OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office

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

June 6, 2007

RE: CONTAINER COMPLIANCE CORP.
OHD060431947
LQG - CEI - NOV

CERTIFIED MAIL

John Tirbaso, President
Container Compliance Corp.
5151 Denison Ave.
Cleveland, OH 44102

Dear Mr. Tirbaso:

On May 16, 2007, Wade Balser and I began a hazardous waste audit of your facility on Denison Avenue. Kevin Roff and Wolfram Von Kiparski of the Northeast Ohio Regional Sewer District accompanied us during the audit. Jeffrey Davis represented Container Compliance Corporation (CCC). You, Dan Mackall and Steve Jared were present for portions of the audit. On May 18, 2007, Wade and I returned to complete the audit. The purpose of the audit was to determine Container Compliance Corporation's compliance with Ohio's hazardous waste laws and rules as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). The audit included a review of your available records and an inspection of your processing building. Pictures were taken during the tour of your facility.

We understand Container Compliance is a drum reconditioner. Your company receives approximately 1000 RCRA empty containers per day. The residue is vacuumed out of the containers. If any poisons or 'heavy' drums are received they are sent back to the customer. Steel containers are forwarded on to Columbus Steel Drum for reconditioning. The good plastic containers are separated from those that are unusable. The unusable ones are ground into plastic scrap that is sent for recycling. The good drums are submersed in a hot caustic water to clean the inside. Then the labels are removed from the outside of the containers manually using xylene or toluene and abrasive pads. Next the drums are put through an external wash and then the inside is steamed and they are sold as reconditioned drums.

Wastes generated include residues that are vacuumed from the incoming containers, waste waters, filter residue, sludge and skimmings from the cleaning tanks, xylene and toluene contaminated labels, gloves, glue and scrubbing pads, and spent fluorescent lamps.

The following violations of the hazardous waste rules were noted:

1. **Waste Evaluation - OAC 3745-52-11**

   A.) During the inspection it was noted that drums containing residues that have been vacuumed from incoming containers were not labeled as hazardous waste but were acknowledged to potentially be hazardous waste. The vacuum station includes three 55 gallon drums connected in series. Each drum was at least half full of wastes. The drums were unlabelled and undated and have been unused for about 5 months. These containers are identified as CC01, CC02, and CC03. A waste determination needs to be made on these wastes or else they need to be managed and labeled conservatively as hazardous waste until, and unless, they are later determined to not be hazardous.

In a letter dated August 10, 2006, Mr. Davis indicated all drums would be labeled and managed as hazardous waste unless, and until, they were determined to not be hazardous. Mr. Davis indicated that, rather than test each container, they would be managed as hazardous waste. Submit manifests showing this waste has been properly disposed.

B.) There were 65 - 330 gallon totes labeled only "waste water" that have collected for at least 5 months. Mr. Davis submitted documentation on January 25, 2007, indicating this water is hazardous for chromium, pH and underlying hazardous constituents. During our inspection pH test paper confirmed at least some of these are hazardous waste because of corrosivity. Three totes that showed a pH of 13 were identified as CC04, CC05, and CC06. You indicated all of the totes of waste water would be sent off-site to Chemtron by May 25, 2007, as hazardous waste. Submit manifests showing this waste has been properly disposed.

C.) In the bermed hazardous waste storage area were 18 mostly unlabelled steel open-head drums of wastes that have been stored since my last inspection on April 20, 2006. These were not sent off with the drums of non-hazardous waste because Mr. Davis thought that they might contain hazardous waste. You indicated that rather than analyze each of these containers they would be sent off-site to Chemtron by May 25, 2007, as hazardous waste. Submit manifests showing this waste has been properly disposed. These drums were identified as CC07 through CC24.

D.) Also in the bermed hazardous waste storage area were 7 unlabelled plastic drums of sludge from the caustic wash operations. Per Steve Jared these were filled on 5/12/07. You indicated that these would be sent off-site to Chemtron by May 25, 2007, as hazardous waste. Submit manifests showing this waste has been properly disposed.

E.) There were 2 unlabelled, undated 55 gallon drums of pour-outs from the conveyor line. These drums were identified as CC27 and CC28. It was unknown if these contained hazardous waste. Please submit a written waste determination on these two drums or submit a manifest showing these wastes have been properly disposed.

F.) There were 7 unlabelled, undated 55 gallon drums of skimmings from the caustic tank that were located upstairs near the caustic wash tank. These drums were identified as CC38 through CC44. Mr. Davis stated these wastes would be added to one of the totes downstairs. Please submit a written waste determination on these drums or submit a manifest showing these wastes have been properly disposed.

G.) There were 8 unlabelled, undated drums of caustic sludge from the caustic wash tank stored upstairs near the end of the rinse tank. These drums were identified as CC29 through CC36. Mr. Davis stated these drums would be added to one of the totes downstairs. Please submit a written waste determination on these drums or submit a manifest showing these wastes have been properly disposed.

H.) Mr. Davis indicated that toluene and xylene are used to remove glue and labels from the outside of drums after the caustic wash. The wastes from this process are placed in a drum and then the drum is emptied into one of the totes for the caustic wastes. There was an open, unlabeled, undated drum of wastes from this process upstairs next to the process. Please submit a written waste determination on this drum and explain how this waste will be managed in compliance with the rules in the future.

2. **Annual Report - OAC 3745-52-41(A)**
The facility stated they are still working on their 2006 annual report and had not filed it by March 1, 2007. Please file this report immediately with our central office in accordance with the directions.

3. **Annual Report - OAC 3745-52-40(B)**
The annual report for 2006 was not kept on file as required. Please file this report immediately with our central office in accordance with the directions and confirm in writing that annual reports will be kept on file for at least 3 years.

4. **Unpermitted Storage - ORC 3734.02(E)&(F)**
CCC stored approximately 65 totes and 3 drums at the vac station of hazardous waste without a permit for over 5 months. CCC stored18 drums of hazardous waste in the generator storage area for over one year. Since CCC violated ORC 3734.02(E) and (F), CCC is subject to all applicable general facility standards found in OAC chapters 3745-54 and 55. Additionally, at any time Ohio EPA might assert its right to have CCC begin facility-wide cleanup pursuant to the corrective action process under Ohio law.

You indicated that these would be sent off-site to Chemtron by May 25, 2007, as hazardous waste. Please submit the manifest documenting that this has been done.

5. **Personnel Training Program- OAC 3745-65-16(A)(1), (A)(2) and (A)(3)**
The facility does not have a training program which teaches all appropriate personnel hazardous waste management procedures relevant to their positions, including contingency plan implementation. No one has received training on contingency plan implementation. Employees involved in vacuuming out incoming drums have not been trained on how to properly manage the wastes generated from this process. Employees involved in pouring out the contents of drums on the conveyor upstairs have not been trained on how to properly manage wastes. Employees involved in removing waste water, sludge and skimmings from the caustic wash tank have not been trained on how to properly manage wastes.

Employees involved in cleaning the filter on the caustic wash system have not been trained on how to properly manage wastes. Employees responsible for moving wastes into the hazardous waste storage area have not been trained on how to properly manage wastes. Employees responsible for inspecting the hazardous waste storage area have not been trained on how to properly manage wastes. Employees responsible for draining the hazardous waste storage tank have not been trained on how to properly manage wastes. Employees preparing &/or signing the hazardous waste manifests have not been trained in hazardous waste management.

Please develop a training program that teaches all involved personnel, hazardous waste management procedures relevant to their positions including contingency plan implementation. The program must be directed by a person trained in hazardous waste management procedures. Submit a written description of this training program and include the qualifications of the person directing the program.

6. **Annual Refresher Training - OAC 3745-65-16(C)**
Annual refresher training has not been given to employees. Please provide a written commitment that annual refresher training will be provided to all employees involved in any way with hazardous waste management.

7. **Job Titles - OAC 3745-65-16(D)(1)**
CCC only has a job title for the vice president and plant manager. Please submit job titles for each of the employees involved in any way with hazardous waste management including those mentioned in violation #5. Also include the names of all employees filling each of those job titles.

8. **Job Descriptions - OAC 3745-65-16(D)(2)**
CCC only has job descriptions for the vice president and plant manager. Please provide job descriptions for each of the job titles provided in response to violation #7. The descriptions must include the requisite skill, education or other qualifications, and duties of facility personnel assigned to each position.

9. **Training Description - OAC 3745-65-16(D)(3)**
CCC does not have a written description of the type and amount of both introductory and continuing training that will be given to each person filling a job title listed in response to violation #7. Please submit a written description of the type and amount of introductory and continuing training that will be given to each person filling a job title listed in response to violation #7. Also see violation #5.

10. **Training Completion Documentation - OAC 3745-65-16(D)(4)**
CCC does not have records that document that the training discussed in violations #5 and #9 has been given to and completed by facility personnel. Please submit documentation showing that the training discussed in violations #5 and #9 has been given to and completed by facility personnel.

11. **Maintenance of Training Records - OAC 3745-65-16(E)**
CCC has not maintained training records for all current employees and for former employees, for at least 3 years from the date the employee last worked at the facility. Please provide a written commitment that records will be maintained as required.

12. **Emergency Equipment List - OAC 3745-65-52(E)**
On April 23, 2007, we received a contingency plan for your facility. Exhibit 6 is a list of your emergency equipment; however, the location of each item is not noted as required. The following page is a completed inspection log for emergency equipment which does list the location of emergency equipment. If this is to serve as part of the contingency plan then it should be labeled as 'Exhibit 6 continued' or in some other way to make clear it is part of the contingency plan. Please document how the location of emergency equipment has been incorporated into the contingency plan.

13. **Amendment of Contingency Plan - OAC 3745-65-54**
CCC has not updated its contingency plan to reflect the change in waste management at the facility. The plan, received on 4/23/07, indicates that your facility is a small quantity generator of hazardous waste when you are actually a large quantity generator. Also the plan indicates hazardous waste is stored in a less than 90 day tank, but you have not used the tank for hazardous waste storage for at least one year. Exhibit 1 includes only water and liquid wastes. We understand that sludges and solids can also be generated. The plan indicates that figure 3 is an evacuation plan. An evacuation plan that was received separately is not labeled figure 3. In addition, the site layout map submitted with the evacuation plan is labeled 'Exhibit V' and there is already an 'Exhibit 5' in the contingency plan. Please update the contingency plan to be accurate and submit a copy.

14. **Emergency Equipment Inspections - OAC 3745-65-33**
Emergency Equipment inspections are required to be recorded in a log. CCC indicated these inspections would be conducted every Monday but no logs were available beyond April 9, 2007. Please submit copies of the available logs for April and May 2007.

15. **Aisle Space - OAC 3745-65-35**
The facility did not have adequate aisle space in the bermed container storage area which contains 3 rows of drums. Access is not provided to the back two rows. Also no aisle space was available to many of the totes storing hazardous waste water. Please explain what steps have been taken to provide adequate aisle space, to at least these areas, and submit pictures documenting that aisle space has been maintained.

16. **Satellite Accumulation Quantity - OAC 3745-52-34(C)(1)**
A maximum of 55 gallons of waste can be stored at the point of generation of a waste if under the control of the operator of the process that generates that waste. CCC had three drums that each were at least half full at the vacuum station. In addition to the action needed in response to violations #1and #4, explain how you will manage this area in the future. If it isn't feasible to consistently keep the quantity at <55 gallons an alternate way to manage this area would be to establish a <90 day storage area at this location. You would then need to comply with the requirements for a generator storage area including weekly inspections and inclusion in the contingency plan.

17. **Satellite Accumulation Labels - OAC 3745-52-34(C)(1)(b)**
The three drums of hazardous waste at the vacuum station were not labeled with the words 'hazardous waste' or with other words that identify the contents of the containers. In addition to the action needed in response to violations #1 and #4, explain how you will manage this area in the future including proper labeling of the containers.

18. **Satellite Accumulation Time - OAC 3745-52-34(C)(2)**
CCC had three drums that each were at least half full at the vacuum station. The drums were unlabelled and undated and have been unused for about 5 months. Once a satellite area exceeds a total of 55 gallons of waste, the excess amount needs to be dated and moved to the <90 day storage area within 3 days. In addition to the action needed in response to violations #1 and #4, explain how you will manage this area in the future including proper dating of the containers.

19. **Container Labeling in the Generator Storage Area - OAC 3745-52-34(A)(3)**
There were 25 drums of hazardous waste in the <90 day storage area. Most were not labeled 'hazardous waste' as required. In addition to the action needed in response to violations #1 and #4, explain what standard operating procedures will be implemented to assure that containers will be properly labeled.

20. **Container Dating in the Generator Storage Area - OAC 3745-52-34(A)(2)**
Accumulation start dates were not found on most of the 25 drums of hazardous waste in the <90 day storage area. In addition to the action needed in response to violations #1 and #4, explain what standard operating procedures will be implemented to assure that containers will be properly dated.

21. **Weekly Container Inspections - OAC 3745-66-74**
Container storage area inspections are required to be conducted weekly and recorded in a log. No documentation of inspections was provided. CCC has been provided with blank inspection forms in the past and they can be found at: http://www.epa.state.oh.us/dhwm/pdf/lqglog.PDF. Please begin conducting and recording inspections immediately and submit a copy of your log.

22. **Tank System Assessment - OAC 3745-66-92**
A tank which was installed in 1998, and previously used for hazardous waste storage, has been emptied and reportedly not used since at least my last inspection in April 2006. You have not been able to provide a written tank assessment certified by an independent, registered, professional engineer attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste. Further OAC 3745-52-34(A)(1) requires that you meet the closure performance standard of 3745-66-11 and the requirements of 3745-66-97(A) and (B).

To address this violation, please submit a copy of all documentation that closure was completed to meet the performance standard. Again you can refer to the Closure Guidance at http://www.epa.state.oh.us/dhwm/cprg/Final2006CPRG.pdf

23. **Tank System Inspections - OAC3745-66-95**
You have not been able to provide inspection records demonstrating that daily inspections were done on the spill control equipment, leak detection equipment, the above ground portion of the tank, the construction materials and the area immediately surrounding the tank while it was in service.

To address this violation, please submit a copy of all documentation that closure was completed to meet the performance standard.

24. **Closed Containers for Universal Waste Lamps- OAC 3745-273-13(D)(1)**
Five open, unlabeled, undated boxes of 4' spent fluorescent lamps were being stored upstairs in Storage Area A. Mr. Davis indicated his intention was to send these for recycling. These could be managed as universal wastes rather than hazardous waste if they will be recycled. The containers must be closed. Please submit a written operating procedure indicating how you will ensure this requirement is met. Also indicate who will be responsible for the management of these wastes.

25. **Universal Waste Lamp Container Labels - OAC 3745-273-14(E)**
Five open, unlabeled, undated boxes of 4' spent fluorescent lamps were being stored upstairs in Storage Area A. Mr. Davis indicated his intention was to send these for recycling. These could be managed as universal wastes rather than hazardous waste if they will be recycled. The containers must be labeled with the words 'Universal Wastes - Lamps' or 'Waste Lamps' or 'Used Lamps'. Please submit a written operating procedure indicating how you will ensure this requirement is met. Also indicate who will be responsible for the management of these wastes.

26. **Universal Waste Lamps Accumulation Time - OAC 3745-273-15(C)**
Mr. Davis indicated spent lamps were last sent off-site 2 years ago. In general, universal wastes must not be accumulated for over one year and you must have a means of documenting the accumulation time. Refer to the rule for different methods to document accumulation time. Probably the easiest method is to simply mark the container with the date accumulation begins.

To address this violation, submit a shipping paper or other documentation that these lamps have been sent for recycling and submit a written operating procedure indicating how you will begin to document accumulation time.

27. **Universal Waste Training - OAC 3745-273-16**
Since the universal waste lamps were not being handled properly, it appears employees who have the responsibility for managing these wastes have not been adequately or properly trained. Please indicate who is responsible for managing these wastes and submit a written confirmation and description of the training they have received.

Please provide the above requested documentation within 30 days of the date of this letter. Enclosed are the inspection checklists completed for this audit. Copies of Ohio's hazardous waste rules can be found at www.epa.state.oh.us/dhwm. It should be noted that the above violations of waste evaluation, satellite accumulation, contingency plan, emergency equipment list and inspections, aisle space, and container inspections and logs were also cited at my previous inspection.

If you should have any questions related to this letter, please do not hesitate to contact me at (330) 963-1226.

Sincerely,

Sheryl K. Slone, P.E.
District Engineer
Division of Hazardous Waste Management

SKS:ddw

Enclosures

cc: Natalie Oryshkewych, DHWM, NEDO
ec: Harry Sarvis, DHWM, CO
Jim Kavalec, DHWM, CO
Todd Anderson, DHWM, CO

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:** OHD 060 431 947
3. Site Name	**Name:** CONTAINER COMPLIANCE CORP. **Website (optional:)**
4. Site Location Information	**Street Address:** 5151 DENISON AVE
	City, Town, or Village: CLEVELAND **State:** OH
	County Name: CUYAHOGA **Zip Code:** 44102

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 number 12.	**First Name:**	**MI:** **Last Name:**
	Phone Number:	**Phone Number Extension:**
	E-Mail Address:	
	Fax Number:	**Fax Number Extension:**
Only provide address information if it is different than the site address.	**Street or P.O. Box:**	
	City, Town or Village:	
	State:	**Country:** **Zip Code:**

8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.

A. Name of Site's Legal Owner:	**Date Became Owner (mm/dd/yyyy):**

Owner Type: Mark with an X

Private	County	District	Federal	Indian	Municipal	State	Other

Street or P.O. Box:		
City, Town, or Village:	**Owner Phone #:**	
State:	**Country:**	**Zip Code:**
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 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
- [X] a. **Large Quantity Generator (LQG):**
- [ ] b. **Small Quantity Generator (SQG)**
- [ ] c. **Conditionally Exempt Small Quantity Generator**
- [ ] d. **United States Importer of Hazardous Waste**
- [ ] e. **Mixed Waste (hazardous and radioactive) Generator**
- [X] 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**
- [ ] 7. **Hazardous Waste Transporter**

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	[X]	[X]

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.

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:	JOHN TIRBASO
(Y) / N	Tanks?	Other comments:	ALREADY IN ENFORCEMENT FROM VIOLATIONS DISCOVERED DURING LAST YEAR'S CEI.
(Y) / N	Containers?		

13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
SHERRY STONE	WADE BALSER	5/16 & 5/18/07

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)

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE ID ATTACH A PROCESS DESCRIPTION MMARY

CESQG: ≤100Kg. (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.
I QG: ≥1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
TE: 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.	Are records of waste determination being kept for at least 3 years?[3745-52-40(C)]	Yes ☐	No ☐	N/A ☐
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes ☒	No ☐	N/A ☐
4.	Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)]	Yes ☐	No ☐	N/A ☐
5.	Are annual reports kept on file for at least 3 years?[3745-52-40(B)]	Yes ☐	No ☐	N/A ☐
6.	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 ☐
7.	Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)]	Yes ☐	No ☒	N/A ☐
8.	Does the generator accumulate hazardous waste?	Yes ☒	No ☐	N/A ☐

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

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)?	Yes ☒	No ☐	N/A ☐

NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G) & (H).

10. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]

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.

11.	Does the generator export hazardous waste? If so:	Yes ☐	No ☐	N/A ☒
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes ☐	No ☐	N/A ☒
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes ☐	No ☐	N/A ☒
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes ☐	No ☐	N/A ☒
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes ☐	No ☐	N/A ☒
e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes ☐	No ☐	N/A ☒

MANIFEST REQUIREMENTS no haz manifested since 4/17/06

12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)]	Yes ☐	No ☐	N/A ☐
13.	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 completed. [3745-52-20(A)]

14.	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 alternate 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)].

15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes ☐	No ☐	N/A ☐
.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (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 a program in place to reduce the volume and toxicity waste they generate.

17. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes ☐ No ☐ N/A ☐
18. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes ☐ No ☐ N/A ☐
19. Are signed copies of all manifests and any exception reports 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.

PERSONNEL TRAINING

20. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes ☐ No ☒ N/A ☐
21. Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes ☐ No ☒ N/A ☐
22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes ☐ No ☒ N/A ☐
23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] unknown Yes ☐ No ☐ N/A ☐
24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes ☐ No ☒ N/A ☐
25. Does the generator keep records and documentation of:
    a. Job titles [3745-65-16D(1)]? only for JD and Robert Clark Yes ☐ No ☒ N/A ☐
    b. Job descriptions [3745-65-16D(2)]? " Yes ☐ No ☒ N/A ☐
    c. Type and amount of training given to each person[3745-65-16D(3)]? Yes ☐ No ☒ N/A ☐
    d. Completed training or job experience required [3745-65-16D(4)]? Yes ☐ No ☒ N/A ☐
26. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes ☐ No ☒ N/A ☐

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the -job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained

CONTINGENCY PLAN

27. Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes ☒ No ☐ N/A ☐
28. Does the plan describe the following:
    a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes ☒ No ☐ N/A ☐
    b. Arrangements with emergency authorities [3745-65-52(C)]. Yes ☒ No ☐ N/A ☐
    c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes ☒ No ☐ N/A ☐
    d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes ☐ No ☒ N/A ☐

e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes ☒ No ☐ N/A ☐

NOTE: If the facility already has a "Spill Prevention, Control and Counter measures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to Incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]

29. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes ☐ No ☐ N/A ☐
30. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] (delete tank) Yes ☐ No ☐ N/A ☒
31. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes ☒ No ☐ N/A ☐

NOTE: The emergency coordinator shall be throughly familiar with: (a) all aspects of the facility's contingency plan: (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES

32. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes ☐ No ☒ N/A ☐
    a. Was the contingency plan implemented? [3745-65-51(B)] Yes ☐ No ☐ N/A ☐
    b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes ☐ No ☐ N/A ☐
    c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes ☐ No ☐ N/A ☐

NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

PREPAREDNESS AND PREVENTION

33. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes ☐ No ☐ N/A ☐
34. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:
    a. Internal communications or alarm system? [3745-65-32(A)] PA system Yes ☑ No ☐ N/A ☐
    b. Emergency communication device? [3745-65-32(B)] cell phones 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 ☐

NOTE: Verify that the equipment is listed in the contingency plan.

35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes ☑ No ☐ N/A ☐
36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes ☐ No ☑ N/A ☐
37. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] cell phones Yes ☑ No ☐ N/A ☐
38. 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 ☑
39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes ☐ No ☒ N/A ☐
40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes ☑ No ☐ N/A ☐
41. 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

42. 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 words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes ☐ No ☑ N/A ☐

43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes ☑ No ☐ N/A ☐

a. Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes ☐ No ☑ N/A ☐

b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded?[3745-52-34(C)(2)] Yes ☐ No ☑ N/A ☐

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less then 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 IN <90 DAY ACCUMULATION AREAS

44. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes ☐ No ☑ N/A ☐

45. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes ☐ No ☑ N/A ☐

46. 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, photograph the area, and record on facility map.

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. Yes ☐ No ☑ N/A ☐

a. Are inspections recorded in a log or summary? [3745-66-74] Yes ☐ No ☑ N/A ☐

48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes ☐ No ☐ N/A ☑

49. 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 ☐

50. 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 ☑

51. 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.

52. If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745- 66-11? [3745-52-34(A)(1)] Yes ☐ No ☐ N/A ☑

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

53. Does the 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 ☑

54. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes ☐ No ☐ N/A ☑

55. 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 ☑

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: **Facility Type:** LQG/SQG/CESQG/TSD **Date of Inspection:** **EPA ID#:**

	***Waste* Generated**			***On- or Off-Site Management***		**P2 Activities**	
	Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	**Waste Description** (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and **EPA Waste Code, if applic.**	**QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area**	**Type of On-Site Treatment** (recycle, wwt, etc)	**Name, state, and type of activity occurring at the off-site facility.**	**Current P2 Activities**	**P2 Opportunities**
1	vacuum out incoming drums	varies D001, D005, D007, D008, F003 D039, D040	varies containers	none			
2	caustic bath sludge	D002 D007	varies totes	none			
3	caustic bath skimmings	? D002	varies containers	none			
4	(xylene/toluene) removing/wiping glue off surface	spent solvent, glue, labels	varies, drums	none			

5							
6							
7							
8							
9							

REMARKS–GENERAL INFORMATION

General Process Information:

Regulatory/Enforcement History (if applicable)**:**

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.
Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html
Other:

LDR CHECKLIST

GENERAL LDR REQUIREMENTS

wastes sent off previously had LDR forms & No wastes sent off since last inspection.

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: Y es__No__N/A__RMK# ___

   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: Y es__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# ___

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:

Y es__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:

Y es__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? Y es__No__N/A__RMK# ___
If so:

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: Y es__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

TANK SYSTE.. REQUIREMENTS (OAC 3745-66-91 TO 3745-66-100)

(Please refer to the rules before or while completing this checklist.)

NOTE: ***New Tank System - Installation commencing after July 14, 1986.***
Existing Tank System - Installation or operation commencing on/before July 14, 1986.

1. **For an existing or new tank system(s)** has secondary containment been provided? [3745-66-93(A)(1) to (A)(5)] Yes X No___ N/A ___RMK#___
Per ID installed in 1998, No certification or assessments available. Not used in last year. Has been emptied.

NOTES:

A. Secondary containment must be provided for all new tank systems or components, prior to their being put into service. [3745-66-93(A)(1)]

*B. For an existing tank system(s) of **known and documentable age** secondary containment is required to be provided within two years after January 12, 1987, or when the tank system has reached 15 years of age, whichever came later. [3745-66-93(A)(3)]*

*C. Secondary containment is required for all existing tanks for which the **age cannot be documented**. The tanks were required to have secondary containment within eight years of January 12, 1987 or when the facility turned 15 years of age, whichever came later. [3745-66-93(A)4)]*

D. Tank systems that store/treat materials that become hazardous waste after January 12, 1987, must have secondary containment required within the time intervals in OAC 3745-66-93(A)(1) to (A)(4). The date the material became a hazardous waste must be used in place of January 12, 1987. [3745-66-93(A)(5)]

E. If the tank system has no secondary containment, or a variance from secondary containment requirements has been granted, skip to the middle of page 6 of this Tank Systems Checklist; (Tank Systems without secondary containment) .

2. Is the secondary containment one of the following:

a. An **External Liner** [3745-66-93(E)(1)(a) - (1)(f)] If so, Yes___ No___ N/A ___RMK#___

i. Is liner designed or operated to contain 100% of the capacity of the largest tank? Yes ___ No ❑ N/A ___RMK#___

ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? Yes ___ No ❑ N/A ___RMK#___

iii. Is liner free of cracks and gaps? Yes ___ No ❑ N/A ___RMK#___

iv. Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release? Yes ___ No ❑ N/A ___RMK#___

v. Are chemically resistant water stops in place at all joints? (*concrete liners only*) Yes ___ No ❑ N/A ___RMK#___

vi. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? *(concrete liners only)* — Yes ___ No ❑ N/A ___RMK#___

b. **Vault System?** [3745-66-93(E)(2)(a) - (2)(f)] If so, — Yes___ No___ N/A ___RMK#___

i. Is vault system designed to contain 100% of the capacity in the largest tank? — Yes ___ No ❑ N/A ___RMK#___

ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? — Yes ___ No ❑ N/A ___RMK#___

iii. Are chemically resistant water stops in place at all joints? — Yes ___ No ❑ N/A ___RMK#___

iv. Is there a compatible interior coating to prevent migration into the concrete? — Yes ___ No ❑ N/A ___RMK#___

v. For **ignitable or reactive waste**: Is the vault system provided with means to prevent against the formation or ignition of vapors? — Yes ___ No ❑ N/A ___RMK#___

vi Is vault system provided with an exterior moisture barrier? — Yes ___ No ❑ N/A ___RMK#___

c. **Double-Walled Tank?** [3745-66-93(E)(3)(a) - (3)(c)] If so, — Yes___ No___ N/A ___RMK#___

i. Is double-walled tank designed as an integral structure to contain any release from the inner tank? — Yes ___ No ❑ N/A ___RMK#___

ii. **If metal**, are the primary tank interior and outer shell exterior surfaces protected from corrosion? — Yes ___ No ❑ N/A ___RMK#___

iii. Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time? — Yes ___ No ❑ N/A ___RMK#___

3. Is the secondary containment system for the tank(s) an equivalent device as described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D)(E)] — Yes___ No___ N/A ___RMK#___

SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION (OAC 3745-66-93(B)(C))

4. Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids? [3745-66-93(B)] Yes ___ No ❑ N/A ___RMK#___

5. Does the secondary containment system meet the following minimum requirements of 3745-66-93(C):

   a. Constructed or lined with compatible materials of sufficient strength to prevent failure? Yes ___ No ❑ N/A ___RMK#___

   b. Placed on a foundation or base capable of providing support? Yes ___ No ❑ N/A ___RMK#___

   c. Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time? Yes ___ No ❑ N/A ___RMK#___

   d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? Yes ___ No ❑ N/A ___RMK#___

   e. Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner? Yes ___ No ❑ N/A ___RMK#___

ANCILLARY EQUIPMENT REQUIREMENTS (OAC 3745-66-93(F))

6. Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)? ***If not***, is the ancillary equipment: Yes___ No___ N/A ___RMK#___

   a. Inspected daily? **AND**; Yes ___ No ❑ N/A ___RMK#___

   b. Is ancillary equipment one of the following:

      i. Above ground piping (exclusive of flanges, joints, valves and connections)? Yes ___ No ❑ N/A ___RMK#___

      ii. Welded flanges, welded joints and/or welded connections? Yes ___ No ❑ N/A ___RMK#___

      iii. Sealless or magnetic coupling pumps and/or sealless valves? Yes ___ No ❑ N/A ___RMK#___

      iv. Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown, and/or loss of pressure-actuated shut-off devices)? Yes ___ No ❑ N/A ___RMK#___

REMARKS

NEW TANK SYSTEM REQUIREMENTS (OAC 3745-66-92)

1. Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)] — Yes ___ No ❑ N/A ___RMK#___

2. Does the written assessment include the following: [OAC 3745-66-92(A)]

   a. Certification by an independent, registered, professional engineer? — Yes ___ No ❑ N/A ___RMK#___

   b. Consideration of the design standards of the system? — Yes ___ No ❑ N/A ___RMK#___

   c. Consideration of the hazardous characteristics of the waste(s)? — Yes ___ No ❑ N/A ___RMK#___

   d. An evaluation by a corrosion expert *(if the external system/components are metal)*? — Yes ___ No ❑ N/A ___RMK#___

   e. A determination of design and operational measures that will be needed to protect the tank system from potential damage *(for underground tank components)*? — Yes ___ No ❑ N/A ___RMK#___

   f. Design considerations to ensure that the tank foundations will maintain the load of a full tank? — Yes ___ No ❑ N/A ___RMK#___

   g. Design considerations for anchoring the unit to prevent floatation *(for tanks situated in a seismic fault zone or saturated zone)*? — Yes ___ No ❑ N/A ___RMK#___

   h. Design considerations to ensure that the tank system will withstand the effects of frost heave *(for underground tank systems)*? — Yes ___ No ❑ N/A ___RMK#___

3. Are there written statements by those person who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)] — Yes ___ No ❑ N/A ___RMK#___

   Do the written statements address all of the following:

a. Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)] Yes ___ No ❑ N/A ___RMK#___

b. Statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)] Yes ___ No ❑ N/A ___RMK#___

c. Proper backfilling? [3745-66-92(C)] Yes ___ No ❑ N/A ___RMK#___

d. Tightness test; if the tank was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)] Yes ___ No ❑ N/A ___RMK#___

e. Proper support and protection of ancillary equipment? [3745-66-92(E)] Yes ___ No ❑ N/A ___RMK#___

f. Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)] Yes ___ No ❑ N/A ___RMK#___

TANK SYSTEMS WITHOUT SECONDARY CONTAINMENT (OAC 3745-66-91)

1. For existing tank system, without secondary containment: Is there a written assessment on file which includes the following considerations: [3745-66-91(A)(B)] Yes ___ No ❑ N/A ___RMK#___

a. Design standards? [3745-66-91(B)(1)] Yes ___ No ❑ N/A ___RMK#___

b. The characteristics of hazardous waste(s) that have been or will be handled? [3745-66-91(B)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Corrosion protection measures? [3745-66-91(B)(3)] Yes ___ No ❑ N/A ___RMK#___

d. The age of the tank system has been estimated or documented? [3745-66-91(B)(4)] Yes ___ No ❑ N/A ___RMK#___

e. A leak test has been conducted? *(For non-enterable underground tanks)* [3745-66-91(B)(5)(a)] Yes ___ No ❑ N/A ___RMK#___

f. A leak test or an internal inspection by qualified P.E. has been conducted? *(For other than non-enterable underground tanks and for ancillary equipment)* [3745-66-91(B)(5)(b)] Yes ___ No ❑ N/A ___RMK#___

g. Is assessment certified by an independent, registered P.E.? [3745-66-91(A)] Yes ___ No ❑ N/A ___RMK#___

2. Have the tests specified in 1e and 1f been conducted annually on the tanks and ancillary equipment until secondary containment is provided? [3745-66-93(I)] ***If so,*** Yes ___ No ❑ N/A ___RMK#___

   a. Have tests been certified by an independent, registered P.E.? Yes ___ No ❑ N/A ___RMK#___

3. For tanks without secondary containment used to store or treat wastes which become hazardous wastes after July 14, 1986, has the assessment been completed within 12 months of the date the waste became a hazardous waste? [3745-66-91(C)] Yes ___ No ❑ N/A ___RMK#___

TANK SYSTEM - GENERAL OPERATING REQUIREMENTS (OAC 3745-66-94)

1. Does the o/o follow the general operating requirements below:

   a. Does the o/o prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail? [3745-66-94(A)] Yes ___ No ❑ N/A ___RMK#___

   b. Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)? [3745-66-94(B)] Yes ___ No ❑ N/A ___RMK#___

   c. If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96? [3745-66-94(C)] Yes ___ No ❑ N/A ___RMK#___

TANK SYSTEM - INSPECTION REQUIREMENTS (OAC 3745-66-95)

1. Has the o/o documented the inspections required in 3745-66-95, in the operating record, including inspection of the following:

   a. Spill control equipment (daily)? [3745-66-95(A)(1)] Yes ___ No ❑ N/A ___RMK#___

   b. Above ground portion of tank (daily)? [3745-66-95(A)(2)] Yes ___ No ❑ N/A ___RMK#___

   c. Data from leak detection equipment (daily)? [3745-66-95(A)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste (daily)? [3745-66-95(A)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(B)(1)] Yes ___ No ❑ N/A ___RMK#___

f. Where applicable, all sources of impressed current at least bi-monthly? [3745-66-95(B)(2)] Yes ___ No ❑ N/A ___RMK#___

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES (OAC 3745-66-98 AND 3745-66-99)

1. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with **one of the following:** [3745-66-98(A)]

   a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-65-17(B)? [3745-66-98(A)(1)]; **OR** Yes___ No___ N/A ___RMK#____

   b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A)(2)]; **OR** Yes___ No___ N/A ___RMK#____

   c. The tank is used solely for emergencies? [3745-66-98(A)(3)] Yes___ No___ N/A ___RMK#____

2. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (1996)? [3745-66-98(B)] Yes ___ No ❑ N/A ___RMK#___

3. Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material? [3745-66-99] Yes___ No___ N/A ___RMK#____

   a. ***If so,*** have the requirements of 3745-65-17(B) been met? Yes ___ No ❑ N/A ___RMK#___

TANK SYSTEM - WASTE ANALYSIS REQUIREMENTS (OAC 3745-66-100)

1. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-100] Yes___ No___ N/A ___RMK#____

   a. Conducted waste analysis and trial treatment or storage tests? [3745-66-100(A)]; OR Yes___ No___ N/A ___RMK#____

   b. Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-100(B)] Yes___ No___ N/A ___RMK#____

TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE (OAC 3745-66-96)

1. Has there been a leak or spill from any tank system or has any tank system been found unfit for use? ***If so***, did the o/o: Yes___ No___ N/A ___RMK#____

   a. Immediately cease flow of material into tank and investigate the cause of the release? [3745-66-96(A)] Yes ___ No ❑ N/A ___RMK#____

   b. Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time? [3745-66-96(B)(1)] Yes ___ No ❑ N/A ___RMK#____

   c. Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment? [3745-66-96(B)(2)] Yes ___ No ❑ N/A ___RMK#____

   d. Immediately conduct a visual inspection of the release? [3745-66-96(C)] Yes ___ No ❑ N/A ___RMK#____

   e. Prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C)(1)] Yes ___ No ❑ N/A ___RMK#____

   f. Properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)(2)] Yes ___ No ❑ N/A ___RMK#____

   g. Report the release to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)(2)] Yes ___ No ❑ N/A ___RMK#____

   h. Submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)] Yes ___ No ❑ N/A ___RMK#____

i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)] Yes ___ No ❑ N/A ___RMK#___

j. For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)] Yes ___ No ❑ N/A ___RMK#___

NOTE: *The requirements noted 1.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.*

2. In the event that the repairs to the tank system were major (replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from an independent, registered P.E. attesting that the repaired unit is capable of handling hazardous waste? [3745-66-96(F)] Yes ___ No ❑ N/A ___RMK#___

a. Was a copy of the certification submitted to the director within seven days after returning the system to use? [3745-66-96(F)] Yes ___ No ❑ N/A ___RMK#___

3. If the o/o was unable to repair and return the unit to service as described in 1.a through 1.e, was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)] Yes ___ No ❑ N/A ___RMK#___

4. Does the o/o have a tank system **with a variance from secondary containment** from which a release has occurred but <u>has not</u> migrated beyond the zone of engineering control? **If so,** Yes___ No___ N/A ___RMK#___

a. Has the o/o complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G)(3)] Yes ___ No ❑ N/A ___RMK#___

b. If soils cannot be contaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)] Yes ___ No ❑ N/A ___RMK#___

5. Does the o/o have a tank system **with a variance from secondary containment** from which a release occurred and <u>has</u> migrated from the zone of engineering control? **If so,** Yes___ No___ N/A ___RMK#___

a. Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)] Yes ___ No ❑ N/A ___RMK#___

b.	If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(4)]	Yes ___ No ❑ N/A ___RMK#___

C:\downloads\TANK SYSTEM11.2004.fin.megaset.wpd

REMARKS

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 X 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: unknown see 12 — 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#___
ID said they were sent to Chemtron about 2 years ago. No documentation.

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 X 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