



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

February 27, 2008

RE: AKRON GENERAL MEDICAL CENTER
EPA ID OHD 041 635 665
SUMMIT COUNTY
CESQG/CEI/NOV

Tammy M. Shaw
Safety Manager
Akron General Medical Center
400 Wabash Ave.
Akron, OH 44307

Dear Ms. Shaw:

On January 29, 2008, I, as a representative of the Ohio EPA's Division of Hazardous Waste Management, conducted an inspection of the Akron General Medical Center facility (Akron General) in Akron, Ohio. I inspected the facility to determine Akron General's compliance with Ohio's hazardous waste, universal waste and used oil laws and regulations as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). You and Joseph Plavecski represented Akron General during the inspection. Subsequent to the inspection, you provided additional information on evaluation of waste carbolime and waste generation rate for the on-site distillation unit for spent xylene.

The inspection included reviews of facility records, interviews with facility personnel and a facility walk-through. The results of these reviews are discussed below.

Akron General was a conditionally exempt small quantity generator (CESQG) of hazardous waste at the time of the inspection. Consequently my inspection was for compliance with the conditionally exempt small quantity generator (CESQG) requirements. Because the waste generation rate was close to 220 pounds per calendar month, it appears that Akron General could be a small quantity generator (SQG) during some calendar months. If this should occur, the facility must comply with SQG requirements for waste generated during those months. This is discussed in more detail in the *Concerns* section of this letter.

Based on the facility documents reviewed and observations made during the facility walk-through, Ohio EPA has determined that Akron General has violated the following state hazardous waste regulations.

1. **OAC Rule 3745-273-14(A) Small Quantity Handler of universal waste must label universal waste batteries/containers.**

Several boxes of used batteries were present in the waste storage (i.e., accumulation) room. At least one battery appeared to be a Ni-Cad battery and so subject to regulation as hazardous or universal waste. The facility stated they intended to manage batteries as universal waste. None were labeled with any of the acceptable words in OAC Rule 3745 273-14(A), namely, "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)." Proper labels were added to the boxes during the inspection. No further action is required for labeling of these containers.

Please submit to this office within 45 days of the date of this letter documentation of measures taken to insure that all containers of universal waste batteries at the facility will be properly labeled in the future.

2. OAC Rule 3745-273-16 Employee training for small quantity handlers of universal waste

Facility employees with universal waste duties did not appear to have been appropriately trained on universal waste requirements.

To return to compliance the facility must:

- Train appropriate personnel with universal waste management duties on applicable universal waste requirements.
- Submit copies of training documentation to this office within 45 days of the date of this letter.

Enclosed you will find a copy of the checklists completed for the inspection.

Concerns

Implications of variation in generation rate.

The facility's waste generation in the months immediately preceding this inspection was close to the 220 pounds in a calendar month required to be a Small Quantity Generator (SQG). If the facility should generate 220 pounds or more of hazardous waste in a calendar month, the facility must comply with the SQG requirements for that month and until those wastes are shipped off-site. If the facility should generate 2.2 pounds or more of an acutely hazardous waste in a calendar month, the facility must comply with the requirements for a Large Quantity Generator (LQG) for that month and until those wastes are shipped off-site and must submit an annual report to Ohio EPA. See the following documents for information to assist in compliance if either of the above should occur:

http://www.epa.state.oh.us/dhwm/pdf/Episodic_Generation.pdf
<http://www.epa.state.oh.us/dhwm/pdf/LQG02.20.2007.pdf>
<http://www.epa.state.oh.us/dhwm/pdf/SQG02.20.07.pdf>
<http://www.epa.state.oh.us/dhwm/pdf/sqglog.PDF>
<http://www.epa.state.oh.us/dhwm/pdf/lqglog.PDF>
<http://www.epa.state.oh.us/dhwm/pdf/GeneratorRequirementsTable.pdf>

Implications if certain chemotherapy medications become waste.

Certain chemotherapy medications (e.g., Mitomycin C and Cyclophosphamide), if discarded, would under certain conditions (e.g., in a formulation in which it is the sole active ingredient and in a container that is not empty) be hazardous waste and could not be managed as chemotherapy wastes in "chemo boxes". Even though the facility stated that these drugs are seldom if ever discarded other than as empty containers, the facility is encouraged to make staff aware of how to manage if disposal of such a waste should occur. The facility is encouraged to develop and implement procedures (including training of appropriate personnel) for managing the following chemotherapy medications, if they should become wastes:

- *Chloramubucil (U035),
- *Cyclophosphamide (U058),
- *Uracil Mustard (U237),
- *Daunomycin (U059),
- *Melphalan (U150),
- *Mitomycin C (U010), and
- *Streptozotocin (U206).

Other Information

Attached to this letter is a listing of some links to Ohio EPA and USEPA, documents that address some hazardous waste compliance issues for hospitals.

A list of Ohio EPA DHWM guidance documents can be found at the following Internet site: <http://www.epa.state.oh.us/dhwm/guidancedocuments.html>. You can find copies of Ohio's hazardous waste laws and regulations at our web page at: <http://www.epa.state.oh.us/dhwm/Law&Regs.html>.

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign up for this free service. You can find more information at the following Web link <http://www.epa.state.oh.us/dhwm/listserv.html>.

The OEPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes and pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image through pollution prevention. More information about pollution prevention can be found on our website at <http://www.epa.state.oh.us/ocapp/ocapp.html>.

Should you have any questions regarding this letter, please contact me at (330) 963-1165.

Sincerely,



Neil J. Wasilk
Environmental Specialist
Division of Hazardous Waste Management

NJW:ddw

Enclosure

cc: Natalie Oryshkewych, Ohio EPA, DHWM, NEDO
Harry Sarvis, Ohio EPA, DHWM, CO

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your facility from its obligation to comply with all applicable regulations.

Links to some OEPA and USEPA documents on hospitals and pharmaceuticals

OEPA Links:

<http://www.epa.state.oh.us/dhwm/searchdocs/mmahaffey.6.15.07.pdf>

<http://www.cpa.state.oh.us/dhwm/searchdocs/csmith4803/>

<http://www.epa.state.oh.us/dhwm/searchdocs/esterling82002/>

http://www.epa.state.oh.us/dhwm/searchdocs/bdurica_8.12.04.pdf

<http://www.epa.state.oh.us/dhwm/searchdocs/adavidner8-27-04.pdf>

http://www.epa.state.oh.us/dhwm/searchdocs/twenning_2.15.05.pdf

<http://www.cpa.state.oh.us/dhwm/searchdocs/tlaurila.4.19.07.pdf>

<http://www.epa.state.oh.us/dhwm/searchdocs/prevlock.11.16.05.pdf>

<http://www.cpa.state.oh.us/dhwm/searchdocs/pfranklin7902/>

<http://www.epa.state.oh.us/dhwm/searchdocs/mgregory.12.15.06.pdf>

<http://www.epa.state.oh.us/dhwm/searchdocs/mgahbauer13003/>

<http://www.epa.state.oh.us/dhwm/searchdocs/mcotter.2.28.07.pdf>

<http://www.epa.state.oh.us/dhwm/searchdocs/kstrausbaugh.12.17.06.pdf>

<http://www.epa.state.oh.us/dhwm/searchdocs/jwootten.1.11.06.pdf>

USEPA Links:

[http://yosemite.epa.gov/osw/rera.nsf/0c994248c239947e85256d090071175f?2F701627EB73B2AB852573D2005E0B4F/\\$file/14778.pdf](http://yosemite.epa.gov/osw/rera.nsf/0c994248c239947e85256d090071175f?2F701627EB73B2AB852573D2005E0B4F/$file/14778.pdf)

[http://yosemite.epa.gov/osw/rera.nsf/0c994248c239947e85256d090071175f?1C1DEB3648A62A868525670F06BCCD2/\\$file/13718.pdf](http://yosemite.epa.gov/osw/rera.nsf/0c994248c239947e85256d090071175f?1C1DEB3648A62A868525670F06BCCD2/$file/13718.pdf)

Ohio Environmental Protection Agency
**RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to
tammy.mcconnell@epa.state.oh.us or mail it to Tammy
McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OHD 041 635 665								
3. Site Name	Name: Akron General Medical Center				Website: (Optional)				
4. Site Location Information	Street Address: 400 Wabash Ave						State: OH		
	City, Town, or Village: Akron			Zip Code: 44307					
	County Name: Summit								
5. Site Land Type (check only one)	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 checked="" type="checkbox"/>	Other <input type="checkbox"/>	
6. NAICS code(s) www.census.gov/epcd/www/naics.html									
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: Joseph		MI: M.	Last Name: Plavecski					
	Phone Number: 330-344-6559			Phone Number Extension:					
	E-Mail Address: jplavecski@agmc.org						Fax Number Extension:		
	Fax Number: 330-344-1781			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.	Name of Site's Legal Owner:				Date Became Owner (mm/dd/yyyy):				
	Owner Type:	Private <input 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 or P.O. Box:								
	City, Town or Village:			Owner Phone #:					
	State:		Country:		Zip Code:				
	Name of Site's Operator:				Date Became Operator (mm/dd/yyyy):				
	Owner Type:	Private <input 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 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								
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Not Regulated				<input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste					
<input type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)									
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Underground Injection Control Facility									

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))

Small Quantity Handler of Universal Waste Large Quantity Handler of Universal Waste
 (accumulates 5,000 kg. or more)

Destination Facility for Universal Waste

Check all boxes below that apply for each of the three types of facilities above

	Managed	10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Lamps	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
		<input type="checkbox"/> Used Oil Re-refiner	

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the 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 RCRA Info source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

Same Annual report

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

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:	Joseph Plavescski, Tammy Shaw
Tanks	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Other Comments:	
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		

13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Neil Wasilk		1/29/2008 10:15 a.m.

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)

PROCESS DESCRIPTION SECTION

Give a general process description (include all processes at the facility)

Akron General Medical Center
25400 Wabash Ave
Akron, OH 44307

Facility is a large hospital with a small research facility (Calhoun Lab).

Veolia is the facility's the hazardous waste contractor. In addition to TSDF and transportation services the contractor provides lab packing and assistance with waste evaluation.

Potential waste generation activities include:

- Excess and/or out-of-date pharmaceuticals
- Wastes from hospitals labs such as pathology and toxicology.
- Research lab wastes.
- Facility maintenance (for example, paint shop, fluorescent lights, used batteries). Used fluorescent bulbs are disposed in the facility's trash.

Pharmaceutical wastes

The following list of chemotherapy drugs (and applicable waste code if they are discarded and are the sole active ingredient in the formulation) was reviewed with the facility:

Chloramubucil (U035),
Cyclophosphamide (U058),
Uracil Mustard (U237),
Daunomycin (U059);
Melphalan (U150);
Mitomycin C (U010); and
Streptozotocin (U206).

The facility stated that these drugs are seldom if ever discarded other than as empty containers. Reasons cited included good medical practice, high costs of these medications and some reimbursement protocols that only pay of drugs actually received by the patient. However, facility staff did not appear to be aware that if disposal of these drugs should occur, the waste would be a hazardous waste rather than chemotherapy waste and that it could not be placed in the "chemo boxes" used for disposal of empty bags and other patient care items from chemotherapy. "Chemo boxes" are not managed as hazardous waste and are shipped to Stericycle.

The facility uses Guaranteed Returns to return many excess and/or out-of-date pharmaceuticals for credit and re-use or disposal.

Reportedly no Warfarin (e.g., Coumadin) is discarded.

The facility reported usage of the following two vaccines that contain thimerosal:

-DTP vaccine. Reportedly no unused or partially used doses are disposed of.

-Multi-flu vaccine. Reportedly there have not been any unused doses of this vaccine in the past two years. Reportedly if there should be any unused doses they would be returned through Guaranteed Returns. The mercury content of such vaccine would be expected to be in excess of the TCLP limit of 0.2 mg/l. If the vaccine is composed solely of liquid that would pass through a paint filter, the TCLP limit would apply directly to the waste and would require that the waste be managed as hazardous waste if it were to be discarded.

Fluorescent bulbs. Facility currently uses T12/ECO fluorescent tubes. It is in the process of converting to T8/ECO fluorescent tubes when bulbs require replacement. All used bulbs (i.e., fluorescent tubes, halogen bulbs, high pressure sodium) are disposed of as solid (i.e., non-hazardous) waste in the facility's solid waste (i.e., trash) dumpsters.

Facility stated that all fluorescent lamps that it uses are Osram Sylvania products that are discussed in a letter from Ohio EPA to Osram-Sylvania Lighting Products dated 10-18-99. Facility provided a copy of this letter. The letter includes two tables. Lamps listed in Table 1 are those for which TCLP results for all RCRA metals were provided and are less than regulatory levels. Lamps listed in Table 2 are those for which TCLP results for barium, lead and mercury were provided and are less than regulatory levels. T12/ECO fluorescent tubes are listed in Table 2. Facility also provided a product data sheet for certain Sylvania fluorescent lamps, including "ECO" lamps, that lists metals used. It does not list cadmium as a metal used. Typically the metals of concern in fluorescent bulbs are mercury, lead and cadmium; consequently no additional requests for evaluation were made.

Walk-Through Observations.

Paint shop. Approximately half dozen one-gallon cans of unused lacquer thinner in flammable cabinet. Unclear how/where material is used.

Maintenance Shop: Parts washer reportedly recently placed back in service. Plan is to use a "green" solvent.

Waste accumulation area

The waste accumulation area is on the first floor. Room provides spill containment by elevated doorsill and no floor drains. Waste had been shipped on 12-18-07. Shipping

3 or 4 times per year.

The following were present in the room:

- Approximately a dozen blue plastic bags of used Carbolime carbon dioxide absorbent.
- Several boxes that appeared from attached MSDS to contain alpha-Naphthol.
- Several 5-gallon pails that appeared to contain chloroform.
- Paint soaking tray for tools from paint department. (Solvent in tray not yet discarded, therefore not yet waste.)

None of the above containers were dated or labeled. Staff unsure if some of the materials were hazardous waste.

Also present in the room were several boxes of used batteries. At least one battery appeared to be a Ni-Cad battery and so subject to regulation as hazardous or universal waste. Batteries shipped several times per year. No labels on containers. Containers were marked as universal waste during the inspection.

No equipment readily available for spill or release response. No inspection form provided for any spill or release response equipment.

Calhoun Research Lab has a satellite accumulation area. One waste container only partially closed; advised to keep closed.

Manifest Review.

Waste carbolime was profiled as D005 (barium) hazardous waste. Weights shipped were 1,450 pounds on 12-18-07 and 3,000 pounds on 9-6-07. If hazardous waste, this waste is sufficient to classify facility as a SQG. Per MSDS, the material before use is lime; staff was unsure how or if barium was added during use. Subsequent to the inspection the facility investigated if this material was properly profiled. It was determined that waste carbolime was not a hazardous waste. It did not exhibit a characteristic for any TCLP metals. Reportedly the facility previously used a barium containing product as a carbon dioxide absorbent prior to using carbolime. The waste profile had not been updated when the waste characteristics changed.

On-site recovery of spent xylene.

The facility generates a spent xylene solvent (waste codes: F003, D001) from the histology labs (e.g., from use in slides preparation). This waste stream is managed by recovery in an on-site distillation unit.

Waste generation rate for on-site reclamation of hazardous waste solvents by distillation is determined by counting the weight of spent solvents before distillation

(except when the solvent goes directly to the still without intermediate storage which does not apply here). If such a solvent is distilled on site and it has already been counted once in a calendar month, it is not counted again that calendar month.

Based on the information on spent xylene system provided by the facility by email subsequent to the inspection:

-The volume of spent xylene distilled is about 20-30 gallons per month which is about 145-218 pounds per month.

-The volume of the system active xylene inventory is about 6.2 gallons or 45 pounds. (One turnover of the system active xylene inventory is needed to meet the exclusion from counting waste that has already been counted once in a month.)

The generation rate for purposes of determining generator category is then 45 pounds since spent xylene beyond that amount has already been counted once in the calendar month.

The average rate of hazardous waste generation for September to December based on manifested shipments was 147 lbs/month. This did not include the spent solvent fed to the on-site still.

Best data on monthly generation rate for recent months is $147 + 45 = 192$ pounds.

WASTE ACTIVITIES AND P2 SUMMARY SECTION

For each of the processes listed above that generate a waste give the following information: (1) name of process generating waste, (2) name or description of waste generated (e.g. sludge, solvent, ash, used oil, spent lamps, etc.), (3) EPA waste codes, if applicable, (4) quantity generated per month, (5) type of accumulation (container, tank, etc.) (6) waste accumulation location in facility, (7) type of on-site treatment (if used), (8) name of off-site management facility and type of waste management activity occurring there, (9) Current P2 activities, and (10) P2 opportunities

REMARKS-GENERAL INFORMATION

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment?

AKRO GENERAL
**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 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:

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

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

REMARKS

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)] *BATTERIES IN WASTE ACCUMULATION ROOM NOT LABELED. ABATED DURING INSPECTION.* 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? Yes No N/A RMK#
[3745-273-15(A)] If not:
- 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# *DOCUMENTATION OF SHIPMENTS*

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)]
NO RELEASES REPORTED 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-transport 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 RMK# ___
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes ___ No ___ N/A 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:
 Yes ___ No N/A RMK# ___
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)]
 Yes ___ No ___ N/A 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 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 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 RMK# ___

EXPORTS

24. Is waste being sent to a foreign destination? If so:
 Yes ___ No 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 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 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 RMK# ___

REMARKS