



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

June 21, 2007

RE: BP OIL, CO. - CANTON TERMINAL
OHD 017 586 389
CONDITIONALLY EXEMPT SMALL
QUANTITY GENERATOR
NOTICE OF VIOLATION

Mr. Jim Connee
Terminal Manager
BP Pipelines (North America) Inc.
807 Hartford Ave SE
Canton, OH 44691

Dear Mr. Connee:

On June 11, 2007, Ohio EPA conducted a Compliance Evaluation Inspection of BP's Canton Terminal. The purpose of the inspection was to determine BP's 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). Ohio EPA was represented by Kris Coder and myself. BP was represented by Dennis Mauder.

BP is a petroleum storage and distribution facility. Products that BP distributes out of this facility are diesel fuel, gasoline and jet fuel. Hazardous waste generation records show that the facility generates hazardous waste as a Conditionally Exempt Small Quantity Generator (CESQG). Ohio EPA is evaluating BP as a CESQG due to the current hazardous waste generation rate.

The following violation was identified by Ohio EPA:

1. OAC Rule 3745-279-22(C).

During the inspection of the maintenance building it was noted that used oil was being stored in an underground tank. The tank or piping (cap cover) were not labeled with the words "used oil". To abate this issue, please label the tank cap or concrete next to the cap with the words "used oil" and mail me a copy of the photo

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

BP OIL, CO. - CANTON TERMINAL
JUNE 21, 2007
PAGE - 2 -

The Division of Hazardous Waste Management offers a free news service to provide you with timely updates on activities related to hazardous waste. You can find out more information and sign up for this service at www.epa.state.oh.us/dhwm/listserv.

Should you have any questions regarding this letter, please contact me at (330) 963-1246.

Sincerely,



John Paquelet
Environmental Specialist II
Division of Hazardous Waste Management

JP:ddw

Enclosure

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

NOTICE:

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

**CONDITIONALLY EXEMPT 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: $\geq 1,000$ Kg. (~300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month.

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

Safety Equipment Used:

WASTE EVALUATION

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

GENERATOR CLASSIFICATION

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

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

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

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

TREATMENT OF HAZARDOUS WASTE

a. Container that meets 3745-66-70 to 3745-66-77? Yes No N/A

b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes No N/A

c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A

d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: Complete appropriate checklist for each unit.

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

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

REMARKS

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

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

| | |
|--------------------|---------------------------------------|
| 2. Site EPA ID No. | EPA ID Number: OHD 017 586 389 |
|--------------------|---------------------------------------|

| | | |
|--------------|--|-------------------------------|
| 3. Site Name | Name: BP Products North America Inc | Website: (Optional) |
|--------------|--|-------------------------------|

| | | |
|------------------------------|--|------------------------|
| 4. Site Location Information | Street Address: 807 Hartford Ave SE | |
| | City, Town, or Village: Canton | State: OH |
| | County Name: Stark | Zip Code: 44707 |

| | | | | | | | | |
|---------------------------------------|--|---|---|--|---|--|--|--|
| 5. Site Land Type (check only one) | Private <input type="checkbox"/> | County <input type="checkbox"/> | District <input type="checkbox"/> | Federal <input type="checkbox"/> | Indian <input type="checkbox"/> | Municipal <input type="checkbox"/> | State <input type="checkbox"/> | Other <input type="checkbox"/> |
|---------------------------------------|--|---|---|--|---|--|--|--|

| | | | |
|--|--|--|--|
| 6. NAICS code(s) www.census.gov/epcd/www/naics.html | | | |
|--|--|--|--|

| | | | |
|--|-------------------------------|-----------------|--------------------------------|
| 7. Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address | First Name: Jim | MI: | Last Name: Conner |
| | Phone Number: | | Phone Number Extension: |
| | E-Mail Address: | | |
| | Fax Number: | | Fax Number Extension: |
| | Street or P.O. Box: | | |
| | City, Town or Village: | | |
| | State: | Country: | Zip Code: |

| | | |
|---|------------------------------------|--|
| 8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page | Name of Site's Legal Owner: | Date Became Owner (mm/dd/yyyy): |
| | Owner Type: | Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> |
| | Street or P.O. Box: | |
| | City, Town or Village: | Owner Phone #: |
| | State: | Country: Zip Code: |
| | Name of Site's Operator: | Date Became Operator (mm/dd/yyyy): |
| | Owner Type: | Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> |
| | Street or P.O. Box: | |
| | City, Town or Village: | Operator Phone #: |
| | State: | Country: Zip Code: |

| | |
|----------------------|---|
| 9. Violations Cited? | X Yes <input type="checkbox"/> No |
|----------------------|---|

| | |
|--|--|
| 10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes) | |
| <input type="checkbox"/> Not Regulated | <input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator |
| <input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 | <input type="checkbox"/> United States Importer of Hazardous Waste |
| <input type="checkbox"/> Large Quantity Generator (LQG) | <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator |

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

| | | | |
|---|----------------------------------|---|---|
| 10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply)) | | | |
| <input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste | | <input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more) | |
| <input type="checkbox"/> Destination Facility for Universal Waste | | | |
| Check all boxes below that apply for each of the three types of facilities above | | 10C. Used Oil Activities (Indicate Type(s) of Activities) | |
| Batteries | Managed <input type="checkbox"/> | <input checked="" type="checkbox"/> Used Oil Generator | <input type="checkbox"/> Off-Specification Used Oil Burner |
| | | <input type="checkbox"/> Used Oil Transporter | <input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil |
| Pesticides | <input type="checkbox"/> | <input type="checkbox"/> Used Oil Transfer Facility | <input type="checkbox"/> Used Oil Fuel Marketer 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 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. | | | |
| | | | |
| 12. Comments: Use this area to describe whether the inspection was announced, whether the wastes stored in tanks or containers, etc. | | | |
| Announced | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Additional Facility Representatives: |
| Tanks | <input type="checkbox"/> Yes | <input type="checkbox"/> No | Other Comments: |
| Containers | <input type="checkbox"/> Yes | <input type="checkbox"/> No | |
| 13. Name of Inspector(s) | | Name of Inspector(s) | Date of Inspection Time (mm/dd/yyyy) (hh:mm) |
| John Paquelet | | | 6/11/2007 11:00 am |
| 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) |
| | | | |

LDR REQUIREMENTS

- 1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] (possibly also cite 3745-52-11) **If so:**
 - a. **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-270-07(A)(6)]
 - b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-270-07(A)(6)]
- 2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] (possibly also cite 3745-52-11)
- 3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1]
- 4. Does the generator generate a characteristic hazardous waste? **If so:**
 - a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)]

Yes No N/A ___ RMK# ___

NOTE: *If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*

- 5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] **If so:**
 - a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)]

Yes No N/A ___ RMK# ___

Yes No N/A ___ RMK# ___

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*

6. Has the generator **correctly** determined if restricted wastes meet or exceed treatment standards? [3745-270-07(A)(1)]

Yes No N/A ___ RMK# ___

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03]

Yes No N/A ___ RMK# ___

NOTE: *A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (§402 of CWA), that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater.* [3745-270-03(B)]

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)]

Yes No N/A ___ RMK# ___

Note: In other words, is combustion a legitimate treatment method

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)]

Yes No N/A ___ RMK# ___

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste? [3745-270-05] **If so:**

Yes ___ No N/A ___ RMK# ___

a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment. [3745-270-05]

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] **If so:** Yes ___ No N/A ___ RMK#___
- a. The facility can land dispose of the waste. [3745-270-06]
12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? **If so:** Yes ___ No N/A ___ RMK#___
- a. Has the facility complied with 3745-270-04? Yes ___ No N/A ___ RMK#___

REMARKS

NOTIFICATION AND CERTIFICATION REQUIREMENTS

- 13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1? [3745-270-07(A)(2)] Yes ___ No N/A RMK# ___
- 14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1? [3745-270-07(A)(3)] Yes No N/A ___ RMK# ___
- 15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1? [3745-270-07(A)(4)] Yes ___ No N/A RMK# ___
- 16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1? [3745-270-07(A)(9)] Yes ___ No N/A RMK# ___
- 17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] **If so:** Yes ___ No ___ N/A ___ RMK# ___
 - a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes ___ No N/A RMK# ___

NOTE: Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit. (See 270-07(A)(7))

Did not check

- 18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)] Yes ___ No N/A ___ RMK# ___

REMARKS

GENERATORS TREATING HAZARDOUS WASTE

1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? Yes ___ No ___ N/A ___ RMK# ___
2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)] Yes ___ No N/A ___ RMK# ___
- a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] Yes ___ No N/A ___ RMK# ___
- b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes ___ No N/A ___ RMK# ___
3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes ___ No N/A ___ RMK# ___
4. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes ___ No N/A ___ RMK# ___

NOTE: If the waste is a characteristic waste, which has been treated to render it non hazardous and subsequently sent to a solid waste landfill, proceed to question 7 & 8.

5. Has the generator sent a notification and certification with the initial shipment of waste?[3745-270-07(A)(5)(c)] Yes ___ No N/A ___ RMK# ___
6. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] Yes ___ No N/A ___ RMK# ___
7. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following:
- i. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes ___ No N/A ___ RMK# ___
- ii. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)] Yes ___ No N/A ___ RMK# ___

NOTE: If the waste will be treated and monitored for **all** UHCs then they do not need to be listed on the notice.

8. Has the process/operation generating the waste or the solid waste landfill facility changed? If so: Yes ___ No ___ N/A ___ RMK# ___

a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] Yes ___ No N/A ___ RMK# ___

b. Has the director been notified of such changes? [3745-270-09(D)] Yes ___ No N/A ___ RMK# ___

NOTE: The director need only be notified on an annual basis but no later than December 31.

9. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: Yes ___ No ___ N/A ___ RMK# ___

a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49(C)] Yes ___ No N/A ___ RMK# ___

10. Does each notification/certification form completed, contain the information found in Table1? [3745-270-07(A)(3)] Yes ___ No N/A ___ RMK# ___

NOTE: If the waste will be treated and monitored for all constituents, there is no need to put them all on the LDR notice.

REMARKS

HAZARDOUS DEBRIS

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)? Yes ___ No ___ N/A ___ RMK# ___

2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.) Yes ___ No ___ N/A ___ RMK# ___
3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so: Yes ___ No ___ N/A ___ RMK# ___
- a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)] Yes ___ No N/A ___ RMK# ___
- NOTE:** *If immobilization has been used in a treatment train, it must be the last treatment technology used.*
4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so: Yes ___ No ___ N/A ___ RMK# ___
- a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] Yes ___ No N/A ___ RMK# ___
5. Is the waste a PCB waste under 40 CFR Part 761? If so: Yes ___ No ___ N/A ___ RMK# ___
- a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)] Yes ___ No N/A ___ RMK# ___
6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)] Yes ___ No N/A ___ RMK# ___
7. Does the owner/operator of a treatment facility that claims the debris is excluded under 3745-51-03(F)(1) maintain the following information?
- a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)] Yes ___ No ___ N/A ___ RMK# ___
- b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)] Yes ___ No N/A ___ RMK# ___
- c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)] Yes ___ No N/A ___ RMK# ___

8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F) have the following information? [3745-270-07(D)(3)]

Yes ___ No N/A ___ RMK# ___

a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)]

Yes ___ No ___ N/A ___ RMK# ___

b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)]

Yes ___ No N/A ___ RMK# ___

c. Technology used from Table 1? [3745-270-07(D)(1)(c)]

Yes ___ No N/A ___ RMK# ___

9. Has the above notification been sent to the director? [3745-270-07(D)(1)]

Yes ___ No N/A ___ RMK# ___

REMARKS

TREATING FACILITIES

- 1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13?[3745-270-07(B)] Yes ___ No N/A ___ RMK# ___
- 2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)] Yes ___ No N/A ___ RMK# ___
- Note:** *No further notification is necessary until such time that the waste changes or the receiving facility changes.*
- 3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07?[3745-270-07(B)(3)] Yes ___ No N/A ___ RMK# ___
- 4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so:** Yes ___ No ___ N/A ___ RMK# ___
 - a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)] Yes ___ No N/A ___ RMK# ___
- 5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? **If so:** Yes ___ No ___ N/A ___ RMK# ___
 - a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)), excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)] Yes ___ No N/A ___ RMK# ___
 - b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4)[3745-270-07(B)(6)] Yes ___ No N/A ___ RMK# ___
 - c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)] Yes ___ No N/A ___ RMK# ___
- 6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)] Yes ___ No N/A ___ RMK# ___
- 7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have: Yes ___ No ___ N/A ___ RMK# ___

a. Copies of all notices and certifications required in 3745-270?

Yes ___ No N/A RMK#

b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49?

Yes ___ No N/A RMK#

c. Followed the testing frequency specified in the facility's WAP?

Yes ___ No N/A RMK#

REMARKS

USED OIL INSPECTION CHECKLIST (Long Version)

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)] *UST Under ground Storage Tanks* 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-oil 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 a 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# ___

REMARKS

McRestore
NA

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)] *If it happens* 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# ___ *If it happens*

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: *not Rejected.*

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 1 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 1 RMK# ___

EXPORTS

24. Is waste being sent to a foreign destination? If so:
 Yes ___ No ___ N/A 1 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