



State of Ohio Environmental Protection Agency

**Northeast District Office**

2110 East Aurora Rd.  
Twinsburg Ohio 44087

TELE: 330-467-1111 FAX: 330-467-0769  
www.epa.state.oh.us

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

February 12, 2007

**RE: CLEVELAND COMMUTATOR CO.  
OHD 004 198 453  
SMALL QUANTITY GENERATOR (SQG)  
NOTICE OF VIOLATION**

Joseph Supina  
Cleveland Commutator Co.  
4865 West 130<sup>th</sup> St.  
Cleveland, Ohio 44135-5182

Dear Mr. Supina:

This letter will report on the recent hazardous waste inspection of Cleveland Commutator Co. It will document any violations and concerns found and outline what you need to do to correct them. A written response to these issues is required within 30 days.

The Ohio EPA Division of Hazardous Waste Management conducted an inspection of Cleveland Commutator Co. (CCC) located at 4865 West 130<sup>th</sup> Street, Cleveland, Ohio on January 29, 2007. The purpose was to determine if CCC had violations of Ohio's hazardous waste and used oil laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC).

Another purpose of the inspection was to look for ways CCC may be able to reduce its waste generation, conserve energy, and save money. An attachment to this letter covers these issues.

Below are listed the violations and concerns found during the inspection and what you need to do to correct or otherwise address them. Please also see the enclosed inspection checklists. The rules listed below apply to facilities that generate between 220 and 2200 pounds of hazardous waste per calendar month (e.g. Small Quantity Generators). Different rules may apply for different generation categories.

**Small Quantity Generator Requirements**

1. OAC rule 3745-52-34(D)(5)(c) – Employees familiar with waste handling and emergency procedures.

This rule requires that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.

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CCC violated this rule because the violations outlined in this letter show that all employees were not familiar with this. **Send me documentation showing that the issues of this letter have been discussed with all the employees involved.**

2. OAC rule 3745-52-34(D)(4) – Accumulation start dates.  
This rule requires that each container of hazardous waste be labeled with the accumulation start date. This does not apply to satellite containers such as the one you use to collect F006 wastewater treatment filter press waste.

CCC violated this rule by having a full, blue drum of D002 hazardous waste stored in the outside shed that did not have an accumulation start date. Your email dated January 31, 2007, documented your correction of this violation.

3. OAC rule 3745-66-74 – Inspections of container storage areas.  
This rule requires that the owner or operator must inspect areas where containers of hazardous waste are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The owner or operator must also record inspections in an inspection log or summary.

CCC violated this rule by not having this inspection program. An example log can be found at: <http://www.epa.state.ch.us/dhwm/pdf/scglog.PDF>.

**Submit documentation including a completed log to show that you have corrected this violation.**

#### **Universal Waste Handler Requirements**

4. OAC 3745-273-14 (E) - Universal waste lamp labeling.  
This rule requires that containers of universal waste lamps be labeled as Universal Waste - Lamps, Waste Lamps, or Used Lamps.

CCC violated this rule by not having its waste lamps labeled as required. **You must correct this violation and provide documentation of that to me.**

#### **Concerns**

1. CCC generates two materials from dust collection units. Some of this material was seen on the ground at the outside outlet of one of these dust collection systems. You stated this will be cleaned up. **Please submit documentation to show that this cleanup has been completed.**
2. You may want to determine whether your waste plating solution is really a D002 hazardous waste. For acid waste, this code applies to waste with a pH of less than or equal to 2. For reference the pH listed on the MSDS for your nickel plating solution is 2.2 to 2.6. A test of pH should be a fairly inexpensive test to have done.

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3. OAC rule 3745-52-42(B) – Manifest exception report.  
This rule requires that a generator of between 220 and 2,200 pounds of hazardous waste per month who does not receive a copy of the manifest with the signature of the receiving facility within 60 days of the date of shipment must submit a copy of the manifest, with some indication that the generator has not received confirmation of delivery, to the Ohio EPA.

At the time of the inspection copies of the following manifests could not be found with the signature of the receiving facility:

manifest document No. 06000 shipped on 1-12-06  
manifest document No. 06001 shipped on 4-12-06  
manifest document No. 06002 shipped on 4-12-06

You later found these signed copies and provided a copy to me on February 5, 2007. I have attached a form you may want to use to make sure you receive future signed copies on time. Use of this would also have the added benefit of listing all your hazardous waste shipments.

4. OAC rule 3745-65-33 – Testing and maintenance of equipment.  
This rule requires that all facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency. This rule also requires the owner or operator to record the emergency equipment inspections in a log or summary. A copy of this and related rules are attached.

An example log can be found at:  
<http://www.epa.state.oh.us/dhwm/pdf/equiplog.PDF>.

You probably want to modify this log to match the particulars of your facility, such as, not managing ignitable hazardous waste, using cell phones, using the containment of the storage shed for spill control. Also if you decide to start storing your hazardous waste inside the building, the maintenance of adsorbent would need to be included. **Please submit documentation to show how you plan to comply with this rule.**

5. Since the inspection you have determined that your waste plating solution does not exceed the TCLP limit for chromium. Therefore, you will not include the D007 waste code on future manifests used in the shipping of this waste. **You must also correct the land disposal notification form for this waste. Please send me a copy of the updated form.**

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Cleveland Commutator Co.  
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6. Universal waste, including burned out fluorescent tubes, can be accumulated for no longer than one year unless it is solely for the purpose of accumulation of such quantities to facilitate proper recovery or treatment. Your last shipment of waste fluorescent tubes was on 1-12-06. Joseph Supina, Cleveland Commutator Co.

**Please either ship the waste fluorescent tubes now onsite and send a copy of the shipping paper to me or send me a description as to why these tubes need to be accumulated for a longer time.**

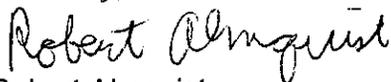
**Please send a written response to this letter within 30 days including the documentation required above.**

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides compliance and pollution prevention assistance on environmental issues related to air, land, and water. They can be contacted at (800) 329-7518, or <http://www.epa.state.oh.us/ocapp/ocapp.html>. In June 2006 they published a 56 page Small Business Environmental Compliance Self-Assessment Guide which can be found at: <http://www.epa.state.oh.us/ocapp/sb/publications/selfade.pdf>.

You can find copies of the regulations and other information on the Division of Hazardous Waste Management web page at <http://www.epa.state.oh.us/dhwm/>.

If you have any questions, please contact me at (330) 963-1217, or [robert.almquist@epa.state.oh.us](mailto:robert.almquist@epa.state.oh.us).

Sincerely,



Robert Almquist  
Division of Hazardous Waste Management

RA:cl  
Enclosures

cc: Natalie Oryshkewych, DHWM, NEDO

ec: Frank Popotnik, DHWM, NEDO  
Harry Sarvis, DHWM, CO  
Ken Slepecky, Cleveland Commutator Co.

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

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	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM</b>		For Ohio EPA use only																		
2. Site EPA ID No.	EPA ID Number: OHD 004 198 453																				
3. Site Name	Name: Cleveland Commutator Company		Website (optional): <a href="http://www.kirkwood-ind.com/kw/index.php">http://www.kirkwood-ind.com/kw/index.php</a>																		
4. Site Location Information	Street Address: 4865 W 130 <sup>th</sup> St.																				
	City, Town, or Village: Cleveland	State: OH																			
	County Name: Cuyahoga	Zip Code: 44135-5182																			
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>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	X									
Private	County	District	Federal	Indian	Municipal	State	Other														
X																					
6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/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: Ken		MI:																		
	Last Name: Slepecky																				
	Phone Number: 216-362-3853		Phone Number Extension:																		
	E-Mail Address: kslepecky@clevelandcomm.com																				
	Fax Number: 216-362-3845		Fax Number Extension:																		
	Street or P.O. Box:																				
	City, Town or Village:																				
State: OH		Country: Ashtabula	Zip Code: 44004																		
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: Kirkwood Holding, Inc.		Date Became Owner (mm/dd/yyyy):																		
	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Owner Type: Mark with an X</td> <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></td> <td>x</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other		x							
	Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other												
		x																			
	Street or P.O. Box: 4825 W 130 <sup>th</sup> St.																				
	City, Town, or Village: Cleveland		Owner Phone #:																		
	State: Ohio		Country:	Zip Code: 44135																	
	B. Name of Site's Operator: Cleveland Commutator Company		Date Became Operator (mm/dd/yyyy):																		
	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Operator Type: Mark with an X</td> <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></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other									
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Street or P.O. Box: same as site location																					
City, Town, or Village:		Operator Phone #:																			
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 "X" in all of the appropriate boxes.)

<b>A. Hazardous Waste Activities</b>	
(choose only one of the following categories)	
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> 3. Treater, Storer or Disposer of Hazardous Waste
<input type="checkbox"/> a. Large Quantity Generator (LQG):	<input type="checkbox"/> 4. Recycler of Hazardous Waste
<input checked="" type="checkbox"/> b. Small Quantity Generator (SQG)	<input type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/> a. Small Quantity On-site Burner Exemption
<input type="checkbox"/> d. United States Importer of Hazardous Waste	<input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/> 6. Underground Injection Control Facility

<b>B. Universal Waste Activities</b>	<b>C. Used Oil Activities</b>															
<input checked="" type="checkbox"/> 1. Small Quantity Handler of Universal Waste (Indicate types of universal waste generated and/or accumulated (check all boxes that apply):	<input checked="" type="checkbox"/> 1. Used Oil Generator															
<input type="checkbox"/> 2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more).	<input type="checkbox"/> 2. Used Oil Transporter Indicate Type(s) of Activity(ies)															
<input type="checkbox"/> 3. Destination Facility for Universal Waste (Check all boxes below that apply for each of the three types of facilities above.)	<input type="checkbox"/> Transporter															
	<input type="checkbox"/> Transfer Facility															
	<input type="checkbox"/> 3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)															
	<input type="checkbox"/> Processor															
	<input type="checkbox"/> Re-refiner															
<table border="1"> <tr> <td></td> <td><u>Generated</u></td> <td><u>Accumulated</u></td> </tr> <tr> <td>A. Batteries</td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>B. Pesticides</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>C. Thermostats</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>D. Lamps</td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> </table>		<u>Generated</u>	<u>Accumulated</u>	A. Batteries	<input checked="" type="checkbox"/>	<input checked="" 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"/>	<input type="checkbox"/> 4. Off-Specification Used Oil Burner
	<u>Generated</u>	<u>Accumulated</u>														
A. Batteries	<input checked="" type="checkbox"/>	<input checked="" 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"/>														
	<input type="checkbox"/> 5. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)															
	<input type="checkbox"/> a. Marketer Who Directs Shipment of Off- Specification Oil															
	<input type="checkbox"/> 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.

D002	F006					
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12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

No	Announced ?	Additional Facility Representatives:	Joe Supina, Cleveland Computator; Lance Traves, Labyrinth
no	Tanks?	Other comments: Sold the building and property. Now rent manufacturing space.	
yes	Containers?		

13.	Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
	Robert Almquist		1-29-07

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

Facility Name: Cleveland Commutator Co. ID #: OHD004198453 Inspection Date: 1-29-07

CESQG: < 100 Kg. (approximately 25-30 gallons) of waste in a calendar month

SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month

LQG: >1,000 Kg. (-300 gallons) of waste in a calendar month or > 1 Kg. of acutely hazardous waste in a calendar month

NOTE: To convert from gallons to pounds:  $\text{Amount in gallons} \times \text{Specific Gravity} \times 8.345 = \text{Amounts in pounds}$

Safety Equipment Used:

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes  No  N/A  
Need more information regarding two dust collection wastes
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

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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

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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

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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: no
- a. Container that meets 3745-66-70 to 3745-66-77? Yes  No  N/A
- b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C) and Yes  No  N/A

- c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes\_ No  N/A
- d. Containment building that mee. 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 Yes\_ No  N/A

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)]

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

*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? [3745-65-32(D)] Yes  No  N/A

Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of

23. emergency [3745-65-33] Yes\_\_ No  N/A  
unknown
24. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes\_\_ No  N/A  
unknown
25. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (*unless the device is not required under OAC 3745-65-32*)? [3745-65-34(A)] Yes X No  N/A
26. If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32?) [3745-65-34(B)] Yes X No  N/A
27. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes X No  N/A
28. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes\_\_ No  N/A  
unknown
29. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes\_\_ No  N/A

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#### SATELLITE ACCUMULATION AREA REQUIREMENTS

30. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? {3745-52-34(C)(1)} Yes X No  N/A
  - b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes X No  N/A
  - c. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes\_\_ No  N/A X
  - d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. Yes X No  N/A
  - e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes X No  N/A
31. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes X 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  
they said they would
  - b. Did the generator mark the container(s) holding the excess with the accumulation date when

the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]

Yes\_\_ No  N/A

c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]

Yes\_\_ No  N/A X

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

#### USE AND MANAGEMENT OF CONTAINERS

32. Has the generator marked containers with the words "Hazardous Waste" [3745-52-34(D)(4)]

Yes X No  N/A

33. Is the accumulation date on each container? [3745-52-34(D)(4)]

Yes\_\_ No X  N/A

34. Are hazardous wastes stored in containers which are:

Yes\_\_ No  N/A

a. Closed (except when adding/removing wastes)? [3745-66-73(A)]

Yes X No  N/A

b. In good condition? [3745-66-71]

Yes X No  N/A

c. Compatible with wastes stored in them? [3745-66-72]

Yes\_\_ X No  N/A

d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]

Yes X No  N/A

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

35. Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days.

Yes\_\_ No X  N/A

a. Are inspections recorded in a log or summary? [3745-66-74]

Yes\_\_ No X  N/A

36. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]

Yes\_\_ No  N/A X

37. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B) 3745-66-77(A)]

Yes\_\_ No  N/A X

38. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B) ? [3745-66-77(B)]

Yes\_\_ No  N/A X

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

**PRE-TRANSPORT REQUIREMENTS**

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

## Land Disposal Restriction Requirements

Facility Name: Cleveland Commutator ID #: OHD004198453 Inspection Date: 1-29-07

### GENERAL LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] If so: Yes  No  N/A  RMK#
- a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)] Yes  No  N/A  RMK#
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes  No  N/A  RMK#
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] Yes  No  N/A  RMK#
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes  No  N/A  RMK#
4. Does the generator generate a characteristic hazardous waste? If so: Yes  No  N/A  RMK#
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes  No  N/A  RMK#

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**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: Yes  No  N/A  RMK#
- 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#

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**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 do not meet treatment standards? [3745-270-07(A)(1)]

Yes  No  N/A  RMK#

**NOTE: Wastes with EPA hazardous waste numbers K174 and K175 (chlorinated aliphatic wastes) have specific requirements in rule 3745-270-33. Waste with EPA hazardous waste numbers K176, K177 and K178 (inorganic chemical wastes) have specific requirements in rule 3745-270-36.**

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] Yes  No  N/A  RMK#

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] Yes  No  N/A  RMK#

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 of 3745-270-07? [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 of 3745-270-07? [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 of 3745-270-07? [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 of 3745-270-07? [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))**

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. Has the generator followed their WAP [3745-270-07(A)(5)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
5. 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.**

6. 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# \_\_\_
7. 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# \_\_\_
8. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- b. 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 ben they do not need to be listed on the notice.**

9. 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.**

10. 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#\_\_
11. Does each notification/certification form completed, contain the information found in Table 1? [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# \_\_\_

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**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 from regulation as a hazardous waste under 3745-51-03(F)(1) maintain the following information? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- 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)(1) 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 WHICH TREAT WASTE TO MEET LDR STANDARDS

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# \_\_\_

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**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:**
- a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)]
5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? **If so:**
- 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:
- 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. The testing frequency specified in the facility's WAP and have they followed the protocol? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- 

**REMARKS**

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

Facility Name: Cleveland Commutator ID #: OHD 004198453 Inspection Date: 1-29-07

*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: no
- 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 or 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#  
unknown

**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