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State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

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

December 22, 2009

RE: SERVICE GUIDE INC.  
OHD 144 217 429  
TRUMBULL COUNTY  
CESQG  
NOTICE OF VIOLATION (NOV)  
COMPLAINT NUMBER 7268

Jim Giuliani  
Safety & Quality Manager  
Service Guide Inc.  
250 Dietz Road  
Warren, OH 44483

Dear Mr. Giuliani:

On November 10, 2009, I, as a representative of the Ohio EPA Division of Hazardous Waste Management, conducted an inspection of Service Guide Inc. (Service Guide), located at 250 Dietz Road, Warren, Ohio, for compliance with Ohio's hazardous waste and used oil regulations. I was accompanied by Erm Gomes representing Ohio EPA Division of Surface Water. Also present during part of the inspection was Keith Folman from the City of Warren. You and Trevor Totten, Electrical Maintenance Manager, represented Service Guide during the inspection. You subsequently provided additional information by fax and email.

This inspection was in response to a complaint received by Ohio EPA alleging that oil had been spilled "all over" at the facility, that oil is entering a storm drain, that a large number of drums without labels are stored inside and outside the facility and that a large indoor storage area was located in the southwest corner of the building. The complaint was received from an anonymous caller to the Ohio EPA Emergency Response Section and by an email. The email included photos of drums and other containers located outdoors that the emailer alleged contained wastes.

At the time of the inspection the drums and other containers located outdoors that were visible in the emailed photos had been removed. The facility representative reported that all the drums and containers visible in the emailed photos had been empty and were removed by the contractor after facility became aware of the emailed photos. The facility further reported that all the totes belonged to the facility's environmental contractor and were at Service Guide for a special maintenance project. The facility also reported that the plastic 55 gallon drums in the photo were drums that water soluble detergent for the parts washer had been received in.

Some drums and containers without labels were observed in two rooms in the southwest corner of the building. Some were empty; others had materials in them.

The facility is an industrial maintenance service shop. Primary activity at this facility is repair of large bearing assemblies from heavy industries such as steel mills. The first step in repair is a two-step cleaning process utilizing hot water washing followed by solvent washing. The hot wash washing process uses water plus a product composed of biosurfactants and other surfactants and enzymes to remove the bulk of the grease from the parts. Grease sludge accumulates in the washer and is removed by Environmental Specialists as a non-hazardous waste. The solvent washing step for bearing cleaning uses a mineral spirits solvent with a flash point above 140°F per the MSDSs provided by the facility. Spent solvent is removed by Environmental Specialists as a non-hazardous waste.

In addition to following-up on the complaint, the inspection included a review of the facility's operations, as well as its waste management practices and documentation. It appeared that for most months Service Guide is a Conditional Exempt Small Quantity Generator (CESQG) of hazardous waste because Service Guide typically generates less than 220 pounds of hazardous waste in a calendar month from normal operations. For purposes of this letter Service Guide is being evaluated to determine compliance with the requirements for Conditional Exempt Small Quantity Generator (CESQG) of hazardous waste. A CESQG is one that generates less than 220 pounds of hazardous waste in a calendar month and has less than 2,200 pounds of hazardous waste on-site at any one time.

Any facility that generates more than 220 pounds but less than 2,200 pounds of hazardous waste in a calendar month or that has between 2,200 and 13,200 pounds on-site at one time is subject to the SQG requirements until that waste is no longer on site. Any facility that generates more than 2,200 pounds of hazardous waste in a calendar month is subject to the LQG requirements until that waste is no longer on site. Any facility, other than an LQG, with more than 13,200 pounds of on-site at one time is operating an unpermitted hazardous waste storage facility as is an SQG that accumulates for more than 180/270 days or a LQG that accumulates for more than 90 days.

If as Service Guide evaluates the containers noted below it is determined that the quantity of hazardous waste on-site at the time of the inspection exceeded 2,200 pounds, generator status may be revised and additional violations may be cited.

Facilities that vary in generator status are called episodic generators. A guidance document on generator status is enclosed for your information.

**Service Guide must respond to this letter and submit all requested documentation to this office within 30 days of the date of this letter.**

Based on observations made during the inspection, Ohio EPA has determined that Service Guide has violated the following state hazardous waste and used oil regulations:

**1. OAC Rule 3745-52-11 Waste Evaluation**

OAC Rule 3745-52-11 requires "Any person who generates a waste...[to] determine if that waste is a hazardous waste using the following...Testing the waste...or...Applying knowledge of the hazardous characteristic of the waste in light of the materials or the processes used."

A number of containers of waste had not been evaluated as required by OAC Rule 3745-52-11 at the time of the inspection.

Attached are photos labeled PB 110 114, PB 110 115 and PB 110 116, all taken in the southwest corner of Bay No. 4. Some containers were empty; others had materials in them. The contents of the non-empty containers had not been evaluated as required by OAC Rule 3745-52-11. Facility was aware of these containers prior to the inspection and had contacted Environmental Specialists to evaluate contents.

In an email received on December 11, Service Guide reported that: "On Monday, December 14th, a representative from Environmental Specialists will be on site to obtain samples of drums located in the southwest corner of the building. Analysis of each sample is expected to be completed within 10 to 14 days thereafter."

Also attached are photos labeled PB 100 118 and PB 100 122 taken at other locations in Bay No. 4. Most of these were empty but a few probably were not. The contents of those that were not empty need to be evaluated as required by OAC Rule 3745-52-11.

Also attached is a photo labeled PB 100 105 of a 5 gallon pail approximately ½ full of an organic solvent and a couple of paint brushes in the maintenance shop area. Also observed nearby were one gallon cans of Penetrol and S.W. Reducer #54. The contents of the container need to be evaluated as required by OAC Rule 3745-52-11. (Per the MSDS, S.W. Reducer #54 contains methyl isobutyl ketone, xylene and ethyl benzene which would make it a F003, F005 hazardous waste when a spent solvent. Per its MSDS, Penetrol has a flash point of 125°F but would not be a listed hazardous waste when a spent solvent.)

To return to compliance the facility must:

- Evaluate all wastes identified above to determine if they are hazardous wastes;
- Determine if there are any other wastes currently at the facility that are not named above that have not been evaluated, and if so, evaluate all such wastes to determine if they are hazardous wastes;
- Dispose of all wastes that are hazardous wastes in accordance with the hazardous waste rules;
- Provide current photos after wastes have been removed for areas in photos PB 110 114, PB 110 115, PB 110 116, PB 100 118 and PB 100 and PB 100 105.
- Provide documentation of results of the waste evaluation and waste disposal (e.g., hazardous waste manifests) to this office within 30 days of receipt of this letter.

**2. OAC Rule 3745-273-16 Employee training for small quantity handlers of universal waste**

Facility employees with universal waste duties for managing used fluorescent lamps were not appropriately trained on universal waste requirements.

To return to compliance the facility must:

- Train appropriate personnel with universal waste management duties on applicable universal waste requirements.
- Submit copies of training documentation to this office within 30 days of the date of receipt of this letter.

Enclosed you will find a copy of the checklists completed during the inspection.

**Other Information**

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

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

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

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

Sincerely,



Neil J. Wasilk  
Environmental Specialist  
Division of Hazardous Waste Management

NJW:ddw  
Enclosure

cc: Nyal McKenna, Ohio EPA, DHWM, NEDO  
Harry Sarvis, Ohio EPA, DHWM, CO  
ec: Erm Gomes, Ohio EPA, DSW, NEDO

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](mailto:kristina.durnell@epa.state.oh.us)  
 or mail it to Kristina Durnell, Central Office

<b>Site EPA ID No.</b>	EPA ID Number: OHD 144 217 429	
<b>Site Name</b>	Name: Service Guide Inc.	Website: (Optional)
<b>Site Location Information</b>	Street Address: 250 Dietz Road	State: OH
	City, Town, or Village: Warren	Zip Code: 44483
	County Name: Trumbull	
<b>Site Land Type</b> (check only one)	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>
<b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/wnaics.html">www.census.gov/epcd/www/wnaics.html</a>		
<b>Facility Representative</b>	First Name: <b>Jim</b>	MI: Last Name: <b>Giuliani</b>
Additional names can be recorded in number 12	Phone Number: <b>(330) 395-1103</b>	Phone Number Extension:
Only provide address information if it is different than the site address	E-Mail Address:	Fax Number Extension:
	Fax Number:	
	Street or P.O. Box:	Zip Code:
	City, Town or Village:	
	State:	
<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner:	Date Became Owner (mm/dd/yyyy):
	Owner Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	
	Type: <input checked="" type="checkbox"/>	
	Street or P.O. Box:	Owner Phone #:
	City, Town or Village:	Country: Zip Code: 44105
	State:	Date Became Operator (mm/dd/yyyy):
	Name of Site's Operator: Same as above	
	Owner Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	
	Type: <input type="checkbox"/>	
	Street or P.O. Box:	Operator Phone #:
	City, Town or Village:	United States Zip Code:
	State:	

**VIOLATIONS CITED?**  Yes  No

**TYPE OF HANDLER-- A MINIMUM OF ONE BOX MUST BE CHECKED**

<input type="checkbox"/> Not a HW Generator	<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
		<input type="checkbox"/> Small Quantity Generator (SQG)
		<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
		<input type="checkbox"/> U.S. Importer of Hazardous Waste
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator



*SRV TO GUIDE*

**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 type="checkbox"/> No <input checked="" 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 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. *QUANTITY ON-SITE TO BE DETERMINED*

**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 type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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*NO DOCUMENTATION OF OFF-SITE DELIVERY OF HAZARDOUS WASTE*

**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 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 type="checkbox"/>

*NONE OBSERVED*

**PROCESS DESCRIPTION**

Facility:

Service Guide Inc.  
250 Dietz Road  
Warren, OH 44483

The facility is an industrial maintenance service shop. Primary activity at this facility is repair of large bearing assemblies from heavy industries such as steel mills. The first step in repair is degreasing the parts. Bulk of the degreasing is done with hot water washing in a washing machine. The hot wash washing process uses a detergent composed of biosurfactants and other surfactants and enzymes to remove the bulk of the grease from the parts. Grease sludge accumulates and is removed by Environmental Specialists as a non-hazardous waste. In the washing machine, solids go to the bottom.

Mineral spirits solvent washing is used for additional cleaning of bearings. The solvent washing step for bearing cleaning uses a mineral spirits solvent with a flash point above 140°F per the MSDSs provided. Spent solvent is removed by Environmental Specialists as a non-hazardous waste.

Environmental Specialists (ES) is the facility waste contractor. It is headquartered in McDonald, Ohio. Their processing facility is located in Youngstown, Ohio.

Service Guide facility is located in Highland Township; it uses the City of Warren sanitary sewers.

Wastes generated include:

- Water and oils from water washer
- Spent solvent from bearing washer
- Spent coolant from metal machining.
- Used cutting oils
- Spent solvents from oil-based painting in the maintenance shop
- Rags contaminated with solvents (.e.g., V & M P Solvent, Lacquer Thinner) from wiping parts
- Old paint brushes, rollers and containers

**PROCESS DESCRIPTION—Service Guide**

Page 2 of 2

Containers of unknown materials were present in two rooms the Southwest Inside Room of Bay 4. Facility was aware of these containers. Environmental Specialists had been contacted to evaluate contents.

Facility reports that it does not use chlorinated solvents in the shop. Small quantities of 1,1,1 Trichloroethane are used as cleaner for dye checking for cracks and defects in parts received. No liquid residue; absorbed as spots on rags. Rags go to trash.

Facility reports that it does not conduct acid treatment of parts. Small quantities of nitric acid are used in the lab.

Facility reports that it does not conduct vehicle oil changes.

*SERVICE GUIDE*

**SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS**

**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)] <i>UNKNOWN</i>	Yes <input type="checkbox"/> No <input 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 type="checkbox"/> <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

**WASTE MANAGEMENT AND LABELING/MARKING**

**UNIVERSAL WASTE BATTERIES - NONE OBSERVED**

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 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 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 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 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 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 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 type="checkbox"/> N/A <input type="checkbox"/>

**UNIVERSAL WASTE PESTICIDES - NOT OBSERVED**

8.	Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97, of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
11.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(B)(4)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-14(B)(1)&(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-14(C)(1)&(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

UNIVERSAL WASTE THERMOSTATS <i>NONE OBSERVED</i>		
14.	Have thermostats that show evidence of leakage, spillage or damage that could cause leaks been contained in a container that is closed, structurally sound, compatible with contents of the thermostats and lacks evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(C)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]	
a.	Remove the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-13(C)(2)(a)&(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)&(d)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-13(C)(2)(h)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
16.	When removing mercury containing ampules from thermostats if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining thermostat units), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-13(C)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-13(C)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
17.	Are thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)"? [3745-273-14(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
UNIVERSAL WASTE LAMPS		
18.	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 type="checkbox"/> N/A <input type="checkbox"/> <i>DID NOT OBSERVE DURING INSPECTION</i>
19.	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 type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>DID NOT OBSERVE</i>
<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>		

20.	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)] <i>DID NOT OBSERVE</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>ACCUMULATION TIME</b>		
21.	Is the waste accumulated for less than one year? [3745-273-15(A)] <i>DID NOT OBSERVE</i>	Yes <input 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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: Accumulation is defined as date generated or date received from another handler.</i>		
22.	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>EMPLOYEE TRAINING</b>		
23.	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 type="checkbox"/> No <input type="checkbox"/> <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<b>RESPONSE TO RELEASES</b> <i>DID NOT OBSERVE</i>		
24.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
25.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
26.	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 type="checkbox"/>
<b>OFF-SITE SHIPMENTS</b> <i>DID NOT OBSERVE</i>		
<i>NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.</i>		
27.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
28.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
30.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input 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 type="checkbox"/>
31.	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 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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

32.	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 type="checkbox"/>
<b>EXPORTS</b>		
33.	Is waste being sent to a foreign destination? If so:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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 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 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 type="checkbox"/>