



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

March 23, 2010

Christopher Minnick
General Manager
Duffin Manufacturing Company
316 Warden Ave.
P.O. Box 4036
Elyria, OH 44036

RE: DUFFIN MFG CO., OHD 004196630, LORAIN COUNTY, SQG, NOV/PRTC

Dear Mr. Minnick:

On January 22, January 28 and February 11, 2010, this writer, representing Ohio EPA, Division of Hazardous Waste Management (DHWM), visited Duffin Manufacturing Company (Duffin) located at 316 Warden Avenue in Elyria, Ohio to conduct a hazardous waste compliance evaluation inspection (CEI). Duffin was represented by Carl Shrader and you.

On March 3, 2010, Duffin submitted documentation concerning waste evaluation information.

The purpose of the inspection was to determine Duffin's compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). The inspection included a review of the facility's operations and records, as well as the management of wastes. Duffin was inspected for the requirements of a small quantity generator (SQG) of hazardous waste.

Due to the number of unevaluated waste streams, Duffin's hazardous waste generator status (SQG) could not be confirmed. Therefore, Duffin must submit an inventory of all types and amounts of hazardous waste generated and accumulated on a monthly basis. **The inventory must be submitted on a monthly basis for the next three months and is due by the seventh day of the following month (e.g., March 2010 waste generation amounts due by April 7, 2010).** Be advised that should Duffin generate more than 2,200 pounds of hazardous waste in a month, the facility must comply with the large quantity generator (LQG) requirements found in OAC rule 3745-52-34(A).

Based on the inspection, Ohio EPA identified the following violations:

1. **OAC rule 3745-52-11, Waste Evaluation:** Any person who generates a waste must evaluate that waste to determine if it is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51.

Duffin failed to evaluate the following wastes:

- A. Mop water from cleaning facility floors. Subsequent testing revealed that the wastewater exceeded the hazardous waste regulatory level for lead. **This violation has been adequately abated. No further response is necessary.**
 - B. Waste kerosene from metal degreasing activities. Subsequent testing revealed that the waste kerosene exceeded the hazardous waste regulatory level for lead. **This violation has been adequately abated. No further response is necessary.**
 - C. Cleaning solution from the aqueous based parts washer units. Subsequent testing revealed that the waste cleaning solution exceeded the hazardous waste regulatory level for lead. **This violation has been adequately abated. No further response is necessary.**
 - D. Sludge from the Cell Six tumbling process. Subsequent testing revealed that the sludge exceeded the hazardous waste regulatory level for lead. **This violation has been adequately abated. No further response is necessary.**
 - E. Waste from the evaporator process. Subsequent testing revealed that the waste exceeded the hazardous waste regulatory level for cadmium, in addition to lead. **This violation has been adequately abated. No further response is necessary.**
 - F. Waste solids removed from the white, plastic holding tank. To abate this violation, submit waste evaluation information for the solids.
2. **ORC §3734.02(F), Causing Hazardous Waste to be Transported to an Unpermitted Facility: No person shall store, treat or dispose of hazardous waste identified or listed under this chapter and rules adopted under it or transport or cause to be transported any hazardous waste identified or listed under this chapter and rules adopted under ... except to a facility operating under a hazardous waste facility installation and operation permit.**

Duffin caused hazardous waste kerosene to be transported to Dubro Oil in Cleveland, Ohio. Duffin violated ORC § 3734.02(F) which states in part that no person shall dispose of or cause to be transported, hazardous waste, except at or to, a permitted hazardous waste facility. Dubro Oil is not a permitted hazardous waste facility. To demonstrate efforts towards abating this violation, Duffin must identify how the facility will prevent a reoccurrence of this violation.

3. **OAC rule 3745-52-34(C)(1)(b), Satellite Accumulation Requirements:**

A generator may accumulate as much as fifty-five gallons of hazardous waste in containers at or near any point of generation provided that the generator complies with OAC rules 3745-66-71 [conditions of containers], 3745-66-72 [compatibility of waste with container], 3745-66-73(A) [management of containers] and marks the containers with the words "hazardous waste" or other words that identify the contents.

Duffin failed to label one, 55-gallon drum with the words "hazardous waste" or other words to identify its contents. Additionally, the drum was open. The drum contained hazardous waste kerosene and was observed at the kerosene distribution area next to the tool crib. To abate this violation, submit photographs which demonstrate that the drum was labeled and closed in compliance with this rule.

4. **OAC rule 3745-52-34(D)(5)(b), Emergency Procedures for SQG:** The generator must post the following emergency information by the telephone: name and telephone number of the emergency coordinator; location of fire extinguishers and spill control material, and, if present fire alarm(s); and the telephone number of the fire department (unless the facility has a direct alarm).

Duffin failed to post the required emergency information in compliance with rule. To abate this violation, submit a copy of the posted emergency information, as well as the location of the posting.

5. **OAC rule 3745-52-42(B), Exception Report:**

Duffin failed to obtain the handwritten signature of the designated facility for manifest 003157748JJK (dated December 13, 2007). During the February 11, 2010 inspection, Duffin provided a copy of manifest 003157748JJK with the handwritten signature of the designated facility. **This violation has been adequately abated. No further response is necessary.**

6. **OAC rule 3745-65-31, Maintenance and Operation:** Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

A. During the inspection, Ohio EPA observed waste on the floor near the evaporator unit. To abate this violation, identify the corrective actions taken to clean up the waste, as well as to identify the source of the leak.

B. During the inspection, Ohio EPA observed that Duffin had accumulated hazardous waste sludge from the Cell Six tumbling process in the truck bay.

To abate this violation, Duffin must adequately clean up and decontaminate the truck bay. Please submit a plan which describes how the surfaces of the truck bay will be decontaminated. For additional information, please refer to the enclosed pages concerning decontamination efforts. This excerpt may be found in Section 3.10 of Ohio EPA's Closure Plan Review Guidance for RCRA Facilities and is available at: <http://www.epa.ohio.gov/portals/32/pdf/2008CPRG.pdf>.

7. OAC rule 3745-65-33, Testing & Maintenance of Emergency Equipment:

Facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment (where required), must be tested and maintained as necessary to assure its proper operation in the event of an emergency. The owner or operator must record the inspections in a log or summary.

Duffin failed to conduct inspections of emergency equipment. To abate this violation, submit copies of completed inspection forms that document emergency equipment is being inspected.

8. OAC rule 3745-270-07(A)(1)(2), LDR Requirements: A generator of a hazardous waste must determine if the waste has to be treated before it can be land disposed. If the waste does not meet the treatment standard, with the initial shipment of waste to each treatment or storage facility, the generator must send a one time written notice to each treatment or storage facility receiving the waste, and place a copy in the generator's files. The notice must include the information in Column A of Table 1 of this rule. No further notification is necessary until such time as the waste changes or the treatment or storage facility changes, in which case a new notification must be sent to the new treatment or storage facility and a copy placed in the generator's files.

Duffin failed to evaluate and retain a copy of the land disposal restriction (LDR) notification form for the evaporator waste shipped to Chemical Solvents. To abate this violation, submit a copy of the completed LDR notification form for the evaporator waste. Please ensure that all applicable hazardous waste numbers (i.e., D006 and D008) and underlying hazardous constituents (i.e., chromium) are identified on the form.

9. OAC rule 3745-273-13(D)(1), Universal Waste Management Standards for Small Quantity Handlers: A small quantity handler 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.

Duffin failed to accumulate universal waste lamps in containers, as well as in containers that were closed. Specifically, five loose lamps were being accumulated in a plastic drum, as well as in three boxes that were open. The lamps were observed in the universal waste accumulation area. Prior to the February 11, 2010 inspection, Duffin containerized and closed the open boxes of universal waste lamps. **This violation has been adequately abated. No further response is necessary.**

10. **OAC rule 3745-273-14(E); Labeling/marking Standards for Small Quantity Handlers of Universal Waste:** Universal waste lamps must be labeled/marked with one of the following phrases: "universal waste lamp(s)," or "waste lamp(s)" or "used lamp(s)."

Duffin failed to label/mark one, 5-gallon container of universal waste lamps with the words required by this rule. Prior to the February 11, 2010 inspection, Duffin labeled the container as "universal waste lamps." **This violation has been adequately abated. No further response is necessary.**

11. **OAC Rule 3745-273-15(C), Accumulation Time Limits - Standards For Small Quantity Handlers of Universal Waste:** A small quantity handler of universal waste must be able to demonstrate the length of time that the universal waste has been accumulated.

Duffin failed to track the length of time that the universal waste batteries were accumulated. To abate this violation, Duffin must track the accumulation time through methods identified in OAC rule 3745-273-15(C). Please submit documentation which demonstrates how Duffin will comply with this rule.

12. **OAC rule 3745-279-22(C)(1), Used Oil Storage Requirements for Generators:** Used oil generators must store used oil in containers and tanks that are in good condition and not leaking. The containers and aboveground tanks must be labeled with the words "Used Oil."

Duffin failed to label the following containers and tanks with the words "Used Oil.":

- A. One, 55-gallon drum observed near the used brass oil filtering system.
- B. One partial 55-gallon drum observed near mop water tank number three.
- C. One pail observed near the mop water recycling machine.
- D. One, 55-gallon drum observed near the coalescer.
- E. The collection tank for the mayfran unit.
- F. One, 55-gallon drum containing used oil and absorbent mats.
- G. The collection tank for the steel centrifuge.
- H. The collection tank for the miscellaneous centrifuge.

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- I. The collection tank for the water-based coolant centrifuge.
- J. Eight collection containers for each of the aqueous based parts washer units.
- K. Two collections tanks observed outdoors, at the rear of the facility.

Prior to the February 11, 2010 inspection, Duffin labeled the containers and tank identified in items 13.A. – 13.E. with the words “used oil.” To abate the violations identified in items 13.F. – 13.K., submit documentation (e.g., photographs) to demonstrate that the containers and tanks are labeled with the words used oil.”

The above violations must be immediately addressed and all of the above requested documentation must be submitted to my attention at the Ohio EPA **within 30 days of receipt of this letter**. Information obtained pertaining to Duffin’s processes, hazardous waste generation and hazardous waste management areas, is discussed on the Process Description-Waste Activities Summary Sheet within the enclosed inspection checklists.

Ohio EPA offers the following comments:

1. In order to prevent a release of used oil to the environment, Duffin should implement better housekeeping and operating practices around the chip processing and used oil filtering process. In particular, used oil spills should be cleaned up and appropriately managed in a timely fashion. Please identify the corrective actions taken to address this concern.
2. With respect to the outdoor storage area, Duffin should clean up and maintain this area to prevent storm water contact with stored materials. Please identify the corrective actions taken to address this concern.
3. Ohio EPA has created an electronic news service to provide facilities with quick and timely updates on news and events related to hazardous waste activities in Ohio. For more information, please refer to:
http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage.
4. Technical assistance and pollution prevention information is available from Ohio EPA at: <http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/ocapp>.
5. The Ohio Department of Development’s Office of Energy Efficiency may be able to help with energy efficiency issues. For more information, please refer to: <http://www.odod.state.oh.us/cdd/oee>.
6. You may be able to reduce the amount of waste your facility generates by finding ways to recycle, reduce, or eliminate it. OCAPP provides free compliance and pollution prevention assistance on environmental issues related to air, land and

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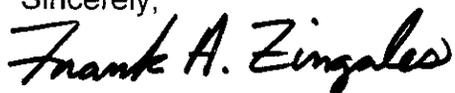
water. Should your facility be interested in receiving a free pollution prevention assessment in the future, please contact me or OCAPP. OCAPP may be contacted at (800) 329-7518 or via the internet at: <http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/ocapp>.

7. You may find copies of the hazardous waste rules and other information on Ohio EPA's web page at: http://www.epa.ohio.gov/dhwm/laws_regs.aspx.

Please be advised that additional violations may be cited upon review of forthcoming documentation. Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve Duffin from having to comply with all applicable regulations.

Should you have any questions, please contact me at (330) 963-1108.

Sincerely,



Frank A. Zingales
Environmental Specialist
Division of Hazardous Waste Management

FAZ:cl

Enclosure

ec: Harry Sarvis, DHWM, CO
Natalie Oryshkewych, DHWM, NEDO
Nyall McKenna, DHWM, NEDO

cc: Marlene Kinney, DHWM, NEDO

Send to Central Office <input checked="" type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to kristina.durnell@epa.state.oh.us.

Site EPA ID No.	EPA ID Number: OHD004196630	
Site Name	Name: Duffin Manufacturing Company	Website: http://www.duffinmfg.com (Optional)
Site Location Information	Street Address: 316 Warden Ave.	
Site Land Type (check only one)	City, Town, or Village: Elyria	State: OH
NAICS code(s) www.census.gov/epcd/www/naics.html	County Name: Lorain	Zip Code:
	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 <input type="checkbox"/>	Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>
	332721	
Facility Representative	First Name: Christopher MI: Last Name: Minnick	
Additional names can be recorded in number 12	Title: General Manager	
Only provide address information if it is different than the site address	Phone Number: 440-323-4681 Phone Number Extension: 501	
	E-Mail Address: chris.minnick@duffinmfg.com	
	Fax Number: 440-323-7389 Fax Number Extension:	
	Street or P.O. Box:	
	City, Town or Village:	
	State:	Zip Code:
Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner:	
	Date Became Owner (mm/dd/yyyy):	
	Owner Type: Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	
	Street or P.O. Box:	
	City, Town or Village:	
	Owner Phone #:	
	State:	Country: Zip Code:
	Name of Site's Operator:	
	Date Became Operator (mm/dd/yyyy):	
	Operator Type: Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	
	Street or P.O. Box:	
	City, Town or Village:	
	Operator Phone #:	
	State:	Country Zip Code:

VIOLATIONS CITED?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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TYPE OF HANDLER - MARK "X" AS APPROPRIATE		
<input type="checkbox"/> Not a HW Generator	<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
	<input type="checkbox"/> Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). <i>Check the box for the applicable generator status and provide a comment.</i>	<input checked="" type="checkbox"/> Small Quantity Generator (SQG)
		<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
		<input type="checkbox"/> U.S. Importer of Hazardous Waste
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

- | | |
|---|--|
| <input type="checkbox"/> Hazardous Waste Transporter | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace |
| <input type="checkbox"/> Hazardous Waste Transfer Facility | <input type="checkbox"/> Small Quantity On-Site Burner Exemption |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Recycler of Hazardous Waste | <input type="checkbox"/> Underground Injection Control Facility |
| | <input type="checkbox"/> Receives Hazardous Waste from Off-site |

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED)

(CHECK ALL BOXES THAT APPLY)

- | | |
|---|---|
| <input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste | <input type="checkbox"/> Destination Facility for Universal Waste |
| <input type="checkbox"/> Large Quantity Handler of Universal Waste
(accumulates 5,000 kg. or more) | |

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

- Batteries
 Pesticides
 Mercury containing equipment
 Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))

- Used Oil Generator
 Used Oil Transporter
 Used Oil Transfer Facility
 Used Oil Processor
 Used Oil Re-refiner
 Off-Specification Used Oil Burner
 Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
 Used Oil Fuel Marketer to Off-Specification Used Oil Burner

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 or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

D006 D008

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

Announced Yes No Additional Facility Representatives: **Carl Shrader**
Tanks Yes No
Containers Yes No

Name of Inspector(s)
Frank Zingales

Name of Inspector(s)

Date of Inspection/Time
(mm/dd/yyyy) (hh:mm)
01/22/2010 0920
01/28/2010 1030
02/11/2010 0900

Comments:

Due to the number of unevaluated waste streams, Duffin's hazardous waste generator status (SQG) could not be confirmed. Therefore, Duffin must submit an inventory of all types and amounts of hazardous waste generated and accumulated on a monthly basis. See March 2009 NOV letter for details.

PROCESS DESCRIPTION / WASTE ACTIVITIES SUMMARY

Facility Name: Duffin Manufacturing Company

Facility Type: Small Quantity Generator (SQG)

EPA ID#: OHD004196630

Process Information: Facility is a screw machine shop. Bar stock composed of brass, steel and aluminum.

Hazardous waste is accumulated at the rear of the facility in a designated area. See summary for wastes generated at facility.

Regulatory / Enforcement History: None

<i>Description of Waste</i>				<i>On-Site Management</i>	
Process/Activity generating Waste	Waste Generated	Evaluation: HW, NHW, Used Oil or UW	Quantity Generated In Month (Gallons or Pounds) See Note 1	Type of Accumulation (Container or Tank)	Comments
Cleaning activities – floor mop water.	A. Mop water. B. Debris from Mop Water Holding Tank #1. C. Sediment from Mop Water Holding Tank #2. D. Oil skimmings from Mop Water Holding Tank #3. E. Oil from Mop Water Recycling Machine coalescer. F. Waste from clean out of Mop Water Recycling Machine.	A. HW-D008 B. HW-D008 C. HW-D008 D. Used Oil E. Used Oil F. HW-D008		A. Tanks B. Container C. Container D. Container E. Container F. Container	
Metal turning activities – brass.	A. Chip processing - used cutting oil and water based coolant. B. Used oil filtering system solids.	A. Used Oil B. HW-D008		A. Tanks & Containers B. Container	

	Metal turning activities – steel.	Chip processing - used cutting oil.	Used Oil		Tank	
	Metal turning activities – miscellaneous.	Chip processing - used cutting oil.	Used Oil		Tank	
	Cell 6 tumbler.	A. Process waste (liquid). B. Sludge in 2-gallon pail. C. Sludge in 55-gallon drum. D. Dock sludge.	A. NHW B. HW-D008 C. HW-D008 D. HW-D008		A. Container B. Container C. Container	
	Tumbling Room: A. Barrel tumbler. B. Small finish mill. C. Large finish mill.	A. Process waste. B. Process waste. C. Process waste.	A. NHW B. NHW C. NHW		A. Tank B. Tank C. Tank	
	Metal cleaning activities - aqueous parts washers.	A. Waste cleaning solution. B. Oil skimmings. C. Filtered solids.	A. HW-D008 B. Used Oil C. HW-D008		A. Tank B. Container C. Container	
	Metal cleaning activities - kerosene.	Waste kerosene	HW-D008		Container	
	Evaporator unit.	Sludge	HW-D006/D008		Tank	
	Grinding activities: A. Tool grinding area. B. Production grinding area.	A. Grinding dust. B. Grinding dust.	A. B.		Container Container	

	Dock water holding tank.	A. Liquid. B. Sediment / solids removed from tank.	A. Use results from individual process. B. Evaluate		A. Tank B. Container	
	Aerosol can puncturing device.	A. No waste accumulated. B. Empty can.	A. Evaluate when necessary. B. Scrap metal			Suggestion - Recycle empty can as scrap metal.
	Coalescer	A. Liquid-limited water. B. Oil	A. Use results from individual process. B. Used Oil		A. Tank B. Container	
	Maintenance	Absorbent pads and socks (no longer usable).	HW-D008		Container	
	Maintenance	A. Spent lamps B. Spent batteries	A. UW Lamps B. UW Batteries		A. Container B. Container	
	Metal turning activities.	Turnings / chips	Scrap metal		Container	

Note 1: Due to the number of unevaluated waste streams, Duffin's hazardous waste generator status (SQG) could not be confirmed. Therefore, Duffin must submit an inventory of all types and amounts of hazardous waste generated and accumulated on a monthly basis. See March 2009 NOV letter for details.

Would this facility be interested in a pollution prevention (P2) assessment? Made facility aware of opportunity.

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

Compliance Assistance and Pollution Prevention information provided to facility: OCAPP brochure, Identifying Your Hazardous Waste, Hazardous Waste Generator Categories and Episodic Generation, SQG Emergency Information Posting, Example Inspection Log for Containers and Emergency Equipment, Generator Requirements and Recordkeeping Summary Tables, Universal Waste Rules for Handlers of Lamps, Used Oil Rules for Generators, Generator Treatment of Hazardous Waste, Properly Managing Hazardous Waste Containers, Stormwater Phase II Final Rule-Conditional No Exposure Exclusion for Industrial Activity.

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

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 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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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"/>
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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 type="checkbox"/>
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 type="checkbox"/> No <input checked="" 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 type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input 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 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 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:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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 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 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 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]	
	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 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 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 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.

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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
5.	Does the SQUWH conduct any of the following activities:	
a.	Sort batteries by type? Lead-acid batteries are segregated from other universal waste batteries.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Mix battery types in one container? Alkaline/nickel cadmium/chromium universal waste batteries are commingled in same container.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Discharge batteries to remove the electric charge?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
d.	Regenerated used batteries?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
e.	Disassemble them into individual batteries or cells?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
f.	Remove batteries from consumer products?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
g.	Remove the electrolyte from the battery?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

UNIVERSAL WASTE LAMPS

8.	Does the SQUWH 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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	[3745-273-13(D)(2)]	
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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<p>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.</p>		
ACCUMULATION TIME		
11.	Is the waste accumulated for less than one year? [3745-273-15(A)] If not:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Unknown, accumulation time not tracked for UW batteries.
<p>NOTE: Accumulation is defined as date generated or date received from another handler.</p>		
12.	Is the length of time the universal waste is stored documented by <u>one</u> of the following: [3745-273-15(C)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RESPONSE TO RELEASES – no releases observed.		
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
19.	Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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> :	No rejections by off-site handler.
	a. Receive the waste back? [3745-273-18(E)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Agree to where the shipment will be sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
21.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss <u>one of the following</u> :	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Sending the waste back to the originating handler? [3745-273-18(F)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
EXPORTS		
24.	Is waste being sent to a foreign destination? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>