Ohio Environmental Protection Agency

**John R. Kasich**, Governor
**Mary Taylor**, Lt. Governor
**Craig W. Butler**, Director

April 11, 2016

Mr. Brent Benham
Closed Loop Refining and Recovery, Inc.
c/o Dennis L. Hall, Attorney, pllc
3033 North Central, Suite 810
Phoenix, Arizona 85012

**Re: Closed Loop Refining and Recovery, Inc.**
**Notice of Violation**
**NOV**
**RCRA C - Hazardous Waste**
**Franklin County**
**OHR000167718**

**Re: Closed Loop Glass Solutions, LLC**
**Notice of Violation**
**NOV**
**RCRA C – Hazardous Waste**
**Franklin County**
**OHR000201145**

Dear Mr. Benham:

Thank you for providing information via your attorney, Mr. Dennis L. Hall, to Ohio EPA on February 26, 2016, regarding the Closed Loop Refining and Recovery, Inc. (Closed Loop) operations at 1675 Watkins Road (Watkins Road Facility) and Closed Loop Glass Solutions, LLC (Glass Solutions) operations at 2200 Fairwood Avenue (Fairwood Avenue Facility), Columbus, Ohio. In a January 25, 2016 e-mail and follow-up letter dated February 26, 2016, we requested Closed Loop's and Glass Solutions' 2015 mass balance numbers for intact cathode ray tubes (CRTs) and processed CRT glass for review to determine if Closed Loop's and Glass Solutions' operations are complying with the speculative accumulation provisions as set forth in Ohio Administrative Code (OAC) rule 3745-51-01 and as required by the conditional exclusion for CRTs and processed CRT glass provided in OAC rule 3745-51-39.

On March 3, 2016 Ohio EPA received information regarding Closed Loop's tenancy at the 1675 and 1655 Watkins Road, Columbus, Ohio, locations and performed a site assessment on March 4, 2016.

As a result of the information provided on February 26, 2016 and gathered during the March 4, 2016 inspection, Ohio EPA has concluded that Glass Solutions is speculatively accumulating CRTs or CRT processed glass at the 2200 Fairwood Avenue Facility.

Information provided by Mr. Robert Cruz (Plant Manager) and Matt Strangle (Manager) on March 4, 2016 indicated that processed glass was being shipped from the Watkins Road Facility to Fairwood Avenue Facility for further recycling. According to Mr. Cruz, the recycling operations stopped in the summer of 2015 when the recycling operations broke. Since the recycling operations at the Fairwood Facility have ceased, Glass Solutions' Fairwood Avenue Facility is not a legitimate recycling facility because there is no feasible means of recycling there. Shipping records provided on March 4, 2016 indicate 28 shipments of leaded funnel glass have been sent from Closed Loop's Watkins Road Facility to Glass Solution's Fairwood Avenue Facility since October of 2015.

Based upon this information Closed Loop and Glass Solutions are in violation of the following Ohio hazardous waste laws and rules. In order to correct these violations you must do the following and send me the required information ***within 14 days of your receipt of this letter.***

**Closed Loop's Watkins Road Facility**

1. ***Hazardous Waste Treatment, Storage, and Disposal, Ohio Revised Code 3734.02(E)&(F):*** No person shall store, treat or dispose of hazardous waste without a permit. A generator of hazardous waste cannot store hazardous waste without a permit or an exemption from the director.

   Since approximately mid-2015, Closed Loop failed to demonstrate that processed CRT glass stored at Closed Loop's Watkins Road Facility was not speculatively accumulated because the receiving facility for processed CRT glass Closed Loop shipped to, Glass Solutions, did not have a feasible means of recycling. Therefore, the processed CRT glass is no longer excluded from Ohio's hazardous waste rules pursuant to the conditional exclusion for CRTs. Based upon this information, Ohio EPA has determined that Closed Loop has been storing, at a minimum, hazardous waste processed CRT glass, which is characteristically hazardous for toxicity (lead) as described in OAC rule 3745-51-24, in violation of ORC §3734.02(E) and (F).

   Since Closed Loop violated ORC §3734.02(E) and (F), Closed Loop 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 Closed Loop begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

   Although no further action is being required by Ohio EPA at this time, be advised that due to the nature of the violation Ohio EPA may require closure pursuant to OAC rules 3745-55-11 through 3745-55-20 and OAC rules 3745-55-42 through 3745-55-47 at this site.

2. ***Hazardous Waste Treatment, Storage, and Disposal, Ohio Revised Code 3734.02(F):*** No person shall store, treat, or dispose of hazardous waste, or transport or cause to be transported any hazardous waste except at or to a hazardous waste facility operating under a permit.

   Glass Solutions Fairwood Avenue Facility is not a legitimate recycling facility. Since Closed Loop has been sending processed glass to Glass Solutions' Fairwood Avenue Facility since mid-2015 and the processed glass can no longer take advantage of the conditional exclusion for CRTs, you have illegally transported a hazardous waste under Ohio's hazardous waste laws to an unpermitted facility.

   Closed Loop must immediately cease the transportation of hazardous waste CRTs and processed glass from the Watkins Road facility to the Fairwood Avenue Facility unless Glass Solutions obtains a hazardous waste permit for that location.

3. ***Satellite Accumulation Area Requirements, OAC Rule 3745-52-34(C)(1)(b):*** Satellite containers must be marked with the words "hazardous waste" or other words identifying the contents.

   At the time of the March 4, 2016 inspection neither drum of hazardous waste from the dust collectors was labeled.

   In order to demonstrate compliance with this rule, Closed Loop needs to appropriately label the drums of hazardous waste and submit a photograph to Ohio EPA demonstrating that this has been done.

4. ***Use and Management of Containers, OAC Rule 3745-52-34(D)(2):*** The date upon which each period of accumulation begins must be clearly marked and visible for inspection on each container.

Two of the totes of hazardous waste being stored in the breaker accumulation area were not dated at the time of the March 4, 2016 inspection.

Closed Loop needs to determine the generation date of these totes, date them appropriately, and submit a photograph to Ohio EPA demonstrating that this has been done.

5. ***Use and Management of Containers, OAC Rule 3745-66-71:*** Hazardous waste must be stored in containers that are in good condition.

   At the time of the inspection, several gaylords of hazardous waste in the breaker room were crushed and deteriorating.

   Closed Loop needs to replace or repair the containers used to store hazardous waste and submit a photograph to Ohio EPA demonstrating that this has been done.

***Comment:*** Please note that Closed Loop is operating as a small quantity generator (SQG) of hazardous waste at the Watkins Road location. However, it is unclear based on manifests and material shipping logs if the facility has generated more than 2,200 pounds of hazardous waste in any given calendar month. If Closed Loop generates more than 2,200 pounds of hazardous waste in any given calendar month, you would be a large quantity generator (LQG) of hazardous waste and subject to all applicable LQG standards. In addition, please note that SQGs cannot accumulate more than 6,000 kilograms (13,200 pounds) of hazardous waste on site at any one time without obtaining a hazardous waste permit.

**Glass Solutions' Fairwood Avenue Facility**

***Hazardous Waste Treatment, Storage, and Disposal, Ohio Revised Code 3734.02(E)&(F):*** No person shall store, treat or dispose of hazardous waste without a permit. A generator of hazardous waste cannot receive a hazardous waste from offsite without a permit or an exemption from the director.

Since Glass Solutions is no longer recycling processed glass before it is shipped to a recycler which uses the processed glass as an ingredient in a product, Glass Solutions is not a legitimate recycling facility and the glass is no longer excluded under the conditional exclusion for CRTs. As such, Glass Solutions has received 28 shipments of hazardous waste from Closed Loop since mid-2015, thus unlawfully receiving and storing hazardous waste without a permit.

Since Glass Solutions violated ORC §3734.02(E) and (F), Glass Solutions 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 Glass Solutions begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

Although no further action is being required by Ohio EPA at this time, be advised that due to the nature of the violation Ohio EPA may require closure pursuant to OAC rules 3745-55-11 through 3745-55-20 and OAC rules 3745-55-42 through 3745-55-47 at this site.

In addition, Closed Loop and Glass Solutions have been referred to Ohio EPA's Division of Materials and Waste Management's hazardous waste enforcement coordinator for enforcement consideration.

You can find Ohio's hazardous waste rules and other information on the division's web page at: http://www.epa.ohio.gov/dmwm/

Enclosed please find copies of the completed checklists. Should you have any further questions, please feel free to contact me at (614) 728-3884.

Sincerely,

Peter Maneff
Central District Office
Division of Materials and Waste Management

c: Dennis L. Hall, Attorney, pllc
Garrison Southfield Park LLC
Olymbec USA LLC, c/o CT Corporation System

e: Jeff Mayhugh, DMWM/CO
Mitch Mathews, DMWM/CO
Melissa Storch, DMWM/CDO
Todd Anderson, Legal

PM/cf Closed Loop April 2016

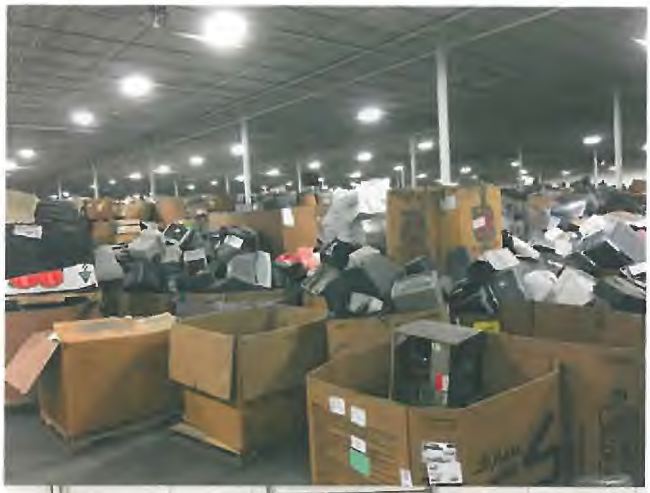

Photo 1. Closed Loop Refining and Recovery, 03-04-2016.

CRT storage at 1655 Watkins Rd.

Photo 2. Closed Loop Refining and Recovery, 03-04-2016.

CRT delivery at 1655 Watkins Rd.

Photo 3. Closed Loop Refining and Recovery, 03-04-2016.

CRT storage at 1655 Watkins Rd.

Photo 4. Closed Loop Refining and Recovery, 03-04-2016.

CRT storage at 1655 Watkins Rd.

Photo 5. Closed Loop Refining and Recovery, 03-04-2016.

CRT storage at 1655 Watkins Rd.

Photo 6. Closed Loop Refining and Recovery, 03-04-2016.

CRT storage at 1655 Watkins Rd.

Photo 7. Closed Loop Refining and Recovery, 03-04-2016.

CRT storage at 1655 Watkins Rd.

Photo 8. Closed Loop Refining and Recovery, 03-04-2016.

CRT storage at 1655 Watkins Rd.

Photo 9. Closed Loop Refining and Recovery, 03-04-2016.

CRT storage at 1655 Watkins Rd.

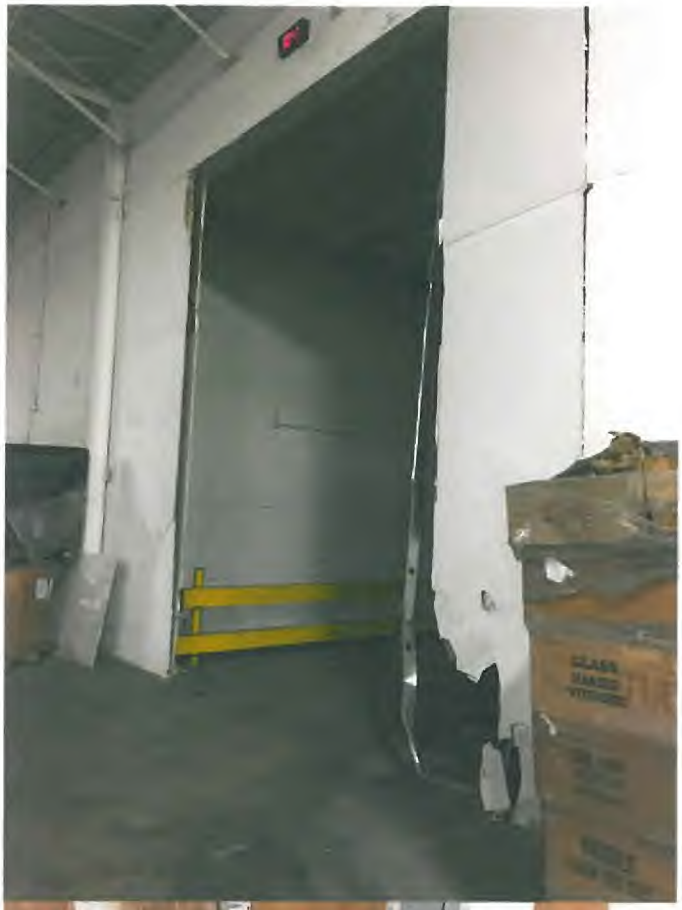

Photo 10. Closed Loop Refining and Recovery, 03-04-2016.

Cross through from 1655 Watkins Rd. to 1675 Watkins Rd.

Photo 11. Closed Loop Refining and Recovery, 03-04-2016.

CRT storage at 1655 Watkins Rd.

Photo 12. Closed Loop Refining and Recovery, 03-04-2016.

Processed CRT storage at 1675 Watkins Rd.



Photo 13. Closed Loop Refining and Recovery, 03-04-2016.

Processed CRT storage at 1675 Watkins Rd.

Photo 14. Closed Loop Refining and Recovery, 03-04-2016.

<180 day storage area at 1675 Watkins Rd. (empty)

Photo 15. Closed Loop Refining and Recovery, 03-04-2016.

<180 day storage area at 1675 Watkins Rd. (empty)


Photo 16. Closed Loop Refining and Recovery, 03-04-2016.

<180 day storage area at 1675 Watkins Rd. Dated 12-30-15 (empty)

Photo 17. Closed Loop Refining and Recovery, 03-04-2016.

<180 day storage area at 1675 Watkins Rd. Dated 12-30-15 (empty)

Photo 18. Closed Loop Refining and Recovery, 03-04-2016.

Debris

Photo 19. Closed Loop Refining and Recovery, 03-04-2016.

Unlabeled hazardous (D008) phosphor powder drum in breaker room.

Photo 20. Closed Loop Refining and Recovery, 03-04-2016.

Phosphor powder in breaker room.

Photo 21. Closed Loop Refining and Recovery, 03-04-2016.

Process CRT glass.

Photo 22. Closed Loop Refining and Recovery, 03-04-2016.

Unlabeled hazardous (D008) phosphor powder drum in breaker room.


Photo 23. Closed Loop Refining and Recovery, 03-04-2016.

Undated (D008) phosphor powder tote in breaker room. Note hazardous debris hanging from inside tote.

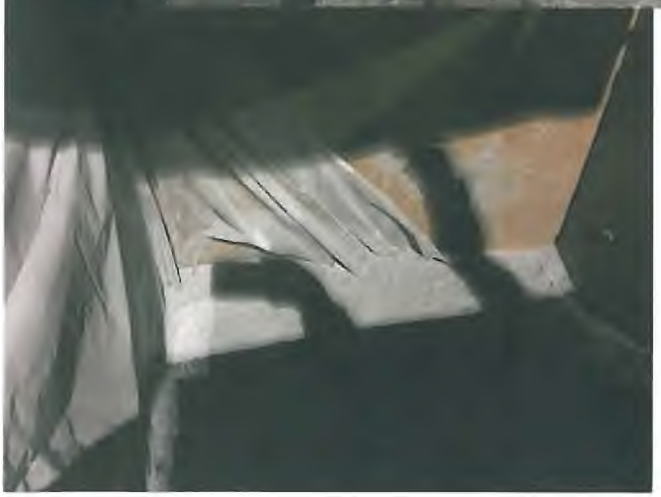

Photo 24. Closed Loop Refining and Recovery, 03-04-2016.

Inside tote.

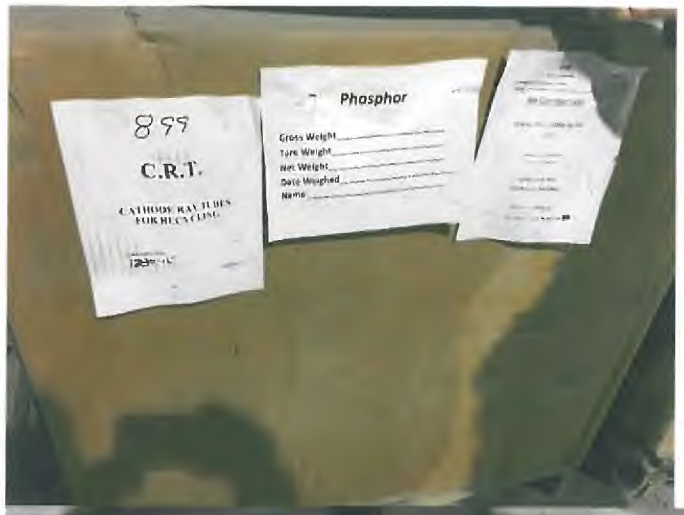


Photo 25. Closed Loop Refining and Recovery, 03-04-2016.

Unlabeled hazardous (D008) phosphor powder tote in breaker room.


Photo 26. Closed Loop Refining and Recovery, 03-04-2016.

Undated hazardous (D008) phosphor powder tote in breaker room.

Photo 27. Closed Loop Refining and Recovery, 03-04-2016.

<180 day accumulation area in breaker room. Note the gaylords of hazardous waste are crushed and breaking down.

Photo 28. Closed Loop Refining and Recovery, 03-04-2016.

Inside of hazardous waste tote in breaker room.


Photo 29. Closed Loop Refining and Recovery, 03-04-2016.

Undated hazardous (D008) phosphor powder tote in breaker room.

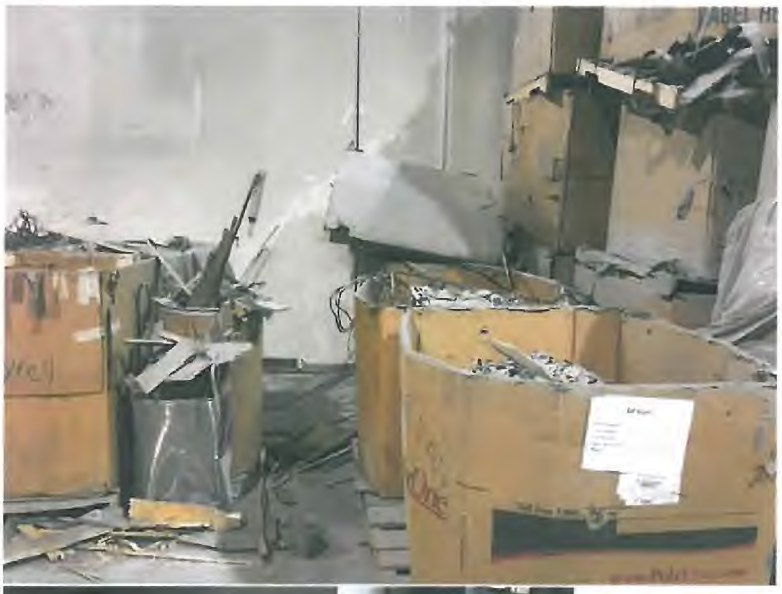

Photo 30. Closed Loop Refining and Recovery, 03-04-2016.

Debris in breaker room.


Photo 31. Closed Loop Refining and Recovery, 03-04-2016.

Labeled hazardous (D008) floor sweepings in 1675 Watkins rd.

Photo 32. Closed Loop Refining and Recovery, 03-04-2016.

Inside of floor sweepings tote in 1675 Watkins rd.

Photo 33. Closed Loop Refining and Recovery, 03-04-2016.

Tote of rework in 1675 Watkins Rd.

# FIELD ACTIVITY REPORT

**Date:** 03/04/16
**Time:** 11:00 AM-1:00 PM
**County:** Franklin
**Facility:** Closed Loop Refining and Recovery
**Location:** 1655 and 1675 Watkins Rd., Columbus OH, 43207
**Personnel:** Robert Cruz (Plant Manager, on phone), Matt Strangle (Manager, on phone), Michelle Bruffy (Accounts Receivable), Angie (floor employee)
**OhioEPA:** Andy Maneff

**Purpose of Visit:** Complaint / Compliance Inspection

**Background:**

Closed Loop Refining and Recovery, 1675 Watkins Rd. Columbus 43207, is a glass recycling facility that accepts Cathode Ray Tubes (CRT, TV glass) which contain lead. This facility is a storage, and breaking plant for Closed Loop Glass Solutions located at 2200 Fairwood Avenue Columbus, Ohio. The storage facility is currently bringing in approximately 2 truckloads a day of CRTs. Closed Loop also runs a breaker for the CRTs which allow them to consolidate and store more feed stock onsite. They have been processing / breaking up to 350,000 pounds per week for continued storage. As part of this breaking process they are currently generating small quantity generator amounts of a phosphor powder (D008) from a wash process, baghouse dust (D008) from the air filtration system and lead dust / floorsweepings (D008) which are sent to Petro-Chem in Detroit, Michigan for hazardous waste disposal.

**Findings:**

On March 4, 2016 I arrived at Closed Loop Refining and Recovery to assess the company's compliance with Ohio's hazardous waste laws. Upon arrival I met with Michelle Bruffy who put me in contact with Robert Cruz (Plant Manager) and Matt Strangle (Manager) by phone. I first explained to Matt and then Robert separately that Ohio EPA had received notice from the property owner that Closed Loop was being served an eviction notice and that I was there to assess the current site conditions. Mr. Cruz informed me that Closed Loop was in a dispute with the property owner over delinquent rent and current lease negotiations. He claimed that Closed Loop was withholding rent because they were not paid for a job that they did for the landlord. I stated that that was not my concern and that I just needed to walk the facility to determine compliance with the CRT rules.

Mr. Strangle then granted me access and I was escorted around the facility by Angie. We first walked to the <180 accumulation area, which was empty, but lined with processed CRT glass stacked 3 high in gaylords. Next we headed to the breaker room

which was down for repairs. In here I observed 3 partially full gaylords of labeled hazardous waste (these were loosely covered with thin piece of cardboard and not all were dated) and numerous gaylords of phosphor powder covered debris. Angie stated that some of the material was rework but she was unsure of the other material. We then proceeded to walk through the remainder of 1675 Watkins Rd. observing the TV breakdown areas and several "satellite" gaylords of hazardous floor sweepings. Upon completing the walkthrough of 1675 we headed to the adjacent 1655 Watkins Rd. building.

As we arrived at 1655 Watkins Road the facility was actively receiving a truckload of CRTs. Angie stated that Closed Loop was receiving approximately 2 truckloads a day of CRTs. I asked about the space issue and she told me (and both Robert and Matt confirmed) that processed and unprocessed CRTs are also being shipped to Closed Loop Glass Solutions (2200 Fairwood Ave.) for additional storage. She also stated that Fairwood is no longer washing processed glass or being staffed (which was also confirmed by both Robert and Matt). Matt and Robert later explained that the tumbler (which aids in the washing) at Fairwood broke in the summer of 2015 and had not been repaired yet but that they were still shipping glass to a recycler via the Watkins Road facility.

I thanked Angie for the tour and headed back to the main office to review paperwork and speak with Robert Cruz before I left.

Shipping records show that Closed Loop Recycling (Watkins) has had 15 shipments of processed glass to a downstream recycler since 10/20/15 (after the tumbler broke on the wash line at Fairwood). Closed Loop Recycling also had one Gaylord packaged and scheduled for shipment from the Watkins Rd. facility on 3/04/16.

I also noted that they have had 28 shipments of leaded funnel glass to Closed Loop Glass Solutions (Fairwood) in that time.

I then reviewed the hazardous waste manifests and hazardous waste material logs that contain the start date for each container of hazardous waste. While Closed Loop is operating as a Small Quantity Generator of hazardous waste it appears based on the amount shipped and amount still on-site at the facility that they may be a large quantity generator of hazardous waste during some calendar months.

| | | | |
|---|---|---|---|
| Start date 10-31-14 | Ship date 12-18-14 | D008 | 629 lbs |
| Start date 11-20-14 | Ship date 12-18-14 | D008 | 2020 lbs |
| Start date 11-21-14 | Ship date 12-18-14 | D008 | 907 lbs |
| Start date 12-19-14 | Ship date 8-10-15 | D008 | 1998 lbs |

| | | | |
|---|---|---|---|
| Start date 1-2-15 | Ship date 8-10-15 | D008 | 2064 lbs |
| Start date 2-7-15 | Ship date 8-10-15 | D008 | 2010 lbs |
| Start date 3-1-15 | Ship date 8-10-15 | D008 | 2127 lbs |
| Start date 4-6-15 | Ship date 8-10-15 | D008 | 2110 lbs |
| Start date 5-10-15 | Ship date 8-10-15 | D008 | 2052 lbs |
| Start date ? | Ship date 11-23-15 | D008 | 4600 lbs |

I informed Mr. Cruz of my findings and discussed setting up a time to inspect Fairwood and said that I would be in touch.

| CONDITIONAL EXCLUSIONS FOR USED CATHODE RAY TUBES | | | | |
|---|---|---|---|---|
| *NOTE: This inspection checklist applies to CRT collectors and processors of used intact and used broken cathode ray tubes (CRTs) that are destined for recycling. It does not apply to companies who generate and store CRTs. Used, intact "CRTs" as defined in rule 3745-50-10 of the Administrative Code (and below) are not wastes within the United States unless they are disposed, or unless they are speculatively "accumulated speculatively" as defined in paragraph (C)(8) of rule 3745-51-01 of the Administrative Code by CRT collectors or glass processors.* | | | | |
| **RECYCLERS RECEIVING BROKEN USED CRTS AND PROCESSED CRT GLASS UNDERGOING RECYCLING** | | | | |
| 1. | Prior to processing,. | | | |
| | a. | Are used broken CRTs stored properly by: [3745-51-39(A)(1)] as follows: *(A used, broken CRT means glass removed from its housing or casing whose vacuum has been released)* | | Yes ☒ No ☐ N/A ☐ |
| | | i. | Stored in a building with a roof, floor and walls? Or | Yes ☒ No ☐ N/A ☐ |
| | | ii. | Placed in a container such as a package or a vehicle constructed, filled, and closed to minimize releases to the environment of CRT glass? | Yes ☐ No ☒ N/A ☐ |
| | b. | Is each container containing CRTs labeled or marked clearly with one of the following phrases "Used cathode ray tube(s) – containing leaded glass" or "Leaded glass from televisions or computers" and is each container also labeled "Do not mix with other glass materials"? [3745-51-39(A)(2)] | | Yes ☒ No ☐ N/A ☐ |
| | c. | Are CRTs transported in a container: [3745-51-39(A)(3)] | | Yes ☒ No ☐ N/A ☐ |
| | | i. | Constructed, filled, and closed to minimize releases to the environment of CRT glass? And | Yes ☒ No ☐ N/A ☐ |
| | | ii. | Labeled or marked clearly with one of the following phrases "Used cathode ray tube(s) – containing leaded glass" or "Leaded glass from televisions or computers" and is each container also labeled "Do not mix with other glass materials"? | Yes ☒ No ☐ N/A ☐ |
| | d. | If CRTs are accumulated speculatively or used in a manner constituting land disposal, does the owner or operator (o/o) of the recycling facility comply with the applicable requirements in 3745-266-20 to 3745-266-23? [3745-51-39(A)(4)] | | Yes ☐ No ☐ N/A ☐ |
| | e. | If the facility is an exporter of CRTs, does the o/o notify U.S. EPA of an intended exports before the CRTs are scheduled to leave the United States, based on the requirements in 40 CFR 261.39(a)(5)(i) to (a)(5)(ix)? [3745-51-39(A)(5)] | | Yes ☐ No ☐ N/A ☒ |
| 2. | Are used, broken CRTs undergoing "CRT processing": | | | Yes ☒ No ☐ N/A ☐ |
| | a. | Storage [3745-51-39(B)(1)]<br>The processor is speculatively accumulating the CRTs undergoing processing or have been processed if either of the following questions is answered "No". If the processor is speculatively accumulating CRTs or processed CRT glass that is a hazardous waste they are storing a hazardous waste in violation of ORC § 3734.02(E) and (F).<br><br>Can the processor demonstrate that the CRTs have a feasible means of being recycled; and<br>During the calendar year, commencing January first, is the amount of material that is recycled, or transferred to a different site for recycling, equals at least seventy-five per cent by weight or volume of the amount of that material accumulated at the beginning of the calendar year. | | Yes ☐ No ☐ N/A ☐<br><br>Yes ☒ No ☐ N/A ☐<br><br>Yes ☐ No ☒ N/A ☐ |
| | b. | Processing | | |

| | | | | |
|---|---|---|---|---|
| | | i. | Based on all activities specified in 3745-50-10(A)(25)(b) and (c) and the activities are performed in a building with a roof, floor, and walls? [3745-51-39(B)(2)] | Yes ☒ No ☐ N/A ☐ |
| | | ii. | With no activities that use temperatures high enough to volatilize lead from CRTs? [3745-51-39(B)(2)] | Yes ☒ No ☐ N/A ☐ |
| *NOTE: CRT processing activities defined in 3745-50-10(A)(25)(b) and (c) include "intentionally breaking intact CRTs or further breaking or separating broken CRTs" and "sorting or otherwise managing glass removed from CRT monitors."* | | | | |
| 3. | | | Is glass from used, broken CRTs destined for recycling at a CRT glass manufacturer or a lead smelter after processing accumulated speculatively? [3745-51-39(C)] | Yes ☒ No ☐ N/A ☐ |
| 4. | | | If glass from used CRTs is used in a manner constituting disposal, does the o/o comply with 3745-266-20 to 3745-266-23? [3745-5139(D)] | Yes ☐ No ☐ N/A ☒ |
| **EXPORTS OF USED, INTACT CRTs** | | | | |
| *NOTE: Used, intact CRTs exported for recycling are not wastes if they meet the notice and consent conditions of 40 CFR 261.39(a)(5) and if they are not accumulated speculatively. [3745-51-40]* | | | | |
| *NOTE: Violations regarding exporting used, intact CETs foreign destinations should be referred to U.S. EPA Region 5 because the federal counterpart provisions are not delegable to states.* | | | | |

DEFINITIONS:

"CRT" or "cathode ray tube" means a vacuum tube, composed primarily of glass, which is the visual or video display component of an electronic device. A used, intact CRT means a CRT whose vacuum has not been released. A used, broken CRT means glass removed from its housing or casing whose vacuum has been released. Used CRTs are "spent materials" as defined in rule 3745-51-01 of the Administrative Code.

"CRT collector" means a person who receives used, intact CRTs for recycling, repair, resale, or donation

"CRT processing" means conducting all of the following activities:
(a) Receiving broken or intact CRTs; and
(b) Intentionally breaking intact CRTs or further breaking or separating broken CRTs; and
(c) Sorting or otherwise managing glass removed from CRT monitors.

A material is "accumulated speculatively" if it is accumulated before being recycled. A material is not accumulated speculatively if the person accumulating the material can show that the material is potentially recyclable and has a feasible means of being recycled; and that during the calendar year, commencing January first, the amount of material that is recycled, or transferred to a different site for recycling, equals at least seventy-five per cent by weight or volume of the amount of that material accumulated at the beginning of the calendar year. In calculating the percentage of turnover, the seventy-five per cent requirement is to be applied to materials of the same type (e.g., slags from a single smelting process) that is recycled in the same way (i.e., from which the same material is recovered or that is used in the same way). Materials accumulated in units that would be exempt from regulation under paragraph (C) of rule 3745-51-04 of the Administrative Code shall not be included in the calculation. (Materials that are already defined as "wastes" also shall not be included in making the calculation.) Materials are no longer in this category once they are removed from accumulation for recycling.

**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:

**GENERAL REQUIREMENTS**

| | | | |
|---|---|---|---|
| 1. | Have all wastes generated at the facility been adequately evaluated? [3745-52-11] | | Yes ☒ No ☐ N/A ☐ |
| 2. | Has the generator obtained a U.S. EPA I.D. number? [3745-52-12] | | Yes ☒ No ☐ N/A ☐ |
| 3. | Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)] **Processed CRTs not meeting the conditional exclusion for used CRTs were transported to Closed Loop Glass Solutions** | | Yes ☒ No ☐ N/A ☐ |
| 4. | Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)] | | Yes ☐ No ☒ N/A ☐ |
| 5. | Does the generator accumulate hazardous waste? | | Yes ☐ No ☒ N/A ☐ |
| *NOTE: If the SQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements might still apply, e.g. manifest, marking, LDR, etc.* | | | |
| 6. | Has the generator accumulated hazardous wastes in excess of (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)] | | Yes ☐ No ☒ N/A ☐ |
| *NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]* | | | |
| 7. | Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)] **Shipping manifest indicate that the facility was near the 6,000kg limit but not at the time of the inspection.** | | Yes ☐ No ☒ N/A ☐ |
| *NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.* | | | |
| 8. | Does the generator treat hazardous waste in a: | | |
| | a. | Container that meets 3745-66-70 to 3745-66-77? | Yes ☒ No ☐ N/A ☐ |
| | b. | Tank that meets 3745-66-101? | Yes ☐ No ☐ N/A ☒ |
| | c. | Drip pads that meet 3745-69-40 to 3745-69-45? | Yes ☐ No ☐ N/A ☒ |
| | d. | Containment building that meets 3745-256-100 to 3745-256-102? | Yes ☐ No ☐ N/A ☒ |
| *NOTE: Complete appropriate checklist for each unit.* | | | |
| *NOTE: If waste is treated to meet LDRs, use LDR checklist.* | | | |
| **MANIFEST REQUIREMENTS** | | | |
| 9. | Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by | | Yes ☒ No ☐ N/A ☐ |

| | | | |
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| | a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)(1)] | | |
| 10. | Are wastes reclaimed under a contractual agreement? If so: [3745-52-0(E)] | | Yes ☐ No ☒ N/A ☐ |
| | a. | Does the contractual agreement specify the type of waste and frequency of shipment? | Yes ☐ No ☐ N/A ☒ |
| | b. | Is the transport vehicle owned and operated by the reclaimer? | Yes ☐ No ☐ N/A ☒ |
| | c. | Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? | Yes ☐ No ☐ N/A ☒ |
| *NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.* | | | |
| 11. | Have items 1 through 20 of each manifest been completed? [3745-52-20(A)(1)] & [3745-52-27(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)(1)]* | | | |
| 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 received a rejected load or residue, did the generator: | | |
| | a. | Sign item 20 of the new manifest or item 18c of the original manifest? [3745-52-23(F)(1) | Yes ☒ No ☐ N/A ☐ |
| | b. | Provide the transporter a copy of the manifest? [3745-52-23(F)(2)] | Yes ☒ No ☐ N/A ☐ |
| | c. | Send a copy of the manifest to the designated facility that returned the shipment with 30 days after delivery of the rejected shipment? [3745-52-23(F)(3)] | Yes ☒ No ☐ N/A ☐ |
| 16. | 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 ☒ |
| 17. | Are signed copies of all manifests being retained for at least three years? [3745-52-40] | | Yes ☐ No ☐ N/A ☒ |
| *NOTE: A generator who sends a shipment of hazardous waste to a TSD facility with the understanding that the TSD facility can accept and manage the waste and later receives that shipment back as a rejected load or residue may accumulate the waste on-site for <90 days or <180 days depending on the amount of hazardous waste on-site in that calendar month. [3745-52-34(M)]* | | | |
| *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* | | | |

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| *"on-site" in OAC rule 3745-50-10.* | | | |
| **PREPAREDNESS AND PREVENTION** | | | |
| 18. | Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)] | | Yes ☒ No ☐ N/A ☐ |
| 19. | 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 ☐ |
| 20. | Are employees familiar with waste handling and emergency procedures? [3745-52-34(D)(5)(c)] | | Yes ☒ No ☐ N/A ☐ |
| 21. | Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)] | | Yes ☐ No ☐ N/A ☒ |
| 22. | 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 ☐ |
| 23. | 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 ☐ |
| 24. | Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] | | Yes ☐ No ☐ N/A ☒ |
| | a. | Are inspections recorded in a log or summary? [3745-65-33] | Yes ☐ No ☐ N/A ☒ |
| 25. | 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 ☐ |
| 26. | If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance (*unless not required under OAC 3745-65-32*)? [3745-65-34(B)] | | Yes ☐ No ☐ N/A ☒ |
| 27. | Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] | | Yes ☒ No ☐ N/A ☐ |
| 28. | Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] | | Yes ☐ No ☐ N/A ☒ |
| 29. | 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** | | | |
| 30. | 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 ☒ |

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| | 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 ☐ |
| 31. | 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 ☒ |
| *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** | | | |
| 32. | Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(D)(4)] | | Yes ☒ No ☐ N/A ☐ |
| 33. | Is the accumulation date on each container? [3745-52-34(D)(4)] | | Yes ☐ No ☒ N/A ☐ |
| 34. | 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] **Gaylords of hazardous waste in the Breaker Room were partially crushed.** | 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.* | | | |
| 35. | Is the container accumulation area(s) inspected at least once during the period from Sunday to Saturday? [3745-66-74] | | Yes ☐ No ☐ N/A ☒ |
| | a. | Are inspections recorded in a log or summary? [3745-66-74] | Yes ☐ No ☐ N/A ☒ |
| 36. | 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 ☐ |
| 37. | 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 ☒ |
| 38. | If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745- | | Yes ☐ No ☐ N/A ☒ |

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| | 65-17(B)? [3745-66-77(B)] | |
| *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** | | |
| 39. | 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 ☒ |
| 40. | Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)] | Yes ☐ No ☐ N/A ☒ |
| 41. | 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 ☒ |
| *NOTE: Continue with the generator LDR requirements on the next page.* | | |

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| **GENERATOR LDR CHECKLIST<br>DOES NOT APPLY TO CESQGS** | | | |
| **GENERAL REQUIREMENTS** | | | |
| 1. | If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07(A)(7)] | | Yes ☐ No ☐ N/A ☒ |
| 2. | Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not, | | Yes ☐ No ☒ N/A ☐ |
| | a. | Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)] | Yes ☒ No ☐ N/A ☐ |
| *NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).* | | | |
| 3. | Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)] | | Yes ☐ No ☐ N/A ☒ |
| 4. | Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)] | | Yes ☒ No ☐ N/A ☐ |
| 5. | Does the generator generate a listed HW that exhibits a characteristic? If yes, | | Yes ☐ No ☒ N/A ☐ |
| | a. | Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)] | Yes ☒ No ☐ N/A ☐ |
| *FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.* | | | |
| 6. | Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)] | | Yes ☒ No ☐ N/A ☐ |
| *NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.* | | | |
| *NOTE: Written documentation of this determination is not required.* | | | |
| 7. | Did the generator treat his HW /soil on-site to meet the LDR treatment | | Yes ☐ No ☒ N/A ☐ |

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| | standard? | | | |
| *NOTE: If "Yes" see question #16.* | | | | |
| 8. | Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)] | | | Yes ☐ No ☒ N/A ☐ |
| | a. | If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include: | | Yes ☒ No ☐ N/A ☐ |
| | | i | Applicable HW codes? | Yes ☒ No ☐ N/A ☐ |
| | | ii | Manifest number of the first shipment to the TSD? | Yes ☒ No ☐ N/A ☐ |
| | | iii | A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination."? | Yes ☒ No ☐ N/A ☐ |
| 9. | Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)] | | | Yes ☒ No ☐ N/A ☐ |
| 10. | Does the generator have a copy of the LDR notification form/notice on file? [3745-270-07(A)(2)] | | | Yes ☒ No ☐ N/A ☐ |
| | a. | Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)] | | Yes ☒ No ☐ N/A ☐ |
| **NOTIFICATION FORM** | | | | |
| 11. | Does the LDR Notification form contain the following information: | | | |
| | a. | Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)] | | Yes ☒ No ☐ N/A ☐ |
| | b. | Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)] | | Yes ☒ No ☐ N/A ☐ |
| | c. | A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)] | | Yes ☒ No ☐ N/A ☐ |
| | d. | A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)] | | Yes ☒ No ☐ N/A ☐ |
| *NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.* | | | | |
| | e. | Designation of the waste subcategory when applicable? [3745-270-07(A)(2)] | | Yes ☒ No ☐ N/A ☐ |
| *NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories* | | | | |
| | f. | A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)] | | Yes ☒ No ☐ N/A ☐ |
| *NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.* | | | | |
| | g. | If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)] | | Yes ☐ No ☐ N/A ☒ |
| *NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.* | | | | |
| **PROHIBITED DILUTION** | | | | |
| 12. | Is the HW treated by burning?<br><br>If "No" go to #15. | | | Yes ☐ No ☒ N/A ☐ |

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| 13. | Is the HW a metal-bearing HW? | | | Yes ☒ No ☐ N/A ☐ |
| *NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.* | | | | |
| 14. | a. | Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless **one** of the following conditions apply. [3745-270-03(c)] | | |
| | | i. | Contains > 1% TOC? | Yes ☐ No ☐ N/A ☒ |
| | | ii. | Contains organic constituents or cyanide at levels greater than the UTS levels? | Yes ☐ No ☐ N/A ☒ |
| | | iii. | Is made up of combustible material e.g., paper, wood, plastic? | Yes ☐ No ☐ N/A ☒ |
| | | iv. | Has a reasonable heating value (e.g., > 5000 Btu)? | Yes ☐ No ☐ N/A ☒ |
| | | v. | Co-generated with a HW that must be combusted? | Yes ☐ No ☐ N/A ☒ |
| | b. | If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution? | | Yes ☐ No ☐ N/A ☒ |
| 15. | Was the HW treated by wastewater treatment? | | | Yes ☐ No ☒ N/A ☐ |
| | a. | Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)] | | Yes ☐ No ☐ N/A ☒ |
| *NOTE: If "Yes", HW is improperly being treated by dilution.* | | | | |
| | b. | Does the waste carry the D001 code and contain ≥10% TOC? | | Yes ☐ No ☐ N/A ☒ |
| | c. | Does the wastewater treatment process include a process to separate/recover the organic phase of the waste? | | Yes ☐ No ☐ N/A ☒ |
| *NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].* | | | | |
| *NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.* | | | | |
| **GENERATOR TREATMENT** | | | | |
| 16. | Does the generator treat to meet LDRs on-site? | | | Yes ☐ No ☒ N/A ☐ |
| | Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard? | | | Yes ☐ No ☐ N/A ☒ |
| | If "Yes"...complete the rest of the checklist. If "No"...stop...you are done. | | | |
| | a. | Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)] | | Yes ☐ No ☐ N/A ☒ |
| | b. | Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)] | | Yes ☐ No ☐ N/A ☒ |
| *NOTE: This is a laboratory analysis but it does not have to be kept by the generator.* | | | | |
| | c. | Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)] | | Yes ☐ No ☐ N/A ☒ |
| | d. | Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)] | | Yes ☐ No ☐ N/A ☒ |

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| | e. | Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)] | | | Yes ☐ No ☐ N/A ☒ |
| | f. | Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)] | | | Yes ☐ No ☐ N/A ☒ |
| **NOTIFICATION FORM FOR GENERATOR TREATMENT** | | | | | |
| 17. | a. | Contains all information in #11 a-g above and | | | Yes ☐ No ☐ N/A ☒ |
| | b. | If the treated HW/soil is listed.....notification contains the following certification statement:<br><br>"I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment." | | | Yes ☐ No ☐ N/A ☒ |
| | c. | If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator: | | | |
| | | i. | Prepare a one-time notification? [3745-270-09 (D)] | | Yes ☐ No ☐ N/A ☒ |
| | | ii. | Maintain a copy of the notice onsite? [3745-270-09(D)] | | Yes ☐ No ☐ N/A ☒ |
| | | iii. | Include in the notification: [3745-270-09(D)] | | |
| | | | 1. | Name & address of receiving landfill? | Yes ☐ No ☐ N/A ☒ |
| | | | 2. | Description of HW when generated? | Yes ☐ No ☐ N/A ☒ |
| | | | 3. | HW code when generated? | Yes ☐ No ☐ N/A ☒ |
| | | | 4. | Treatability group when generated? | Yes ☐ No ☐ N/A ☒ |
| | | | 5. | Underlying hazardous constituents present when generated? | Yes ☐ No ☐ N/A ☒ |
| | | iv. | Contain the certification statement as required by 3745-270-07(B)(4)? | | Yes ☐ No ☐ N/A ☒ |