Environmental
Protection Agency

, Governor
, Lt. Governor
, Director

September 9, 2010

RE: GARRETT MORGAN WATER PLANT
EPA ID NO. OHD 980 278 949
CUYAHOGA COUNTY
CESQG COMPLIANCE INSPECTION
NOV

Ryan Olinek
Cleveland Division of Water
Risk Management Group
1201 Lakeside, 4th Floor
Cleveland, OH 44114

Dear Mr. Olinek:

On August 24, 2010, I as a representative of the Ohio EPA Division of Hazardous Waste Management, conducted an inspection of the Garrett A. Morgan Drinking Water Plant, Cleveland Division of Water (Garrett Morgan), located at 1245 West 45th Street, Cleveland, Ohio, for compliance with Ohio's hazardous waste and used oil laws and regulations. You, Kurt Reszegi, Assistant Plant Manager, and Michael Shantery, Hazardous Materials Specialist, represented Garrett Morgan during the inspection. On August 26, 2010 I went to the Parma office at 6313 Merkle to review manifests and weekly inspection records.

The facility is a drinking water plant that treats raw water from its intake in Lake Erie to produce finished drinking water. Processes include: screening, chemical addition, mixing, coagulation, flocculation, sedimentation, filtration and disinfection.

Routine operations typically produce little hazardous waste. Most hazardous wastes are the result of chemical cleanouts and cleanups of releases of treatment chemicals.

The facility also generates used fluorescent lamps that are managed as universal wastes and used oil that is managed under the used oil rules. Both used oil and used lamps are transported to 1825 Lakeside for consolidation and management.

The inspection included a review of the facility's operations, as well as waste management practices and documentation. Garrett Morgan was inspected for the requirements of a conditionally exempt small quantity generator (CESQG) of hazardous waste because Garrett Morgan appears to have generated less than 220 pounds of hazardous waste per calendar month in 2009 and year-to-date in 2010 and at the time of the inspection less than 2,200 pounds of hazardous waste was on-site.

In at least one prior year (2008) the facility was an episodic Large Quantity Generator (LQG). From the hazardous waste manifests reviewed (e.g., Manifest Tracking Number 000 319 866 FLE, shipped on 2-15-08), Garrett Morgan apparently generated more than 2,200 pounds in a calendar month and so was a Large Quantity Generator (LQG) for the month of February 2008.

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087-1924

330 | 963 1200
330 | 487 0769 (fax)
www.epa.ohio.gov

Anytime that Garrett Morgan generates more than 220 pounds of hazardous waste in a calendar month or accumulates more than 2,200 pounds of hazardous waste on-site at any one time, it must comply with the requirements of a Small Quantity Generator (SQG) or a Large Quantity Generator (LQG), whichever is applicable. Guidance on this topic is attached.

This letter will explain the violations I found and steps you need to take to correct them.

I found the following violation of Ohio's hazardous waste, used oil and universal waste laws and regulations:

1. OAC Rule 3745-52-41(A)). An LQG Must File An Annual Report.

OAC Rule 3745-52-41(A) requires Ohio generators who have shipped hazardous waste off-site to submit an annual report. If the site is a Large Quantity Generator (LQG) in any calendar month during the calendar year, an annual report must be filed and it must report ALL hazardous wastes generated and/or shipped during the entire year.

Based on a hazardous waste manifest (i.e., Manifest Tracking Number 000 319 866 FLE, waste shipped on 2-15-08), it appears that Garrett Morgan generated more than 2,200 pounds in a calendar month and so was an LQG for the month of February 2008. Approximately 12,850 pounds of hazardous waste, reportedly from clean-up of a spill, was shipped on Manifest Tracking Number 000 319 866 FLE.

Because Garrett Morgan was an LQG for the month of February 2008, Garrett Morgan should have submitted an annual report for the year 2008 by March 1, 2009. No evidence that this report was submitted was provided by the facility or found in agency records.

To return to compliance the facility must:

- Submit an annual report for 2008 in accordance with the instructions at this website page: http://www.epa.ohio.gov/dhwm/ann_report/ann_report_2008.aspx
- Submit documentation that the annual report has been filed to this office within 30 days of receipt of this letter.

Contact Paula Canter at (614) 644-2923 with any questions on the annual report. Also see this webpage for more information on the annual report process: http://www.epa.ohio.gov/dhwm/ann_report.aspx

Enclosed you will find a copy of the checklists that were completed as a result of the inspection.

Other Information

The division has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link: http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage.

You can find copies of the rules and other information on the division's web page at: http://www.epa.ohio.gov/dhwm/laws_regs.aspx .

Should you have any questions regarding this letter, please contact me at (330) 963-1165.

Sincerely,

Neil J. Wasilk
Environmental Specialist
Division of Hazardous Waste Management

NJW:ddw

Enclosure

ec: Nyall McKenna, Ohio EPA, DHWM, NEDO
Harry Sarvis, Ohio EPA, DHWM, CO

NOTICE:
Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your facility from its obligation to comply with all applicable regulations.

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: OHD 980 278 949
Site Name	Name: Morgan Water Treatment Plant — Website: (Optional)
Site Location Information	Street Address: 1245 West 45th Street City, Town, or Village: Cleveland — State: OH County Name: Cuyahoga — Zip Code: 44114
Site Land Type (check only one) **NAICS code(s)** www.census.gov/epcd/www/naics.html	Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal X☐ State ☐ Other ☐
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: **Ryan** MI: Last Name: **Olinek** Phone Number: **(216) 664-2444** Phone Number Extension: **5838** E-Mail Address: Fax Number: Fax Number Extension: Street or P.O. Box: 1201 Lakeside Avenue City, Town or Village: Cleveland State: OH Zip Code: 44114
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 ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal X☐ State ☐ Other ☐ Street or P.O. Box: Same as above address. City, Town or Village: Owner Phone #: State: Country: Zip Code: Name of Site's Operator: Same as above Date Became Operator (mm/dd/yyyy): Owner Type: Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other ☐ Street or P.O. Box: City, Town or Village: Operator Phone #: State: United States Zip Code:

VIOLATIONS CITED? X☐ Yes ☐ No

TYPE OF HANDLER– A MINIMUM OF ONE BOX MUST BE CHECKED

☐ Not a HW Generator	☐UNKNOWN: Cited for violation of 3745-52-11	☐Large Quantity Generator (LQG)
		☐Small Quantity Generator (SQG)
		X ☐Conditionally Exempt Small Quantity Generator
		☐U.S. Importer of Hazardous Waste
		☐Mixed Waste (Hazardous and Radioactive) Generator

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

- ☐ Recycler of Hazardous Waste
- ☐ Underground Injection Control Facility
- ☐ Hazardous Waste Transporter
- ☐ Treater, Storer or Disposer of Hazardous Waste
- ☐ Exempt Boiler and/or Industrial Furnace
  - ☐ Small Quantity On-Site Burner Exemption
  - ☐ Smelting, Melting, Refining Furnace Exemption

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY)

- X☐ Small Quantity Handler of Universal Waste
- ☐ Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)
- ☐ Destination Facility for Universal Waste

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

- X☐ Batteries
- ☐ Pesticides
- ☐ Mercury containing equipment
- X☐ Lamps

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

- X☐ 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 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.

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

Announced	☐ Yes	X☐ No	Additional Facility Representatives:
Tanks	☐ Yes	X☐ No	Other Comments:
Containers	X☐ Yes	☐ No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
N. Wasilk		8-24-10 9:45 am

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)
SIGNATURE NOT REQUIRED		

PROCESS DESCRIPTION

Facility:

Garrett Morgan Drinking Water Plant
Cleveland Division of Water
1245 West 45th Street
Cleveland, OH 44114

Facility is a drinking water plant with a rated capacity of 150 MGD. The facility treats raw water from its intake in Lake Erie to produce finished drinking water. Processes include: screening, chemical addition, mixing, coagulation, flocculation, sedimentation, filtration and disinfection.

Chemicals used by the facility in the water treatment process include:

-Potassium Permanganate (oxidant to control taste, odor & color; aids in coagulation)
-Powder Activated Carbon (PAC) (for taste and odor control)
-Gaseous chlorine (chlorine source for disinfection)
-Alum (aluminum sulfate as a flocculant)
-Polymer (flocculant aide)
-Hydrofluorosilicic Acid (fluoride source for tooth decay preventative)
-Phosphoric acid (forms protective layer in distribution system to reduce lead and copper transfer into water)

Routinely produced high volume wastes include:

-Flocculant sediment; and
-Sediment from sand filter backwash.

Thesse are non-hazardous wastes. Both are treated to specification concentrations and discharged to the NEORSD (pumped to the Southerly Plant). New residuals management facility was under construction.

Routine operations typical produce little hazardous waste. Most hazardous waste is the result of chemical cleanouts (e.g., outdated chemicals) and cleanup of releases of treatment chemicals (e.g., acids) from the containment systems.

No vehicle maintenance is conducted by the facility. No painting is done by facility employees.

Facility states it has essentially eliminated mercury.

Three small plastic buildings located in front of the Pilot Building are sued as the accumulation area for hazardous waste. No hazardous waste in the accumulation area present at time of the inspection.

Room in lower level of the Pump House is used to store used oil and some other non-hazardous liquid wastes.

Facility reported no used fluorescent lamps or used batteries were currently on-site. Facility stated these are transported to 1825 Lakeside for consolidation and further management.

MORGAN WAT & PLANT

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

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
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:

WASTE EVALUATION			
1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]		Yes ☑ No ☐ N/A ☐
GENERATOR CLASSIFICATION			
2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]		Yes ☑ No ☑ N/A ☐
*NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). **If so,** complete the Small Quantity Generator Requirements checklist.* SER COMMENT			
OFF-SITE SHIPMENT OF HAZARDOUS WASTE			
3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)]		Yes ☑ No ☐ N/A ☐
TREATMENT OF HAZARDOUS WASTE			
4.	Does the generator treat hazardous waste in a:		
	a.	Container that meets 3745-66-70 to 3745-66-77?	Yes ☐ No ☐ N/A ☑
	b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes ☐ No ☐ N/A ☑
	c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes ☐ No ☐ N/A ☑
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes ☐ No ☐ N/A ☑
NOTE: Complete appropriate checklist for each unit.			
NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.			
NOTE: If waste is treated to meet LDRs, use LDR checklist.			
MIX HAZARDOUS WASTE WITH USED OIL			
5.	Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:		Yes ☐ No ☑ N/A ☐
	a.	Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes ☐ No ☐ N/A ☑

FACILITY WAS AN EPISODIC LQG IN FEB. 2008. DID NOT FILE ANNUAL REPORT AS REQUIRED BY 3745-52-41(A). APPARENTLY A CESQG ~~FOR~~ AT TIME OF INSPECTION.

MORGAN WATER PLANT

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 ☐ No ☑ N/A ☐
	a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes ☐ No ☐ N/A ☑
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 ☐ No ☑ N/A ☐
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?		Yes ☐ No ☐ N/A ☑
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 ☐ No ☑ N/A ☐
	a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes ☐ No ☐ N/A ☑
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 ☐ No ☐ N/A ☑
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 ☑ No ☐ N/A ☐
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]		Yes ☑ No ☐ N/A ☐
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]		Yes ☑ No ☐ N/A ☐
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] NO RELEASES OBSERVED		Yes ☐ No ☐ N/A ☐
	a.	Stopped the release?	Yes ☐ No ☐ N/A ☐
	b.	Contained the release?	Yes ☐ No ☐ N/A ☐
	c.	Cleaned up and properly managed the used oil and other materials?	Yes ☐ No ☐ N/A ☐
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes ☐ No ☐ N/A ☐
ON-SITE BURNING IN SPACE HEATER			
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: NOT BURNING		
	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 ☐ No ☐ N/A ☑

	b.	Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour?	Yes ☐ No ☐ N/A ☑
	c.	Are the combustion gases from heater vented to the ambient air?	Yes ☐ No ☐ N/A ☑
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 ☑ No ☐ N/A ☐
12.	If the generator self-transports 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 ☐ No ☐ N/A ☑
	b.	Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24]	Yes ☐ No ☐ N/A ☑
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 ☐ No ☐ N/A ☑
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]		Yes ☐ No ☐ N/A ☑
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 ☐ No ☐ N/A ☑
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.			

MORGAN WATER PLANT

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 ☐
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]		Yes ☐ No ☑ N/A ☐
WASTE MANAGEMENT AND LABELING/MARKING NO UW BATTERIES OBSERVED			
UNIVERSAL WASTE BATTERIES DURING INSPECTION			
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]		Yes ☐ No ☐ N/A ☐
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 ☐
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]		Yes ☐ No ☐ N/A ☐
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]		Yes ☐ No ☐ N/A ☐
	a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes ☐ No ☐ N/A ☐
	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 ☐
7.	Are the batteries or containers 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 ☐
UNIVERSAL WASTE LAMPS NO UW LAMPS OBSERVED DURING INSPECTION			
8.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and 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 ☐
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 ☐
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 rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.*			
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 ☐

ACCUMULATION TIME			
11.	Is the waste accumulated for less than one year? [3745-273-15(A)]		Yes ☐ No ☐ N/A ☐
	a.	If not, is 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 ☐
NOTE: Accumulation is defined as date generated or date received from another handler.			
12.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below:		Yes ☐ No ☐ N/A ☐
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 ☐
RESPONSE TO RELEASES NO RELEASES OBSERVED			
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]		Yes ☐ No ☐ N/A ☐
15.	Is the material released characterized? [3745-273-17(B)]		Yes ☐ No ☐ N/A ☐
16.	If the material released is a hazardous waste, was 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 OAC Chapter 3745-52) [3745-273-17(B)]		Yes ☐ No ☐ N/A ☐
OFF-SITE SHIPMENTS SEE COMMENT AT END OF CHECKLIST			
NOTE: If a SQUWH self-transports waste, then the handler 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 ☐
18.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.		Yes ☐ No ☐ N/A ☐
19.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]		Yes ☐ No ☐ N/A ☐
20.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?		Yes ☐ No ☐ N/A ☐
	a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes ☐ No ☐ N/A ☐
21.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u>:		Yes ☐ No ☐ N/A ☐
	a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)]	Yes ☐ No ☐ N/A ☐
22.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]		Yes ☐ No ☐ N/A ☐
EXPORTS			
23.	Is waste being sent to a foreign destination? If so:		Yes ☐ No ☑ N/A ☐

	a.	Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes ☐ No ☐ N/A ☑
	b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	Yes ☐ No ☐ N/A ☑
	c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes ☐ No ☐ N/A ☑

U.W. LAMPS AND BATTERIES ARE CONSOLIDTED AT DEPT. OF WATRR FACILITY AT 1825 LAKESIDE FOR FUTURE MANAGEMENT.