



State of Ohio Environmental Protection Agency

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file

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Southwest District

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Ted Strickland, Governor
Lee Fisher, Lt. Governor
Laura H. Powell, Acting Director

January 22, 2007

Mr. Rob Groeschen
Resource-One
6043 Interstate Circle
Cincinnati, Ohio 45242

Re: Resource-One complaint investigation

Dear Mr. Groeschen:

Thank you for assisting Steve Roth and me during our complaint investigation on January 3, 2007. The complaint alleged improper handling of chlorinated solvents and solvent contaminated rags for reuse. This letter will explain the validity of the complaint, violations we found and what you need to do to correct the violations.

During the investigation, Ohio EPA did not find any validity with regards to Resource-One's solvent reuse program and the reuse program for solvent contaminated rags (laundered). Based on Ohio EPA's investigation, Resource-One's solvent reuse program appears to be compliant with Ohio's hazardous waste rules and regulations and it was determined the solvent contaminated rags (laundered) have been replaced with off-spec adult diapers for manufacturing absorbents socks. During our investigation, Ohio EPA also conducted a full inspection including hazardous waste generation, universal waste and used oil.

We found the following violations of Ohio's hazardous waste laws. In order to correct these violations, you must do the following and send me the required information within 30 days of the receipt of this letter:

1. Used Oil Collection Centers [OAC 3745-279-31(B)(2)]

Owners and operators of all used oil collections centers shall: (2) Be registered with Ohio EPA, on a form prescribed by the director, to manage used oil.

Resource-One failed to comply with this rule in that they have not registered with Ohio EPA to manage used oil. To return to compliance Resource-One must register with Ohio EPA as a used oil collection center. The registration form can be found at the following web address: <http://www.epa.state.oh.us/dhwm/pdf/usedoilform.pdf>.

Please submit documentation resolving this violation to this office for review.

GROESCHEN.JS.WPD

2. Notification by Used Oil Transporters [OAC 3745-279-42(a)]

Used oil transporters who have not previously notified Ohio EPA or U.S. EPA of regulated waste activity must comply with these requirements and obtain a U.S. EPA identification number.

Resource-One failed to comply with this rule in that they have been transporting used oil without a U.S. EPA identification number. To return to compliance, Resource-One must obtain a U.S. EPA number. The notification form can be found at the following web address: <http://www.epa.state.oh.us/dhwm/notiform.html>.

Please submit documentation resolving this violation to this office for review.

3. Rebuttable Presumption for Used Oil for Transporters [OAC 3745-279-44 (A) and (D)]

(A) To ensure that used oil is not a hazardous waste the used oil transporter shall determine whether the total halogen content of used oil being transported or stored at a transfer facility is above or below one thousand parts per million (ppm). The transporter shall make this determination by (1) testing the used oil; or (2) applying generator knowledge of the halogen content of the used oil in light of the materials or processes used.

(D) Records of analyses conducted or information used to comply with this rule shall be maintained by the transporter for at least three years.

Resource-One failed to comply with this rule in that they have not been determining the total halogen content of the used oil they are transporting and storing at their facility to ensure it is not a hazardous waste and maintain documentation. To return to compliance, Resource-One must begin determining the halogen content of all used oil transported and stored at their facility and maintain documentation on-site. Please submit documentation resolving this violation to this office for review.

4. Used Oil Storage at Transfer Facilities [OAC 3745-279-45(D)]

Secondary containment for containers. Containers used to store used oil at transfer facilities must be equipped with a secondary containment system. (1) The secondary containment system must consist of at a minimum:

- (a) Dikes, berms or retaining walls; and
- (b) A floor. The floor must cover the entire area within the dikes, berms, or retaining walls; or
- (c) An equivalent secondary containment system.

Mr. Rob Groeschen
January 22, 2007
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Resource-One failed to comply with this rule in that they do not have a secondary containment system for storage of used oil containers which meets the requirements of this rule. To return to compliance, Resource-One must equip their used oil container storage area with secondary containment. Please submit documentation resolving this violation to this office for review.

5. Used Oil Storage at Transfer Facilities [OAC 3745-279-45(G)]

Containers used to store used oil at transfer facilities must be labeled or marked clearly with the words "Used Oil".

Resource-One failed to comply with this rule in that one 55-gallon container of used oil was not properly labeled. It was determined the drum was pumped earlier in the week, however the company was unable to pump out the sludge portion and left the drum for pickup at a later date. To return to compliance, Resource-One needs to ensure all containers used to store used oil are marked or labeled properly. Please submit documentation resolving this violation to this office for review.

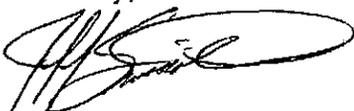
GENERAL COMMENT

During the inspection we had talked about the requirements for a Large Quantity Universal Waste Handler. Please find below links to a Large Quantity Handler Checklist, a Universal Waste Guidance Document and a Universal Waste Requirements Table:

<http://www.epa.state.oh.us/dhwm/pdf/UWR.LQG.11.2004.fin.megaset.pdf>
<http://www.epa.state.oh.us/dhwm/pdf/New Universal Waste Guidance.pdf>
<http://www.epa.state.oh.us/dhwm/pdf/UniversalWasteRequirementsTable.pdf>

Enclosed you will find a copy of the checklists that we completed as a result of the inspection. Should you have any questions, please feel free to call me at (937) 285-6070. You can find copies of the rules and other information on the division's web page at: <http://www.epa.state.oh.us/dhwm/>.

Sincerely,



Jeff Smith
Division of Hazardous Waste Management

Enclosure

cc: Dinah Crawford, SWDO-DHWM/SWDO File

JS/br



E-mail this completed form to tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office	Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM		For Ohio EPA use only						
2. Site EPA ID No.	EPA ID Number:								
3. Site Name	Name: Resource One		Website (optional):						
4. Site Location Information	Street Address: 6043 Interstate Circle								
	City, Town, or Village: Cincinnati		State: OH						
	County Name: Hamilton		Zip Code: 45242						
5. Site Land Type (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other	
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A.		B.						
	C.		D.						
7. Facility Representative: Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	First Name: Rob		MI:	Last Name: Groeschen					
	Phone Number: (513) 247-0175			Phone Number Extension:					
	E-Mail Address: rgroeschen@resourceone-recycling.com								
	Fax Number: (513) 247-0176			Fax Number Extension:					
	Street or P.O. Box:								
	City, Town or Village:								
	State:		Country:			Zip Code:			
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	A. Name of Site's Legal Owner:			Date Became Owner (mm/dd/yyyy):					
	Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
	Street or P.O. Box:								
	City, Town, or Village:				Owner Phone #:				
	State:			Country:		Zip Code:			
	B. Name of Site's Operator:			Date Became Operator (mm/dd/yyyy):					
	Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
	Street or P.O. Box:								
	City, Town, or Village:				Operator Phone #:				
	State:			Country:		Zip Code:			
9. Violations Cited?		<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No				
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)									
<input type="checkbox"/>	Not Regulated								

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

A. Hazardous Waste Activities	
(choose only one of the following categories)	<input type="checkbox"/> 3. Treater, Storer or Disposer of Hazardous Waste
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> 4. Recycler of Hazardous Waste
<input type="checkbox"/> a. Large Quantity Generator (LQG):	<input type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> b. Small Quantity Generator (SQG)	<input type="checkbox"/> a. Small Quantity On-site Burner Exemption
<input checked="" type="checkbox"/> c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> d. United States Importer of Hazardous Waste	<input type="checkbox"/> 6. Underground Injection Control Facility
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/> 7. Hazardous Waste Transporter

B. Universal Waste Activities	C. Used Oil Activities															
<input checked="" type="checkbox"/> 1. Small Quantity Handler of Universal Waste (Indicate types of universal waste generated and/or accumulated (check all boxes that apply):	<input type="checkbox"/> 1. Used Oil Generator															
<input type="checkbox"/> 2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more).	<input type="checkbox"/> 2. Used Oil Transporter Indicate Type(s) of Activity(ies)															
<input type="checkbox"/> 3. Destination Facility for Universal Waste (Check all boxes below that apply for each of the three types of facilities above.)	<input checked="" type="checkbox"/> Transporter															
	<input checked="" type="checkbox"/> Transfer Facility															
	<input type="checkbox"/> 3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)															
	<input type="checkbox"/> Processor															
	<input type="checkbox"/> Re-refiner															
<table border="1"> <thead> <tr> <th></th> <th>Generated</th> <th>Accumulated</th> </tr> </thead> <tbody> <tr> <td>A. Batteries</td> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>B. Pesticides</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>C. Thermostats</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>D. Lamps</td> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> </tbody> </table>		Generated	Accumulated	A. Batteries	<input type="checkbox"/>	<input checked="" type="checkbox"/>	B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>	C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>	D. Lamps	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> 4. Off-Specification Used Oil Burner
	Generated	Accumulated														
A. Batteries	<input type="checkbox"/>	<input checked="" type="checkbox"/>														
B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>														
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>														
D. Lamps	<input type="checkbox"/>	<input checked="" type="checkbox"/>														
	<input type="checkbox"/> 5. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)															
	<input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Oil															
	<input type="checkbox"/> b. Used Oil to Off-Specification Used Oil Burner															

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

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12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

N	Announced ?	Additional Facility Representatives:
N	Tanks?	Other comments:
Y	Containers?	

13.	Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
	Jeff Smith	Steven Roth	1 / 3 / 07

14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of owner, operator, or an authorized representative	Name and Title (Print)	Date (mm-dd-yyyy)
	Rob Groeschen	

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

CESQG: <100Kg. (Approximately 25-30 gallons) of waste in a calendar month.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or >1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

WASTE EVALUATION

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A

GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes No N/A

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes No N/A

TREATMENT OF HAZARDOUS WASTE

4. Does the generator treat hazardous waste in a :
- a. Container that meets 3745-66-70 to 3745-66-77? Yes No N/A
 - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C) 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



USED OIL INSPECTION CHECKLIST

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes ___ No N/A ___ RMK# ___
Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes ___ No N/A RMK# ___
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No N/A ___ RMK# ___
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes ___ No N/A RMK# ___

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes ___ No N/A RMK# ___
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes ___ No N/A ___ RMK# 1
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes ___ No N/A RMK# ___

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes No N/A ___ RMK# ___

USED OIL TRANSPORTER AND TRANSFER FACILITIES

16. Does the used oil transporter process used oil? [3745-279-41(A)] If so: Yes ___ No N/A ___ RMK# ___
Is the used oil transporter in compliance with the requirements for processors/re-refiners in 3745-279-50 to 3745-279-59 (except as provided in 3745-279-41(B) and (C))? [3745-279-41(A)] Yes ___ No N/A RMK# ___
17. Has the used oil transporter notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-42(A)] Yes ___ No N/A ___ RMK# 2
18. Has the used oil transporter delivered all used oil to:
a. Another used oil transporter that has a U.S. EPA ID#? [3745-279-43(A)(1)] Yes ___ No N/A RMK# ___

- b. A used oil processing/re-refining facility that has a U.S. EPA ID#? [3745-279-43(A)(2)] Yes No N/A RMK#
- c. An off-spec used oil burning facility that has a U.S. EPA ID#? [3745-279-43(A)(3)] Yes No N/A RMK#
- d. An on-spec used oil burning facility? [3745-279-43(A)(4)] Yes No N/A RMK#
19. Has the used oil transporter complied with all applicable USDOT regulations (49 CFR 171 to 180)? [3745-279-43(B)] Yes No N/A RMK#
20. Has the used oil transporter had a discharge of used oil? If so: Yes No N/A RMK#
Did they take the appropriate action as outlined in 3745-279-43(C)? Yes No N/A RMK#
21. Has the used oil transporter determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? [3745-279-44(A)] Yes No N/A RMK# 3
22. Does the transporter retain all records of analyses and information used to comply with 3745-279-44 for at least three years? [3745-279-44(D)] Yes No N/A RMK# 3
23. Does the owner/operator of a used oil transfer facility:
- a. Stored used oil in tanks, containers, or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-45(B)] Yes No N/A RMK#
- b. Stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-45(C)] Yes No N/A RMK#
- c. Provide secondary containment for containers used to store used oil as required by 3745-279-45(D)? [3745-279-45(D)] Yes No N/A RMK# 4
- d. Provide secondary containment for existing aboveground tanks required by 3745-279-45(E)? [3745-279-45(E)] Yes No N/A RMK#
- e. Provide secondary containment for new aboveground tanks as required by 3745-279-45(F)? [3745-279-45(F)] Yes No N/A RMK#

- f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-45(G)] Yes ___ No N/A ___ RMK# 5
- g. Upon detection of a release of used oil: [3745-279-45(H)]
- i. Stopped the release? Yes ___ No N/A RMK# ___
- ii. Contained the release? Yes ___ No N/A RMK# ___
- iii. Cleaned up and managed the used oil and other materials? Yes ___ No N/A RMK# ___
- iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A RMK# ___
24. Does the used oil transporter keep a record of each shipment of used oil? [3745-279-46(A)] Yes No N/A ___ RMK# ___
- a. Does each record include the name and address of the generator, transporter or processor/re-refiner who provides the used oil for transport? [3745-279-46(A)(1)] Yes No N/A ___ RMK# ___
- b. Does each record include the U.S. EPA ID# of the generator, transporter or processor/re-refiner (if applicable) that provides the used oil for transport? [3745-279-46(A)(2)] Yes No N/A ___ RMK# ___
- c. Does each record include the quantity of used oil accepted? [3745-2679-46(A)(3)] Yes No N/A ___ RMK# ___
- d. Does each record include the date of acceptance? [3745-279-46(A)(4)] Yes No N/A ___ RMK# ___
- e. Does each record include the signature of a representative of the generator, transporter, processor/re-refiner that provided the used oil for transport? [3745-279-46(A)(5)] Yes No N/A ___ RMK# ___
25. Does the used oil transporter keep a record of each shipment of used oil that is delivered to another used oil transporter, burner, processor/re-refiner, or disposal facility? [3745-279-46(B)] Yes No N/A ___ RMK# ___
- a. Does each record include the name and address of the receiving facility or transporter? [3745-279-46(B)(1)] Yes No N/A ___ RMK# ___

- b. Does each record include the U.S. EPA ID# of the receiving facility or transporter? [3745-279-46(B)(2)] Yes No N/A RMK#
- c. Does each record include the quantity of used oil delivered? [3745-279-46(B)(3)] Yes No N/A RMK#
- d. Does each record include the date delivered? [3745-279-46] Yes No N/A RMK#
- e. Does each record include the signature of a representative of the receiving facility or transporter (intermediate rail transporters are not required to sign a record of delivery)? [3745-279-46(B)(5)] Yes No N/A RMK#
26. Does the used oil transporter who exports used oil to a foreign country comply with 3745-279-46(B)(1) to (B)(4)? [3745-279-46(C)] Yes No N/A RMK#
27. Does the used oil transporter retain all records required under 3745-279-46 for at least three years? [3745-279-46(D)] Yes No N/A RMK#
28. Does the used oil transporter generate residues from the storage or transportation of used oil? Yes No N/A RMK#
- If so, are they managed as specified in 3745-279-10(E)? [3745-279-47] Yes No N/A RMK#

REMARKS

1. Resource-One is not registered with Ohio EPA as an Used Oil Collection Center.
2. Resource -One does not have a U.S. EPA ID# for transporting Used Oil.
3. Resource-One has not determined whether the total halogen content of Used Oil being transported or stored is above or below 1000ppm and they do not have the required documentation to support this.
4. Resource-One does not have the required secondary containment for containers of Used Oil stored at their facility.
5. One container (55-gallon drum) of used oil was stored without a label. The container was pumped earlier in the week and the label was marked off. However the container still contained used oil sludge which was going to be shipped directly to the used oil processor in the 55-gallon drum as a used oil.

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more

Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No N/A ___ RMK# ___
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes No N/A ___ RMK# ___

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes ___ No N/A RMK# ___
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes No N/A ___ RMK# ___
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes ___ No N/A ___ RMK# ___
- b. Mix battery types in one container? Yes ___ No N/A ___ RMK# ___
- c. Discharge batteries to remove the electric charge? Yes ___ No N/A ___ RMK# ___
- d. Regenerated used batteries? Yes ___ No N/A ___ RMK# ___
- e. Disassemble them into individual batteries or cells? Yes ___ No N/A ___ RMK# ___
- f. Remove batteries from consumer products? Yes ___ No N/A ___ RMK# ___

g. Remove the electrolyte from the battery?

Yes ___ No N/A ___ RMK# ___

If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)?
[3745-273-13(A)(2)]

Yes No ___ N/A RMK# ___

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)]

Yes ___ No N/A RMK# ___

a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]

Yes ___ No N/A RMK# ___

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]

Yes ___ No N/A RMK# ___

7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"?
[3745-273-14(A)]

Yes No N/A ___ RMK# ___

UNIVERSAL WASTE LAMPS

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]

Yes No N/A ___ RMK# ___

9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]

Yes ___ No N/A RMK# ___

10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)" [3745-273-14(E)] Yes No N/A RMK#

NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes No N/A RMK#
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes No N/A RMK#

NOTE: Accumulation is defined as date generated or date received from another handler.

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes No N/A RMK#
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes No N/A RMK#
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes No N/A RMK#
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes No N/A RMK#
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes No N/A RMK#
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes No N/A RMK#

- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)]

Yes ___ No N/A ___ RMK# ___

EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]

Yes No N/A ___ RMK# ___

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]

Yes ___ No N/A RMK# ___

15. Is the material released characterized? [3745-273-17(B)]

Yes ___ No N/A RMK# ___

16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)]

Yes ___ No N/A RMK# ___

OFF-SITE SHIPMENTS

NOTE: *If a SQUWH self-transportes waste, then they must comply with the Universal Waste transporter requirements.*

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]

Yes No N/A ___ RMK# ___

NOTE: *SQUWHs are prohibited to send waste to any other facility.*

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)]

Yes ___ No N/A RMK# ___

19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)]

Yes No N/A ___ RMK# ___

20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes ___ No ___ N/A X RMK# ___
-
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes ___ No ___ N/A X RMK# ___
-
21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes ___ No ___ N/A X RMK# ___
-
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes ___ No ___ N/A X RMK# ___
-
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes ___ No N/A X RMK# ___
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes ___ No N/A X RMK# ___

EXPORTS

24. Is waste being sent to a foreign destination? If so: Yes ___ No X N/A ___ RMK# ___
-
- a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes ___ No N/A X RMK# ___
- b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)] Yes ___ No N/A X RMK# ___
- c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes ___ No N/A X RMK# ___

