



**Environmental  
Protection Agency**

John Kasich, Governor  
Mike DeWine, Lt. Governor  
Chris Pappalardo, Director

December 21, 2010

Ms. Mary Mayse  
Parma Board of Education  
5311 Longwood Avenue  
Parma, Ohio 44134

**RE: PARMA BOARD OF EDUCATION, LARGE QUANTITY GENERATOR,  
OHD 077 775 435, COMPLIANCE EVALUATION INSPECTION,  
CUYAHOGA COUNTY NOTICE OF VIOLATION/RETURN TO COMPLIANCE**

Dear Ms. Mayse:

On August 31, 2010, Mr. Bill Lutz and I, representing the Ohio Environmental Protection Agency (EPA), visited the Parma Board of Education (Board) Administration Center at 5311 Longwood Avenue in Parma, Ohio. Our intention was to conduct a hazardous waste compliance inspection to determine the Board'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 Board was represented by Mr. James Leigh and you.

The District serves three communities and had 26 facilities. The names and addresses are included as Attachment 1; there are three high, three middle, and fifteen elementary schools, a Transportation Center (bus garage); an early education center, the Administration Center at Longwood Ave., an alternate usage school, and the Central Office Building at Byers Field which has since been demolished. Three buildings, Dag Hammarskjold Elementary, Pleasantview Elementary, and Arlington Schools, are closed.

Over the summer, the Board conducted a clean-out of the Central Office Building, located at 6726 Ridge Road, prior to its demolition. The waste collected included off specification, out-dated, and unwanted materials and chemicals. A contractor was employed to manage the clean out operations at that building. As a result of the onetime event, the Board generated over 2,200 lbs (1,000 kg) of hazardous waste from the site and assumed large quantity generator (LQG) status. Prior to the clean out and after the waste was transported off-site for disposal, the Board was, and is, a conditionally exempt small quantity generator (CESQG).

The clean out garnered caustic (acids and bases) liquids, flammable liquids, mercury bearing devices, latex paint waste, and used oil for disposal. The waste was consolidated into pails, drums, and cubic yard fiber boxes and placed on pallets in the Central Office Building.

During the inspection of the Central Office Building on August 31, 2010, we observed four of the cubic yard fiber boxes open and several of the containers with no label indicating hazardous waste or the accumulation start date of the waste.

The violations regarding large quantity generator requirements were abated upon the removal of the waste from the Central Office Building on September 1, 2010. The LQG violations are noted in this letter and “**no further action**” is required as the waste has been removed and the building has been demolished. The LQG checklist is included for your review and records. The violations are described below.

### **VIOLATIONS**

1. **OAC 3745-52-34 (A)(2) Dating of Hazardous Waste Containers (<90 Day Accumulation Areas).**

A generator may, for ninety days or less, accumulate....hazardous waste that is generated on site, provided that....The date upon which each period of accumulation...begins is clearly marked and visible for inspection on each container.

The date the waste from the building cleanup was accumulated was not marked clearly and visible for inspection on each container. As the waste is no longer on-site, **there is no further action required at this time.**

2. **OAC 3745-52-34(A)(3) Labeling of Hazardous Waste Containers (<90 Day Accumulation Areas).**

While being accumulated...on site, each container...is labeled or marked clearly with the words, Hazardous Waste.

Ohio EPA observed containers of hazardous waste in the Central Office Building that were not labeled or marked with the words, “Hazardous Waste”. The wastes were picked-up by Penn Ohio Corporation on September 1, 2010, and transported to Chemtron Corporation in Avon, OH. The generator’s initial copy of the waste manifests and LDR notifications were available and reviewed. **At this time, there is no further action required.**

3. **OAC 3745-66-73(A) Management of Containers (<90 Day Accumulation Areas).**

A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

During the inspection on August 31, 2010 of the Central Office Building, we observed four of the cubic yard fiber boxes in the storage area that were open. As the waste is no longer on-site, **there is no further action required at this time.**

The following reflect requirements of large quantity generators and were violated as a result of the Board’s unexpected change from a CESQG to a LQG. Once the waste generated was shipped off site, these requirements no longer applied and the Board **returned to compliance.**

4. **OAC 3745-52-40 Recordkeeping.**  
The o/o shall maintain records of operation such as manifests, LDR notifications, training records, annual reports, waste evaluations on site for at least three years.
5. **OAC 3745-65-16 Personnel Training.**  
Facility personnel shall successfully complete....training that teaches....
6. **OAC 3745-65-30 to 37 Emergency Equipment.**  
The o/o shall maintain internal communication or alarm systems, such as telephones and fire, spill control, and decontamination equipment.
7. **OAC 3745-65-51 to 56 Emergency Procedures and Contingency Plan.**  
Each o/o shall have a written contingency plan and emergency procedures
8. **OAC 3745-66-74 General Inspection Requirements (<90 Day Accumulation Areas).**  
The o/o shall inspect areas where containers are stored at least weekly.....and record the inspections in a log or summary.

Be aware, if the Board should again fluctuate from the CESQG status, possibly due to another building clean out, you will be required to maintain compliance with all requirements applicable to the appropriate generator status. I provided you with a list of generator requirements for all three categories, conditionally exempt small quantity (CESQG), small quantity (SQG), and large quantity (LQG) generators during the inspection.

Note, in accordance with OAC 3745-52-41 (A) Annual report, a large quantity generator who ships any hazardous waste off-site must prepare and submit to Ohio EPA the "Annual Hazardous Waste Report" by March first of each year they assume that status. As the Board assumed LQG status during the month of August, an annual report must be submitted by March 1, 2011.

**Websites that may be useful to you:**

You can find Ohio's hazardous waste rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>

Ohio EPA, Division of Hazardous Waste Management 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](http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage)

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides compliance and pollution prevention assistance on environmental issues (including sources of funding) related to air, land, and water. They can be contacted at 800-329-7518 or <http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/ocapp>

ENERGY STAR is a government-backed program helping businesses and individuals protect the environment through superior energy efficiency. Their website is at: <http://www.energystar.gov/>

The Ohio Department of Development's Office of Energy Efficiency website at: <http://www.development.ohio.gov/cdd/oeel/>, may be able to help with energy efficiency issues.

Entrepreneurs for Sustainability is a group that seeks to "build a sustainable regional economy in Northeast Ohio that will create prosperity and total community health." They offer workshops, conferences, a business to business directory and more. Their website is at <http://www.e4s.org/content/index.asp>

Ohio Bureau of Workers' Compensation has an OSHA On-Site Consultation service which includes free on-site safety inspections and consultation, safety program assistance, and safety and hygiene training or seminars. More information can be found at: <http://www.ohiobwc.com/employer/programs/safety/SandHOSHAOnSite.asp>

Should you have any questions regarding this letter, you may call me at (330) 963-1279 or via e-mail at [patricia.natali@epa.state.oh.us](mailto:patricia.natali@epa.state.oh.us).

Sincerely,



Patricia Natali  
Environmental Specialist  
Division of Hazardous Waste Management

PN:ddw  
Enclosure

cc: Mr. James Leigh, Parma Board of Education  
ec: Frank Popotnik, DHWM, NEDO  
Natalie Oryshkewych, DHWM, NEDO  
Harry Sarvis, DHWM, CO  
Adrienne LaFavre, OCAPP, 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 applicable regulations.

# ATTACHMENT 1

<b>SCHOOL</b>	<b>ADDRESS</b>	<b>STATUS</b>
Col. John Glenn Elementary School	1300 E. Dartmoor Avenue	Open
Dag Hammarskjold Elementary School	4040 Tamarack Drive	Closed
Dentzler Elementary School	3600 Dentzler Road	Open
Greenbriar Middle School	11810 Huffman Rd.	Open
Greenbriar Annex	11800 Huffman Road	Open
Green Valley Elementary School	2401 West Pleasant Valley Road	Open
Hanna Elementary School	11212 Snow Road	Open
Hillside Middle School	1 Educational Park Drive	Open
John Muir Elementary School	5531 W. 24 <sup>th</sup> Street	Open
Normandy High School	2500 West Pleasant Valley Road	Open
Parkview Elementary School, Early Ed. Center	5210 Loya Parkway	Open
Parma Park Elementary School	6800 Commonwealth Boulevard	Open
Parma Senior High School	6285 W. 54 <sup>th</sup> street	Open
Pearl Road Elementary School	6125 Pearl Road	Open
Pleasant Valley Elementary School	9906 West Pleasant Valley Road	Open
Pleasantview Elementary School	7700 Malibu Drive	Closed
Renwood Elementary School	8020 Deerfield Drive	Open
Ridge-Brook Elementary School	7915 Manhattan Avenue	Open
Shiloh Middle School	2303 Grantwood Drive	Open
State Road Elementary School	6121 State Road	Open
Thoreau Park Elementary School	5401 W. 54 <sup>th</sup> Street	Open
Valley Forge High School	9999 Independence Boulevard	Open
Administration Center	5311 Longwood Avenue	Open
Transportation Center	7600 Day Drive	Open
Arlington School	7377 Chateau Drive	Closed

**PROCESS, WASTE, P2 SUMMARY SHEET**

Facility Name: Parma Board of Education Facility Type: CESQG/Episodic Date of Inspection: 8/31/10 EPA ED# OHD 077 775 435

Waste Generated			On or Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applicable	QTY Generated per Month, Type of Accumulation (container, tank, etc.) and location of waste accumulation area	Type of On-Site Treatment (recycle, waste water treatment, etc.)	Name, state, and type of activity occurring at the off-site facility	Current P2 Activities	P2 Opportunities
1 High and Middle School lab cleanouts	Unused, expired chemicals. Waste codes dependent upon chemicals discarded	Varies; chemicals kept in small containers in laboratory until scheduled pickup	None	ChemTron Corp. OHD 066 060 609	None	none
2 Vehicle maintenance	Aerosol cans	Varies; when emptied, they are discarded with trash	Discards with trash	Commercial solid waste company	None	Discard empty cans with scrap metal
3 Building updates	Mercury devices – universal waste	Varies; maintained in small containers in building until scheduled pickup	Recycles	PennOhio Corporation, Ashtabula, OH; (440) 992-7906	Recycles	None
4 Building maintenance	Fluorescent bulbs (spent) – universal waste	Varies; maintained in small containers in building until scheduled pickup	Recycles	Consolidated Electrical Distributers transports the spent bulbs to Fluorescent Recycling, Inc.	Recycles	None
5 Vehicle maintenance	Batteries – universal waste	Varies; stored in racks in the Transportation Center until scheduled pickup	Recycles	Picked up by Kirk Batteries Distribution	Recycles	None

6	Vehicle maintenance	Scrap tires	Quantity generated monthly varies; stored in vehicle service garage;	Recycles	Sylvester Truck and Tire Service, Avon, OH	Recycles	Tires picked up once or twice a week depending upon number
7	Vehicle maintenance	Used oil and transmission fluid	Varies; stored in two aboveground tanks (300 gal) in Transportation Center; also use small containers when servicing vehicles	Recycle and energy recovery	Rice Company OHR 000 001 321	recycles	Waste oil is usually picked up once a year; No P2 opportunities
8	Vehicle maintenance	Parts washers (2), mineral spirits	Approximately 15 gal generated each month; spent solvent stored in parts washers in the Transportation Center	Serviced approximately every 3 weeks	Hukill Chemical Corp OHD 001 926 740	Recycles	None
9	Vehicle maintenance	Antifreeze	Quantity generated each month varies; spent antifreeze is stored in 55 DM nearused oil tanks in Transportation Center	Recycles/reuses	Rice Companies; OHR 000 001 321	Recycles/reuses	None
11	Vehicle maintenance	Rags – not saturated	Quantity generated each month varies	Discards in trash	Commercial solid waste company	None	Supplied info regarding benefits of laundering rags

**REMARKS – GENERAL INFORMATION**

**General Process Information:** District has 25 facilities: 3 high, 3 middle, and 15 elementary schools, Transportation Center (vehicle garage), early education center, Administration Building, and an annex. Three of the buildings are not in use and the Central Office Building (6726 Ridge Rd) was demolished in September. Spent fluorescent bulbs are kept at each of the buildings and are picked up on an as needed basis. Several of the schools have science labs and art rooms which occasionally generate hazardous waste (chemicals). Although the Board is typically a CESQG, clean-out of buildings, such as the Central Office Building, or labs results in fluctuations between hazardous waste generator categories. For example during the month of August, the Board was a LQG. The Transportation Center generates waste transmission fluids, anti-freeze, cleaning solvents from two parts washers, used oil, batteries, scrap tires, aerosol cans, and cleaning rags, all of which are described above.

**Regulatory/Enforcement History (if applicable):** None

**Additional P2 remarks and information:** Provided information about laboratory chemicals, i.e., to try to find alternative use for unwanted chemicals, e.g., Ohio Materials Exchange; to buy chemicals on an "as needed" basis, to substitute non-hazardous materials when possible.

**Other:** Would like Adrienne LaFavre to do a training session for their maintenance people regarding hazardous materials, e.g., lab chemicals. Gave them her brochure and spoke to her; they will schedule a time and place when convenient.

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

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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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.

**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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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**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 <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 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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

\* In August 2010, the Board cleaned out a building  
 \*, as a result, assumed LQG status. A separate  
 inspection was conducted and a letter (NOV/RTC)  
 sent 12/21/10.

Parma Board of Education  
 July 28, 2010

[Facility Name/Inspection Date]  
 [ID number]  
 CESQG/February 2009  
 Page 1 of 1

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

*NOTE: 1. 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.*

*2. Inspectors can check BUSTR's web-site at [https://www.comapps.ohio.gov/sfm/fire\\_apps/bust/bustr/PublicInquiry.asp](https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp) to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at:*

*[https://www.comapps.ohio.gov/sfm/fire\\_apps/bust/bustr/SearchByCounty.asp](https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp).*

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

<b>ON-SITE BURNING IN SPACE HEATER</b>		
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 type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> X
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"/> X
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"/> X
<i>NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).</i>		
<b>GENERATOR TRANSPORTATION</b>		
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	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 type="checkbox"/> X
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 type="checkbox"/> X
<i>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).</i>		
<b>COLLECTION CENTERS AND AGGREGATION POINTS</b>		
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"/> X
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"/> X
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"/> X
<i>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.</i>		

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 OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
WASTE MANAGEMENT AND LABELING/MARKING		
UNIVERSAL WASTE BATTERIES		
3.	Are batteries 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.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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 <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 OAC Chapters 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 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 <input type="checkbox"/> No <input checked="" 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 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? [3745-273-13(D)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><b>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.</b></p>		
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"/>

Parma Board of Education  
CESQG July 28, 2010

ACCUMULATION TIME		
11.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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)] (this change makes it like the LQUWH checklist)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Accumulation is defined as date generated or date received from another handler.</i>		
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: <i>The Board provided Certificates of Recycling from Consolidated Electrical Distributors</i>	Yes <input checked="" 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		
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 checked="" type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
OFF-SITE SHIPMENTS		
<i>NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.</i>		
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"/>
18.	Is the handler aware of DOT requirements for packaging and shipping?  If no, make aware of 49 CFR 171-180.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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)] (this change makes it like the LQUWH checklist)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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 and do <u>one of the following</u> :	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	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)] (this change makes it like the LQUWH checklist)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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EXPORTS		
23.	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 rules 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 checked="" type="checkbox"/>
	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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