LLC ("Respondent") pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency ("Ohio EPA") under Ohio Revised Code ("ORC") §§ 6111.03, 3704.03, 3745.01 and Chapter 3714. Director's Final Findings and Orders may be issued later to require Respondent to take additional action.

#### II. PARTIES BOUND

These Orders shall apply to and be binding upon Respondent and successors in interest liable under Ohio law. No change in the composition of Respondent shall in any way alter Respondent's obligations under these Orders.

#### III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC Chapter 3704, 3714, 3734 and 6111 and the rules promulgated thereunder.

#### **IV. FINDINGS**

The Director of the Ohio EPA has determined the following findings:

- 1. Respondent is a Delaware corporation doing business in Ohio and registered as a foreign corporation with the Ohio Secretary of State.
- 2. Respondent owns and operates a construction and demolition debris (C&DD) landfill

- facility (Facility ID CDDL018903) located at 7555 North Street, Negley, Ohio 44441, Columbiana County (Facility).
- 3. In the past three months, Respondent has been issued Notices of Violation for ongoing operational issues at the Facility. These violations will be addressed in a future compliance order.
- 4. Respondent had begun accepting rail cars at a property located at 44626 State Route 154 in Elk Run Township, Columbiana County ("Signal Site"). In early December 2019, Respondent began unloading rail cars at the Signal Site without first obtaining a storm water permit and an air permit.
- 5. Respondent ceased all operations at the Signal Site upon notification from Ohio EPA that it was operating without permits. As a result, Respondent left dormant approximately 180 rail cars loaded with C&DD currently located at or staged for delivery to the Signal Site.
- 6. Currently, Respondent's Facility exceeds the limits of its waste placement and Respondent has not completed construction of a new cell. Therefore, Respondent will not be able to accept the approximately 180 rail cars referenced in Finding 7.
- 7. On December 10, 2019, Youngstown & Southeastern Railway Company (Y&SR) notified Ohio EPA that it was the owner of the Signal Site and that the approximate 180 rail cars loaded with C&DD were impacting its business because the dormant rail cars were interfering with Y&SR's ability to service its customers. Y&SR needed the rail cars removed from the rail lines, unloaded and returned to service other companies waiting to ship materials by rail.
- 8. In an effort to prevent any further disruption of rail service, Ohio EPA has agreed to enter into these Orders with Respondent to allow the temporary unloading of rail cars at the Signal Site.
- 9. In order to suppress dust from Respondent's rail car unloading operation, Respondent intends to utilize a misting device to control dust during the transfer process at the Signal Site. The misting water and precipitation events will combine with the debris to form leachate, which will be collected in a holding tank that will be pumped and the leachate removed for proper disposal.
- 10. In order to address surface water run-off and leachate management, Respondent intends to implement the Temporary Control Plan (Appendix A) it submitted to Ohio EPA on December 6, 2019. Under this plan, Respondent will capture and manage leachate along with managing storm water run-off from the Signal Site.

## V. ORDERS

- 1. These Orders shall terminate after the 180<sup>th</sup> rail car is unloaded or sixty (60) days after issuance of this Order whichever occurs first.
- Respondents shall limit rail unloading operations at the Signal Site to no more than twelve (12) hours per day Monday through Friday. Rail unloading operations shall commence no earlier than 5:30 AM and shall cease no later than 5:30 PM each day. Saturday or Sunday operations will only occur with the prior written consent of Ohio EPA.
- 3. Respondent shall complete installation of the leachate, dust, and stormwater controls as soon as practicable and commence rail car unloading operations immediately thereafter, with the goal to commence rail car unloading no later than Thursday, December 26, 2019. At a minimum, Respondent will unload 5 rail cars a day during operation hours and the waste shall be disposed of at a licensed construction and demolition debris landfill or a permitted and licensed municipal solid waste landfill in Ohio or Pennsylvania. Respondent is prohibited from conducting rail car unloading operations at the Signal Site on December 25, 2019 and January 1, 2020.
- 4. Respondent is prohibited from accepting or disposing any of the waste from the approximate 180 rail cars at the Facility without the prior written authorization from Ohio EPA. Respondent is prohibited from open dumping or illegally disposing of the waste from the rail cars at the Signal Site. Trucks loaded with waste from the rail cars shall be removed from the Signal Site by the next business day. All unloaded rail cars will be turned over to Y&SR for removal from the site as part of their normal operations. Any waste spilled during unloading operations shall be removed prior to the close of business.
- 5. Respondent shall provide a daily report of the operations at the Signal Site. The report shall be submitted to Ohio EPA by noon each day detailing the activities of the previous working day. The report shall include, but not limited to, the following:
  - a. The actual operating hours, starting and ending.
  - b. The number of rail cars unloaded during that day.
  - c. The number of trucks loaded during that day.
  - d. The destination of each of those trucks, including all weight receipts for each truck as measured at the destination.
  - e. Narrative detailing any operational changes to address dust emissions.
  - Narrative detailing any operational changes to address surface water runoff.
  - g. Narrative detailing any operational changes to address leachate management, including any transfer of leachate for off-site disposal and

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disposal receipts.

- h. Narrative detailing any problem that has impacted Respondent's ability to unload rail cars and properly dispose of the waste and any operational changes to address the problem.
- 6. Any waste unloaded that meets the definition of construction and demolition debris (C&DD) pursuant to OAC Rule 3745-400-01(C) may be taken to a licensed C&DD landfill or a permitted and licensed solid waste landfill in Ohio or Pennsylvania.
- Any waste unloaded that meets the definition of solid waste pursuant to ORC 3734.01 shall be taken to a permitted and licensed solid waste landfill in Ohio or Pennsylvania.
- 8. Respondent shall provide roll-off trailers at each Ohio-based C&DD landfill that accepts waste from these rail cars. The roll-off trailers will be used to collect prohibited materials (i.e. solid waste) that are picked out of the C&DD waste stream originating from the rail cars.
- Respondent shall implement the Temporary Controls Plan attached as Appendix A to capture, manage, and properly dispose of all leachate from its operations at the Signal Site.
- 10. Within seven (7) days from the effective date of these Orders, Respondent shall submit a complete and approvable permit to install ("PTI") application for the holding tank pursuant to Ohio Adm. Code Sections 3745-42-03 and 3745-42-11. The PTI application shall include a detailed plan to properly dispose of the leachate from the holding tank at an approved facility equipped to treat industrial waste.
- 11. Within thirty (30) days from the effective date of these Orders and prior to submitting a notice of intent ("NOI") for coverage under Ohio EPA's Authorization to Discharge Storm Water Associated with Industrial Activity Under the National Pollutant Discharge Elimination System (Multi-Sector General Permit), Respondent shall develop a storm water pollution prevention plan ("SWP3") for the Signal Site that satisfies Part 5.1 of the Multi-Sector General Permit and includes control measures to minimize and/or eliminate the offsite tracking of sediment from vehicular traffic.
- 12. Within thirty (30) days from the effective date of these Orders, Respondent shall submit a NOI for authorization under the Multi-Sector General Permit, for the discharge of storm water associated with industrial activities occurring at the Signal Site.
- 13. Respondent shall immediately implement the SWP3 that was developed in Order No. 12 upon receiving Ohio EPA authorization under the Multi-Sector General Permit.

- 14. Respondent shall comply with the following requirements in the roadways and parking areas:
  - a. Emissions from roadways and parking areas shall not exceed the limitations listed in the following table:

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures		
1.	OAC rule 3745-31-05(A)(3)	Implement a site-specific work practice plan designed to minimize or eliminate fugitive dust emissions. See c		
2.	OAC rule 3745-17-07(B)(4)	No visible PE from any paved roadway or parking area except for a period of time not to exceed 6 minutes during any 60-minute observation period		
3.	OAC rule 3745-17-07(B)(5)	No visible PE from any unpaveroadway or parking area except for a period of time not to exceed 13 minute during any 60-minute observation period		
4.	OAC rule 3745-17-08(B)	See b.		

- b. Respondent shall employ reasonably available control measures to minimize or eliminate visible PE of fugitive dust by:
  - i. The periodic application of asphalt, oil (excluding any used oil as defined in paragraph (A)(12) of rule 3745-279-01 of the Administrative Code), water or other suitable dust suppression chemicals on roads and parking areas.
  - ii. The prompt removal, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

- iii. Requiring open-bodied vehicles transporting materials likely to become airborne to have such materials covered at all times if the control measure is necessary for the materials being transported.
- Respondent will implement the following site-specific Work Practice Plan designed to minimize or eliminate fugitive dust from all roadway areas.
  - i. Each segment of roadways identified on the map attached as Appendix B will follow this plan.
  - ii. The frequency that roadways will be inspected is at least once per day to determine if additional control measures or work practices are needed.
  - iii. The Roadway Daily Inspection Form found in Appendix C shall be used to document each inspection required by the plan. The form requires the following information to be completed:
    - (a) Roadway Segment Inspected: Respondent shall inspect all roadway areas;
    - (b) Date of Inspection.
    - (c) Name of Employee performing Inspection: Employee first and last name (no initials) who conducted inspection or can verify it was completed. First and last name will be included in file name and on form referenced above.
    - (d) Result of Inspection: The employee performing inspection shall indicate whether the area inspected needs treated or does not need treated or communicate with the Production Foreman/Superintendent to determine if alternate controls such as road material changes need implemented.

- (e) Description of Why No Treatment Needed: Describe conditions why treatment is not needed (recent precipitation, snow/ice cover, etc.).
- (f) Date Treated: The date treated (if fresh water applied or vacuum truck).
- (g) Name of Employee doing Treatment: The first and last name (no initials) of employee who either treated the segment or can verify the segment was treated; and
- (h) Method of Treatment Used: Indicate the method of treatment used.
- d. Respondent shall perform inspections of each of the roadway segments and parking areas at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
- e. Respondent shall maintain records of the following information:
  - i. The records required to be collected under the Work Practice Plan, and
  - ii. The date and reason any element of the Work Practice Plan was not implemented.
- f. By Tuesday of each week, Respondent shall submit electronic copies of all records required to be maintained under this Order for the previous calendar week (Sunday through

Saturday) to Tim Fischer, Manager, Division of Air Pollution Control, Ohio EPA, Northeast District Office.

- 15. Respondent shall comply with the following requirements related to material handling of C&DD.
  - a. Emissions from material handling of C&DD shall not exceed the limitations listed in the following table:

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures			
1.	OAC rule 3745-17-07(B)	Visible emissions of fugitive dust shall not exceed 20% opacity, as a three-minute average.			
2.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.  See b			

- b. Respondent shall employ reasonably available control measures on all load-in and load-out operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. Reasonably available control measures may include minimal drop heights for stackers and front-loaders, and chemical stabilization/dust suppressants and/or watering/sprinkling systems at sufficient treatment frequencies to ensure compliance. The operator shall avoid dragging any front-end loader bucket along the ground. Nothing in this paragraph shall prohibit Respondent from employing other control measures to ensure compliance.
  - i. The above-mentioned control measure(s) shall be employed for each load-in and load-out operation if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- c. Monitoring and/or Recordkeeping Requirement. Respondent shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., railcars, excavator grapples, truck beds, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions

shall be noted in an operations log. If visible emissions are observed, the Respondent shall also note the following in the operations log:

- i. the location and color of the emissions;
- ii. whether the emissions are representative of normal operations;
- iii. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- iv. the total duration of any visible emissions incident; and
- v. any corrective actions taken to minimize or eliminate the visible emissions.
- d. If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (b)(1) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.
- e. Reporting Requirements: By Tuesday of each week, Respondent shall submit electronic copies of all records required to be maintained under this Order for the previous calendar week (Sunday through Saturday) to Tim Fischer, Manager, Division of Air Pollution Control, Ohio EPA, Northeast District Office.

#### VI. TERMINATION

Respondent's obligations under these Orders shall terminate when Respondent certifies in writing and demonstrate to the satisfaction of Ohio EPA that Respondent has performed all obligations under these Orders and Ohio EPA's Division of Surface Water acknowledges, in writing, the termination of these Orders. If Ohio EPA does not agree that all obligations have been performed, then Ohio EPA will notify Respondent of the obligations that have not been performed, in which case Respondent shall have an opportunity to address any such deficiencies and seek termination as described above.

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The certification shall contain the following attestation: "I certify that the information contained in or accompanying this certification is true, accurate and complete."

This certification shall be submitted by Respondent to Ohio EPA and shall be signed by a responsible official of Respondent. For the purposes of these Orders, a responsible official is defined in Ohio Administrative Code Rule 3745-33-03(F).

## VII. OTHER CLAIMS

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a party to these Orders, for any liability arising from, or related to the Site.

## **VIII. OTHER APPLICABLE LAWS**

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state and federal laws and regulations. These Orders do not waive or compromise the applicability and enforcement of any other statutes or regulations applicable to Respondent.

## IX. MODIFICATIONS

These Orders may be modified by agreement of the parties hereto. Modifications shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

#### X. NOTICE

Unless otherwise specified, all documents required to be submitted by Respondent pursuant to these Orders shall be addressed to:

Ohio Environmental Protection Agency
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087
Attn: Enforcement Supervisors for
Division of Surface Water,
Division of Materials and Waste Management,
Division of Air Pollution Control (as applicable).

#### XI. RESERVATION OF RIGHTS

Ohio EPA and Respondent each reserve all rights, privileges and causes of action, except as specifically waived in Section XII of these Orders.

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## XII. WAIVER

Respondent hereby waives the right to appeal the issuance, terms and conditions, and service of these Orders, and Respondent hereby waives any and all rights Respondent may have to seek administrative or judicial review of these Orders either in law or equity.

Notwithstanding the preceding, Ohio EPA and Respondent agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such appeal. In such an event, Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated or modified.

## XIII. EFFECTIVE DATE

The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

## **IV. SIGNATORY AUTHORITY**

Each undersigned representative of a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these Orders.

IT IS SO ORDERED AND AGREED: Ohio Environmental Protection Agency	
Lavin G. Stevess	12/20/19
Laurie A. Stevenson Director	Date
IT IS SO AGREED: Penn-Ohio Waste LLC	
DUM By Valle	12/19/2019 Date
Printed or Typed Name	
Title Pirsident	

# Appendix A

December 6, 2019

Mr. John Hujar Ohio Environmental Protection Agency Northeast District Office 2110 East Aurora Road Twinsburg, Ohio 44087



Subject:

PennOhio Waste, LLC.

Rail Unloading Facility – Temporary Control Elk Run Township, Columbiana County, Ohio

Design Solutions Project 2019-123

Mr. Hujar:

Civil Design Solutions, Inc. (Design Solutions) is pleased to submit four copies of this Temporary Control plan for the proposed Rail Unloading Facility operations to be located in Elk Run Township, Columbiana County, Ohio. This rail terminal is an existing facility which is owned by Signal Rail Terminal, LLC. This rail terminal was previously utilized for unloading of Construction & Demolition Debris (C&DD) by a different company and much of the existing in-place infrastructure will be utilized as part of this operation.

The submittal presents a Temporary Control plan to outline the leachate management related to the operations at this facility. We understand that permanent operations and controls will be permitted while the facility is operating.

The address of this facility is: 44626 State Route 154; Lisbon, Ohio 44432. Correspondence related to the operations of this facility should be directed to PennOhio Waste, LLC. 7555 North Street; Negley, Ohio 44441.

If you have any questions concerning this Temporary Control plan, please contact Rich Walton of Penn Ohio Landfill, at (610) 698-9291 or our office at (412) 299-2700.

Sincerely,

Civil Design Solutions, Inc.

David Murray, P.E.

Principal Engineer, Ext. 151

cc:

Mr. Rich Walton, Penn Ohio Landfill – 1 copy Mr. Brian Stewart, Penn Ohio Landfill – 1 copy This narrative presents a Temporary Control plan for the proposed Rail Unloading Facility operations located in Elk Run Township, Columbiana County, Ohio. This existing rail terminal facility is owned by Signal Rail Terminal, LLC. and will be operated by PennOhio Waste, LLC.

Figure 1 included here presents the facility location on a USGS Site Plan, the address of the facility is 44626 State Route 154; Lisbon, Ohio 44432. Figure 2 included here presents an overall view of the rail facility. Figure 3 includes an enlarged view of the concrete pad where road trucks will be parked to be loaded.

The proposed operations are limited to the unloading of Construction & Demolition Debris (C&DD) from rail cars and loading the waste directly into road trucks. Rail cars will be staged on the existing tracks in the facility and standard heavy equipment with a grapple or other bucket will be used to remove the C&DD materials. Road trucks will be parked on the existing concrete pad and will be top loaded with the same equipment used to unload the rail cars or from an excavator on the loading platform over the track. The C&DD materials will be removed from the rail cars and directly located into the road trucks. The C&DD materials will not be staged or placed on the concrete pad area.

No waste screening or sorting will be performed at the rail facility. All waste screening will occur at the landfill as part of dumping, observation, spreading and placement. Road trucks will not be weighed at the rail facility.

The concrete pad will be periodically monitored and any loose C&DD materials that spills onto the concrete pad as part of the loading operations will be removed with brooms and shovels and also loaded into the road trucks leaving the facility.

Rail car unloading operations will occur between 6-am and 8-pm, 7-days per week. Employee arrival, equipment startup, maintenance and equipment staging will occur starting at 5-am. Road truck loading will cease at 8-pm; however, site cleanup, final tarping and exiting of loaded road trucks may occur until 8:30-pm. Staging of unloaded trailers may occur during the nighttime non-operating hours. Rail car unloading activities outside of the hours identified here may only be performed with prior approval of the Ohio EPA. Reasons that may warrant a request for operations outside of these normal operating hours include unscheduled or delayed train arrival, weather conditions not allowing work start on time or other unforeseen obstacles.

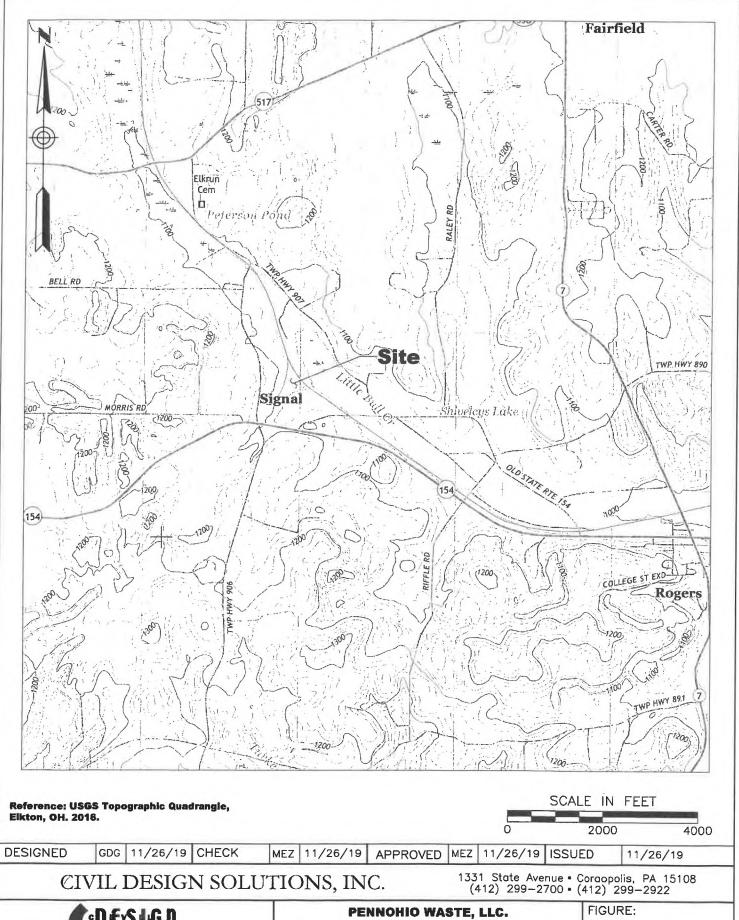
The concrete pad to be used by the road trucks is shown in Figure 3. This concrete pad will provide an impervious surface where any C&DD litter and runoff will be contained. As shown by the spot elevations, the concrete pad is relatively flat. Curbing will be installed around the perimeter of the pad to contain runoff which will be pushed to the northeast corner of the slab.

A pump or vacuum hose inlet will be placed near the northeast corner of the existing concrete slab to allow runoff water to be removed periodically and placed into a temporary above

ground plastic / metal single wall tank(s) with a total approximate 1,500-gallons in size or placed directly into a truck for off-site hauling and disposal.

This curbing will include a removable section or diverter that will allow runoff from the slab to be diverted as stormwater runoff for periods when C&DD is not being unloaded.

The tank(s) will be visually observed to assess the quantity of water stored at the start of the day, end of the day and while actively pumping. Once the storage is over 50% utilized, tanker trucks will be scheduled and mobilized to the site to remove the leachate. The leachate will be hauled to the same treatment utilized by Penn Ohio Landfill or another properly permitted treatment plant.

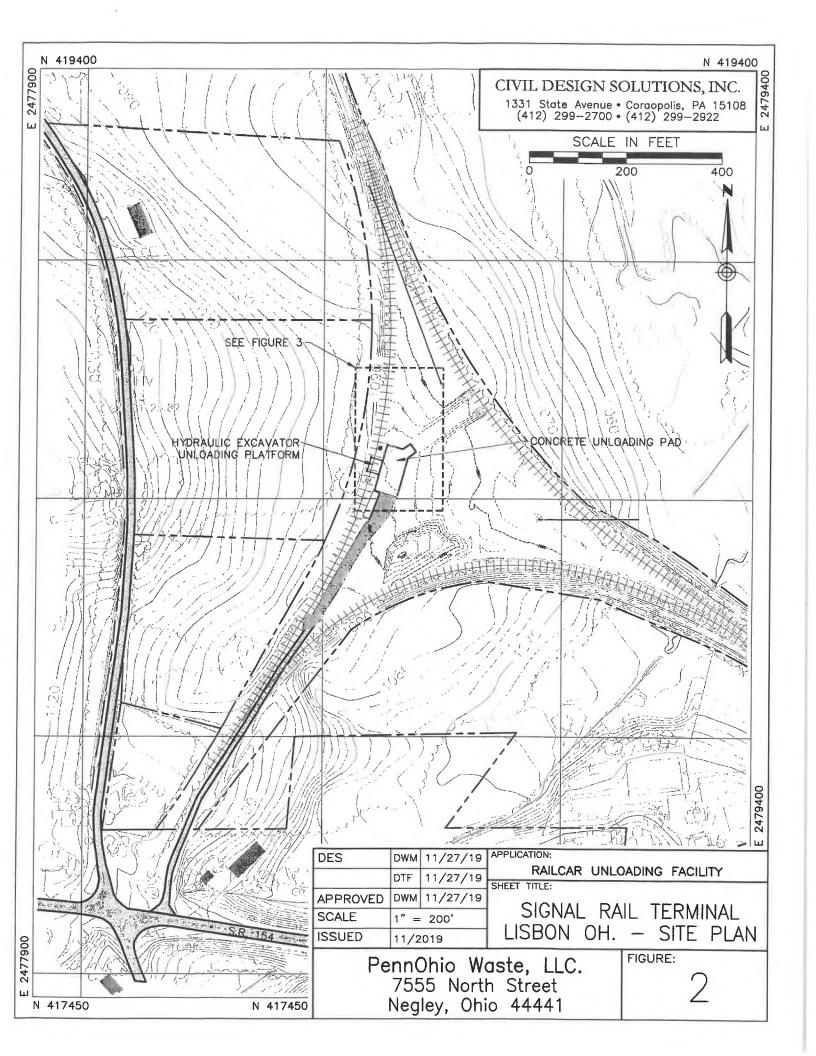


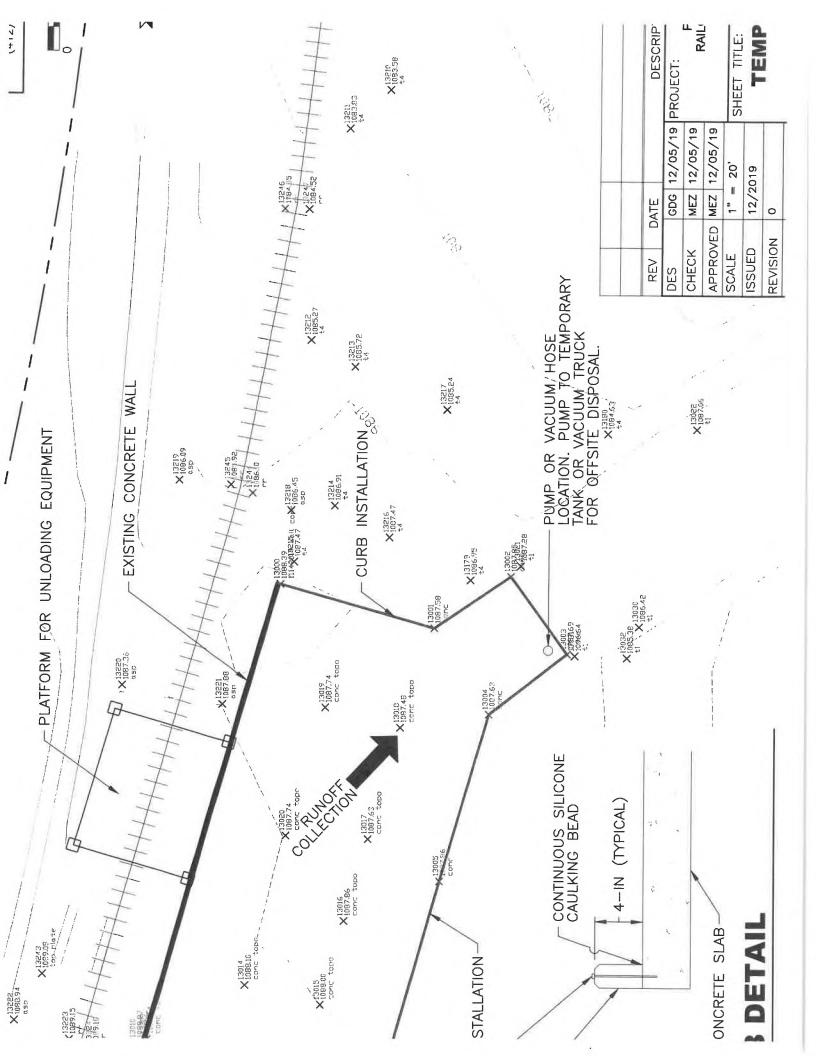
OLUTIONS

PENNOHIO WASTE, LLC. Railcar Unloading Facility

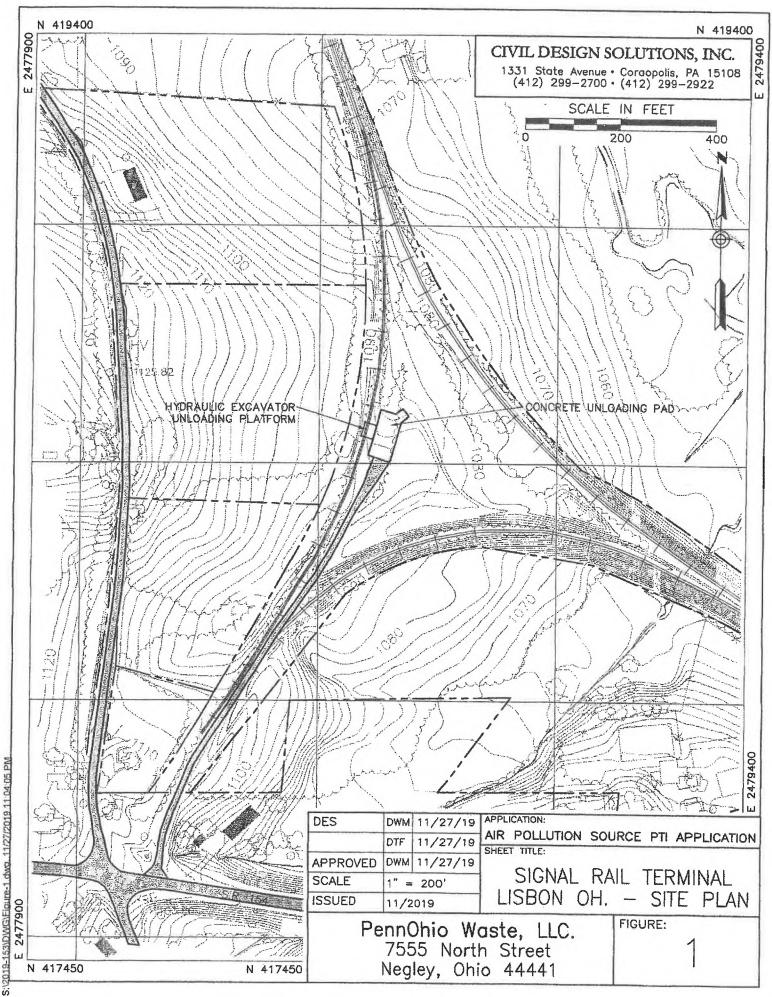
**USGS Site Location Map** 

1





## Appendix B



## Appendix C

Roadway Daily Inspection Form											
Date of Inspection (Month, Day, and Year)	Name of Employee (first and last, not initials)	Result of Inspection (Control Measures Applied or Areas Vacuumed, Control Not Needed)	Describe Why No Treatment Needed if Applicable	Date of Treatment	Name of Employee doing Treatment (first and last, no initials). Who did treatment or will verify it was done.	Method of Treatment Used: Indicate the method of treatment used.					
	r										