



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

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

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

March 19, 2009

RE: DIST TECH
OHD 002 834 919
SMALL QUANTITY GENERATOR
CEI – NOV

Bill Alstead
Manager Tank Wash Operations
Dist Tech
11250 Kinsman Road
Newbury, OH 44065

Dear Mr. Alstead:

On March 3, 2009, Sherry Slone and I met with Dist Tech personnel at the Dist Tech facility located at 11250 Kinsman Road, Newbury, Ohio. We inspected Dist Tech to determine its state of compliance with 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). Dist Tech was represented by yourself and John Letchic. Our completed checklists are enclosed.

The following violations (in bold) were found. The OAC rules mentioned below can be found at: http://www.epa.state.oh.us/dhwm/laws_regs.html.

1. **OAC 3745-52-34(A)(2) – Container Labeling.**

OAC 3745-52-34(A)(2) states that the date upon which each period of accumulation and/or treatment begins is clearly marked and visible for inspection on each container.

Dist Tech violated OAC 3745-52-34(A)(2) by not having the labels on 55 gallon drums in a position that they could be read without moving barrels. Dist Tech had seven 55 gallon drums containing hazardous waste resins. Four of the barrels were placed along the wall with several of the labels facing the wall. The remaining three drums were placed next to the four drums with no room between the drums. During the inspection the facility moved the drums so all labels could be read.

Please describe in writing what actions have been taken to assure dates will be visible for inspection in the future.

2. **OAC 3745-65-35 – Required Aisle Space**

OAC 3745-65-35 states the owner or operator shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility.

Dist Tech violated OAC 3745-65-35 by not having adequate space between 55 gallon drums so personnel could move between 55 gallon drums to inspect their integrity. Dist Tech had seven 55 gallon drums containing hazardous waste resins. Four of the barrels were placed along the wall with several of the labels facing the wall. The remaining three drums were placed next to the four drums with no room between the drums. During the inspection the facility moved the drums so personnel could get between the drums.

Please describe in writing what actions have been taken to assure that there will be adequate aisle space between hazardous waste containers.

3. OAC 3745-273-13(D)(1) – Containerizing Spent Lamps.

OAC 3745-273-13(D)(1) states that small quantity handlers of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

Dist Tech violated OAC 3745-273-13(D)(1) by not containing nine spent eight foot fluorescent bulbs.

Please confirm in writing that all spent lamps are placed in appropriate containers and describe what steps have been taken to assure that lamps are not left loose in the future.

4. OAC 3745-273-14(E) – Container Labeling for Spent Lamps.

OAC 3745-273-14(E) states that each lamp or container, or package in which such lamps are contained, must be labeled or marked clearly with one of the following phrases: "Universal Waste – Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)."

Dist Tech violated OAC 3745-273-14(E) by not marking the nine eight foot fluorescent bulbs.

Please confirm in writing that all containers of spent lamps are labeled as required.

5. OAC 3745-273-15(C) – Accumulation Time for Spent Lamps.

OAC 3745-273-15(C) states that a small handler of universal waste who accumulates universal waste shall be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

Dist Tech violated OAC 3745-273-15(C) by not being able to demonstrate the date the nine, eight foot fluorescent bulbs became a waste.

Please confirm in writing that the appropriate accumulation start date for these wastes has been marked on them, or their container, or describe what method is being used to document accumulation times.

6. OAC 3745-273-14(A) – Labeling.

OAC 3745-273-14(A) states that universal waste batteries, or a container in which the batteries are contained, must be labeled or marked clearly with any of the following phrases: "Universal Waste Batteries", "Waste Batteries", or "Used Batteries".

Dist Tech violated OAC 3745-273-14(A) by not having twenty-six batteries which were on a pallet clearly marked with one of the above phrases.

Please confirm in writing that the above batteries have been appropriately labeled or sent off-site for recycling.

7. OAC 3745-66-74 – Inspections.

OAC 3745-66-74 states that the owner or operator must inspect areas where containers are stored, at least weekly. The owner or operator must record inspections in an inspection log or summary.

Dist Tech violated OAC 3745-66-74 by not inspecting the two hazardous waste storage areas (one area contained seven 55 gallon drums, one area contained one 55 gallon drum) weekly and recording the inspections in an inspection log or summary.

Please confirm that hazardous waste storage areas are being inspected and recorded on a weekly basis. Please provide two weeks of completed inspection logs for each area. It appears the area on the west wall of the cleaning facility that contained only one drum of hazardous waste could qualify as a satellite area under OAC 3745-52-34 (C). If you plan to manage this area under the provisions of this rule please indicate such in your response.

8. OAC 3745-52-34(D)(5)(b) – Postings.

OAC 3745-52-34(D)(5)(b) states that the generator must post, next to the emergency telephone, the name and telephone number of the emergency coordinator.

Dist Tech violated OAC 3745-52-34(D)(5)(b) by not having the current name and telephone number of the emergency coordinator Ron Labuda.

Please insure all of the information posted by the phone is up to date and submit a photograph of the updated posting.

Concerns

1. Dist Tech currently throws waste rags into the non-hazardous trash bin. Dist Tech stated the rags are used for oil clean-up only. Be advised that if the rags are used for some solvent clean-up or other materials, they could be a hazardous waste. Please refer to the Spring 2006 article regarding solvent contaminated rags in the Ohio EPA Hazardous Waste Notifier located at the following web site: <http://www.epa.state.oh.us/dhwm/newsletter.html>.
2. Dist Tech throws empty aerosol paint cans in the non-hazardous waste dumpster. Be aware that if non-empty cans are discarded they must be evaluated first and determined to be non-hazardous. Please refer to the Winter 2005 article regarding aerosol cans in the Ohio EPA Hazardous Waste Notifier located at the following web site: <http://www.epa.state.oh.us/dhwm/newsletter.html>.
3. Dist Tech indicated spill pads are available in the cleaning facility but are located upstairs. Ohio EPA suggests that Dist Tech consider moving spill pads closer to where they might be needed.

Please send a written response to this letter within 30 days of the date of this letter providing the requested information and confirmations.

Dist Tech may be able to reduce its operating costs with waste minimization and energy conservation practices. The Ohio EPA offers Pollution Prevention Assessments to help you decide which practices would benefit your operations. Please contact me if you would like to have a Pollution Prevention Assessment or would like more information.

The Office of Compliance Assistance and Pollution Prevention also provides compliance and pollution prevention assistance on environmental issues related to air, land and water. Their web site is: <http://www.epa.state.oh.us/opp/ocapp.html>.

BILL ALMSTEAD
DIST TECH
MARCH 19, 2009
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The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. You can find more information at the following Web link:

<http://www.epa.state.oh.us/dhwm/listserv.html>.

You can find copies of the laws and other information on the Ohio EPA web page at www.epa.state.oh.us. If you have any questions, please contact me by phone at (330) 963-1245, or by email at bill.lutz@epa.state.oh.us.

Sincerely,



Bill Lutz
Division of Hazardous Waste Management

BL:ddw

Enclosure

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

NOTICE:

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

Ohio Environmental Protection Agency
RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM

For Ohio EPA use only

E-mail this completed form to kristina.durnell@epa.state.oh.us
or mail it to Kristina Durnell, Central Office

| | | | |
|---|---|---|------------------------------------|
| Site EPA ID No. | EPA ID Number: OH 002 834 919 | | |
| Site Name | Name: DISTTECH INC. <i>Distribution Technology Inc.</i> | Website: (Optional) | |
| Site Location Information | Street Address: 11250 Kinsman Road | | |
| | City, Town, or Village: Newbury | State: OH <i>Ohio</i> | |
| | County Name: Deauga | Zip Code: 44065 | |
| Site Land Type (check only one) | <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other | | |
| NAICS code(s) www.census.gov/epcd/www/naics.html | 484121 | | |
| Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address | First Name: WILLIAM | MI: J | |
| | Last Name: ALMSTEAD | | |
| | Phone Number: 440-564-2232 | Phone Number Extension: 351 | |
| | E-Mail Address: BALMSTEAD@DISTTECH.COM | | |
| | Fax Number: 440-564-7902 | Fax Number Extension: | |
| | Street or P.O. Box: 11250 KINSMAN RD. | | |
| City, Town or Village: NEWBURY | State: OHIO | Country: USA | |
| Zip Code: 44065 | | | |
| Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page | Name of Site's Legal Owner: | | Date Became Owner (mm/dd/yyyy): |
| | Owner Type: | <input type="checkbox"/> Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other | |
| | Street or P.O. Box: | | |
| | City, Town or Village: | | Owner Phone #: |
| | State: | | Country: |
| | Zip Code: | | |
| | Name of Site's Operator: | | Date Became Operator (mm/dd/yyyy): |
| | Owner Type: | <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other | |
| | Street or P.O. Box: | | |
| | City, Town or Village: | | Operator Phone #: |
| State: | | Country: | |
| Zip Code: | | | |
| Violations Cited? | <input type="checkbox"/> Yes <input type="checkbox"/> No | | |
| Type of Generator | | | |
| <input type="checkbox"/> Not Regulated | <input type="checkbox"/> Conditionally Exempt Small Quantity Generator | | |
| <input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 | <input type="checkbox"/> United States Importer of Hazardous Waste | | |
| <input type="checkbox"/> Large Quantity Generator (LQG) | <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator | | |
| <input checked="" type="checkbox"/> Small Quantity Generator (SQG) | | | |
| Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes) | | | |
| <input type="checkbox"/> Recycler of Hazardous Waste | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace | | |
| <input type="checkbox"/> Underground Injection Control Facility | <input type="checkbox"/> Small Quantity On-Site Burner Exemption | | |
| <input type="checkbox"/> Hazardous Waste Transporter | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption | | |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | | | |

| | | | |
|---|---|--|--|
| Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply)) | | | |
| <input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste | | <input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more) | |
| <input type="checkbox"/> Destination Facility for Universal Waste | | | |
| (Check all boxes below that apply for each of the three types of facilities above) | | Used Oil Activities (Indicate Type(s) of Activity(ies)) | |
| | Managed | <input checked="" type="checkbox"/> Used Oil Generator | <input type="checkbox"/> Off-Specification Used Oil Burner |
| Batteries | <input checked="" type="checkbox"/> | <input type="checkbox"/> Used Oil Transporter | <input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil |
| Pesticides | <input type="checkbox"/> | <input type="checkbox"/> Used Oil Transfer Facility | <input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner |
| Mercury containing equipment | <input type="checkbox"/> | <input type="checkbox"/> Used Oil Processor | |
| Lamps | <input checked="" type="checkbox"/> | <input type="checkbox"/> Used Oil Re-refiner | |
| Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record. | | | |
| D001 | D005 | D007 | D008 |
| Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc. | | | |
| Announced | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Additional Facility Representatives: |
| Tanks | <input type="checkbox"/> Yes | <input type="checkbox"/> No | Other Comments: |
| Containers | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | |
| Name of Inspector(s) | Name of Inspector(s) | Date of Inspection/Time (mm/dd/yyyy) (hh:mm) | |
| OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. | | | |
| Signature of Owner, Operator, or an Authorized Representative | Name and Title (Print) | Date (mm/dd/yyyy) | |
| | | | |

**SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤ 100 Kg. (approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.

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

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

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

Safety Equipment Used: SAFETY BOOTS, SAFETY GLASSES, HARD HAT

GENERAL REQUIREMENTS

- | | | | | | | | |
|----|---|-----|-------------------------------------|----|-------------------------------------|-----|--------------------------|
| 1. | Have all wastes generated at the facility been adequately evaluated? [3745-52-11] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 2. | Has the generator obtained a U.S. EPA I.D. number? [3745-52-12] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 3. | Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 4. | Has the generator disposed of hazardous waste 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 | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 5. | Does the generator accumulate hazardous waste? | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

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

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

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

- | | | | | | | | |
|----|---|-----|--------------------------|----|-------------------------------------|-----|--------------------------|
| 7. | Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
|----|---|-----|--------------------------|----|-------------------------------------|-----|--------------------------|

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

- | | | | | | | | |
|----|--|-----|--------------------------|----|--------------------------|-----|-------------------------------------|
| 8. | Does the generator treat hazardous waste in a: | | | | | | |
| a. | Container that meets 3745-66-70 to 3745-66-77? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| b. | Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| c. | Drip pads that meet 3745-69-40 to 3745-69-45? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| d. | Containment building that meets 3745-256-100 to 3745-256-102? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |

NOTE: Complete appropriate checklist for each unit.

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

MANIFEST REQUIREMENTS

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

[Facility Name/Inspection Date]
[ID number]
SQG/February 2007
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- 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 claimer? Yes No N/A
- c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? Yes No N/A

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

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

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

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

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

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

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

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

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

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

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

PREPAREDNESS AND PREVENTION

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

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

- a. Name and telephone number of emergency coordinator? Yes No N/A
- b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes No N/A
- c. Telephone number of local fire department? Yes No N/A

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

20. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)] Yes No N/A

21. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31] Yes No N/A
22. Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:
- a. Internal Alarm system? [3745-65-32(A)] (P.A. SYSTEM) Yes No N/A
- b. Emergency communication device? [3745-65-32(B)] Yes No N/A
- c. Portable fire control, spill control and decon equipment? [3745-65-32(C)]? Yes No N/A
- d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes No N/A
23. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency?[3745-65-33]
- a. Are inspections recorded in a log or summary? [3745-65-33]? Yes No N/A
24. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)] Yes No N/A
25. If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32?) [3745-65-34(B)] Yes No N/A
26. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
27. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes No N/A
28. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes No N/A
- SATELLITE ACCUMULATION AREA REQUIREMENTS (NONE)**
29. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? {3745-52-34(C)(1)} Yes No N/A
- b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes No N/A
- c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A
- d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes No N/A
- e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. Yes No N/A
- f. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
30. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:
- a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes No N/A

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

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

USE AND MANAGEMENT OF CONTAINERS

31. Has the generator marked containers with the words "Hazardous Waste"[3745-52-34(D)(4)] Yes No N/A
32. Is the accumulation date on each container? [3745-52-34(D)(4)] Yes No N/A
33. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A
- b. In good condition? [3745-66-71] Yes No N/A
- c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A

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

34. Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days. Yes No N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
35. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes No N/A
36. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B) 3745-66-77(A)] Yes No N/A
37. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B) ? [3745-66-77(B)] Yes No N/A

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

PRE-TRANSPORT REQUIREMENTS

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

**GENERATOR LDR CHECKLIST
DOES NOT APPLY TO CESQGS**

GENERAL REQUIREMENTS

- | | | |
|----|--|---|
| 1. | If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07 (A)(7)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 2. | Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07 (A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).

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| 3. | Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 4. | Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 5. | Does the generator generate a listed HW that exhibits a characteristic? If yes, | Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.

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| 6. | Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|--|

NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.

NOTE: Written documentation of this determination is not required.

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| 7. | Did the generator treat his HW /soil on-site to meet the LDR treatment standard? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
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NOTE If "Yes" see question #16.

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| 8. | Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility?[3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 9. | Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 10. | Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTIFICATION FORM

- | | | |
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| 11. | Does the LDR Notification form contain the following information: | |
| a. | Manifest number of the first waste shipment to the TSD?[3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d. | A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]. | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.

| | | |
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| e. | Designation of the waste subcategory when applicable? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
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NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories

| | | |
|----|--|--|
| f. | A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|----|--|--|

NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.

| | | |
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| g. | If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for?[3745-270-07(A)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
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NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.

PROHIBITED DILUTION

| | | |
|-----|--|---|
| 12. | Is the HW treated by burning? If "No," go to #15. | Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
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|-----|-------------------------------|---|
| 13. | Is the HW a metal-bearing HW? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|-----|-------------------------------|---|

NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.

| | | | |
|-----|----|--|--|
| 14. | a. | Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless one of the following conditions apply. [3745-270-03(c)] | |
|-----|----|--|--|

| | | | |
|--|----|--------------------|--|
| | i. | Contains > 1% TOC? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|--|----|--------------------|--|

| | | | |
|--|-----|---|--|
| | ii. | Contains organic constituents or cyanide at levels greater than the UST levels? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|--|-----|---|--|

| | | | |
|--|------|--|--|
| | iii. | Is made up of combustible material e.g., paper, wood, plastic? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
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| | | | |
|--|-----|--|--|
| | iv. | Has a reasonable heating value (e.g., > 5000 Btu)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|--|-----|--|--|

| | | | |
|--|----|--|--|
| | v. | Co-generated with a HW that must be combusted? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|--|----|--|--|

| | | | |
|--|----|---|--|
| | b. | If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|--|----|---|--|

| | | |
|-----|---|--|
| 15. | Was the HW treated by wastewater treatment? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|-----|---|--|

| | | | |
|--|----|---|--|
| | a. | Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|--|----|---|--|

NOTE: If Yes, HW is improperly being treated by dilution.

| | | | |
|--|----|--|--|
| | b. | Does the waste carry the D001 code and contain ≥10% TOC? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|--|----|--|--|

| | | | |
|--|----|---|--|
| | c. | Does the wastewater treatment process include a process to separate/recover the organic phase of the waste? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|--|----|---|--|

NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B) and 3745-270-40(A)(3)].

NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.

| GENERATOR TREATMENT | | | |
|--|--|--|--|
| 16. | Does the generator treat to meet LDRs on-site [3745-270-40(A)]? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> | |
| | Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building <u>to meet</u> the LDR treatment standard? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> | |
| | If "Yes"...complete the rest of the checklist. If "No"...stop...you are done. | | |
| a. | Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> | |
| b. | Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> | |
| <i>NOTE: This is a laboratory analysis but it does not have to be kept by the generator.</i> | | | |
| c. | Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> | |
| d. | Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> | |
| e. | Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> | |
| f. | Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> | |
| NOTIFICATION FORM | | | |
| 17. | a. | Contains all information in #11 a-g above and | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. | If the treated HW/soil is listed.....notification contains the following certification statement: " I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or trough knowledge of the waste, to support this certification that the waste complies with the treatment stands specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment." | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | c. | If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator: | |
| | i. | Send a one-time notification to the director?[3745-270- 09 (D)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | ii. | Maintain a copy of the notice onsite?[3745-270-09(D)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | iii. | Include in the notification: [3745-270-09(D)(1)(a)] | |
| | | 1. Name & address of receiving landfill? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | | 2. Description of HW when generated? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | | 3. HW code when generated? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | | 4. Treatability group when generated? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | | 5. Underlying hazardous constituents present when generated? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | iv. | Contain the right certification statement as required by 3745-70-07(b)(4)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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#
BL 3/11/09
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) ^{or} container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]

Yes ___ No N/A ___ RMK# ___

UNIVERSAL WASTE LAMPS

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]

Yes ___ No N/A ___ RMK# ___

9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]

Yes ___ No N/A RMK#

10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)]

Yes ___ No N/A ___ RMK# ___

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

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

ACCUMULATION TIME

11. Is the waste accumulated for less than one year? Yes No N/A RMK#
[3745-273-15(A)] If not:
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes No N/A RMK#

NOTE: *Accumulation is defined as date generated or date received from another handler.*

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes No N/A RMK#
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes No N/A RMK#
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes No N/A RMK#
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes No N/A RMK#
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes No N/A RMK#
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes No N/A RMK#
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes No N/A RMK#

EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]

Yes No N/A RMK#

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]

Yes No N/A RMK#

15. Is the material released characterized? [3745-273-17(B)]

Yes No N/A RMK#

16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)]

Yes No N/A RMK#

OFF-SITE SHIPMENTS

NOTE: *If a SQUWH self-transport waste, then they must comply with the Universal Waste transporter requirements.*

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]

Yes No N/A RMK#

NOTE: *SQUWHs are prohibited to send waste to any other facility.*

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)]

Yes No N/A RMK#

19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)]

Yes No N/A RMK#

20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:

a. Receive the waste back? [3745-273-18(E)(1)]

Yes No N/A RMK#

b. Agree to where the shipment will be sent? [3745-273-18(E)(2)]

Yes No N/A RMK#

21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:

Yes ___ No N/A RMK#

a. Sending the waste back to the originating handler? [3745-273-18(F)(1)]

Yes ___ No ___ N/A RMK#

b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)]

Yes ___ No ___ N/A RMK#

22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]

Yes ___ No N/A RMK#

23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)]

Yes ___ No N/A RMK#

EXPORTS

24. Is waste being sent to a foreign destination? If so:

Yes ___ No N/A ___ RMK# ___

a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]

Yes ___ No N/A RMK#

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)]

Yes ___ No N/A RMK#

c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]

Yes ___ No N/A RMK#

REMARKS

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION PLANTS**

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS

| | | |
|----|---|--|
| 1. | Does the generator manage used oil in a surface impoundment or waste pile? If yes: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

NOTE: For example, used oil contaminated scrap metal stored in a pile.

| | | |
|----|---|--|
| 2. | Is used oil used as a dust suppressant? [3745-279-12(B)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 3. | Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

| | | |
|----|---|--|
| 4. | Does the generator mix hazardous waste with used oil? If so, | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

| | | |
|----|--|--|
| 5. | Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|----|--|--|

NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

| | | |
|----|--|---|
| 6. | Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> BL 3/11/09 |
| 7. | Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 8. | Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 9. | Has the generator, upon detection of a release of used oil, done the following. [3745-279-22(D)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| a. | Stopped the release? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Contained the release? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| c. | Cleaned up and properly managed the used oil and other materials? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| d. | Repaired or replaced the containers or tanks prior to returning them to service, if necessary? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

ON-SITE BURNING IN SPACE HEATER

| | | |
|-----|--|--|
| 10. | Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: | |
| a. | Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

| | | |
|----|--|--|
| b. | Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Are the combustion gases from heater vented to the ambient air? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

GENERATOR TRANSPORTATION

| | | |
|-----|--|--|
| 11. | Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 12. | If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| a. | Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

COLLECTION CENTERS AND AGGREGATION POINTS

| | | |
|-----|---|--|
| 13. | Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 14. | Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 15. | Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.