

**Environmental  
Protection Agency**

**Governor  
Lt. Governor  
Director**

September 2, 2011

Christine Jones  
Environmental Assurance Engineer  
The Lubrizol Corporation  
155 Freedom Road  
Painesville, OH 44077-1234

**RE: LUBRIZOL PAINESVILLE, TSDBLQG, OHD 004 172 623/02-43-178, LAKE COUNTY,  
NOTICE OF VIOLATION/RETURN TO COMPLIANCE**

Dear Miss Jones:

On August 23, 2011, Ohio EPA, represented by Ed D'Amato conducted a compliance evaluation inspection of the Lubrizol Corporation's Painesville, Ohio facility. The purpose of the inspection was to determine Lubrizol's compliance with its hazardous waste permit and Ohio's hazardous waste laws and regulations found under the Ohio 'Revised Code (ORC) and the Ohio Administrative Code (OAC). Lubrizol was represented by you and Ken Frato.

The following violations were found:

**1. Satellite Containers  
OAC 3745-52-34 (C)(1)**

*A generator may accumulate as much as fifty-five gallons of hazardous waste...at or near any point of generation where waste initially accumulate which is under control of the operator...*

Lubrizol had accumulated more than 55 gallons in its satellite accumulation area in Building 21. There were two drums containing the same waste stream, one of which was full. It appears the first drum became full on or about February 15, 2011.

**2. Management of Satellite Containers  
OAC 3745-52-34 (C)(2)**

*A generator may accumulate as much as fifty-five gallons (55) of hazardous waste in containers at or near any point of generation. A generator who accumulates in excess of fifty-five (55) gallons of hazardous waste at or near any point of generation shall, with respect to that amount of excess waste, comply within three (3) days with OAC rule 3745-52-34 (A).*

Lubrizol failed to comply with this rule for the excess drum of waste in violation #1. During the inspection Lubrizol moved the excess drum to the less-than-90-day accumulation pad near the incinerator.

On September 1, 2011, Ohio EPA received a letter explaining that key Lubrizol personnel have been reminded of the satellite accumulation rules, training logs will be updated to ensure satellite accumulation is covered, and plant-wide training is being planned to reinforce satellite accumulation rules.

Lubrizol's actions are sufficient to correct violations 1 and 2 above. No further action is required regarding these violations.

**3. Labeling/Marking Standards for Universal Waste  
OAC 3745-273-14(E)**

*Each universal waste lamp or a container or package in which such lamps are contained, must be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)", or "Waste Lamp(s)", or "Used Lamp(s)"*

There were approximately 5 boxes of universal waste lamps in Building 77 that were not labeled per this rule. To correct this violation, you must label the boxes, photograph them and submit the photographs to this office.

**4. Universal Waste Management Standards—Containers  
OAC 3745-273-13(D)**

*A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage...such containers must be kept closed and must lack evidence of leakage, spillage or damage.*

Three of the boxes of lamps were not closed and one box was not adequate to prevent breakage. On September 1, 2011, Ohio EPA received a postal letter and an e-mail with photographs showing that all lamps were in appropriate containers, closed, and were properly labeled. No further action is required regarding this violation.

Enclosed are copies of the checklists used for the inspection.

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

Please feel free to contact me at (330) 963-1170 if you have any questions.

Sincerely,



Edward J. D'Amato  
Environmental Specialist  
Division of Materials and Waste Management

EJD:ddw  
Enclosure

ec: Natalie Oryshkewych, DMWM, NEDP  
Frank Popotnik, DMWM, NEDO  
cc: John Nyers, DMWM, CO  
Regional Offsite Administrator, DE-9J, USEPA, Region V

**LUBRIZOL—PAINESVILLE  
OHIO PART B PERMITTED FACILITY  
RCRA INSPECTION CHECKLIST**

Facility: Lubrizol—Painesville Ohio Permit: 02-43-078  
 Address: 155 Freedom Rd USEPA ID: OHD 004 172 623  
Painesville, OH 44077  
 County: Lake Phone: (440) 943-1200  
 Inspection Date: 8/23/11

Was advanced notice given?  Yes  No

**Name                                      Agency/Title                                      Phone**

Inspectors: Ed D'Amato                                      OEPA-DHWM                                      (330)963-1170

Facility Reps: Christine Jones                                      Env. Assurance Eng.  
Ken Frato                                      E.H+S mgr

Is facility operating as a generator?  Yes  No

**PERMIT STATUS**

Permit Issued: March 31, 2004                                      LDR Checklist Attached?  Yes  No  
 Permit Effective Date: March 31, 2004                                      Used Oil Checklist Attached?  Yes  No  
 Permit Expiration Date: March 31, 2014                                      Generator Checklist Attached?  Yes  No

Permit Renewal Date: \_\_\_\_\_ Permit Modification Date: \_\_\_\_\_

**AUTHORIZED ACTIVITIES**

<b><u>STORAGE</u></b>		<b><u>TREATMENT</u></b>		<b><u>DISPOSAL</u></b>	
<input type="checkbox"/>	Containers	<input checked="" type="checkbox"/>	Tanks	N/A	Injection Well
<input checked="" type="checkbox"/>	Tanks	<input checked="" type="checkbox"/>	Incinerator	N/A	Landfill
<input type="checkbox"/>	Waste Pile	<input type="checkbox"/>	Thermal Treatment	N/A	Land Application
<input type="checkbox"/>	Surface Impoundment	<input type="checkbox"/>	Post-Closure	N/A	Surface Impoundment

Post-Closure Care                                       Corrective Action

## TABLE OF CONTENTS

<b>GENERAL PERMIT COMPLIANCE AND ACTIVITIES.....</b>	<b>3</b>
Permit Modification, Revision, Revocation.....	5
Site Entry-Availability of Records.....	5
<b>RECORDKEEPING/OPERATING REQUIREMENTS .....</b>	<b>6</b>
Operating Record.....	6
Documents To Be Maintained At Facility.....	6
Annual Report Requirement.....	7
Sampling Monitoring and Recordkeeping Requirements.....	7
<b>WASTE MINIMIZATION REQUIREMENTS .....</b>	<b>8</b>
<b>WASTE ACCEPTANCE AND GENERATION.....</b>	<b>8</b>
<b>OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS.....</b>	<b>9</b>
<b>WASTE ANALYSIS/WASTE ANALYSIS PLAN .....</b>	<b>10</b>
<b>GENERAL INSPECTION REQUIREMENTS.....</b>	<b>10</b>
Security Requirements.....	11
Facility Operations.....	11
<b>PERSONNEL TRAINING.....</b>	<b>11</b>
<b>REQUIRED EQUIPMENT .....</b>	<b>12</b>
<b>CONTINGENCY PLAN – EMERGENCY PROCEDURES.....</b>	<b>12</b>
Emergency Coordinator.....	13
Implementation of Contingency Plan.....	14
<b>CLOSURE REQUIREMENTS .....</b>	<b>18</b>
<b>LAND DISPOSAL RESTRICTION REQUIREMENTS.....</b>	<b>15</b>
<b>CORRECTIVE ACTION .....</b>	<b>19</b>
<b>TANK STORAGE, TREATMENT, AND MAINTENANCE .....</b>	<b>16</b>

**GENERAL PERMIT COMPLIANCE AND ACTIVITIES**

1. Has the expiration date of the permit passed? If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. Is the permittee continuing any activity regulated by the permit after the expiration date of the permit? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- b. Has the facility submitted an application for a permit renewal to the director no later than 180 days prior to the expiration date of the permit? (Condition A.6) Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
2. Has the permittee submitted the annual permit fee, Payable to "Treasurer, State of Ohio", to Ohio EPA on or before the anniversary of the date of issuance during the term of the permit? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
3. Is the permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit? [Conditions A.1(b) and A.5] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
4. Have any provisions of the permit been identified as Invalid? [Condition A.4] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
5. Has the facility identified any instances of noncompliance with the permit (ORC Chapter 3734), which may endanger human health or the environment? If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. Did the facility immediately report the following information as specified in Condition A.20?
- i. Information concerning a release of any hazardous waste that may cause an endangerment to the public drinking water supplies; and Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- ii. Information concerning a release of hazardous waste, fire, or explosion at the facility which could threaten human health or the environment outside the facility including a description of:
- a). Name address telephone number of the owner/operator Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- b). Name, address, and telephone number of facility? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- c). Name and quantity of material(s) involved. Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- d). The extent of injuries, if any? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

e). An assessment of the actual or potential hazard to the environment and human health outside the facility? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

f). Estimated quantity and disposition of recovered material that resulted from the incident? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

6. Did the permittee provide a written report to Ohio EPA within five days of becoming aware of the circumstances? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

**Note:** The permittee need not comply with the five day written report requirement if the director, upon good cause shown by the permittee, waives that requirement and the permittee submits a written report within 15-days of the time the permittee became aware of the circumstances. [Condition A.21].

7. Has the permittee identified other instances of noncompliance not provided for in Condition A.22, if so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

a. Did the permittee report these instances to Ohio EPA, DHWM? [Condition A.22]? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

b. Do the reports provided contain the information set forth in Condition A.20? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

c. Has the permittee taken all steps necessary to minimize releases to the environment or prevent any adverse impact on human health or the environment? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

8. Has the permittee planned any changes in the permitted facility or activity which may result in noncompliance with the conditions of the permit? Yes  No \_\_\_ N/A \_\_\_ RMK# ①

a. If so, has the facility provided Ohio EPA with advance notice of such changes? [Condition A.17] *In progress* Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# ①

**Note:** Such notification does not waive the permittee's duty to comply with the permit [Condition A.17]

9. Has the permittee become aware that it failed to submit any relevant facts in the permit or issuance proceedings or that it submitted incorrect or incomplete information in permit issuance proceedings or other submissions to Ohio EPA? If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

a. Has the permittee filed a request for a permit modification, revision, or revocation since permit issuance? [Condition A.2] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

① Facility is constructing a new fire station which will result in changes to the emergency equipment list in the Contingency Plan. Facility intends to submit a class 1 mod for these changes.

**Permit Modification, Revision, Revocation**

- 10. Has the permittee filed a request for a permit modification revision, or revocation since permit issuance? [Condition A.2] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Were the changes made per OAC 3745-50-51? [Condition A.15] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- 11. Has the permit been transferred to a new owner/operator? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. Were the changes made per OAC 3745-50-51? [Condition A.15] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- 12. Has the permittee submitted reports to Ohio EPA for each compliance Schedule of the permit by the scheduled date, unless otherwise specified? [Condition A.19] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- 13. Has the permittee furnished to Ohio EPA upon request relevant information to determine whether cause exists for modifying, revising, revoking, or suspending the permit? [Condition A.10] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- 14. Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- 15. Has the permittee maintained records of all data used to complete the application and any amendments, revisions or modifications to the application? [Condition A.14(c)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- 16. Has the permittee retained a complete copy of the approved application on-site? [Condition A.14(c)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- 17. Has the permittee given notice to the Director as soon as possible of any physical alterations or additions to any of the permitted portions of the facility? If so: Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- a. Were all such changes made per OAC3745-50-51? [Condition A.15] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

**Site Entry-Availability of Records**

- 18. As specified in Condition A.11, has the permittee allowed the director or an authorized representative, upon proper identification to:
  - a. Enter at reasonable times upon the premises where a regulated activity is located or where records are kept under the conditions of the permit? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

- b. Have access to and copy, at reasonable times, any records required to be kept under the conditions of the permit? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. Inspect, at any time, facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- d. Sample, document, photograph or monitor, at reasonable times, any substances or parameter at the location of the facility to assure compliance with the permit or as otherwise authorized by ORC Chapter 3734 and the rules adopted thereunder? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

**RECORDKEEPING/OPERATING REQUIREMENTS**

**Operating Record**

- 1. Does the permittee maintain an operating record per OAC 3745-54-73 and 3745-54-74 and Condition B.22 of the permit which contains the following information:
  - a. A description of the quantity of each hazardous waste and the method(s) and date(s) of its treatment or storage? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - b. The location of each hazardous waste and quantity at each location, including cross-reference to specific manifest numbers? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - c. Records and results of required waste analysis? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - d. Summary reports and details of all incidents that required implementation of the contingency plan? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - e. Records and results of required inspections? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - f. Documents required to be maintained by LDR requirements of OAC 3745-270? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

**Documents To Be Maintained At Facility**

- 2. Is the permittee maintaining the following documents at the facility?: [Condition A.28]
  - a. Waste analysis plan per OAC 3745-54-13? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - b. Contingency plan per OAC 3745-54-53? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - c. Closure plan in per OAC 3745-55-12? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

- d. Cost estimate for facility closure per OAC 3745-55-42? (Estimate only—adequacy will be evaluated by CO financial assurance personnel)[Condition B.36] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- e. Personnel training plan and records required by OAC 3745-54-15? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- f. Inspection schedules developed per OAC 3745-54-15, 3745-55-74 and 3745-55-95? [Condition B.5] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- g. Operating record per OAC 3745-54-73? [Condition B.22] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- h. Post-closure plan, as required by OAC 3745-55-18(A) Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- i. Annually-adjusted cost estimate for facility closure and post-closure, as required by OAC 3745-55-42 and 3745-55-44? [Condition A.28(a)(ix)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
3. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from the date of the inspection? [Condition B.5] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
4. Have any of the documents in Question No. 2 been revised? [Condition A.15] If so, Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. Has the permittee submitted the revisions to Ohio EPA per OAC 3745-50-51? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- b. Have all requirements of OAC 3635-50-51 been met, including Ohio EPA Approval where required? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

### Annual Report Requirement

5. Is the permittee in compliance with annual report requirements set forth in OAC 3745-54-75 and the additional report requirements set forth in OAC 3745-54-77? [Condition B.25] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

### Sampling Monitoring and Recordkeeping Requirements

6. In compliance with Condition A.12(b) of the permit, do the perimeter's record of monitoring information specify the:
- a. Date(s), exact place(s), time(s) and method(s) of sampling or measurement? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. Individual(s) who performed the sampling or measurement? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. Date(s) analyses were performed? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- d. Individual(s) who performed the analyses? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

- e. Analytical technique(s) or method(s) used? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- f. Results of such analyses? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
7. Have the methods used to obtain a representative sample of the waste to be analyzed included the appropriate SW-846 method or an equivalent method specified in the approved waste analysis plan? [Condition A.12(a)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
8. Per Condition A.14 of the permit, is the permittee retaining records of monitoring information as required by the permit for at least three years from the date of sampling including:
- a. All calibration and maintenance records. Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
9. Has Ohio EPA requested submittal of any reports or other information from the permittee? If so:
- a. Have the submittals been signed and certified according to OAC 3745-50-42? [Condition A.13] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

### **WASTE MINIMIZATION REQUIREMENTS**

1. Does the permittee certify at least once every year that a program is in place to reduce the volume and toxicity of hazardous waste generated per Condition A.29(a) and OAC 3745-54-73? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Did the permittee submit the waste minimization report to Ohio EPA within 180 days of journalization of this permit and biennially thereafter? [Condition A.29] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
3. Has the permittee reduced the amount of waste (hazardous waste, solid waste, air emissions, waste water discharges, etc) generated at their facility this year by implementing P2/waste minimization? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

### **WASTE ACCEPTANCE AND GENERATION**

1. Is the permittee storing any container of hazardous waste received from any off-site source that it is not permitted to store? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
2. Has the permittee arranged to receive hazardous waste from a foreign or off-site source that it is not permitted to store? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
3. Has the permittee notified the director at least four weeks prior to the date the permittee expects to receive hazardous waste from a foreign source? OAC 3745-54-12(A), [Condition B.2(a)] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

## OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS

1. Is the permittee complying with the following manifest requirements set forth in OAC 3745-52, 54-70, 54-71, 54-72, and 54-76 [Condition B.24] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Have all hazardous wastes shipped off-site been accompanied by a completed manifest in compliance with OAC 3745-52-20(A)? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. The manifest form used contains all information required by OAC 3745-52-20 and the minimum number of copies required by OAC 3745-52-22? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. Has the permittee designated at least one permitted disposal facility and has/will designate an alternate facility or return waste in compliance with OAC 3745-52-20(B),(C),and (D)? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- d. Have prepared manifests been signed by the permittee and initial transporter in compliance with OAC 3745-52-23? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. As a permittee that generates hazardous waste, are signed copies of all hazardous waste manifests and any documentation required for exception reports retained for at least three years at the facility as required by OAC 3745-52-40 and 3745-54-71(A)(5)? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
3. Does the permittee use only properly registered transporters when removing hazardous wastes? [Condition A.16] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
4. Does the permittee give one copy of the manifest to the transporter, send one copy to the generator within 30-days, and keep one copy for at least three years? [3745-54-71(B)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met? [3745-54-71(B)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. Are any significant discrepancies been reconciled within 15 days as required by 3745-54-72(B)? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
5. Have any manifest discrepancies been reconciled within 15 days as required by 3745-54-72(B)? If not Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Has the owner/operator submitted the required information to the director? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

**WASTE ANALYSIS/WASTE ANALYSIS PLAN**

- 1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information of the waste in accordance with OAC Chapters 3745-54 to 57, 3745-218 and 3745-270 and the terms and conditions of the permit? [Condition B.3(a)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- 2. Does the permittee follow the procedures described in the WAP? (Section C of the Application)? [Condition B.3(b)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - a. Is the schedule kept at the facility? [OAC 3745-54-15(B)(2)] Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- 3. Does the permittee repeat the waste analysis when the process or operation generating the hazardous waste has changed, or at least annually? [Condition B.3] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- 4. Does the permittee place the results of all waste analyses in the facility operating record in accordance with OAC 3745-54-73? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

**GENERAL INSPECTION REQUIREMENTS**

- 1. Is the permittee following the inspection procedures and schedules set forth in the permit (Section F of the application) and the requirements of OAC 3745-54-15(A)(C) and (D)? [Condition B.5] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- 2. Is the permittee following the approved inspection schedule for: monitoring equipment, safety equipment, emergency equipment, security devices, and operating and structural equipment as specified in OAC 3745-54-15(B) [Section F] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- 3. Does the permittee remedy deterioration or any malfunctions discovered by an inspection in a timely manner (OAC 3745-54-15(c))? [Condition B.5] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- 4. Do inspection records contain the following information (OAC 3745-54-15(D))?
  - a. Date and time of inspection? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - b. Name of inspector? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - c. Notation of observations made? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - d. Date and nature of any repairs or remedial actions? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

## Security Requirements

1. Is the permittee complying with OAC 3745-54-14 and Condition B.4 of the permit? [Section F]
- a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. A means to control entry, at all times, through gates or other entrances to the active portion of the facility? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Per OAC 3745-54-14(c), does the permittee have signs reading "Danger-Unauthorized Personnel Keep Out" posted at the entrances to the active portions of the facility and other locations? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

## Facility Operations

3. Is construction, maintenance, and operation of the facility being conducted to minimize the possibility of a fire, explosion or unplanned release of hazardous waste or hazardous waste constituents to air, soil, ground or surface water? [OAC 3745-54-31; Condition B.1] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
4. Does the Permittee operate and maintain the facility in accordance with fire, explosion, or release prevention procedures, practices and design specification provided in Sections D, F, and G, of the Part B permit application [OAC 3745-54-31, Condition B.1] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
5. Does the permittee properly maintain and operate the facility to achieve compliance with the terms and conditions of the permit [Condition A.9] including:
- a. Effective management practices? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. Adequate funding? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. Adequate operator staffing and training? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- d. Adequate laboratory and process controls? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

## PERSONNEL TRAINING

1. Is the permittee conducting personnel training per Section H of the Application and the following requirements of OAC 3745-54-16? [Condition B.6]:
- a. Personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC 3745-54-16(A)(B)(C)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

b. Personnel training to new employees within six months after their date of employment [OAC 3745-54-16(B)]? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

c. Annual refresher training [OAC 3745-54-16(C)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

2. Is the permittee maintaining personnel training records as per OAC 3745-54-16(D) and Section H, including: written job titles, job descriptions, and documented employee training records? [Condition B.6] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

**REQUIRED EQUIPMENT**

1. Has the permittee equipped the facility with the emergency equipment specified in Section G? [OAC 3745-54-32, Condition B.9]? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

a. An internal communications or alarm system? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

b. A device capable of summoning emergency assistance from local emergency authorities? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

c. Portable fire extinguishers and/or fire control equipment, spill control and decontamination equipment? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

d. Water of adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers or water spray systems? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

2. Is the permittee inspecting, testing, and maintaining the equipment specified to ensure its proper operation in accordance with OAC 3745-54-33 and Condition B.10? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

3. Has the permittee provided all personnel involved in the operation with immediate access to an internal alarm or emergency communication device [OAC 3745-54-34, Condition B.11]? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

**CONTINGENCY PLAN – EMERGENCY PROCEDURES**

1. Per Condition B.13 of the permit and OAC 3745-54-37(A) and (B), does the permittee:  
a. Familiarize emergency response agencies with the facility layout, associated hazards, places where personnel will normally be working, entrances and evacuation routes? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

b. Inform such agencies of safety equipment, supplies, proper emergency safety procedures that are applicable to the facility? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

- c. Familiarize the local hospital, police, fire dept., and other responders listed in the permit application with the properties of haz waste handled at the facilities and the types of injuries or illness that could result from fires, explosions and releases? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Have any response agencies declined to enter into the arrangements set forth in OAC 3745-54-37(A)?, If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. Has the permittee documented the refusal in the operating record? (OAC 3745-37(B), [Condition B.13(b)])? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
3. Has the permittee submitted a copy of the approved contingency plan (including amendments, revisions, or changes) to all local authorities, agencies, and response contractors designated in the approved contingency plan? [OAC3745-54-53, Condition B.18(b)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
4. Has the permittee notified all parties identified in the contingency plan, in writing of amendments, modifications, or revisions to the plan within 10 days of the effective date of the change in the plan? [Condition B.18(b)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
5. Has the permittee submitted a copy of the approved contingency plan and all revisions, amendments, modifications to the Ohio EPA, Division of Emergency and Remedial Response in accordance with OAC 3745-54-53? [Condition B.18(c)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
6. Is the permittee reviewing the approved contingency plan at least annually and amending the plan immediately if needed as per OAC 3745-54-54 [Condition B.17] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

### Emergency Coordinator

7. Is there an emergency coordinator on premises or on call at all times? [OAC 3745-54-55; Condition B.19] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
8. Is/are the emergency coordinator(s) at the facility familiar with the following [OAC 3745-54-55; Condition B.19]:
- a. Contingency Plan? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. Facility operations/activities? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. Waste characterization and location? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- d. Location of all records in the facility? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- e. Facility Layout? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
9. Does/do the emergency coordinator(s) have the authority to commit the resources needed to carry out the contingency plan? [OAC 3745-54-55; Condition B.19]? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

10. Does the permittee have a contingency plan for the facility that meets the following: [Condition B.19, Section G]
- a. Describes the actions facility shall take to comply with OAC 3745-54-51 through 3745-54-56 in response to fires, explosions, or any unplanned release of haz waste or haz waste constituents to air, soil, or surface water? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - b. Describes arrangements agreed to by local police, fire departments, hospitals, contractors, and Ohio EPA and the local emergency response team to coordinate emergency services? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - c. Includes and up-to-date list of names, addresses and phone numbers for all persons qualified to act as emergency coordinator in the order that they will assume responsibility for coordination of emergency response? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - d. Includes a list of all emergency equipment, including fire extinguishing systems, spill control equipment, communications and alarm systems and decontamination equipment? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - e. Includes the location and physical description of each item on the list referenced in Question 10(d), and a brief outline of its capabilities? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - f. Includes an evacuation plan for the facility personnel describing signals to be used to begin evacuation, evacuation routes, and alternate evacuation routes in situations where the primary routes could be blocked by releases of hazardous waste? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

### Implementation of Contingency Plan

11. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility since the date of the last inspection? If so:
- Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. Did the permittee immediately implement the approved contingency plan and follow the emergency procedures described in OAC 3745-54-56? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
  - b. Did the permittee immediately notify the Ohio EPA's Division of Emergency and Remedial Response providing the following information [OAC 3745-54-56(D)(2)]:
    - i. Name and telephone number of the reporter Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
    - ii. Name and address of the facility? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
    - iii. Time and type of incident? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

- iv. Name and quantity of materials involved? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- v. The extent of injuries? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- vi. The possible hazards to human health or the environment? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- c. Did the permittee collect and manage as hazardous waste all liquid or solid material resulting from fire, explosion, released material or emergency response materials until such time as the permittee can demonstrate to Ohio EPA that the wastes are not hazardous wastes? [Condition B.16(b)] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- d. Within 15-days of the incident, did the permittee submit to the director a written report of the incident?  
If so: Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- e. Did the permittee note in the operating record the time, date, and details of any incident that required the implementation of the contingency plan? [OAC 3745-54-56(J); Condition B.23]. Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

#### **LAND DISPOSAL RESTRICTION REQUIREMENTS**

1. Does the permittee comply with all applicable regulations regarding land disposal prohibition and restrictions as required by OAC 3745-270? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Does the permittee comply with the notification and certification requirements of OAC 3745-270-07(A)? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
3. Does the permittee comply with the requirements of OAC 3745-270-03 and does not in any way dilute a restricted waste or treatment residue as a substitute for adequate treatment? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
4. Does the permittee retain supporting data used to determine if wastes managed at the facility are restricted from land disposal in the facility files as required by OAC 3745-270-07(A)(5)? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Are copies of all notices, certifications, demonstrations waste analyses, and other documentation produced pursuant to OAC 3745-270 retained for a period of three years as required by OAC 3745-270-07(A)? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
5. Is the permittee in compliance with the requirements of OAC 3745-270-50 regarding the storage of wastes restricted or prohibited from land disposal under OAC 3745-270-50? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

## TANK STORAGE, TREATMENT, AND MAINTENANCE

1. Is secondary containment in the form of an external liner being provided for all permitted hazardous waste tanks (W-Tank Farm)? [3745-66-93(A)(1) to (A)(5)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Has the permittee operated the secondary containment systems per the design plans and descriptions in Sections D and F of the permit application? [Condition D.3] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
3. Is the liner in the secondary containment compatible with the wastes stored in the tank system? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
4. Is the liner free of cracks and gaps? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
5. Is the liner provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at the earliest practical time. Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
6. Is the liner proved with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24-hours or at the earliest practicable time? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
7. Is any liquid which accumulates in the containment unit resulting from spills, leaks, or precipitation removed within 24 hours or at earliest practicable time? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
8. Is ancillary equipment to the tank systems provided with secondary containment (such as double-walled piping, jacketing or a trench)? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_  
If not, is the ancillary equipment inspected daily, Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
9. Is ancillary equipment to the tank systems provided with secondary containment (such as double-walled piping, jacketing or a trench)? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
10. Has the permittee stored or treated wastes in tanks consistent with the restrictions and prohibitions in Table C-1 of the Section C of the application? [Condition D.1(c)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
11. Does the permittee prevent placement of hazardous waste or treatment reagents in tanks or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail? [3745-66-94(A)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
12. Does the permittee use controls appropriate to facility design to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)? [3745-66-94(A)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

13. Has the permittee conducted and documented inspections of the tank system per the inspection schedule in Section F of the application? [Condition D.6] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
14. Has the permittee documented these inspection in the operating record, including inspection of the following: Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Spill Control Equipment (daily)? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. Above ground portion of tank (daily)? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. Data from leak detection equipment (daily)? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- d. Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste (daily)? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
15. Has the permittee had any leaks, spills or releases from the tank system (W-Tank Farm)? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
16. If so, did the permittee do any of the following?
- a. Immediately stop the flow of hazardous waste into the tank system or secondary containment system and inspect the system to determine the cause of the leak? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- b. Remove the waste within 24 hours or the after detection of the release, or at the earliest practicable time, remove as much of the waste as necessary to prevent further release to the environment and to allow inspection and repair of the tank system to be performed? [Condition D.7(a)(ii)]. Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- c. Immediately conduct a visual inspection of all releases to the environment and, based upon the inspection:
- i. Prevent further migration of the release to soils or surface water and [Condition D.7(a)(iii)].
- ii. Remove and properly dispose of any visible contamination? [Condition D.7(a)(iii)]. Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
17. Report the release to Ohio EPA within 24 hrs of detection? [Condition D.8(a)]. Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
18. Was a written report submitted within 30 days of detecting the release that addressed the elements in [Condition D.8b]. Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
19. If major repairs to a tank system were required, was a certification submitted to Ohio EPA within 7 days of returning the tank system to use? [Condition D.7(c)] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
20. Does the permittee have on file at the facility written statements by those persons required to certify the design and installation of the tank system? [Condition D.8(b)]. Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

21. If the permittee was unable to repair and return the tank to to service, was the tank system closed per 3745-66-97? [Condition D.9] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
22. Is the permittee following the special provisions for ignitable or reactive wastes, is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
23. For tanks used to treat or store ignitable or reactive wastes, is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
24. Is the permittee following the special provisions for incompatible wastes specified in Condition D.11? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
25. Has the permittee placed incompatible wastes or materials into the same tank system that has not been decontaminated and which previously held an incompatible waste or material? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. If so, have the requirements of 3745-65-17(B) been met? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
26. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the permittee done one of the following [OAC 3745-66-100]: Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Conducted waste analysis and trial treatment or storage tests? [OAC 3745-66-100(B)]; OR Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [OAC 3745-66-100(B)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

### CLOSURE REQUIREMENTS

1. Does the permittee maintain the approved closure plan at the facility? [Condition B.29; Section I] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Is the permittee keeping at the facility and submitting annually to the Ohio EPA, the latest closure cost estimate per OAC 3745-55-42(D)? [Condition B.36] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
3. Has the permittee amended the closure plan? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- If so:
- Has the plan been amended per OAC 3745-55-18(D)? [Condition B.28] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

4. Has the permittee closed the facility? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_  
If so:
- a. Did the permittee complete closure of the facility 180 days after receiving the final volume of hazardous waste, as per Condition B.31 of the permit? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- b. Was closure conducted per the closure performance standard of OAC 3745-55-11? [Condition B.26] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- c. Did the permittee carry out the approved closure plan as set forth in Section I of the approved permit application [Condition B.27]? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- d. After receiving the final volume of hazardous waste, did the permittee remove all hazardous waste and complete closure activities as per the schedule specified in the approved closure plan? [OAC 3745-55-13; Condition B.31] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- e. Has the permittee decontaminated and/or disposed of all facility equipment, structures, and soils per OAC 3745-55-14 and the approved closure plan? [Condition B.33] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- f. Has the permittee certified that the facility has been closed per the specifications in the approved closure plan? [OAC 3745-55-15, Condition B.33] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- g. Has the permittee submitted a survey plat to the director and local zoning authority no later than the submission of certification of closure of each hazardous waste disposal unit? [Condition B.34] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

### **CORRECTIVE ACTION**

1. Has the permittee identified any new WMU's or releases at the facility? [Condition E.3(f)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. Did the permittee follow the steps in Condition E.10? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

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

**NOTE:** 1. A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

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

**PROHIBITIONS**

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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**NOTE:** For example, used oil contaminated scrap metal stored in a pile.

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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**NOTE:** Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

**GENERATOR STANDARDS**

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
----	--	--

a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
----	---	--

**NOTE:** Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
----	--	--

**NOTE:** If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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a.	Stopped the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
----	----------------------	--

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

c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
----	---	--

d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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[Facility Name/Inspection Date]  
[ID Number]

**LDR CHECKLIST (GENERATOR)**  
**DOES NOT APPLY TO CESQGS**

**GENERAL REQUIREMENTS**

- |    |  |  |
|----|--|--|
| 1. | If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07 (A)(7)]                  | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 2. | Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

*NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07 (A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).*

- |    |  |  |
|----|--|--|
| 3. | Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]           | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 4. | Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 5. | Does the generator generate a listed HW that exhibits a characteristic? If yes,  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

*FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.*

- |    |   |  |
|----|---|--|
| 6. | Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|--|

*NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.*

*NOTE: Written documentation of this determination is not required.*

- |    |  |  |
|----|--|--|
| 7. | Did the generator treat his HW /soil on-site to meet the LDR treatment standard? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|----|--|--|

*NOTE If a Yes@ see question #16.*

- |     |  |  |
|-----|--|--|
| 8.  | Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility?[3745-270-07(A)(2)]          | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 9.  | Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 10. | Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)]  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

	a.	Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>NOTIFICATION FORM</b>			
11.	Does the LDR Notification form contain the following information:		
	a.	Manifest number of the first waste shipment to the TSD?[3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)].	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.			
	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories			
	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.			
	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for?[3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.			
<b>PROHIBITED DILUTION</b>			
12.	Is the HW treated by burning?		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	If No, go to #15.		
13.	Is the HW a metal-bearing HW?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.			
14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless <b>one</b> of the following conditions apply. [3745-270-03(c)]	
	i.	Contains > 1% TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	ii.	Contains organic constituents or cyanide at levels greater than the UST levels?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

	iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	v.	Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	If all responses to 14 a.i. through 14 a.v. are No, HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
15.		Was the HW treated by wastewater treatment?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>NOTE: If Yes, HW is improperly being treated by dilution.</b>			
	b.	Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>NOTE: If the answers to b &amp; c are Ayes@ and Ano@, respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B) and 3745-270-40(A)(3)].</b>			
<b>NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.</b>			
<b>GENERATOR TREATMENT</b>			
16.		Does the generator treat to meet LDRs on-site [3745-270-40(A)]? <i>Incineration</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building <u>to meet</u> the LDR treatment standard? <i>Incineration</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
		If AYes@...complete the rest of the checklist. If ANo@...stop...you are done.	
	a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>NOTE: This is a laboratory analysis but it does not have to be kept by the generator.</b>			
	c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	f.	Is the WAP available for the inspector=s review during the inspection? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>NOTIFICATION FORM</b>			
17.	a.	Contains all information in #11 a-g above and	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	If the treated HW/soil is listed.....notification contains the following certification statement: "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or trough knowledge of the waste, to support this certification that the waste complies with the treatment stands specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:	
	i.	Send a one-time notification to the director?[3745-270- 09 (D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	ii.	Maintain a copy of the notice onsite?[3745-270-09(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iii.	Include in the notification: [3745-270-09(D)(1)(a)]	
		1. Name & address of receiving landfill?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		2. Description of HW when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		3. HW code when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		4. Treatability group when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		5. Underlying hazardous constituents present when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iv.	Contain the right certification statement as required by 3745-270-07(b)(4)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**LARGE QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

CESQG: ≤100 Kg. (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:

**GENERAL REQUIREMENTS**

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Were annual reports filed with Ohio EPA on or before March 1 <sup>st</sup> ? [3745-52-41(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	Has the generator transported or caused to be transported hazardous waste to <b>other</b> than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
7.	Has the generator disposed of hazardous waste <b>on-site without a permit</b> or at another facility <b>other</b> than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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*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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input 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"/>

<i>NOTE: Complete appropriate checklist for each unit.</i>		
<i>NOTE: If waste is treated to meet LDRs, use LDR checklist.</i>		
11.	Does the generator export hazardous waste? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>MANIFEST REQUIREMENTS</b>		
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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>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)]</i>		
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>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)]</i>		
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>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.</i>		
17.	If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
18.	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
19.	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

[Facility Name/Inspection Date]

[ID number]

LQG/September 2010

Page 2 of 7

*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**

21.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	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)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]*

23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
25.	Does the generator provide annual refresher training to employees? [3745-65-16(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
26.	Does the generator keep records and documentation of:	
a.	Job titles? [3745-65-16(D)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Job descriptions? [3745-65-16(D)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Completed training or job experience required? [3745-65-16(D)(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
27.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*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.*

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date Trained</u>

<b>CONTINGENCY PLAN</b>		
28.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 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. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]</i></p>		
30.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
31.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>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.</i></p>		
<b>EMERGENCY PROCEDURES</b>		
33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Did the facility submit a report to the Director within 15	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

[Facility Name/Inspection Date]

[ID number]

LQG/September 2010

Page 4 of 7

	days of the incident as required by 3745-65-56(I)?	
<p><i>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.</i></p>		
<b>PREPAREDNESS AND PREVENTION</b>		
34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
35.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE: Verify that the equipment is listed in the contingency plan.</i></p>		
36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
38.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
39.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>SATELLITE ACCUMULATION AREA REQUIREMENTS</b>		
43.	Does the generator ensure that satellite accumulation area(s):	
	a. Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

*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 than 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**

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

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

48.	Is the container accumulation areas(s) inspected weekly? [3745-66-74]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: "Week" means 7 consecutive days per ORC§1.44(A).*

49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
50.	Are containers of incompatible wastes stored separately from each via a dike, berm, wall or other device? [3745-66-77(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

	accordance with 3745-65-17(B)? [3745-66-77(A)]	
52.	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<p><i>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.</i></p>		
53.	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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<p><i>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 &lt;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]</i></p>		
<b>PRE-TRANSPORT REQUIREMENTS</b>		
54.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS – BATTERIES AND LAMPS**

**Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more**

**Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less**

**PROHIBITIONS**

- |    |   |  |
|----|---|--|
| 1. | Did the SQUWH dispose of universal waste? [3745-273-11(A)]  | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 2. | Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |

**WASTE MANAGEMENT AND LABELING/MARKING**

**UNIVERSAL WASTE BATTERIES**

- |    |  |  |
|----|--|--|
| 3. | Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]  | Yes <input checked="" 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 checked="" 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 checked="" 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 checked="" type="checkbox"/> |
| a. | If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]   | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]  | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 7. | Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

**UNIVERSAL WASTE LAMPS**

- |    |   |  |
|----|---|--|
| 8. | Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]   | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 9. | Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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

ACCUMULATION TIME		
11.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Accumulation is defined as date generated or date received from another handler.</i>		
12.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)]  If yes, describe below:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
EMPLOYEE TRAINING		
13.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RESPONSE TO RELEASES		
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] <i>NO releases since last insp.</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
OFF-SITE SHIPMENTS		
<i>NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.</i>		
17.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
18.	Is the handler aware of DOT requirements for packaging and shipping?  If no, make aware of 49 CFR 171-180.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
21.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u> :	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	a. Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
22.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
EXPORTS		
23.	Is waste being sent to a foreign destination? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

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