



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

November 5, 2007

Thomas N. Tinnirello  
Associated Materials Inc.  
Alside Division  
3773 State Road  
Cuyahoga Falls, OH 44223

**RE: Associated Materials Inc., Alside Division  
OHD 004163549, Summit County  
Used Oil Generator, Small Quantity Universal Waste Handler(SQUWH), RCRA  
Conditionally Exempt Small Quantity Generator (CESQG) CEI NOV/RTC**

Dear Mr. Tinnirello:

On October 24, 2007, this writer and Todd Surrena, representing Ohio EPA, Division of Hazardous Waste Management (DHWM), visited Associated Materials Inc., Alside Division (Alside), located at 3773 State Road, Cuyahoga Falls, Ohio. The purpose of the visit was to conduct a compliance evaluation inspection (CEI) to determine the facility's compliance with Ohio's hazardous waste laws and rules as adopted under the Ohio Revised Code (ORC) Chapter 3734 and Chapter 3745 of the Ohio Administrative Code (OAC). The CEI included a discussion of facility operations and a visual inspection of the facility operations. Larry Hovatter and Don Vanhorn represented Alside.

The following represents Ohio EPA's findings:

Alside manufactures vinyl siding and windows for commercial and residential buildings. Alside is recognized by Ohio EPA as a hazardous waste treatment, storage and/or disposal facility (TSDF) for permitted container storage in two container accumulation areas. Alside is currently undergoing TSDF closure and corrective action, and has not used the two permitted container accumulation areas for storage of hazardous waste since beginning closure activities in the early 1990's. Alside is also identified as a conditionally exempt small quantity generator (CESQG) of hazardous waste. In the past, hazardous wastes generated at Alside included: waste alcohols (D001); waste isocyanate (Methyl Diisocyanates) (D003); waste mercury (D009); spent batteries (D002, D008) (Universal Waste, now recycled); spent mineral spirits from parts washer (D001); fluorescent lamps (D009) (Universal Waste, now recycled); used oil (recycled); computer monitors. Most of the hazardous waste (ie., waste mercury, waste alcohols, spent mineral spirits, etc.) were generated in their garage door manufacturing operations. This operation has been taken out of service. Non-hazardous waste include the following: cardboard (recycled); wooden pallets, metal bands; scrap vinyl(recycled); scrap aluminum (recycled); antifreeze; oil rags; Zep parts washer aqueous-based solvent; and RCRA empty aerosol cans.

During this inspection Ohio EPA noted that Alside had several closed, cardboard shipping containers of spent fluorescent lamps which are anticipated to be shipped off in the near future to Chemtron; had one, 55 gallon drum of used oil in the compressor room which needed a used oil label; had no wastes in the caged area of the maintenance shop; and in the truck

Thomas N. Tinnirello  
Associated Materials Inc.  
November 5, 2007  
Page 2

maintenance garage, had one tank of used oil which was properly labeled and several spent truck batteries stored as Universal Waste.

**During this inspection Ohio EPA noted that Alside failed to mark the used oil drum in the compressor room with the words "Used Oil." Alside was noted in violation of OAC 3745-279-22(C). Later, during the inspection, Mr. Hovatter marked the drum with the words "Used Oil" which abated the violation.**

Enclosed are copies of the Ohio EPA checklists for a CESQG, a SQUWH and a Used Oil generator.

As a courtesy the following guidance information is being provided to you as part of this inspection:

- June 2005, "Universal Waste Rules for Handlers of Lamps;
- December 2004, "Universal Waste";
- January 2007, "Fluorescent Lamps: What You Should Know";
- April 2006, "The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil."

Thank you for your cooperation in this matter. If you have any questions about this letter, please call me at (330) 963-1266. A response to this letter is not required.

The DHWM 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 Alside from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve your facility from liability for any past or present violations of the state's hazardous waste laws.

Sincerely,



Kris Coder  
Environmental Specialist  
Division of Hazardous Waste Management

KC:cl  
Enclosure

cc: Natalie Oryshkewych, NEDO, DHWM

ec: Todd Surrena, NEDO, DHWM      Harry Sarvis, CO, DHWM

|  |   |  |                       |
|--|---|--|-----------------------|
|  | <b>Ohio Environmental Protection Agency</b><br><b>RCRA SUBTITLE C SITE</b><br><b>IDENTIFICATION/VERIFICATION FORM</b> |  | For Ohio EPA use only |
|--|---|--|-----------------------|

E-mail this completed form to [tammy.mcconnell@epa.state.oh.us](mailto:tammy.mcconnell@epa.state.oh.us) or mail it to Tammy McConnell, Central Office

Site EPA ID No. EPA ID Number: OHD004163549

Site Name Name: **Alside Inc** Website: (Optional)

Site Location Information  
 Street Address: **3773 State Rd**  
 City, Town, or Village: **Cuyahoga Falls** State: **OH**  
 County Name: **Summit** Zip Code: **44223**

Site Land Type (check only one)

|  |                                   |                                      |                                     |                                    |                                       |                                   |                                   |
|--|-----------------------------------|--------------------------------------|-------------------------------------|------------------------------------|---------------------------------------|-----------------------------------|-----------------------------------|
| Private<br><input checked="" type="checkbox"/> | Count<br><input type="checkbox"/> | District<br><input type="checkbox"/> | Federal<br><input type="checkbox"/> | Indian<br><input type="checkbox"/> | Municipal<br><input type="checkbox"/> | State<br><input type="checkbox"/> | Other<br><input type="checkbox"/> |
|--|-----------------------------------|--------------------------------------|-------------------------------------|------------------------------------|---------------------------------------|-----------------------------------|-----------------------------------|

NAICS code(s) **326199**  
[www.census.gov/epcd/www/naics.html](http://www.census.gov/epcd/www/naics.html)

Facility Representative  
 Additional names can be recorded in number 12  
 Only provide address information if it is different than the site address

First Name: **Thomas** Mi: **N** Last Name: **Tinnirelio**  
 Phone Number: **330-922-5379** Phone Number Extension:  
 E-Mail Address: **ttinnirelio@alside.com**  
 Fax Number: **330-922-2354** Fax Number Extension:  
 Street or P.O. Box: **PO Box 2010**  
 City, Town or Village: **Akron**  
 State: **OH** Country: **USA** Zip Code: **44309**

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: **Associated Materials Inc** Date Became Owner (mm/dd/yyyy): **04/03/1993**

|             |  |                                    |                                      |                                     |                                    |                                       |                                   |                                   |
|-------------|--|------------------------------------|--------------------------------------|-------------------------------------|------------------------------------|---------------------------------------|-----------------------------------|-----------------------------------|
| Owner Type: | Private<br><input checked="" type="checkbox"/> | County<br><input type="checkbox"/> | District<br><input type="checkbox"/> | Federal<br><input type="checkbox"/> | Indian<br><input type="checkbox"/> | Municipal<br><input type="checkbox"/> | State<br><input type="checkbox"/> | Other<br><input type="checkbox"/> |
|-------------|--|------------------------------------|--------------------------------------|-------------------------------------|------------------------------------|---------------------------------------|-----------------------------------|-----------------------------------|

Street or P.O. Box: **PO Box 2010**  
 City, Town or Village: **Akron** Owner Phone #: **330-929-1811**  
 State: **OH** Country: **USA** Zip Code: **44309**

Name of Site's Operator: **Alside** Date Became Operator (mm/dd/yyyy): **01/01/1958**

|             |  |                                    |                                      |                                     |                                    |                                       |                                   |                                   |
|-------------|--|------------------------------------|--------------------------------------|-------------------------------------|------------------------------------|---------------------------------------|-----------------------------------|-----------------------------------|
| Owner Type: | Private<br><input checked="" type="checkbox"/> | County<br><input type="checkbox"/> | District<br><input type="checkbox"/> | Federal<br><input type="checkbox"/> | Indian<br><input type="checkbox"/> | Municipal<br><input type="checkbox"/> | State<br><input type="checkbox"/> | Other<br><input type="checkbox"/> |
|-------------|--|------------------------------------|--------------------------------------|-------------------------------------|------------------------------------|---------------------------------------|-----------------------------------|-----------------------------------|

Street or P.O. Box: **PO Box 2010**  
 City, Town or Village: **Akron** Operator Phone #: **330-929-1811**  
 State: **OH** Country: **USA** Zip Code: **44309**

Violations Cited?  Yes  No

Type of Generator

|   |   |
|---|---|
| <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        |

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

|   |  |
|---|--|
| <input type="checkbox"/> Recycler of Hazardous Waste            | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace       |
| <input type="checkbox"/> Underground Injection Control Facility | <input type="checkbox"/> Small Quantity On-Site Burner Exemption       |
| <input type="checkbox"/> Hazardous Waste Transporter            | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |

**Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply))**

|  |                                     |  |  |
|--|-------------------------------------|--|--|
| <input checked="" type="checkbox"/> <b>Small Quantity Handler of Universal Waste</b> |                                     | <input type="checkbox"/> <b>Large Quantity Handler of Universal Waste</b><br>(accumulates 5,000 kg. or more) |  |
| <input type="checkbox"/> <b>Destination Facility for Universal Waste</b>             |                                     |  |  |
| (Check all boxes below that apply for each of the three types of facilities above)   |                                     | Used Oil Activities (Indicate Type(s) of Activity(ies))  |  |
|  | <b>Managed</b>                      | <input checked="" type="checkbox"/> <b>Used Oil Generator</b>  | <input type="checkbox"/> <b>Off-Specification Used Oil Burner</b>                            |
| <b>Batteries &amp; Lamps</b>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> <b>Used Oil Transporter</b>   | <input type="checkbox"/> <b>Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil</b> |
| <b>Pesticides</b>  | <input type="checkbox"/>            | <input type="checkbox"/> <b>Used Oil Transfer Facility</b>   | <input type="checkbox"/> <b>Used Oil Fuel Marketer to Off-Specification Used Oil Burner</b>  |
|  |                                     |  |  |

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 RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

|      |      |      |      |  |  |
|------|------|------|------|--|--|
| D001 | D003 | D018 | F005 |  |  |
|------|------|------|------|--|--|

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

|                   |   |  |   |  |
|-------------------|---|--|---|--|
| <b>Announced</b>  | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | <b>Additional Facility Representatives:</b>   | <b>Larry Hovatter, Building Superintendent</b> |
| <b>Tanks</b>      | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | <b>Other Comments: One used oil labeling violation was noted. Facility RTC'd on the used oil violation on same day of the inspection. No hazardous waste containers were noted.</b> |  |
| <b>Containers</b> | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            |   |  |

|                             |                             |   |
|-----------------------------|-----------------------------|---|
| <b>Name of Inspector(s)</b> | <b>Name of Inspector(s)</b> | <b>Date of Inspection/Time (mm/dd/yyyy) (hh:mm)</b> |
| <b>Kris Coder</b>           | <b>Todd Surrena</b>         | <b>October 24, 2007; 9:30 a.m.</b>                  |

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.

|  |                               |                          |
|--|-------------------------------|--------------------------|
| <b>Signature of Owner, Operator, or an Authorized Representative</b> | <b>Name and Title (Print)</b> | <b>Date (mm/dd/yyyy)</b> |
|  |                               |                          |

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

For Associated Materials Inc.

Alside Division

Conducted by Kris Coder and Todd Surrena, DHWM

October 24, 2007

CESQG:  $\leq 100$  Kg. (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:  $\geq 1,000$  Kg. (~300 gallons) of waste in a calendar month or  $\geq 1$  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: steel toed shoes and safety glasses

General Remarks: The following represents Ohio EPA's findings during this inspection. Thomas Tinnirello was not available. Larry Hovatter (LH), Building Superintendent, came forward and escorted us through the facility including the truck maintenance shop located outside and at the rear of the facility. They are a CESQG, a used oil generator, and a small quantity handler of Universal Waste batteries and spent fluorescent lamps. First we went to the spent fluorescent bulb location. LH said Chemtron picks up the fluorescent bulbs and spent batteries (small equipment batteries). LH said Chemtron comes in about twice a year. According to LH, Associated Materials employees separate the batteries into 5 gallon pails such as NiCd which is required by Chemtron before they will pick up. (LH did not show us any pails of batteries during this inspection.) LH anticipates a shipment soon to Chemtron. In this area we noted several card board shipping containers of spent bulbs that were closed and labeled. Next we went into the compressor room where LH showed us one drum of used compressor oil. It was not labeled used oil. Later, LH came back with a marker and marked the drum used oil, dated it and applied his initials. Next we went to the maintenance department chain link fence area where no parts cleaner or used oil containers were noted. It was very clean and well organized, no waste was noted. LH showed us a yellow flammable cabinet that contained flammable raw materials and no waste. Next we went to the truck maintenance shop where we met Don Vanhorn, Mike Hatfield was not available. Don showed us the used oil tank that was labeled "used oil", one small black drum below the filter crusher that was labeled used oil. Don said Akron Canton Waste Oil picks up the used oil and the used antifreeze coolant that is stored in a separate plastic tank next to the Zep parts washer. Don also, showed us a couple of spent, used truck batteries which had the appropriate UW marking requirements for spent batteries. He said the spent batteries are picked up in exchange for new batteries from International Truck in Akron. LH escorted us back to the compressor room where he labeled the used oil drum as noted above.

**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   
**See remark below.**

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   
**All wastes,( except for the waste noted above in the General Remarks) including Universal Waste, are managed offsite to Chemtron Inc.**

**TREATMENT OF HAZARDOUS WASTE**

- |    |   |     |                          |    |                          |     |                                     |
|----|---|-----|--------------------------|----|--------------------------|-----|-------------------------------------|
| a. | Container that meets 3745-66-70 to 3745-66-77?                  | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| b. | Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| c. | Drip pads that meet 3745-69-40 to 3745-69-45?                   | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| d. | Containment building that meets 3745-256-100 to 3745-256-102?   | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |

*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**

**During this inspection no hazardous waste containers were noted.**



**USED OIL INSPECTION CHECKLIST**  
**GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**  
**FOR ASSOCIATED MATERIALS INC. ALSIDE DIVISION**  
**CONDUCTED BY KRIS CODER AND TODD SURRENA, DHWM**  
**OCTOBER 24, 2007**

*NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.*

**PROHIBITIONS**

1. Does the generator manage used oil in a surface impoundment or waste pile? If yes: Yes  No  N/A
- a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] Yes  No  N/A
2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes  No  N/A
3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? Yes  No  N/A

*NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).*

**GENERATOR STANDARDS**

4. Does the generator mix hazardous waste with used oil? If so, Yes  No  N/A
- a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] Yes  No  N/A

*NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.*

5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes  No  N/A

*NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.*

6. Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] Yes  No  N/A  55 gallon drum in compressor room and above ground tank in the truck maintenance garage, and one small drum below filter

crusher.

7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes  No  N/A
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes  No  N/A  The above ground tank in the truck maintenance garage was marked "used oil" and the small drum below the filter crusher was marked "used oil" ; the 55 gallon drum in the compressor room was not marked "used oil"; later during the inspection Mr. Hovatter marked this drum with the words "used oil".
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes  No  N/A
- b. Contained the release? Yes  No  N/A
- c. Cleaned up and properly managed the used oil and other materials? Yes  No  N/A
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes  No  N/A
- ON-SITE BURNING IN SPACE HEATER**
10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: Yes  No  N/A
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes  No  N/A
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes  No  N/A
- c. Are the combustion gases from heater vented to the ambient air? Yes  No  N/A
- GENERATOR TRANSPORTATION**
11. If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] Yes  No  N/A
- a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24] Yes  No  N/A
- b. Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24] Yes  No  N/A

*NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID*

# if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

**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  x
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes  No  N/A  x
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  x

*NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.*

*Keyword: UsedOilChecklistforGenerators.Oct.2007.doc According to facility representatives Akron Canton Waste Oil picks up the used oil from the truck maintenance shop including the used antifreeze coolant. Spent truck batteries are picked up in exchange for new batteries by International Truck in Akron.*

**SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS**

For Associated Materials Inc. Alside

Division, inspection conducted by Kris Coder and Todd Surrena on October 24, 2007.

**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# \_\_\_  
Several truck batteries were noted in the truck maintenance garage.
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_  
small equipment batteries according to Mr. Hovatter which is required by Chemtron.
- 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 x 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 x No\_\_\_ N/A \_\_\_RMK#\_\_\_  
Chemtron picks up at least twice a year according to Mr. Hovatter.

### **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 x 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 x RMK#\_\_\_
15. Is the material released characterized? [3745-273-17(B)] Yes \_\_\_ No  N/A x 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 x 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#\_\_\_  
Chemtron receives the small equipment batteries and spent fluorescent lamps according to Mr. Hovatter. Mr. Vanhorn said the spent truck batteries are exchange for new batteries by International Truck in Akron.

**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#\_\_\_  
 Did not evaluate during this inspection.
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#\_\_\_  
 Did not evaluate during this inspection.
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 \_\_\_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**