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State of Ohio Environmental Protection Agency
Northeast District Office

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

July 13, 2009

Margie Darling
HES Administrator
145 Parker Court
Chardon, OH 44024

RE: RHEIN CHEMIE CORPORATION, GEAUGA COUNTY, RCRA/LQG, PLANT #1 - OHD021151329, PLANT #2 - OHD987044500, COMPLIANCE EVALUATION INSPECTION, NOTICE OF VIOLATION/RETURN TO COMPLIANCE

Dear Ms. Darling:

On June 9 and 10, 2009, Ohio EPA's Division of Hazardous Waste Management (DHWM) conducted a compliance evaluation inspection of both Rhein Chemie (RC) Plant #1 and Plant #2 located on Parker Court in Chardon, Ohio. Both RC facilities blend and package chemicals for the rubber industry and qualify as Large Quantity Generators (LQG's) of hazardous waste. Hazardous waste streams generated at the facility include toxic debris (P205, U116, U190, U201, U028 and U244), waste ignitable solids (D001), waste organic peroxides (D001 and D003) and waste aerosol cans (D001).

The purpose of this inspection was to determine RC's compliance with Ohio's hazardous waste laws and regulations as found under the Ohio Revised Code and Ohio Administrative Code ("ORC" and "OAC" respectively). Both RC facilities were represented by Brad Bechina and you, while Ohio EPA was represented by me. Ohio EPA's inspection included an inspection of both RC facilities and a review of written documentation. Ohio EPA also documented portions of the inspection using digital photography. Violations for Plant #1 and Plant #2 will be addressed separately in this Notice of Violation (NOV) letter. Violations observed at Plant #1 will be cited first, while violations observed at Plant #2 will be cited in a second section of this letter.

Please note: RC Plant #1 and RC Plant #2 generate the same waste streams and use the same personnel to manage hazardous waste, perform inspections and act as emergency coordinators. Because of this, the contingency plan and personnel training program has been designed to apply to both the RC facilities on Parker Court. However, each facility has its own USEPA ID number, is an LQG and subject to the same regulatory burden. Therefore hazardous waste violations cited for personnel training or the facility contingency plan will be cited for each RC facility separately.

RC Plant #1 – OHD021151329

Based on the June 9, 2009 inspection, Ohio EPA has determined that RC Plant #1has violated the following state hazardous waste regulations:

1. ***OAC 3745-52-34(A)(2) Accumulation date:*** *A generator may, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit, provided that while being accumulated and/or treated on-site, each container and tank is labeled or marked clearly with the words Hazardous Waste and the date upon which each period of accumulation and/or treatment begins is clearly marked and visible for inspection on each container.*

   At the time of the June 9, 2009 inspection, Ohio EPA observed two containers of hazardous waste in the Plant #1 hazardous waste accumulation which had not been labeled with an accumulation start date.

   Upon being informed of this violation, RC immediately instructed an employee to properly label both containers with the appropriate accumulation start date. Ohio EPA therefore considers this violation abated and no further action is required.

2. ***OAC 3745-279-22(C)(1) Used oil storage requirements for generators****: Containers and aboveground tanks used to store used oil at generator facilities shall be labeled or marked clearly with the words "Used Oil."*

   RC Plant #1 generates used oil which is accumulated in steel containers to be shipped off site for recycling. At the time of this inspection, Ohio EPA observed five (5) fifty-five gallon containers of used oil labeled with the words "Waste Oil".

   Upon being informed of this violation, RC immediately labeled the containers of used oil with the words "Used Oil". Ohio EPA therefore considers this violation abated, no further action is required.

3. ***OAC 3745-65-16(D)(3)& (4) Personnel training:*** *The owner or operator shall maintain the following documents and records at the facility:*

   (3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (D)(1) of this rule; and

   (4) Records that document that the training or job experience required under paragraphs (A), (B), and (C) of this rule has been given to, and completed by, facility personnel.

   At the time of this inspection, RC did not have job titles and descriptions which included the type and amount of both introductory and continuing training and the training or job experience required by each position.

By letter dated June 19, 2009, Ohio EPA received documentation demonstrating the job titles and descriptions for positions managing hazardous waste at the facility had been updated to include the information required by OAC 3745-65-16(D)(3)&(4). Ohio EPA therefore considers this violation abated and no further action is required.

4. ***OAC 3745-65-16(A)(1) Personnel training:***

(1) Facility personnel shall successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements chapters 3745-65 to 3745-69 and 3745-248 of the Administrative Code. The owner or operator shall ensure that this program includes all the elements described in the document required under paragraph (D)(3) of this rule.

At the time of this inspection, Ohio EPA observed that Ron Springborn, a utility person and William Havel from Quality Assurance, had been signing hazardous waste manifests, but had not received training in hazardous waste management and the facility contingency plan. In addition, Ohio EPA observed Wes Morrison, Vice Present of Manufacturing, was listed as the Primary Emergency Coordinator, yet had not received the required hazardous waste training, including training in the facility contingency plan.

By letter dated June 19, 2009, Ohio EPA received documentation demonstrating Ron Springborn, William Havel and Wes Morrison have received training in hazardous waste management and the facility contingency plan. Ohio EPA therefore considers this violation abated and no further action is required.

5. ***OAC Rule 3745-65-52(A)(E) Content of Contingency Plan:***

(A) The contingency plan must describe the actions facility personnel must take to comply with rules 3745-65-51 and 3745-65-56 of the Administrative Code in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

(D) The plan shall list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator, and this list shall be kept up to date. Where more than one person is listed, one shall be named as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates.

(E) The contingency plan must include a list of all emergency equipment at the facility [such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment] where this equipment is required. This list must be kept up to date. In addition, the contingency plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

During a review of the facility contingency plan, Ohio EPA observed the facility contingency plan failed to address emergencies involving hazardous waste generated on site. The contingency plan also did not have a current list of employees qualified to act as emergency coordinators which included addresses and telephone numbers (office and home). The contingency plan also failed to list the locations of the emergency equipment including emergency communication devices.

By letter dated June 19, 2009, Ohio EPA received an updated copy of the facility contingency plan revised to include responses to emergencies involving hazardous waste at the facility, an updated list of emergency coordinators which included the required addresses and telephone numbers, and a revised list of the emergency equipment to include the locations. Ohio EPA therefore considers this violation abated and no further action is required.

6. ***OAC Rule 3745-270-07 Testing, Tracking, and Record keeping Requirements for Generators, Treaters, and Disposal Facilities***: *If the waste or contaminated soil 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.*

   During a review of the facility's shipping documentation for hazardous waste shipped off site, the facility could not produce Land Disposal Restriction (LDR) forms for hazardous waste shipped to Ross Incineration Services.

   Upon being informed of this violation of hazardous waste regulations, the facility immediately contacted Ross Incineration and acquired LDR forms for each waste stream shipped off-site. Ohio EPA therefore considers this violation abated and no further action is required.

RC Plant #2 - OHD987044500

Based on the June 9, 2009 inspection, Ohio EPA has determined that RC Plant #2 has violated the following state hazardous waste regulations:

1. ***OAC 3745-65-16(D)(3)& (4) Personnel training:*** *The owner or operator shall maintain the following documents and records at the facility:*

   (3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (D)(1) of this rule; and

(4) Records that document that the training or job experience required under paragraphs (A), (B), and (C) of this rule has been given to, and completed by, facility personnel.

At the time of this inspection, RC did not have job titles and descriptions which included the type and amount of both introductory and continuing training and the training or job experience required by each position.

By letter dated June 19, 2009, Ohio EPA received documentation demonstrating the job titles and descriptions for positions managing hazardous waste at the facility had been updated to include the information required by OAC 3745-65-16(D)(3)&(4). Ohio EPA therefore considers this violation abated and no further action is required.

2. ***OAC 3745-65-16(A)(1) Personnel training:***

(1) Facility personnel shall successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements chapters 3745-65 to 3745-69 and 3745-248 of the Administrative Code. The owner or operator shall ensure that this program includes all the elements described in the document required under paragraph (D)(3) of this rule.

At the time of this inspection, Ohio EPA observed that Ron Springborn, a utility person and William Havel from Quality Assurance, had been signing hazardous waste manifests, but had not received training in hazardous waste management and the facility contingency plan. In addition, Ohio EPA observed Wes Morrison, Vice Present of Manufacturing, was listed as the Primary Emergency Coordinator, yet had not received the required hazardous waste training, including training in the facility contingency plan.

By letter dated June 19, 2009, Ohio EPA received documentation demonstrating Ron Springborn, William Havel and Wes Morrison have received training in hazardous waste management and the facility contingency plan. Ohio EPA therefore considers this violation abated and no further action is required.

3. ***OAC Rule 3745-65-52(A)(D)(E) Content of Contingency Plan:***

(A) The contingency plan must describe the actions facility personnel must take to comply with rules 3745-65-51 and 3745-65-56 of the Administrative Code in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

(D) The plan shall list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator, and this list shall be kept up to date. Where more than one person is listed, one shall be named as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates.

(E) *The contingency plan must include a list of all emergency equipment at the facility [such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment] where this equipment is required. This list must be kept up to date. In addition, the contingency plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.*

During a review of the facility contingency plan, Ohio EPA observed the facility contingency plan failed to address emergencies involving hazardous waste generated on site. The contingency plan also did not have a current list of employees qualified to act as emergency coordinators which included addresses and telephone numbers (office and home). The contingency plan also failed to list the locations of the emergency equipment including emergency communication devices.

By letter dated June 19, 2009, Ohio EPA received an updated copy of the facility contingency plan revised to include responses to emergencies involving hazardous waste at the facility, an updated list of emergency coordinators which included the required addresses and telephone numbers, and a revised list of the emergency equipment to include the locations. Ohio EPA therefore considers this violation abated and no further action is required.

4. ***OAC Rule 3745-270-07 Testing, Tracking, and Record keeping Requirements for Generators, Treaters, and Disposal Facilities***: *If the waste or contaminated soil 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.*

During a review of the facility's shipping documentation for hazardous waste shipped off site, the facility could not produce Land Disposal Restriction (LDR) forms for hazardous waste shipped to Ross Incineration Services.

Upon being informed of this violation of hazardous waste regulations, the facility immediately contacted Ross Incineration and acquired LDR forms for each waste stream shipped off-site. Ohio EPA therefore considers this violation abated and no further action is required.

Ohio EPA has the following comment:

1. Ohio EPA wishes to remind the facility about generator closure requirements regarding the previous less than ninety day accumulation area in RC Plant #2. Please find enclosed a guidance document regarding generator closure developed from Ohio EPA's Closure Plan Review Guidance. Ohio EPA discussed this with you at the time of the inspection.

Enclosed you will find copies of the checklists completed during the inspections. Ohio EPA has reviewed the documentation submitted to this office on June 19, 2009, addressing each of the outstanding violations. My review of this documentation reveals that RC has adequately abated the violations discovered during Ohio EPA's June 9, 2009 inspections of RC Plant #1 and Plant #2, and is hereby returned to compliance.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (*i.e.* source reduction). For those wastes and pollutants that are generated, the second is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, visit Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) website at:

http://www.epa.state.oh.us/ocapp/ocapp.html

Please find enclosed a pamphlet regarding OCAPP's services and a list of contact numbers.

The 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-in/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage.

Should you have any questions, please feel free to call me at (330) 963-1181.

Sincerely,

Suzanne Prusnek
Environmental Specialist
Division of Hazardous Waste Management

SP:ddw
Enclosures

ec: Frank Popotnik, DHWM, NEDO, OEPA
Harry Sarvis, DHWM, CO, OEPA
cc: Natalie Oryshkewych, DHWM, NEDO, OEPA

Failure to list specific deficiencies in this communication does not relieve RC from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve RC from liability for any past or present violations of the state's hazardous waste laws.

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: **OHD021151329**	
Site Name	Name: **Rhein Chemie Corporation**	Website: (Optional)
Site Location Information	Street Address: **145 Parker Court** City, Town, or Village: **Chardon** County Name: **Geauga**	State: OH Zip Code: **44024**
Site Land Type (check only one)	Private ☒ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other ☐	
NAICS code(s) www.census.gov/epcd/www/naics.html	**326299**	
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: **Wes** MI: Last Name: **Morrison** Phone Number: **4402792373** Phone Number Extension: E-Mail Address: Fax Number: 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: **Lanxess Corp.** Date Became Owner (mm/dd/yyyy): Owner Type: Private ☒ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other ☐ Street or P.O. Box: **111 RIDC Park West Dr.** City, Town or Village: **Pittsburg** Owner Phone #: **412-809-4765** State: **PA** Country: Zip Code: **15275** Name of Site's Operator: **Rhein Chemie Corporation** Date Became Operator (mm/dd/yyyy): Operator Type: Private ☒ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other ☐ Street or P.O. Box: **same as above** City, Town or Village: Operator Phone #: State: United States Zip Code:	

VIOLATIONS CITED?	☒ 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)
		☐ 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)

- ☒ 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

- ☒ 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 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. Instead just indicate the date of the most recent source record.

D001	D002	F003	P205	U028	U116	U190

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:	**Margie Darling**
Tanks	☐ Yes	☒ No	Other Comments:	
Containers	☒ Yes	☐ No		

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Suzanne	**Prusnek**	**6/9/2009 09:00**

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)

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)]		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:		
	a.	Does the heater burn only used oil that owner/operator generates or	Yes ☐ No ☐ N/A ☑

		used oil received from household do-it-yourself (DIY) used oil generators?	
	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#? [3745-279-24]		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.			

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

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: Safety Glasses, Steel toed boots

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]		Yes ☑ No ☐ N/A ☐
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]		Yes ☑ No ☐ N/A ☐
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]		Yes ☑ No ☐ N/A ☐
4.	Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)]		Yes ☑ No ☐ N/A ☐
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]		Yes ☑ No ☐ N/A ☐
6.	Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]		Yes ☐ No ☑ N/A ☐
7.	Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)]		Yes ☐ No ☑ N/A ☐
8.	Does the generator accumulate hazardous waste?		Yes ☑ No ☐ N/A ☐
NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.			
9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)?		Yes ☐ No ☑ N/A ☐
NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G) & (H).			
10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]		
	a.	Container that meets 3745-66-70 to 3745-66-77?	Yes ☐ No ☐ N/A ☑
	b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes ☐ No ☐ N/A ☑
	c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes ☐ No ☐ N/A ☑
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes ☐ No ☐ N/A ☑
NOTE: Complete appropriate checklist for each unit.			
NOTE: If waste is treated to meet LDRs, use LDR checklist.			
11.	Does the generator export hazardous waste? If so:		Yes ☐ No ☑ N/A ☐
	a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes ☐ No ☐ N/A ☑
	b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes ☐ No ☐ N/A ☑
	c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes ☐ No ☐ N/A ☑
	d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes ☐ No ☐ N/A ☑

	e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes ☐ No ☐ N/A ☑
MANIFEST REQUIREMENTS			
12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]		Yes ☑ No ☐ N/A ☐
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)] & [3745-52-27(A)]		Yes ☑ No ☐ N/A ☐
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]			
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]		Yes ☑ No ☐ N/A ☐
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].			
15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]		Yes ☑ No ☐ N/A ☐
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)]		Yes ☑ No ☐ N/A ☐
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.			
17.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]		Yes ☐ No ☐ N/A ☑
18.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]		Yes ☐ No ☐ N/A ☑
19.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]		Yes ☑ No ☐ N/A ☐
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.			
PERSONNEL TRAINING			
20.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]		Yes ☑ No ☑ N/A ☐ SEE NOV
21.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)]		Yes ☑ No ☑ N/A ☐ Need to train EC's + manifest signers
22.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]		Yes ☑ No ☐ N/A ☐
23.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]		Yes ☑ No ☐ N/A ☐
24.	Does the generator provide annual refresher training to employees? [3745-65-16(C)]		Yes ☑ No ☐ N/A ☐
25.	Does the generator keep records and documentation of:		
	a.	Job titles? [3745-65-16D(1)]	Yes ☑ No ☐ N/A ☐

	b.	Job descriptions? [3745-65-16D(2)]	Yes ☑ No ☐ N/A ☐
	c.	Type and amount of training given to each person? [3745-65-16D(3)]	Yes ☐ No ☑ N/A ☐
	d.	Completed training or job experience required? [3745-65-16D(4)]	Yes ☐ No ☑ N/A ☐ see POV
26.		Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes ☑ No ☐ N/A ☐

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

Job Performed	Name of Employee	Date Trained

CONTINGENCY PLAN

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

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

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

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

EMERGENCY PROCEDURES

32.		Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes ☐ No ☑ N/A ☐
	a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes ☐ No ☐ N/A ☑

	b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes ☐ No ☐ N/A ☑
	c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)?	Yes ☐ No ☐ N/A ☑
NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.			
PREPAREDNESS AND PREVENTION			
33.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]		Yes ☑ No ☐ N/A ☐
34.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:		
	a.	Internal communications or alarm system? [3745-65-32(A)]	Yes ☑ No ☐ N/A ☐
	b.	Emergency communication device? [3745-65-32(B)]	Yes ☑ No ☐ N/A ☐
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes ☑ No ☐ N/A ☐
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes ☑ No ☐ N/A ☐
NOTE: Verify that the equipment is listed in the contingency plan.			
35.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]		Yes ☑ No ☐ N/A ☐
36.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]		Yes ☑ No ☐ N/A ☐
37.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]		Yes ☑ No ☐ N/A ☐
38.	If there is only one employee on the premises, is there immediate access to a device (eg.,phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]		Yes ☑ No ☐ N/A ☐
39.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]		Yes ☑ No ☐ N/A ☐
40.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]		Yes ☑ No ☐ N/A ☐
41.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]		Yes ☐ No ☐ N/A ☑
SATELLITE ACCUMULATION AREA REQUIREMENTS			
42.	Does the generator ensure that satellite accumulation area(s):		
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes ☑ No ☐ N/A ☐
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes ☑ No ☐ N/A ☐
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes ☑ No ☐ N/A ☐
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes ☑ No ☐ N/A ☐
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes ☑ No ☐ N/A ☐
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes ☑ No ☐ N/A ☐

43.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:		Yes ☐ No ☑ N/A ☐
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes ☐ No ☐ N/A ☑
	b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded?[3745-52-34(C)(2)]	Yes ☐ No ☐ N/A ☑

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

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

44.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]		Yes ☑ No ☐ N/A ☐
45.	Is the accumulation date on each container? [3745-52-34(A)(2)]		Yes ☑ No ☐ N/A ☐
46.	Are hazardous wastes stored in containers which are:		
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes ☑ No ☐ N/A ☐
	b.	In good condition? [3745-66-71]	Yes ☑ No ☐ N/A ☐
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes ☑ No ☐ N/A ☐
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes ☑ No ☐ N/A ☐

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

47.	Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days.		Yes ☑ No ☐ N/A ☐
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes ☑ No ☐ N/A ☐
48.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]		Yes ☑ No ☐ N/A ☐
49.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]		Yes ☑ No ☐ N/A ☐
50.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]		Yes ☐ No ☐ N/A ☑
51.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]		Yes ☐ No ☐ N/A ☑

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

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

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

PRE-TRANSPORT REQUIREMENTS		
53.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes ☑ No ☐ N/A ☐
54.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes ☑ No ☐ N/A ☐
55.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes ☑ No ☐ N/A ☐

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

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: Safety Glasses, steel toed boots, hearing prot.

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]		Yes ☑ No ☐ N/A ☐
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]		Yes ☑ No ☐ N/A ☐
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]		Yes ☑ No ☐ N/A ☐
4.	Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)]		Yes ☑ No ☐ N/A ☐
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]		Yes ☑ No ☐ N/A ☐
6.	Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]		Yes ☐ No ☐ N/A ☑
7.	Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)]		Yes ☐ No ☐ N/A ☑
8.	Does the generator accumulate hazardous waste?		Yes ☑ No ☐ N/A ☐
NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.			
9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)?		Yes ☐ No ☐ N/A ☑
NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G) & (H).			
10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]		
	a.	Container that meets 3745-66-70 to 3745-66-77?	Yes ☐ No ☐ N/A ☑
	b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes ☐ No ☐ N/A ☑
	c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes ☐ No ☐ N/A ☑
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes ☐ No ☐ N/A ☑
NOTE: Complete appropriate checklist for each unit.			
NOTE: If waste is treated to meet LDRs, use LDR checklist.			
11.	Does the generator export hazardous waste? If so:		Yes ☐ No ☑ N/A ☐
	a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes ☐ No ☐ N/A ☑
	b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes ☐ No ☐ N/A ☑
	c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes ☐ No ☐ N/A ☑
	d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes ☐ No ☐ N/A ☑

	e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes ☐ No ☐ N/A ☑
MANIFEST REQUIREMENTS			
12.		Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes ☑ No ☐ N/A ☐
13.		Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)] & [3745-52-27(A)]	Yes ☑ No ☐ N/A ☐
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]			
14.		Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes ☑ No ☐ N/A ☐
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].			
15.		If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes ☐ No ☐ N/A ☑
16.		Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)]	Yes ☑ No ☐ N/A ☐
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.			
17.		If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes ☐ No ☐ N/A ☑
18.		If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes ☐ No ☐ N/A ☑
19.		Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes ☑ No ☐ N/A ☐
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.			
PERSONNEL TRAINING			
20.		Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes ☑ No ☑ N/A ☐ SEE NOV
21.		Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)]	Yes ☑ No ☑ N/A ☐ need to train EC's + manifest signers
22.		Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes ☑ No ☐ N/A ☐
23.		Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes ☑ No ☐ N/A ☐
24.		Does the generator provide annual refresher training to employees? [3745-65-16(C)]	Yes ☑ No ☐ N/A ☐
25.		Does the generator keep records and documentation of:	
	a.	Job titles? [3745-65-16D(1)]	Yes ☑ No ☐ N/A ☐
	b.	Job descriptions? [3745-65-16D(2)]	Yes ☑ No ☐ N/A ☐

	c.	Type and amount of training given to each person? [3745-65-16D(3)]	Yes ☐ No ☑ N/A ☐
	d.	Completed training or job experience required? [3745-65-16D(4)]	Yes ☐ No ☑ N/A ☐
26.		Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes ☑ No ☐ N/A ☐

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

Job Performed	Name of Employee	Date Trained

CONTINGENCY PLAN

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

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

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

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

EMERGENCY PROCEDURES

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

NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.			
PREPAREDNESS AND PREVENTION			
33.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]		Yes ☑ No ☐ N/A ☐
34.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:		
	a.	Internal communications or alarm system? [3745-65-32(A)]	Yes ☑ No ☐ N/A ☐
	b.	Emergency communication device? [3745-65-32(B)]	Yes ☑ No ☐ N/A ☐
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes ☑ No ☐ N/A ☐
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes ☑ No ☐ N/A ☐
NOTE: Verify that the equipment is listed in the contingency plan.			
35.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]		Yes ☑ No ☐ N/A ☐
36.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]		Yes ☑ No ☐ N/A ☐
37.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]		Yes ☑ No ☐ N/A ☐
38.	If there is only one employee on the premises, is there immediate access to a device (eg.,phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]		Yes ☑ No ☐ N/A ☐
39.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]		Yes ☑ No ☐ N/A ☐
40.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]		Yes ☑ No ☐ N/A ☐
41.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]		Yes ☐ No ☐ N/A ☑
SATELLITE ACCUMULATION AREA REQUIREMENTS			
42.	Does the generator ensure that satellite accumulation area(s):		
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes ☑ No ☐ N/A ☐
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes ☑ No ☐ N/A ☐
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes ☑ No ☐ N/A ☐
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes ☑ No ☐ N/A ☐
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes ☑ No ☐ N/A ☐
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes ☑ No ☐ N/A ☐
43.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: sat accum cont. in < 90 day area		Yes ☑ No ☐ N/A ☐ → see NOV
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes ☐ No ☐ N/A ☑

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

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

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

44.		Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes ☑ No ☐ N/A ☐
45.		Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes ☐ No ☑ N/A ☐
46.		Are hazardous wastes stored in containers which are:	
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes ☑ No ☐ N/A ☐
	b.	In good condition? [3745-66-71]	Yes ☑ No ☐ N/A ☐
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes ☑ No ☐ N/A ☐
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes ☑ No ☐ N/A ☐

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

47.		Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days.	Yes ☑ No ☐ N/A ☐
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes ☑ No ☐ N/A ☐
48.		Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes ☑ No ☐ N/A ☐
49.		Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes ☑ No ☐ N/A ☐
50.		If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes ☑ No ☐ N/A ☐
51.		If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] always use new	Yes ☐ No ☐ N/A ☑

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

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

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

PRE-TRANSPORT REQUIREMENTS

53.		Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes ☑ No ☐ N/A ☐
54.		Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes ☑ No ☐ N/A ☐
55.		Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes ☑ No ☐ N/A ☐

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			
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 ☐ 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			
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)] (this change makes it like the LQUWH checklist)	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			
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			
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)] (this change makes it like the LQUWH checklist)		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)] (this change makes it like the LQUWH checklist)	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 ☑