OhioEPA
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

September 10, 2007

RE: CICOGNA SIGN CO.
ASHTABULA COUNTY
OHR 000 042 317
SQG, UNIV. WASTE, NOV

Mark Valerio
Cicogna Sign Co.
4330 North Bend Road
Ashtabula, OH 44004

Dear Mr. Valerio:

Ohio EPA conducted a complaint inspection at Cicogna Sign Co. (Cicogna) on August 16, 2007. The investigation was initiated upon receipt of a complaint alleging the facility was mismanaging lamps, ballasts and transformers. I represented Ohio EPA during the inspection. You represented Cicogna.

During the inspection, Ohio EPA learned that Cicogna manufactures and installs signs for commercial properties. The hazardous waste generated at the facility is spent paint/ solvent (D001, F003, F005). Cicogna also generates spent neon light bulbs.

Ohio EPA found the following violations:

1. Accumulation Date
   OAC 3745-52-34(D)(4)

   Cicogna is required to place the date upon which each period of accumulation begins on each container.

   Cicogna abated this violation on September 5, 2007, when the drums of hazardous waste were manifested off-site.

2. Weekly Container Inspections
   OAC 3745-66-74

   Cicogna failed to inspect areas where containers of hazardous waste are stored, at least weekly, for deterioration caused by corrosion or other factors. These inspections must be recorded in an inspection log or summary.

   To abate this violation, please send in a completed log or summary that documents a weekly inspection of the hazardous waste accumulation and storage areas.

3. Emergency Equipment Inspection
   OAC 3745-65-33

   Cicogna failed to document its inspection of all facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment. Cicogna must record the inspections in a log or summary.

   To abate this violation, please send in a completed log or summary that documents an emergency equipment inspection.

Within 30 days of the date of this letter, please submit the above requested documentation that demonstrates compliance with the rules cited.

Enclosed is a copy of the checklists that we completed during the inspection. 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.

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,

Nyall 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 tammy.mcconnell@epa.state.oh.us 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: OHR 000 042 317							
3. Site Name	Name: Cicogna Sign Co					Website (optional:)		
4. Site Location Information	Street Address: 4330 North Bend Road							
	City, Town, or Village: Ashtabula				State: OH			
	County Name:				Zip Code: 44004			
5. Site Land Type (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other
	✓							
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A.			B.				
	C.			D.				
7. Facility Representative: Additional names can be recorded in comments section. Only provide address information if it is different than the site address.	First Name: Mark		MI:	Last Name: Valerio				
	Phone Number: 440-998-2637			Phone Number Extension:				
	E-Mail Address:							
	Fax Number: 440-992-8021			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.	A. Name of Site's Legal Owner: Cicogna Land Company			Date Became Owner (mm/dd/yyyy): 1-28-2005				
	Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
		✓							
	Street or P.O. Box: 2131 Aetna Rd.							
	City, Town, or Village: Ashtabula			Owner Phone #:				
	State: Ohio			Country: Ashtabula		Zip Code: 44004		
	B. Name of Site's Operator:			Date Became Operator (mm/dd/yyyy):				
	Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
	Street or P.O. Box:							
	City, Town, or Village:			Operator Phone #:				
	State:			Country:		Zip Code:		
9. Violations Cited?	☒ Yes	☐ No						

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

☐ **Not Regulated**

10. Type of Regulated Waste Activity (Mark "X" 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):**
- [x] 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

- [x] 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	[ ]	[ ]
B. Pesticides	[ ]	[ ]
C.Thermostats	[ ]	[ ]
D. Lamps	[ ]	[ ]

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

D001	F003	F005				

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

Y / (N)	Announced ?	Additional Facility Representatives:	
Y / (N)	Tanks?	Other comments:	
(Y) / N	Containers?		

13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
Niall McKenna		September 6, 2007

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)

S. .ALL QUANTITY GENERATOR REQUIRE\. .NTS
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	☑	No	☐	N/A	☐
2.	Has the generator obtained a U.S. EPA I.D. number? [3745-52-12]	Yes	☑	No	☐	N/A	☐
3.	Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)]	Yes	☐	No	☑	N/A	☐
4.	Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)]	Yes	☐	No	☑	N/A	☐
5	Does the generator accumulate hazardous waste?	Yes	☑	No	☐	N/A	☐

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

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

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

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

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

8. Does the generator treat hazardous waste in a:

	a. Container that meets 3745-66-70 to 3745-66-77?	Yes	☑	No	☐	N/A	☐
	b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)?	Yes	☐	No	☐	N/A	☑
	c. Drip pads that meet 3745-69-40 to 3745-69-45?	Yes	☐	No	☐	N/A	☑
	d. Containment building that meets 3745-256-100 to 3745-256-102?	Yes	☐	No	☐	N/A	☑

NOTE: Complete appropriate checklist for each unit.

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

MANIFEST REQUIREMENTS

9.	Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)]	Yes	☐	No	☐	N/A	☑
10.	Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)]	Yes	☐	No	☐	N/A	☑

a. Does the contractual agreement specify the type of waste and frequency of shipment? Yes ☐ No ☐ N/A ☑

b. Is the transport vehicle owned and operated by the reclaimer? Yes ☐ No ☐ N/A ☑

c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? Yes ☐ No ☐ N/A ☑

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

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

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

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

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

13. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes ☑ No ☐ N/A ☐

14. Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)] Yes ☑ No ☐ N/A ☐

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

15. If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? 3745-52-42(B)] Yes ☐ No ☐ N/A ☑

16. Are signed copies of all manifests being retained for at least three years? [3745-52-40] Yes ☑ No ☐ N/A ☐

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

PREPAREDNESS AND PREVENTION

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

18. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]

a. Name and telephone number of emergency coordinator? Yes ☑ No ☐ N/A ☐

b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes ☑ No ☐ N/A ☐

c. Telephone number of local fire department? Yes ☑ No ☐ N/A ☐

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

20. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(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]	Yes	☐	No	☐	N/A	☐
	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" <u>or</u> other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes	☑	No	☐	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 contai (s) holding the excess with the accumulation date when the 55 ga..on (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 <u>or</u> offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes ☑ No ☐ N/A ☐

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] — Yes ☑ No___ N/A ___RMK#___

2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] — Yes ☑ No___ N/A ___RMK#___

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] — Yes ___ No ☐ N/A ✓ RMK#___

4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] — Yes ___ No ☐ N/A ✓ RMK#___

5. Does the SQUWH conduct any of the following activities:

   a. Sort batteries by type? — Yes___ No___ N/A ✓ RMK#___

   b. Mix battery types in one container? — Yes___ No___ N/A ✓ RMK#___

   c. Discharge batteries to remove the electric charge? — Yes___ No___ N/A ✓ RMK#___

   d. Regenerated used batteries? — Yes___ No___ N/A ✓ RMK#___

   e. Disassemble them into individual batteries or cells? — Yes___ No___ N/A ✓ RMK#___

   f. Remove batteries from consumer products? — Yes___ No___ N/A ✓ RMK#___

   g. Remove the electrolyte from the battery? — Yes___ No___ N/A ✓ RMK#___

   If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] — Yes ☐ No___ N/A ✓ RMK#___

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] — Yes ___ No ❑ N/A ✓ 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___ 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-transports 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 <u>one of the following</u>:

    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