



State of Ohio Environmental Protection Agency

Northeast District Office

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Ted Strickland, Governor
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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 15, 2007

Ilene Weisberg
Allen Aircraft Products, Inc.
4879 Newton Falls Rd.
Ravenna, OH 44266

**RE: ALLEN AIRCRAFT PRODUCTS INC., OHD 004 212 437, PORTAGE COUNTY
RCRA/SQG, COMPLIANCE EVALUATION INSPECTION, NOTICE OF VIOLATION**

Dear Ms. Weisberg:

On January 23, 2007, representatives of Ohio EPA's Division of Hazardous Waste Management (DHWM) and the United States Environmental Protection Agency (U.S. EPA) conducted a compliance evaluation inspection at the Allen Aircraft Products, Inc. (Allen Aircraft) facility located at 4879 Newton Falls Road in Ravenna, Ohio. Allen Aircraft is a metal coatings operation and at the time of this inspection qualified as a Small Quantity Generator (SQG) of hazardous waste. Hazardous waste streams generated at the facility include waste paint related material (D001, D018, F003, F005), sodium hydroxide sludge (D002, D007) and spent chromic acid solution (D002, D007, D008).

The purpose of this inspection was to determine Allen Aircraft's compliance with Ohio's hazardous waste laws and regulations as found under the Ohio Revised Code and Ohio Administrative Code ("ORC" and "OAC" respectively) and certain provisions of the Resource Conservation and Recovery Act (RCRA). Allen Aircraft was represented by you, Roger Rollyson and Debbie Drago. Ohio EPA was represented by me, while U.S.EPA was represented by Duncan Campbell. The January 23, 2007 inspection included an inspection of the Allen Aircraft facility and a review of written documentation. Ohio EPA also documented portions of the inspections using digital photography. Copies of photographs taken during the January 23, 2007 inspection were e-mailed to you on January 30, 2007.

Based on these inspections, Ohio EPA has determined that Allen Aircraft has violated at least the following state hazardous waste regulations:

1. **OAC 3745-52-34(D)(4) Accumulation Date:** *A generator who generates greater than one hundred kilograms but less than one thousand kilograms of hazardous waste in a calendar month may, for one hundred eighty days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit, provided that the date upon which each period of accumulation and/or treatment begins is clearly marked and visible for inspection on each container;*

At the time of the January 23, 2007 inspection, Ohio EPA observed two overpack containers and one fifty-five gallon steel container, each labeled as hazardous waste (D002, D007), in the accumulation area located in the building across Woobine Avenue. The three containers of hazardous waste were not labeled with an accumulation date.

Upon Ohio EPA's request, Allen Aircraft checked it's production records and labeled the containers with appropriate accumulation dates. Therefore Ohio EPA considers this violation abated and no further action is required.

2. **OAC 3745-66-73(A) Management of containers:** *A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.*

Allen aircraft uses paper filters to strain paint and dry film prior to use in the spray booth. These filters are shipped off site as a hazardous waste (D001, D007, D008, D035, F003, F005). At the time of this inspection, Ohio EPA observed one open, unlabeled five gallon container of spent paint filters and hazardous waste contaminated debris next to the paint preparation station.

To demonstrate abatement of this violation, please see violation #3A.

3. **OAC 3745-52-34(C)(1) Satellite Accumulation:** *A generator may accumulate as much as fifty-five gallons of hazardous waste or one quart of acutely hazardous waste listed in paragraph (E) of rule 3745-51-33 of the Administrative Code in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit and without complying with paragraph (A) of this rule provided he:*

(a) Complies with rules 3745-66-71, 3745-66-72, and paragraph (A) of rule 3745-66-73 of the Administrative Code; and

(b) Marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

- A. Allen aircraft uses paper filters to strain paint and dry film prior to use in the spray booth. These filters are shipped off site as a hazardous waste (D001, D007, D008, D035, F003, F005). At the time of this inspection, Ohio EPA observed one open, unlabeled five gallon container of spent paint filters and hazardous waste contaminated debris next to the paint preparation station. At the time of this observation, Allen Aircraft stated that it would replace the five gallon container with a steel container with a foot operated lid.

To demonstrate abatement of this violation, Allen Aircraft must submit to this office documentation in the form of a photograph demonstrating that the spent paint waste is being managed in a container that is closed when not adding or removing waste and appropriately labeled with the words "Hazardous Waste" or words describing the contents.

- B. Allen Aircraft utilizes a spray gun cleaning unit supplied and managed by Safety Kleen. This unit generates a spent solvent that is collected in a five gallon container located under the unit and shipped off site as a hazardous waste (D001, D018, D035, D038, D039, D040, F003, F005).

At the time of the January 23, 2007 inspection, Ohio EPA observed the five gallon container of spent solvent under the gun cleaner was not labeled with the words "Hazardous Waste" or words describing the contents.

To demonstrate abatement of this violation, Allen Aircraft must submit to this office documentation in the form of a photograph demonstrating that the container of spent solvent under the gun cleaner has been appropriately labeled with the words "Hazardous Waste" or words describing the contents.

4. **OAC Rule 3745-52-34(D)(5)(b) Emergency Information:** *A generator who generates greater than one hundred kilograms but less than one thousand kilograms of hazardous waste in a calendar month may, for one hundred eighty days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit, provided that the generator post the following information next to the telephone:*

- (i) The name and telephone number of the emergency coordinator;*
- (ii) Location of fire extinguishers and spill control material, and, if present, fire alarm(s); and*
- (iii) The telephone number of the fire department, unless the facility has a direct alarm.*

At the time of the January 23, 2007 inspection, Ohio EPA observed that Allen Aircraft did not have the required information posted by the telephone.

To demonstrate abatement of this violation, Allen Aircraft must submit to this office documentation in the form of a photograph demonstrating that the required emergency information as listed above, has been posted next to the telephone inside the facility.

5. **OAC 3745-273-14(E) Labeling/marking of Universal Waste:** *Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste- Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)."*

At the time of this inspection, Ohio EPA observed spent fluorescent bulbs being accumulated in containers in a crawl space above the laboratory labeled as "spent fluorescent lamps".

To demonstrate abatement of this violation, please see Violation #6.

6. **OAC 3745-273-15(C) Accumulation time limits for Universal Waste:** *A small quantity handler of universal waste who accumulates universal waste shall be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.*

At the time of this inspection, Allen Aircraft could not demonstrate how long the universal waste lamps had been accumulated onsite.

Allen Aircraft must submit to this office documentation in the form of photographs demonstrating that the universal waste lamps are being managed in containers which are labeled with the words "Universal Waste- Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)." In addition, Allen Aircraft must submit documentation that the facility can demonstrate how long the universal waste lamps have been on site. This may be in the form of a photograph demonstrating that containers of universal waste lamps are labeled with an accumulation date or one of the other methods described in OAC 3745-273-15(C).

Furthermore, Allen Aircraft was previously inspected by Ohio EPA on July 14, 2005. As a result of that inspection Allen Aircraft developed and submitted to this office a protocol for the management of fluorescent lamps dated September 12, 2005. Allen Aircraft must review this protocol with employees that manage universal waste and submit to this office a copy of said protocol signed by each employee involved in the management of universal waste.

7. **OAC 3745-273-15(A) Accumulation time limits for universal waste:** *A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler, unless the requirements of paragraph (b) of this rule are met.*

Upon inquiry by Ohio EPA as to how long the UW lamps had been on site, Allen Aircraft stated that they had been on site at least two years.

To demonstrate abatement of this violation, Allen Aircraft will ship the UW lamps offsite immediately and submit documentation to this office demonstrating that this has been done.

8. **OAC 3745-270-07(A) Testing, Tracking, and Record keeping Requirements for Generators, Treaters, and Disposal Facilities:** *Generators shall retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to this rule for at least three years from the date that the waste that is the subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal.*

At the time of this inspection, Allen Aircraft did not have on site Land Disposal Restriction (LDR) forms for all hazardous waste streams sent to Envirite.

To demonstrate abatement of this violation Allen Aircraft must submit to this office copies of LDR forms for waste profiles #C7271, #C7270 and #C7116 sent to Envirite.

Ohio EPA has the following concerns which must be addressed:

1. Allen Aircraft generates a spent caustic etch from the coating operations on site. This material is managed in labeled containers and used in the wastewater treatment system for pH adjustment as a substitute for sodium hydroxide (OAC 3745-51-02(E)(1)(b)). At the time of this inspection, Ohio EPA observed at least nine (9) fifty-five gallon containers labeled as spent caustic etch to be used in the waste water treatment system. Ohio EPA wishes to remind Allen Aircraft that although the spent caustic etch is not a waste because it is recycled as an effective substitute for a commercial product, the facility must take care not to accumulate the spent caustic etch speculatively (OAC 3745-51-01(C)(8)). Therefore Allen Aircraft must be able to demonstrate that at least 75% of the spent caustic etch is recycled per calendar year. Please submit to this office information regarding how Allen Aircraft can demonstrate that the spent caustic etch is not being accumulated speculatively.
2. Allen Aircraft generates electronic wastes such as computers, computer monitors and other electronic equipment. At the time of this inspection, you stated that electronic waste was shipped off site for recycling. Please submit to this office information regarding how the electronic waste is collected and managed prior to shipment, what the electronic waste is comprised of and where it is shipped to for recycling.

Ohio EPA has the following comment:

Allen Aircraft generates a sludge from its on site wastewater treatment unit which Ohio EPA determined not to be a hazardous waste at the time of the July 14, 2005 inspection. However, on January 27, 2006 Allen Aircraft shipped off site 5 yards of the waste water treatment sludge to Envirite as an F006 hazardous waste. This shipment of F006 to Envirite may make Allen Aircraft subject to annual reporting requirements for 2006. Ohio EPA wishes to remind Allen Aircraft to review their records and submit an Annual Hazardous Waste Report for all waste generated in 2006 if they qualified as an LQG at any time during 2006.

ALLEN AIRCRAFT PRODUCTS INC.
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Enclosed you will find copies of the checklists completed at the time of the inspection. Please submit all of the requested documentation to my attention within thirty (30) days of receipt of this letter demonstrating that all issues have been addressed.

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>. Please feel free to share this information with your colleagues.

Failure to list specific deficiencies in this communication does not relieve Allen Aircraft from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve Allen Aircraft from liability for any past or present violations of the state's hazardous waste laws.

Should you have any questions, please feel free to call me at (330) 963-1181.

Sincerely,



Suzanne Prusnek
Environmental Specialist
Division of Hazardous Waste Management

SP:ddw

Enclosures

ec: Frank Popotnik, DHWM, NEDO, OEPA
Harry Sarvis, DHWM, CO, OEPA
cc: Duncan Campbell, Region V, U.S. EPA

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

CESQG: < 100 Kg. (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:

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A
2. Has the generator obtained a U.S. EPA I.D. number? [3745-52-12] Yes No N/A
3. Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)] Yes No N/A
4. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)] Yes No N/A
5. Does the generator accumulate hazardous waste? Yes No N/A

NOTE: If the SQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements might still apply, e.g. manifest, marking, LDR, etc.

6. Has the generator accumulated hazardous wastes **in excess of** (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)] Yes No N/A

NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]

7. Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)] Yes No N/A

NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.

8. Does the generator treat hazardous waste in a:
- a. Container that meets 3745-66-70 to 3745-66-77? Yes No N/A
- b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C) and Yes No N/A
- c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A
- d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: Complete appropriate checklist for each unit.

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

MANIFEST REQUIREMENTS

9. Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)] Yes No N/A
10. Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)] Yes No N/A
- a. Does the contractual agreement specify the type of waste and frequency of shipment? Yes No N/A
- b. Is the transport vehicle owned and operated by the reclaimer? Yes No N/A
- c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? Yes No N/A

NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.

11. Have items 1 through 20 of each manifest been completed? [3745-52-20(A)] Yes No N/A

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be complete. [3745-52-20 (A)]

12. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] Yes No N/A

NOTE: The generator may designate on the manifest one alternative facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]

13. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes No N/A
14. Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)] Yes No N/A

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.

15. If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? 3745-52-42(B)] Yes No N/A
16. Are signed copies of all manifests being retained for at least three years? [3745-52-40] Yes No N/A

NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.

PREPAREDNESS AND PREVENTION

- 17. Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)] Yes No N/A

- 18. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]
 - a. Name and telephone number of emergency coordinator? Yes No N/A
 - b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes No N/A
 - c. Telephone number of local fire department? Yes No N/A

- 19. Are employees familiar with waste handling and emergency procedures [3745-52-34(D)(5)(c)] Yes No N/A

- 20. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(a)] Yes No N/A

- 21. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31] Yes No N/A

- 22. Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:
 - a Internal Alarm system? [3745-65-32(A)] *Intercom system* Yes No N/A
 - b Emergency communication device? [3745-65-32(B)] Yes No N/A
 - c Portable fire control, spill control and decon equipment? [3745-65-32(C)]? Yes No N/A
 - d Water of adequate volume/pressure? [3745-65-32(D)] *per the facility* Yes No N/A

- 23. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency [3745-65-33] Yes No N/A

- 24. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A

- 25. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)] Yes No N/A

- 26. If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32?) [3745-65-34(B)] Yes No N/A

27. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
28. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes No N/A
29. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes No N/A

SATELLITE ACCUMULATION AREA REQUIREMENTS

30. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes No N/A
 - b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes No N/A
 - c. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes No N/A
 - d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. Yes No N/A
 - e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
31. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes No N/A
- a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes No N/A
 - b. Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes No N/A
 - c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS

32. Has the generator marked containers with the words "Hazardous Waste" [3745-52-34(D)(4)] Yes No N/A
33. Is the accumulation date on each container? [3745-52-34(D)(4)] Yes No N/A
34. Are hazardous wastes stored in containers which are: Yes No N/A

- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes_ No N/A_
- b. In good condition? [3745-66-71] *one drum may be leaking* Yes_ No N/A_
- c. Compatible with wastes stored in them? [3745-66-72] Yes_ No N/A_
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes_ No N/A_

NOTE: Record location on process summary sheets and photograph the area.

- 35. Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days. Yes_ No N/A_
 - a. Are inspections recorded in a log or summary? [3745-66-74] Yes_ No N/A_
- 36. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes_ No N/A_
- 37. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B) 3745-66-77(A)] Yes_ No N/A_
- 38. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B) ? [3745-66-77(B)] Yes_ No N/A_

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

PRE-TRANSPORT REQUIREMENTS

- 39. Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes_ No N/A_
- 40. Does each container ≤ 100 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes_ No N/A_
- 41. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes_ No N/A_

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 1 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# ___
- label is on sheet on wall.*

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# ___

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-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