

## Selecting a Treatment Storage and Disposal Facility to Manage Your Hazardous Waste

Many business owners think that once their hazardous waste is hauled away, they have no further responsibilities. This is not entirely correct. Under Ohio EPA's hazardous waste rules, you (the "generator") are responsible for your hazardous waste from "cradle to grave." This means that your business can be held responsible for a cleanup or pursued in an enforcement action if your hazardous waste is mismanaged by a company, even after it leaves your property.

It is important, therefore, that you select a qualified treatment, storage and/or disposal facility (TSDF) to accept your company's hazardous waste. This fact sheet provides general guidelines when selecting a TSDF and provides additional resources to help you make this important decision.

### Permitting Activities and Compliance Record

Any facility that accepts hazardous waste for treatment, storage or disposal must have an Ohio EPA permit for these activities. The permit authorizes the types of waste the TSDF can accept and the treatment, storage and/or disposal activities that can be conducted. The permit also outlines the operating conditions and record keeping procedures the TSDF must follow to ensure that wastes will be handled according to Ohio EPA's rules. In Ohio, TSDFs are permitted through the Ohio EPA's *Division of Materials and Waste Management* (DMWM).

TSDFs within the state are inspected by Ohio EPA. Commercial facilities (those that receive and process wastes from off-site hazardous waste generators) generally are inspected twice per year. A few larger hazardous waste disposal sites have on-site Ohio EPA inspectors who monitor the daily activities of the facility.

You can access compliance-related information for facilities through several national tracking systems maintained by U.S. EPA.

### Envirofacts

This is a single point of access to several U.S. EPA databases and is able at [epa.gov/enviro](http://epa.gov/enviro).

### Enforcement and Compliance History Online (ECHO)

ECHO provides integrated compliance and enforcement information for approximately 800,000 regulated facilities nationwide. The site allows you to find facility level inspection, violation, enforcement action and penalty information for the past two years. Facilities regulated under the Clean Air Act (CAA) Stationary Source Program, Clean Water Act (CWA), National Pollutant Discharge Elimination System (NPDES), and Resource Conservation and Recovery Act (RCRA) are included.

ECHO reports provide a snapshot of a facility's environmental record, showing dates and types of violations and the state or federal government's response. ECHO reports also contain demographic information from the national census. You can access ECHO online at [epa.gov/echo](http://epa.gov/echo).

You can also contact the local Ohio EPA district office for information about a company's permits and compliance record. The first step is to locate the Ohio EPA district office that oversees the county where the TSDF is located (see map). Then, contact DMWM in that district office and ask to talk with the person responsible for inspecting the facility.

### Ask your Ohio EPA contact

- Does the facility have a hazardous waste permit?
- What types of hazardous waste treatment, storage and/or disposal activities are authorized by the permit?
- Is the facility permitted to handle the specific wastes that your business will be sending to them?



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- When was the facility last inspected by Ohio EPA?
- What types of problems or violations were found? Has the facility been operating in compliance with its permit conditions?
- If problems or violations were found during past inspections, has the facility corrected these?
- Are there any current enforcement actions against the facility for violations?
- Has the facility recently been penalized for violations?
- Does the facility have financial assurance in accordance with the regulations to ensure that it can properly close or clean up its hazardous waste units?



Because there are many regulations that apply to a TSDF, it is common for these companies to have had some past violations. Paperwork violations and some operating violations may have been found at the company during past inspections (for example, open drums, incorrect information on inspection logs, manifests, training records). However, a long history of violations may signal poor waste management practices (for example, many spills, emergency incidents, unauthorized treatment/storage/disposal activities).

## Waste Handling Practices

To ensure your hazardous waste will be managed properly, it is important for you to know how the waste will be handled once it gets to the TSDF. Your waste may be handled by more than one facility. For example, your waste may be treated at one location and then shipped off to another site for disposal. If so, you should look at the compliance and operating status of both sites.

## Ask the TSDF

- Can the facility accept the waste you are sending (by EPA waste code)?
- How will the waste be transported to the facility? If this will be arranged by the TSDF, will a licensed hazardous waste transporter be used?
- How will the hazardous waste be managed once it gets on-site: stored? treated? fuel blended? incinerated? landfilled?
- Will hazardous waste be handled only in those areas authorized under the facility's permit?
- If wastes are treated, how will any residues from the treatment (for example, incinerator ash, still bottoms, etc.) be handled?
- Will the waste or treatment residues be shipped off to another facility for handling or disposal? If so, how are these wastes managed by the second facility?
- How will you be notified of final disposal of the waste? Will you get something in writing?
- How much time will it take from when the wastes are received at the TSDF until final disposal?
- Does the facility have an environmental compliance manager or an internal auditing program to help monitor its compliance with the regulations?

## Is there a list of TSDFs in Ohio that take hazardous waste?

Yes, Ohio EPA's DMWM has a list of the facilities in Ohio permitted to treat, store and/or dispose of hazardous wastes. This list is available through Ohio EPA's website at <https://ebiz.epa.ohio.gov/Recyclers/jsp/results.jsp?category=29>

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## Are there any other considerations in choosing a TSDF?

Information from Ohio EPA's DMWM is related to compliance with the hazardous waste rules only. This means that you may need to make additional contacts within Ohio EPA to get a complete record of the facility's compliance status. Other areas to consider are compliance with Ohio EPA's waste water, air pollution and right-to-know rules.

Some businesses sending wastes to a TSDF have completed their own on-site audits of the facility beforehand to make sure their wastes will be properly handled. This isn't always feasible though, particularly for small business owners. One alternative is to ask the TSDF for a reference list of other business customers. This will allow you to talk directly with other businesses about the service received and can help you identify potential problem areas.

## What if I'm considering using a TSDF that isn't in Ohio?

If you are considering using a TSDF outside Ohio, that state's environmental agency should have compliance and permitting information available. There is no single contact list for all other state environmental agencies, however, you can start at *U.S. EPA's Regional Office website* to find contact information.

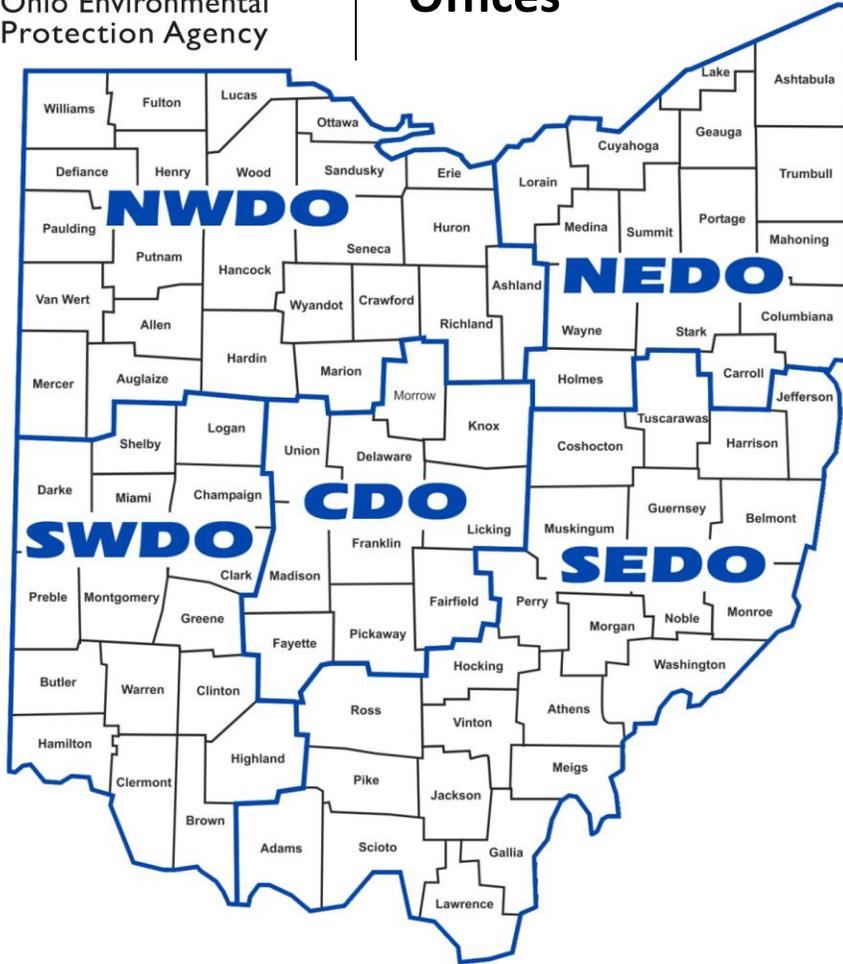
## Where can I get more help?

If you have questions or need help in understanding Ohio EPA's rules, you can also contact Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) for help. OCAPP is a non-regulatory office of Ohio EPA with a goal of helping businesses comply with environmental regulations and permitting requirements. For more information, contact OCAPP at (800) 329-7518, or visit our website at [epa.ohio.gov/ocapp/](http://epa.ohio.gov/ocapp/).

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## District Offices



### Central Office

Lazarus Government Center  
50 W. Town St., Suite 700  
P.O. Box 1049  
Columbus, OH 43215  
(614) 644-3020

### Northwest District Office

347 N. Dunbridge Rd.  
Bowling Green, OH 43402  
(419) 352-8461  
(800) 686-6930

### Northeast District Office

2110 E. Aurora Rd.  
Twinsburg, OH 44087  
(330) 963-1200  
(800) 686-6330

### Central District Office

Lazarus Government Center  
50 W. Town St., Suite 700  
Columbus, OH 43215  
(614) 728-3778  
(800) 686-2330

### Southeast District Office

2195 Front Street  
Logan, OH 43138  
(740) 385-8501  
(800) 686-7330

### Southwest District Office

401 E. Fifth St.  
Dayton, OH 45402  
(937) 285-6357  
(800) 686-8930

*Toll-free numbers are for citizens with questions or concerns about environmental issues.  
The regulated community should use the business line for routine business.  
Spills and emergencies should be reported to (800) 282-9378.*