



August 25, 2025

Transmitted Electronically

Andrew Blazar
Rocal Inc.
3186 County Rd 550
Frankfort, OH 45628

**Re: Rocal Inc.
Inspection or Compliance Review
Correspondence
RCRA C - Hazardous Waste
Ross County
OHD990780777**

Sent via email to: ablazar@rocal.com

Hazardous Waste Program - DERR

Subject: NRR Inspection Report Transmittal Letter

Dear Mr. Blazar,

Ohio EPA conducted a Non-financial Record Review (NRR) of Rocal Inc (Rocal) located at 3186 County Rd 550 Frankfort, OH 45628 on August 12, 2025. The goal of the NRR was to determine Rocal's compliance with Ohio's Hazardous Waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and the rules adopted pursuant to ORC § 3734.12 found in Chapter 3745 of the Ohio Administrative Code (OAC). Manifests uploaded to RCRAInfo were reviewed as part of an ongoing CEI investigation begun during the facility inspection conducted on April 30, 2025.

Enclosed is the August 25, 2025, Notice of Violation (NOV) letter outlining the violations that were observed during the August 12, 2025, NRR inspection. Also included in this envelope is the complete inspection report which contains the site verification form, an inspection narrative, and completed inspection checklist.

The recommendation set out below is NOT an Order. The recommendation is offered by Ohio EPA in an effort to provide compliance assistance to the facility.

Recommendation 1: Rocal manifests all waste coming from the conversion coating process line as F019 waste. Since it is a sludge and water mixture, it is a listed hazardous waste. Per OAC 3745-50-19, any person seeking to exclude a waste at a particular generating facility from the lists in rules 3745-51-30 to 3745-51-35 of the Administrative Code may petition U.S. EPA for a regulatory amendment pursuant to 40 CFR 260.22. Rocal should ensure that proper exemptions and approvals are in place prior to discharging currently listed hazardous waste to a local treatment facility.

Please be advised that this inspection report is only associated with those areas of the operations that were inspected, or documentation reviewed and does not constitute a waiver of potential violations not discovered.

You can find Ohio's Hazardous Waste rules and other information on the division's web page at: <https://epa.ohio.gov/divisions-and-offices/environmental-response-revitalization>.

Should you have any questions, please contact me at (740) 380-5252 or danielle.stumbo@epa.ohio.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Danielle Stumbo'.

Danielle Stumbo, SEDO

DS/ch

ec: Kristy Hunt, Southeast District Office, DERR
Zak Kabelen, CO, DERR

Enclosure

HAZARDOUS WASTE PROGRAM - DERR
INSPECTION REPORT FORM
OHIO EPA

FACILITY	Rocal Inc.	US EPA ID#	OHD990780777
INSPECTION DATE	8/12/2025	Generator Status	LQG
Facility Contact (s)	Andrew Blazar	740-998-2122	
EPA Inspector (s)	Danielle Stumbo	SEDO	

PRE-INSPECTION INFORMATION / FACILITY BACKGROUND

Rocal Inc. (Rocal) is a sign manufacturing company. Aluminum products are cut to size and chemical conversion coatings are applied to improve adhesion and prevent corrosion. Reflective sheeting, lettering, sign decals, and silk screen printings are applied to the aluminum after this treatment.

A CEI inspection conducted on April 30, 2025, found improper hazardous waste and universal waste labeling, no hazardous waste employee training records, universal waste storage issues, failure to provide LDR notifications, and Contingency Plan and Quick Reference Guide deficiencies.

A follow-up email was sent to Mr. Blazar on May 1st, 2025, describing the issues seen on site, necessary corrections to ensure compliance, and a list of documents still needed to complete the record review. All documents were requested to be sent by May 7th, 2025. Electronic versions of the guidance documents originally provided in print were also attached to the email.

As of May 9, 2025, several documents were still outstanding. An email was sent to Mr. Blazar confirming the receipt of the hazardous waste label photos and documents sent. The email reiterated the open violations and addressed what was still needed to resolve the violations.

A notice of violation (NOV) was sent to Rocal on May 22, 2025, with 9 violations, one of which had been resolved.

Rocal responded by email on June 6, 2025, and provided updated labeling photographs, an updated Contingency Plan, confirmation of updating local responding agencies of the updated Contingency Plan and hazardous waste recertification records. I responded to Mr. Blazar on June 10, 2025, confirming that Violations #3, #6, and #8 were resolved and requesting further information regarding the other five open violations. The Generator Handbook was sent at this time with the page numbers for LDR notification form requirements highlighted in the email.

Rocal responded by email on June 11, 2025. An additional labeling photograph was provided that resolved Violation #2. Rocal provided information from Arcwood that stated they do not land dispose of the wastes and do not have LDR's for wastes shipped to them from Rocal. In accordance with OAC Rule 3745-270-07(A), Rocal is responsible for determining if a waste is being properly disposed of and if the waste has to be treated before it can be land disposed. Additionally, Rocal is responsible for determining if the waste meets or does not meet LDR

treatment standards, and for providing a one-time LDR notification with the initial shipment of this waste to the treatment facility (and a subsequent one-time LDR notification is required again any time the waste stream has changed). This notification must include all information found in Column A of Table 1 of OAC rule 3745-270-07.

If Rocal chooses not to make this determination after making arrangements for this responsibility to be assumed by the treatment facility, then Rocal may, in accordance with OAC rule 3745-270-07, instead provide the treatment facility with a one-time LDR notification that includes the EPA hazardous waste numbers, manifest number of the first shipment, and statement "This hazardous waste may or may not be subject to the LDR treatment standards. The treatment facility shall make that determination."

On June 18, 2025, Ohio EPA responded and reiterated that the one-time LDR notification must be shipped with the next shipment of waste and if no shipments are planned, then the LDR form should be created and provided to OEPA with a statement that it will be sent with the next shipment.

On July 1, 2025, Ohio EPA provided Rocal with a Partial Resolution of Violation (PROV) letter confirming the resolution of Violations #1, #2, #3, #6, and #8. Rocal responded on July 1, 2025, with an acknowledgement of the letter and a timeline on when the remaining violations will be addressed. Mr. Blazar emailed me on July 8, 2025, stating that they had a power issue and that no progress had been made.

On August 5, 2025, I emailed Mr. Blazar to check on the current progress of resolving the violations. He responded that he was at their Florida facility and would send an update the following week. On August 11, 2025, Mr. Blazar sent an email detailing that they were in discussion with the Village of Frankfort regarding disposing of the F019 listed waste through the sanitary sewer, training was rescheduled for October, and that no progress had been made on the Contingency Plan QRG.

PURPOSE OF INSPECTION

An unannounced Non-financial Record Review (NRR) of Rocal Inc. (hereinafter "Rocal" or "facility") located at 3186 County Rd 550 Frankfort, OH 45628 took place on August 12, 2025. The NRR was conducted by the Ohio Environmental Protection Agency (Ohio EPA) as an evaluation of the facility's compliance with certain provisions of Ohio's hazardous waste regulations found in the Ohio Administrative Code. The NRR was a routine evaluation of Rocal's compliance with the regulations governing large quantity generators of hazardous waste.

FACILITY RECORDS

Since the May 22, 2025, NOV was issued, Rocal has provided no documentation of a one-time LDR notification form being completed for the F019 waste stream. RCRAInfo manifests were reviewed to ensure that Rocal is properly sending out shipments within appropriate timeframes. This Record review showed that Rocal had again shipped listed F019 hazardous waste to Arcwood without a one-time LDR notification, on June 11, 2025.

Follow-up communication with Rocal through June and July revealed that as of July 1, 2025, Rocal had not sent any of the requested one-time LDR notification forms to Arcwood. This is a new violation since this shipment occurred after the original NOV issued on May 22, 2025, and did not include the necessary LDR form.

EXIT INTERVIEW

On August 25, 2025, the facility was notified that an additional NOV would be forthcoming related to the additional shipment of listed F019 hazardous waste without a one-time LDR notification. Rocal should continue to coordinate with Ohio EPA's Division of Surface Water and seek an exemption for the F019 listed waste through US EPA to ensure that all requirements to discharge the waste are met prior to Rocal discharging waste to the Village of Frankfort.

POST INSPECTION FOLLOW-UP**CHECKLIST COMPLETED**

Generator Checklist:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	LDR Checklist	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Universal Waste:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	Used Oil Checklist	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
CRO	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	RCRA Organic Air CC Container Checklist	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
RCRA Organic Air CC Tank Checklist	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	RCRA Organic Air BB Equipment Leak Checklist	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
Other Checklist			

ATTACHMENTS

- A. Notice of Violation
- B. Site Verification Form
- C. LDR Checklist



August 25, 2025

Transmitted Electronically

Andrew Blazar
Rocal Inc.
3186 County Rd 550
Frankfort, OH 45628

**Re: Rocal Inc.
Notice of Violation (NOV)
NOV
RCRA C - Hazardous Waste
Ross County
OHD990780777**

Sent via email to: ablazar@rocal.com

Hazardous Waste Program - DERR

Subject: NRR Notice of Violation

Dear Mr. Blazar:

Thank you for your June 6, 2025, June 11, 2025, July 1, 2025, and August 11, 2025, responses to Ohio EPA's May 22, 2025, Notice of Violation (NOV) and June 30, 2025, Partial Resolution of Violation (PROV) letters. The violations were originally communicated to you during an exit conference following an investigation conducted on April 30, 2025. The documentation you submitted included photographs of the universal waste labeling and containers, a training plan to bring facility back to compliance, recertification paperwork submitted to Heritage, and an updated Contingency Plan.

Ohio EPA previously reviewed documentation provided by Rocal and issued a Partial Resolution of Violation letter on June 30, 2025, resolving Violations one, two, three, six, and eight. Email communication from Rocal on August 11, 2025, provided no further progress on resolving the following outstanding violations.

As a routine follow-up to the CEI violations, Ohio EPA reviewed manifest data submitted by Rocal to RCRAInfo. The Non-financial Record Review (NRR) was conducted to determine Rocal's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and the rules adopted pursuant to ORC § 3734.12 found in Chapter 3745 of the Ohio Administrative Code (OAC). The investigation included a review of Rocal's manifest data. This document review was conducted on August 12, 2025.

Findings

Ohio EPA observed the following violations of Ohio's hazardous waste laws and rules. To bring Rocal into compliance, Ohio EPA recommends promptly addressing these violations within 14 days of your receipt of this letter.

- 1. OAC Rule 3745-270-07(A), Testing, tracking, and recordkeeping requirements for generators, treaters, and disposal facilities:** A generator of a hazardous waste shall determine if the waste has to be treated before the waste can be land disposed. With the initial shipment of waste to each treatment or storage facility, the generator shall send a one-time written notice regarding land disposal restrictions (LDR) to each treatment or storage facility receiving the waste and place a copy in the generator's files.

The original NOV issued to Rocal included a violation for not providing LDRs with hazardous waste shipments. Email communications on July 1, 2025, show that Rocal does not have LDR forms created and has not provided them with their waste shipments. The RCRAInfo manifest review showed that Rocal shipped listed F019 hazardous waste on June 11, 2025, after the original NOV was issued. This is a new violation of OAC 3745-270-07(A).

Rocal must send an appropriate LDR notification with the next shipment of F019 waste and provide documentation to Ohio EPA.

Several violations remain outstanding. The outstanding violations as provided in the June 30, 2025, PROV letter are outlined below. Ohio EPA acknowledges that Rocal has had to reschedule training from July to October due to contractor issues and that the violations will remain open until Rocal provides documentation of completion of hazardous waste and universal waste training.

Outstanding Notice of Violation (June 30, 2025)

- NOV Citation #4; **OAC Rule 3745-270-07(A), Testing, tracking, and recordkeeping requirements for generators, treaters, and disposal facilities.**

On June 6, 2025, Rocal provided waste stream recertification paperwork sent to Arcwood. While this information is helpful, it is not enough to make a hazardous waste determination and does not verify that Rocal has provided Arcwood with the required one-time notification for Land Disposal Restriction (LDR). Therefore, this violation has not been resolved.

Ohio EPA recommends that Rocal provide this verification, and if that is not possible, prepare and include the one-time notification for LDR with the next shipment of each waste stream. If no shipments are planned, please provide the last manifest for the waste stream and document that Rocal will send the one-time notification for LDR with the next shipment of each waste stream.

NOV Citation #5; OAC Rule 3745-52-17 (A)(7)(d), Conditions for exemption from a hazardous waste permit for large quantity generators that accumulate hazardous waste.

On June 6, 2025, Rocal informed Ohio EPA that Rocal has not kept up with their hazardous waste training program documentation and does not have appropriate records of training completed during the last five years. Rocal has contracted Lancaster Safety Consultants to provide this training. A three-day training course has been scheduled for July of 2025. Therefore, this violation has not yet been resolved.

Ohio EPA recommends that Rocal provides a copy of the training covered and the completion dates for employees once the training has been provided.

NOV Citation #7; OAC 3745-52-262(B), Quick Reference Guide.

On June 6, 2025, Rocal provided excerpts of the Contingency Plan to satisfy the Quick Reference Guide requirements. A complete and stand-alone Quick Reference Guide document has not been provided. Therefore, this violation has not been resolved.

Ohio EPA recommends that Rocal provide a copy of the stand-alone Quick Reference Guide document.

NOV Citation #9; OAC 3745-273-16, Employee training for small quantity handlers of universal waste.

On June 6, 2025, Rocal informed Ohio EPA that Rocal has not kept up with their universal waste training program documentation and does not have appropriate records of training completed during the last five years. Rocal has contracted Lancaster Safety Consultants to provide this training. A three-day training course has been scheduled for July of 2025. Therefore, this violation has not yet been resolved.

Ohio EPA recommends that Rocal provides a copy of the training covered and the completion dates for employees once the training has been provided.

Please submit the requested documentation demonstrating the resolution or steps to resolution of outstanding violations to this office within 14 days of your receipt of this letter.

Conclusion

Ohio EPA respectfully thanks you for your effort to resolve these violations. Ohio EPA requests that Rocal continue to take the necessary measures to resolve the outstanding violations. Within 14 days of receipt of this letter, Rocal is requested to provide documentation to Ohio EPA including the steps taken to resolve 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 danielle.stumbo@epa.ohio.gov.

Please be advised that violations cited above will continue until all violations have been properly resolved. Failure to comply with Chapter 3734. of the Ohio Revised Code and rules promulgated thereunder may result in an administrative or civil penalty. If circumstances delay the resolution of violations, Rocal is requested to submit written correspondence describing the steps that will be taken by date certain to attain compliance.

Please be advised that this Notice of Violation is only associated with those areas of the operations that were inspected, or the documentation reviewed and does not constitute a waiver of potential violations not discovered.

Should you have any questions, please contact me at (740) 380-5252 or danielle.stumbo@epa.ohio.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Danielle Stumbo'.

Danielle Stumbo, SEDO

DS/ch

cc: Kristy Hunt, Southeast District Office, DERR
Zak Kabelen, CO, DERR
EPA.RCRAInfoData@epa.ohio.gov

Ohio EPA RCRA Subtitle C Verification Form- Inspector Use

Email Completed Forms to EPA.RCRAInfoData@epa.ohio.gov

Inspector's Name + District Danielle Stumbo SEDO		Date of Inspection (Day One) 8/11/2025		Complaint Investigation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Evaluation Type: CEI, FCI, FUI, GME, OAM, FSD, CAC, CAV, NRR, CDI, etc		NRR		FCI Focus Area (Must List One if Eval Type is FCI): OTH, UOI, UWR, ISI, CAR, CPC, IEC, etc			OTH
Site EPA ID Number		EPA ID Number: OHD990780777					
Site Name		Name: Rocal Inc					
Site Location Information		Street Address: 3186 Co Rd 550					
		City: Frankfort			State: OH		
		County Name: Ross			Zip Code: 45628		
Latitude/Longitude		Latitude/Longitude: 39.414384/-83.200428					
Site Land Type		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"/>				
NAICS Code(s)		339950					
Facility Representative		First Name: Andrew				Last Name: Blazar	
Additional names can be recorded in the space provided on the next page.		Title: Chief Operating Officer					
		Phone Number: 740-998-2122				Phone Number Ext:	
		E-Mail Address: ablazar@rocal.com					
		Fax Number: 740-998-2073				Fax Number Ext:	
Provide address information if it is different than the site address.		Street or P.O. Box: 3186 County Road 550					
		City: Frankfort					
		State: OH			Zip Code: 45628		
Legal Owner and Operator of the Site		Name of Site's Legal Owner: BEDABM, LLC				Date Became Owner (mm/dd/yyyy): 10/08/2003	
List Additional Owners and/or Operators in the Comments Section.		Owner Type:	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"/>			
		Street/PO Box: 3186 Co Rd 550			City: Frankfort		State: OH
		Zip Code: 45628		Country: USA		Owner's Phone #: 740-998-2122	
Provide address information when known even if it is the same as above.		Name of Site's Operator: Rocal Inc				Date Became Operator (mm/dd/yyyy): 10/08/2003	
		Operator Type:	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"/>			
		Street/PO Box: 3186 Co Rd 550			City: Frankfort		State: OH
		Zip Code: 45628		Country: USA		Operator's Phone #: 740-998-2122	
Violations Found?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Undetermined at Time of Inspection					
Type of Handler		<input type="checkbox"/> UNKNOWN: Cited for Violation of 3745-52-11 <input type="checkbox"/> Not a HW Generator					
		<input checked="" type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> LQG Consolidator of VSQG HW <input type="checkbox"/> Small Quantity Generator (SQG) <input type="checkbox"/> Very Small Quantity Generator (VSQG)					

Ohio EPA RCRA Subtitle C Verification Form- Inspector Use

Email Completed Forms to EPA.RCRAInfoData@epa.ohio.gov

Type of Regulated Waste Activity- Mark all that Apply

- | | |
|---|---|
| <input type="checkbox"/> Hazardous Waste Transporter | <input type="checkbox"/> Receives Hazardous Waste from Off-site |
| <input type="checkbox"/> Hazardous Waste Transfer Facility | <input type="checkbox"/> Underground Injection Control Facility |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | <input type="checkbox"/> U.S. Importer of Hazardous Waste |
| Recycler of Hazardous Waste | Recognized Trader |
| <input type="checkbox"/> Stores prior to recycling | <input type="checkbox"/> Importer <input type="checkbox"/> Exporter |
| <input type="checkbox"/> Does not store prior to recycling | Spent Lead-Acid Battery |
| <input type="checkbox"/> 72-Hour Recycler | <input type="checkbox"/> Importer <input type="checkbox"/> Exporter |
| Exempt Boiler and/or Industrial Furnace | <input type="checkbox"/> Electronic Manifest Broker |
| <input type="checkbox"/> Small Quantity On-Site Burner Exemption | |
| <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption | |

Universal Waste Activities- Mark all that Apply

- | | |
|---|---|
| <input checked="" 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 | |

Mark Types of Universal Waste Managed

- | | |
|---|--|
| <input checked="" type="checkbox"/> Batteries | <input type="checkbox"/> Aerosol containers |
| <input type="checkbox"/> Pesticides | <input type="checkbox"/> Antifreeze |
| <input type="checkbox"/> Mercury containing equipment | <input checked="" type="checkbox"/> Paint and paint-related wastes |
| <input checked="" type="checkbox"/> Lamps | |

Used Oil Activities- Mark all that Apply

- ☐ 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 Healthcare Facilities and Reverse Distributors: Facility has previously notified that they are opting into managing hazardous waste pharmaceuticals pursuant to OAC rules 3745-266-500 through 3745-266-510. Check the box below to indicate the facility type.

- | | |
|--|--|
| <input type="checkbox"/> Healthcare Facility | <input type="checkbox"/> Reverse Distributor |
|--|--|

Eligible Academic Entities with Laboratories: 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

Ohio EPA RCRA Subtitle C Verification Form- Inspector Use

Email Completed Forms to EPA.RCRAInfoData@epa.ohio.gov

Waste Codes for Federally Regulated Hazardous Wastes: Please list the codes for the federally regulated hazardous waste handled at the site. 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. If a handler type is VSQG, SQG, or LQG there should be at least one HW code provided below.

F019

D009

D002

Hazardous Secondary Material Activity: Facility has previously notified that they are opting into managing excluded HSM in compliance with OAC rules 3745-50-23, 3745-51-04(A)(23), (24), (25), or (27). **See last page for facility code definitions.**

A. Facility Code-

B. Waste Code(s) for HSM-

C. Estimated Short Tons of Excluded HSM to be Managed Annually-

D. Actual Short Tons of Excluded HSM that was Managed During the Most Recent Odd-Numbered Year-

E. Land-Based Unit-

A. Facility Code-

B. Waste Code(s) for HSM-

C. Estimated Short Tons of Excluded HSM to be Managed Annually-

D. Actual Short Tons of Excluded HSM that was Managed During the Most Recent Odd-Numbered Year-

E. Land-Based Unit-

A. Facility Code-

B. Waste Code(s) for HSM-

C. Estimated Short Tons of Excluded HSM to be Managed Annually-

D. Actual Short Tons of Excluded HSM that was Managed During the Most Recent Odd-Numbered Year-

E. Land-Based Unit-

Additional Information for Internal Notes in RCRAInfo

Announced Inspection

☐ Yes

☒ No

Waste Stored in Tanks

☐ Yes

☒ No

Waste Stored in Containers

☒ Yes

☐ No

Additional Facility Representatives

Inspector Comments:

Hazardous wastewater sludge listed as F019 waste was shipped after May 22, 2025, NOV citing failure to provide LDR forms with shipments. This is a new violation.

Ohio EPA RCRA Subtitle C Verification Form- Inspector Use

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HSM Facility Code Definitions

Under Generator Exclusion (OAC rule 3745-51-04(a)(23))	
<u>Code</u>	<u>Facility Code Description</u>
01	HSM Generator reclaiming HSM “on-site”: This code applies if you generate and reclaim hazardous secondary material at your generating facility.
02	HSM Generator transferring HSM to reclaimer within the “same company”: This code applies if you generate hazardous secondary material and send the material for reclamation to a different facility that is either controlled by you or controlled by the same person that controls your generating facility.
03	Reclaimer receiving HSM from HSM generator within the “same company”: This code applies if you receive and reclaim hazardous secondary material from a different facility that either controls you or is controlled by the same person that controls you.
04	Tolling Contractor reclaiming HSM pursuant to a tolling contract: This code applies if you are a tolling contractor that reclaims hazardous secondary material pursuant to a written contract with a toll manufacturer.
05	Toll Manufacturer managing HSM pursuant to a tolling contract: This code applies if you generate and send hazardous secondary material for reclamation to a tolling contractor pursuant to a written contract.
Transfer-Based Exclusion (OAC rule 3745-51-04(a)(24))	
<u>Code</u>	<u>Facility Code Description</u>
06	HSM Generator transferring HSM off-site to a domestic reclamation facility: This code applies if you generate and send hazardous secondary material for reclamation to an off-site domestic reclamation facility.
07	Reclaimer receiving HSM from off-site: This code applies if you reclaim hazardous secondary material received from an off-site hazardous secondary material generator or other facility and you certify that you have financial assurance per OAC rule 3745-50-16.
08	Intermediate facility receiving HSM from off-site: This code applies if you receive hazardous secondary material from an off-site hazardous secondary material generator or another facility, you store it for more than ten days, and you certify that you have financial assurance per OAC rule 3745-50-16. This code does not apply if you generate or reclaim the hazardous secondary material.
Imports and Exports (OAC rules 3745-51-04(a)(24) and (25))	
<u>Code</u>	<u>Facility Code Description</u>
09	HSM Generator exporting HSM to a foreign entity for reclamation: This code applies if you generate and plan to send hazardous secondary material for reclamation to a foreign entity for reclamation and will meet the notice and consent procedures in OAC rule 3745-50-16.
10	HSM Generator importing HSM from a foreign entity to send to another U.S. facility for reclamation: This code applies if you import hazardous secondary material from a foreign entity and send the material to a different U.S. reclamation facility.
11	HSM Generator importing HSM from a foreign entity for reclamation: This code applies if you import hazardous secondary material from a foreign entity and reclaim the material at your facility.
Non-waste Determinations and Solid Waste Variances (OAC rule 3745-50-23)	
<u>Code</u>	<u>Facility Code Description</u>
14	Variance for Materials that are Accumulated Speculatively: This code applies if you operate under an approved variance from EPA or your State for materials that are accumulated speculatively without sufficient amounts being recycled (see OAC rule 3745-50-24).
15	Variance for Materials that are Reclaimed and then Reused within the Original Production Process: This code applies if you operate under an approved variance from EPA or your State for materials that are reclaimed and then reused as feedstock within the original production process in which the materials were generated (see OAC rule 3745-50-24(b)).
16	Variance for Materials that are Partially Reclaimed: This code applies if you operate under an approved variance from EPA or your State for materials that have been partially-reclaimed but must be reclaimed further before recovery is completed if the partial reclamation has produced a commodity-like material (see OAC rule 3745-50-24(c)).
20	Non-waste determination for HSM reclaimed in a continuous industrial process: This code applies if you operate under an approved non-waste determination from EPA or your State for hazardous secondary material which is reclaimed in a continuous industrial process (see OAC rule 3745-50-15(b)).
21	Non-waste determination for HSM that are indistinguishable from a product or intermediate: This code applies if you operate under an approved non-waste determination from EPA or your State for hazardous secondary materials which is indistinguishable in all relevant aspects from a product or intermediate (see OAC rule 3745-50-15(c)).

07(A)(1) 1 WASTE NOT MEETING LDRs at the POINT of GENERATION		
GENERATOR LDR CHECKLIST DOES NOT APPLY TO VSQGS		
GENERAL REQUIREMENTS		
1.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE: This is done by determining if the HW /soil contain 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).</i></p>		
2.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standards based on generator knowledge in conjunction with #1, above? [3745-270-07(A)(6)(a)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standards based on testing in conjunction with #1, above? 3745-270-07(A)(6)(b)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
4.	Does the generator keep the documentation required in #1, 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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
WASTES THAT EXHIBIT A CHARACTERISTIC		
5.	Did the generator determine if the characteristic hazardous waste contains underlying hazardous constituents that must be treated? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	Does the generator generate a listed HW that also exhibits a characteristic? If yes:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the generator determine if the constituent causing the characteristic is addressed in the treatment standard for the listed HW? [3745-270-09(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
b.	If the characteristic is not addressed in the treatment standard for the listed HW, did the generator meet the treatment standards for all applicable listed and characteristic waste numbers, including underlying hazardous constituents? [3745-270-09(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>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.</i></p>		
<p><i>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.</i></p>		
<p><i>NOTE: Only listed HW that also exhibit a characteristic not addressed in the treatment standard for the listed HW could be required to meet universal treatment standards for UHCs.</i></p>		
<p><i>NOTE: Written documentation of this determination is not required.</i></p>		
<p><i>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.</i></p>		
<p><i>NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.</i></p>		
PROHIBITED DILUTION		
7.	Is the HW treated by burning?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
8.	Is the HW a metal-bearing HW?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<p><i>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 is given in the Appendix to 3745-270-03.</i></p>		
RMK	Rocal provided testing data for the phosphoric acid/fluorotitanic acid waste stream. No testing or	

	documentation of waste determination (or determination of underlying hazardous constituents) has been provided for the sodium hydroxide or mercury wastes that were manifested in 2024. All F019 wastes that are also listed for corrosivity are managed under the appropriate H070 waste management method. Mercury is listed under management code H141.			
9.	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 hazardous organic constituents or cyanide at levels exceeding the constituent-specific treatment standard in rule 3745-270-48?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	ii.	Is made up of combustible material e.g., paper, wood, plastic contaminated with an inorganic metal-bearing hazardous waste?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iii.	Has a reasonable heating value (e.g., > 5000 Btu/pound)?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iv.	The waste is co-generated with wastes for which combustion is a required method of treatment?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	v.	The waste contains greater than one per cent total organic carbon.	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	If all responses to 8 a. (i. to v.) are “No”, HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution or burning?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
10.	Was the HW treated by wastewater treatment? Treating wastes in a CWA-equivalent treatment system, or which treat wastes for purposes of pretreatment requirements under Section 307 of the CWA is not impermissible dilution for purposes of this rule unless:		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	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 <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	Is the waste is a D003 reactive cyanide wastewater or Non-wastewater?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c.	Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	d.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: If the answers to a, b & c are “yes” and d is “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 NOT MEETING LDR STANDARDS				
11.	Did the generator treat their HW /soil on-site?		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
11.a.	Was the treatment NOT intended to <u>meet</u> the LDR treatment standard? If No skip to question 14		Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
12.	Is the generator managing and treating prohibited waste or contaminated soil in tanks, containers, or containment buildings regulated under rule 3745-52-16 or 3745-52-17 of the Administrative Code 3745-270-07 (A)(5)		Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: When treating hazardous waste to make it less hazardous or non-hazardous but NOT treating to meet LDRs the generator is NOT required to have a WAP and may not need to use a hazardous waste manifest if treated to be non-hazardous. However, they must notify the disposal facility that the waste must still be treated to meet the LDR treatment standards for the waste as it was generated.				
13.	Is the form/notice kept on-site for three years after last HW shipped? [3745-270-07(A)(8)]		Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

RMK	<i>Hazardous waste is not treated on site.</i>		
NOTIFICATION FORM			
18.	Does the LDR Notification form contain the following information:		
	a.	Manifest number of the first waste shipment to the treatment or storage facility? [3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<i>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.</i>			
RMK	<i>No LDR forms were provided by Rocal. The waste streams have been unchanged since 2021. Rocal shipped hazardous waste with no LDR forms after initial NOV was issued on May 22, 2025.</i>		
	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories</i>			
	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.</i>			
	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.</i>			
TREATMENT OF HAZARDOUS WASTE OR SOILS			
19.	a.	If the waste or contaminated soil meets the treatment standard at the original point of generation, did the generator send a one-time written notice with the initial shipment of waste to each treatment, storage, or disposal facility that contains the following certification statement? "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 believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of 74 fine and imprisonment." [3745-270-07(A)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	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 and certification? [3745-270-09(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	ii.	Maintain a copy of the notice onsite? [3745-270-09(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

		iii.	Include in the notification: [3745-270-09(D)]		
			1.	Name & address of receiving landfill?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
			2.	Description of HW when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
			3.	HW code when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
			4.	Treatability group when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
			5.	Underlying hazardous constituents present when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
		iv.	Contain the certification statement as required by 3745-270-07(B)(4) ?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
RMK	The generator has not made the determination that the hazardous waste does not require treatment.				