



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

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www.epa.state.oh.us

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

March 29, 2007

RE: AUTOMATED PACKAGING SYSTEMS  
CUYAHOGA COUNTY  
OHD 085 761 591  
SQG, USED OIL, UNIV. WASTE  
NOV-PRTC

Paul Bandfield  
Automated Packaging Systems  
13555 McCracken Rd.  
Garfield Heights, OH 44125

Dear Mr. Bandfield:

Ohio EPA conducted a hazardous waste inspection at Automated Packaging Systems (APS) on February 22, 2006. The purpose of the inspection was to evaluate APS compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). I represented Ohio EPA during the inspection. Mark Droles and you represented APS.

During the inspection, Ohio EPA learned that APS operates plastic film extruding machines and a printing operation at this facility. APS generates a large quantity of spent ink and alcohol mixture that is shipped offsite to be recovered and is returned back to APS for reuse. About once a year, APS must dispose of this material as a hazardous waste (D001, F003). APS also generates off-spec ink (D001), film developer (D018), spent batteries, spent lamps, and used oil which is recycled off-site.

Ohio EPA discovered the following violations of Ohio's hazardous waste and universal waste laws:

1. Labeling Hazardous Waste Container  
OAC 3745-52-34 (C)(1)(b)

APS failed to label one partially filled drum of waste ink in the ink store room with the words "Hazardous Waste" or other words identifying the contents. APS abated this violation at the time of the inspection.

2. Containers of lamps  
OAC 3745-273-13(D)(1)

APS failed to containerize spent lamps in a structurally sound and closed container. Ohio EPA observed spent sodium lamps stored in an open box and spent fluorescent lamps stored haphazardly on a pallet. To abate this violation, please send in your new procedure on how these lamps will be managed in the future.

3. Container labeling for lamps  
OAC 3745-273-14(E)

APS failed to label all containers of spent lamps with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)." To abate this violation, please send in procedural documentation on how these lamps will be managed in the future.

AUTOMATED PACKAGING SYSTEMS  
MARCH 29, 2007  
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It appeared during the inspection that APS monthly quantity of hazardous waste generated would fluctuate between a conditional exempt small quantity generator (CESQG) [less than 25 gallons] and a small quantity generator (SQG) [between 25 - 300gallons]. In addition, at least once a year APS is a large quantity generator (LQG) [over 300 gallons]. Please be aware you are required to be in compliance with the rules associated with the classifications for the month that you are generating that amount of hazardous waste. You are also required to submit an annual hazardous waste report for the year if APS was a LQG for any of the 12 months in that year. Please make sure you have submitted a monthly report for 2005 and 2006.

Within 30 days of the date of this letter, please submit the above requested documentation that demonstrates compliance with the rules cited. Should you have any questions, please feel free to call me at (330) 963-1272. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/opp>.

Ohio EPA offers a free, confidential resource, called the Office of Compliance Assistance and Pollution Prevention, for Ohio business owners who need help with EPA's regulations and pollution prevention. Feel free to contact Adrienne LaFavre at (330) 963-1250 for assistance in complying with the requirements cited above.

DHWM has created an electronic news service to provide you with timely news and updates related to hazardous waste activities in Ohio. You can sign up for this free service at: <http://www.epa.state.oh.us/dhwm/listserv.html>.

Sincerely,



Niall McKenna  
Environmental Specialist  
Division of Hazardous Waste Management

NM:ddw

Enclosure

cc: Natalie Oryshkewych, DHWM, NEDO

**NOTICE:**

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

E-mail this completed form to <a href="mailto:tammy.mcconnell@epa.state.oh.us">tammy.mcconnell@epa.state.oh.us</a> or mail it to Tammy McConnell, Central Office	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM		For Ohio EPA use only																					
2. Site EPA ID No.	EPA ID Number: <u>OH10 085 761 591</u>																							
3. Site Name	Name: <u>Automated Packaging Systems</u> Website (optional:)																							
4. Site Location Information	Street Address: <u>13555 McCracken Rd.</u>																							
	City, Town, or Village: <u>Garfield Hts</u>	State: <u>OH</u>																						
	County Name: <u>Cuyahoga</u>	Zip Code: <u>44125</u>																						
5. Site Land Type (check only one)	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>									
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6. NAICS code(s) <a href="http://www.census.gov/epecd/www/naics.html">www.census.gov/epecd/www/naics.html</a>	A.		B.																					
	C.		D.																					
7. Facility Representative:  Additional names can be recorded in number 12.  Only provide address information if it is different than the site address.	First Name: <u>Paul</u>		MI:																					
	Last Name: <u>Bamfield</u>		Phone Number Extension:																					
	Phone Number: <u>330-528-2222</u>			E-Mail Address:																				
	E-Mail Address:		Fax Number Extension:																					
	Fax Number:			Street or P.O. Box:																				
	Street or P.O. Box:			City, Town or Village:																				
	State:		Country:	Zip Code:																				
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	A. Name of Site's Legal Owner:		Date Became Owner (mm/dd/yyyy):																					
	Owner Type: Mark with an X		<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>	Private	County	District	Federal	Indian	Municipal	State	Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>									
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	Street or P.O. Box:			Owner Phone #:																				
	City, Town, or Village:		State:																					
	State:		Country:	Zip Code:																				
	B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):																					
	Operator Type: Mark with an X		<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>						Private	County	District	Federal	Indian	Municipal	State	Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>						
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Street or P.O. Box:			Operator Phone #:																					
City, Town, or Village:		State:																						
State:		Country:	Zip Code:																					
9. Violations Cited?	<input checked="" type="checkbox"/> Yes		<input type="checkbox"/> No																					
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.) <input type="checkbox"/> Not Regulated																								

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

**A. Hazardous Waste Activities**

(choose only one of the following categories)

- UNKNOWN: Cited for violation of 3745-52-11
- a. Large Quantity Generator (LQG):
- b. Small Quantity Generator (SQG)
- c. Conditionally Exempt Small Quantity Generator
- d. United States Importer of Hazardous Waste
- e. Mixed Waste (hazardous and radioactive) Generator

- 3. Treater, Storer or Disposer of Hazardous Waste
- 4. Recycler of Hazardous Waste
- 5. Exempt Boiler and/or Industrial Furnace
  - a. Small Quantity On-site Burner Exemption
  - b. Smelting, Melting, Refining Furnace Exemption
- 6. Underground Injection Control Facility

**B. Universal Waste Activities**

- 1. Small Quantity Handler of Universal Waste  
(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):
- 2. Large Quantity Handler of Universal Waste  
(accumulates 5,000 kg or more).
- 3. Destination Facility for Universal Waste  
(Check all boxes below that apply for each of the three types of facilities above.)

Generated      Accumulated

- |                |                                     |                                     |
|----------------|-------------------------------------|-------------------------------------|
| A. Batteries   | <input type="checkbox"/>            | <input type="checkbox"/>            |
| B. Pesticides  | <input type="checkbox"/>            | <input type="checkbox"/>            |
| C. Thermostats | <input type="checkbox"/>            | <input type="checkbox"/>            |
| D. Lamps       | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

**C. Used Oil Activities**

- 1. Used Oil Generator
- 2. Used Oil Transporter Indicate Type(s) of Activity(ies)
  - Transporter
  - Transfer Facility
- 3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)
  - Processor
  - Re-refiner
- 4. Off-Specification Used Oil Burner
- 5. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)
  - a. Marketer Who Directs Shipment of Off-Specification Oil
  - b. Used Oil to Off-Specification Used Oil Burner

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

D001      F003      U011

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

<input checked="" type="radio"/> Y / <input type="radio"/> N	Announced?	Additional Facility Representatives:	
<input checked="" type="radio"/> Y / <input type="radio"/> N	Tanks?	Other comments:	
<input checked="" type="radio"/> Y / <input type="radio"/> N	Containers?		

13. Name of Inspector(s)      Name of Inspector(s)      Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)

Nyall McKenna

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)

**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 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:

**GENERAL REQUIREMENTS**

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

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 <b>in excess of</b> (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
|--|-----|--------------------------|----|-------------------------------------|-----|--------------------------|

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

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 | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 10. Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)]  | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| a. Does the contractual agreement specify the type of waste and frequency of shipment?  | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| b. Is the transport vehicle owned and operated by the reclaimer?  | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement?  | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

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 | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
|---|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
- 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 | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
|--|-----|-------------------------------------|----|--------------------------|-----|--------------------------|

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 | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
|---|-----|-------------------------------------|----|--------------------------|-----|--------------------------|

14. Have the manifests been signed by the generator and initial transporter? Yes  No  N/A   
 [3745-52-23 (A) (1) and (2)]
- 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)(d)] 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)] 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 per documentation or facility rep? [3745-65-32(D)] Yes  No  N/A
23. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency?[3745-65-33]
- a. Are inspections recorded in a log or summary? [3745-65-33]? Yes  No  N/A
24. 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
25. 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
26. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes  No  N/A
27. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes  No  N/A
28. 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

29. 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 a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes  No  N/A
- d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes  No  N/A
- e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. Yes  No  N/A

- f. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [374 2-34(C)(1)(b)] Yes  No  <sup>correct</sup> N/A
30. 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

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**

31. Has the generator marked containers with the words "Hazardous Waste"[3745-52-34(D)(4)] Yes  No  N/A
32. Is the accumulation date on each container? [3745-52-34(D)(4)] Yes  No  N/A
33. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes  No  N/A
- b. In good condition? [3745-66-71] 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.

34. 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
35. 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
36. 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
37. 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**

38. 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
39. Does each container ≤100 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes  No  N/A
40. 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

1. Automated Packaging Systems is a SQG 10-11 months a year when they ship their waste propyl Alcohol off to Huckill to be reclaimed. 1-2 months a year the waste propyl Alcohol is disposed offsite as a hazardous waste.

2. One satellite drum in ink room (pool) not labeled.

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

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

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

**PROHIBITIONS**

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

**WASTE MANAGEMENT & LABELING/MARKING**

**UNIVERSAL WASTE BATTERIES**

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes \_\_\_ No  N/A  RMK# \_\_\_
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes \_\_\_ No  N/A  RMK# \_\_\_
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
  - b. Mix battery types in one container? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
  - c. Discharge batteries to remove the electric charge? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
  - d. Regenerated used batteries? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
  - e. Disassemble them into individual batteries or cells? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
  - f. Remove batteries from consumer products? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
  - g. Remove the electrolyte from the battery? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] Yes  No \_\_\_ N/A  RMK# \_\_\_

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] Yes \_\_\_ No  N/A  RMK# \_\_\_
- a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] Yes \_\_\_ No  N/A  RMK# \_\_\_
- b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] Yes \_\_\_ No  N/A  RMK# \_\_\_
7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)] Yes \_\_\_ No  N/A  RMK# \_\_\_

**UNIVERSAL WASTE LAMPS**

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes  No  N/A \_\_\_ RMK# \_\_\_
10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

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

generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

### ACCUMULATION TIME

11. Is the waste accumulated for less than one year? 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**

## USED OIL INSPECTION CHECKLIST (Short Version)

**NOTE:** *This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.*

### PROHIBITIONS

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

### USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
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  RMK# \_\_\_
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes  No  N/A \_\_\_ RMK# \_\_\_
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 \_\_\_ RMK# \_\_\_
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 \_\_\_ RMK# \_\_\_
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 \_\_\_ RMK# \_\_\_
- b. Contained the release? Yes  No  N/A \_\_\_ RMK# \_\_\_

- c. Cleaned up and properly managed the used oil and other materials? Yes  No  N/A \_\_\_RMK#\_\_\_
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes  No  N/A \_\_\_RMK#\_\_\_
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes  No \_\_\_ N/A \_\_\_RMK#\_\_\_
- 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 \_\_\_RMK#\_\_\_
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes  No  N/A \_\_\_RMK#\_\_\_
- c. Are the combustion gases from heater vented to the ambient air? Yes  No  N/A \_\_\_RMK#\_\_\_
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes  No  N/A \_\_\_RMK#\_\_\_

**USED OIL COLLECTION CENTERS AND AGGREGATION POINTS**

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

**WASTE EVALUATION**

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

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**REMARKS**