



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

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www.epa.state.oh.us

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

February 6, 2009

**RE: TOMLINSON INDUSTRIES
OHD 004 166 120
NOTICE OF VIOLATION AND
PRTC**

Kenneth Sidoti
Tomlinson Industries
13700 Broadway Ave.
Cleveland, Ohio 44125-1992

Dear Mr. Sidoti:

On January 21 and 27, 2009, I met with you and other Tomlinson employees to conduct an inspection of Tomlinson located at 13700 Broadway Avenue in Cleveland, Ohio. I also inspected your operations at 13900 Broadway Avenue which is also included within the hazardous waste ID number of OHD 004 166 120. The purpose was to determine if Tomlinson had violations of Ohio's hazardous waste and used oil laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC).

This letter will document any violations and concerns found and outline what you need to do to correct them. A written response to these issues is required within 30 days.

Another purpose of the inspection was to look for ways you may be able to reduce your waste generation, conserve energy, and save money. An attachment to this letter which covers these issues will be sent in the near future.

The hazardous waste rules that apply to a certain facility are generally based on the amount of hazardous waste generated during a calendar month. Based on your records of hazardous waste shipped during 2008, it appears you are generally a Small Quantity Generator (SQG) (i.e. between 220 and 2200 pounds of hazardous waste generated during a month). Your actual status may change from month to month. The inspection and the attached checklist cover the SQG rules.

The following violations were found: (These follow the same order as the enclosed inspection checklists)

Small Quantity Generator Requirements

1. OAC rule 3745-52-11 – Hazardous waste determination.

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This rule requires that any person who generates a waste must determine if that waste is a hazardous waste. The following documents give more information regarding this:

Identifying Your Hazardous Waste

<http://www.epa.state.oh.us/ocapp/sb/publications/identifyingwaste.pdf>

Use of Generator Knowledge in Complying with OAC 3745-52-11

<http://www.epa.state.oh.us/dhwm/pdf/GeneratorKnowledge6.pdf>

Tomlinson violated this rule by having waste in the secondary containment system below the electroplating tanks and not determining whether or not that waste is a hazardous waste. **You must now determine whether this waste is a hazardous waste and send the results of that determination to me. Any waste that is determined to be hazardous waste must be removed and properly disposed. It is suggested that this secondary containment system be cleaned out regardless of whether the waste is hazardous waste.**

Tomlinson violated this rule by disposing of waste paint booth filters as solid waste without determining whether or not they are a hazardous waste. Specifically, whether or not they are a D007 (for chromium) and/or D008 (for lead) hazardous waste has not been determined. The reason for this is that you have used these two waste codes in disposing of your paint waste. This can be determined by reviewing the MSDS for the paints used and/or by testing the filters. **Please submit the results of your determination to me.**

2. Ohio Revised Code (ORC) 3734.02(E) and (F)—Accumulation beyond 180 days. ORC 3734.02 (E) and (F) state that no person shall establish or operate a hazardous waste facility without a permit and that no person shall store, treat, or dispose of hazardous waste except at a facility with a hazardous waste permit.

Tomlinson violated ORC 3734.02(E) and (F) by storing four drums of F006 hazardous waste pit sludge beyond 180 days. This waste was removed from the pit that collects wastewater from the electroplating and stripping lines in order to repair a leak in the liner of that pit. This was done about seven years ago. The drums were seen stored next to this indoor pit. Most of the contents of one of these drums had been pumped back into the pit a little at a time. When I returned on January 27, 2009, the three full drums had been moved to the main hazardous waste storage area at the south corner of the building. I was told the waste remaining in the fourth drum would be pumped into the pit within the next few days.

Tomlinson violated ORC 3734.02(E) and (F) by storing a drum of hazardous painting waste for greater than 180 days. This drum was stored at the now unused paint booth near the wastewater treatment system. The drum had a 2004 date on its label. I was told this was probably the date the drum started to be filled and that in 2004 this booth was used for painting. I was also told that the drum was about ½ full. When I returned on January 27, 2009, the drum had been moved to the main hazardous waste storage area at the south corner of the building.

These wastes must be shipped to a hazardous waste treatment, storage, or disposal facility as soon as possible. Please send me a copy of the manifest showing this shipment.

Since Tomlinson violated (ORC) 3734.02(E) and (F), Tomlinson is subject to all applicable general facility standards found in OAC chapters 3745-54 and 55. Additionally, at any time Ohio EPA may assert its right to have Tomlinson begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

Although not required at this time, be advised that due to the nature of the violation, Ohio EPA may require cleanup procedures (called closure) pursuant to OAC rules 3745-55-11 through 3745-55-20 and OAC rules 3745-55-42 through 3745-55-47 at this site.

3. OAC rule 3745-52-20(A)–Completion of manifests.

This rule requires the completion of items 1 through 20 on the hazardous waste manifest.

Tomlinson violated this rule by not completing item 5–Generator's mailing and/or site address on manifest 000229143 FLE shipped on July 21, 2008. The next manifest (shipped on November 26, 2008) was complete so this violation is considered to have been corrected.

4. OAC rule 3745-52-34(D)(5)(c) – Employees familiar with waste handling and emergency procedures.

This rule requires that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.

Tomlinson violated this rule because the violations outlined in this letter show that all employees were not familiar with this. **Please send me documentation showing that the issues of this letter have been discussed with all the employees involved.**

5. OAC 3745-52-34(C)(1)–Satellite accumulation area.

This rule requires that containers in satellite accumulation areas not exceed a total of 55 gallons of hazardous waste per waste stream.

Tomlinson violated this rule by having more than 55 gallons of the floor sweepings from the polishing area in the satellite accumulation box on January 21, 2009. On January 27, 2009, I saw that this violation had been corrected because I saw that the bag lining this box and containing the excess waste had been moved to your main accumulation area at the south corner of the building. I was also told that the box has now been replaced by a 55-gallon drum. More information regarding satellite areas can be found at:

http://www.epa.state.oh.us/dhwm/pdf/Satellite_Accumulation_Guidance.pdf

6. OAC 3745-52-34(C)(1)(b)–Satellite accumulation area.

This rule requires that containers in satellite accumulation areas be marked with the words “hazardous waste” or with other words identifying the contents.

Tomlinson violated this rule by not labeling its 55-gallon drum used to collect waste from the dust collection system used for the polishing operation. **Please send me documentation showing that this container has been labeled.**

Tomlinson violated this rule by storing waste nickel filters in satellite containers that were not properly labeled. On January 27, 2009, I saw that this violation had been corrected.

Tomlinson violated this rule by storing waste oil dry that had been used to clean up spills at the electroplating line in satellite containers that were not properly labeled. On January 27, 2009, I saw that this violation had been corrected.

7. OAC rule 3745-52-34(D)(4)–Hazardous waste labels.

This rule requires that each container of hazardous waste be labeled with the words “Hazardous Waste”.

Tomlinson violated this rule by having a drum of hazardous waste generated from the leak of a steam line into the secondary containment system under the electroplating tanks that was not labeled as hazardous waste. On January 27, 2009, I saw that this violation had been corrected.

8. OAC rule 3745-52-34(D)(4)–Accumulation start dates.

This rule requires that each container of hazardous waste be labeled with the accumulation start date. If the container is a 55-gallon drum that qualifies as a satellite container, then this date is the date the drum is full.

Tomlinson violated this rule by having two drums of hazardous waste generated from the leak of a steam line into the secondary containment system under the electroplating tanks that did not have accumulation start dates labeled on them. Based on our discussions, this waste may be close to or over your 180 day accumulation time limit. **This waste must be shipped to a hazardous waste treatment, storage, or disposal facility as soon as possible. Please send me a copy of the manifest showing this shipment.** An alternative to this may be to treat this waste in your wastewater treatment system. Please contact me if you plan to use that alternative.

Generator LDR Checklist

9. OAC rule 3745-270-07(A)(8) - On-site copies of land disposal restriction documentation.

This rule requires that generators must retain on site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to the land disposal restriction rules for at least three years.

Tomlinson violated this rule by not retaining on site a copy of its current Land Disposal Notification/Certification Form for each of its types of hazardous waste. On February 4, 2009, I received the notification form for the F006 filter press sludge (CS5316). **Since you recently sampled the polishing dust (CS5317) and the paint rags (CS024561), send me the results of that sampling and a new land disposal restriction form for each based on those sampling results.**

10. OAC rule 3745-270-07(A)(2) – Land disposal restriction notice sent to receiving facility.

This rule requires certain notification if the waste does not meet the treatment standard. This includes the manifest number of the first waste shipment using this notification form.

Tomlinson violated this rule by not including the manifest number on the notification form for the paint waste (024560).

11. OAC rule 3745-270-07(A)(2) – Land disposal restriction notice sent to receiving facility.

This rule requires certain notification if the waste does not meet the treatment standard. This includes stating which constituents of concern any F001 through F005 waste contains.

Tomlinson violated this rule by not including which constituents of concern the F003 and F005 paint waste contains. This must be put on the notification form unless the waste will be treated and monitored for all constituents. **A complete notification form for the paint waste must be created and a copy of it sent to me. If this waste will not be sent out in the near future then the manifest number can be left blank on the copy you send to me and added when the waste is shipped out.**

Small Quantity Universal Waste Handler Requirements

12. OAC rule 3745-273-13 (D) - Universal waste lamp containers.

This rule requires universal waste lamps to be in closed containers or packages that are structurally sound and adequate to prevent breakage.

Tomlinson violated this rule by having full boxes of waste fluorescent lamps in containers that were not closed. **Please correct this violation and provide documentation of that to me.**

13. OAC rule 3745-273-14 (E) - Universal waste lamp labeling.
This rule requires that containers of universal waste lamps be labeled as Universal Waste - Lamps, Waste Lamps, or Used Lamps.

Tomlinson violated this rule by not having its waste lamps labeled as required. **Please correct this violation and provide documentation of that to me.**

Waste lamps were last shipped out on March 25, 2008. Based on the amount of waste lamps I saw during the inspection, they should again be shipped out before March 25, 2009.

Used Oil Inspection Checklist

14. OAC rule 3745-279-22(C) - Used oil labels.

This rule requires containers and aboveground tanks for used oil to be labeled or marked clearly with the words "Used Oil".

Tomlinson violated this rule by having two containers of used oil that were labeled as waste oil. You corrected this at the time of the inspection.

The following concerns were found:

1. Your Hazardous Waste Storage Areas Weekly Inspection Sheet covers the requirements of OAC rule 3745-66-74 but, I have a few comments regarding it. It indicates that both the satellite areas and the main storage area are to be checked. It is a good idea to check the satellite areas but not a requirement. To use this form for both areas, you may want to include a note that the accumulation date does not need to be marked on satellite containers. The item 'Full drums have been removed after "180-day allowance period?' may be confusing and may be better changed to something like "Are any wastes close to being 180 days old?'. The list of wastes included to indicate how many drums of each is present includes chrome filters. It is my understanding that chrome filters are not generated very often and maybe this list should be updated. It is good (although not required) to include an inspection of the waste lamps. More detail here, such as, "Are all boxes labeled waste lamps?" and "Are all full boxes closed?" may be useful. For a comparison, Ohio EPA has developed an example inspection log which can be found at: <http://www.epa.state.oh.us/dhwm/pdf/sqglog.PDF>.

2. OAC rule 3745-270-03(C)–Dilution prohibited as a substitute for treatment.

This rule states that metal-bearing hazardous waste cannot be incinerated, combusted or blended and burned for fuel unless one of the following conditions apply:

1. Contains greater than 1% total organic carbon,

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2. Contains organic constituents or cyanide at levels exceeding the treatment standard in rule 3745-270-48,
3. Is made of combustible material (e.g. paper, wood, plastic),
4. Has a reasonable heating value (e.g. greater than 5,000 Btu per pound),
or
5. Co-generated with wastes for which combustion is a required method of treatment.

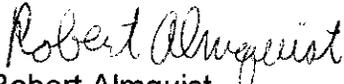
On March 18, 2008, and November 26, 2008, paint waste (CSI # 024560) was shipped to Chemical Solvents using the waste codes of D007 (chromium), and D008 (lead). The manifest listed the management method code of H061 which stands for fuel blending prior to energy recovery at another site. **Please provide information showing whether or not this waste met one of the conditions mentioned above.** An alternative to this would be to determine whether or not these waste codes actually apply to this waste.

The Division of Hazardous Waste Management has created an email service to provide updates on events and news related to hazardous waste activities in Ohio. You can find more information and sign up at: <http://www.epa.state.oh.us/dhwm/listserv.html>.

You can find copies of the regulations and other information on the Division of Hazardous Waste Management web page at: <http://www.epa.state.oh.us/dhwm/>.

If you have any questions, please contact me at (330) 963-1217, or robert.almquist@epa.state.oh.us.

Sincerely,


Robert Almquist
Division of Hazardous Waste Management

RA:cl
Enclosures

cc: Natalie Oryshkewych, DHWM, NEDO

ec: Frank Popotnik, DHWM, NEDO
Harry Sarvis, DHWM, CO
Christine Lucas, Tomlinson

Notice

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

Ohio Environmental Protection Agency
**RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to kristina.durnell@epa.state.oh.us
or mail it to Kristina Durnell, Central Office

| | | | | | | | | | |
|--|--|--|--------------------------------------|--|---|---------------------------------------|---------------------------------------|-----------------------------------|-----------------------------------|
| Site EPA ID No. | EPA ID Number: OHD 004 166 120 | | | | | | | | |
| Site Name | Name: Tomlinson IND | | | | Website: http://www.tomlinsonind.com/ (Optional) | | | | |
| Site Location Information | Street Address: 13700 Broadway Ave. | | | | | | | | |
| | City, Town, or Village: Cleveland | | | | State: OH | | | | |
| | County Name: Cuyahoga | | | | Zip Code: 44125-1992 | | | | |
| Site Land Type (check only one) | Private <input checked="" type="checkbox"/> | County <input type="checkbox"/> | District <input type="checkbox"/> | Federal <input type="checkbox"/> | Indian <input type="checkbox"/> | Municipal <input type="checkbox"/> | State <input type="checkbox"/> | Other <input type="checkbox"/> | |
| NAICS code(s) www.census.gov/epcd/www/naics.html | 333319 | | | | | | | | |
| Facility Representative | First Name: Kenneth | | | MI: C | Last Name: Sidoti | | | | |
| Additional names can be recorded in number 12 | Phone Number: 216-587-3400 | | | | Phone Number Extension: 266 | | | | |
| | E-Mail Address: ksidoti@tomlinsonind.com | | | | | | | | |
| | Fax Number: 216-587-0733 | | | | Fax Number Extension: | | | | |
| | Street or P.O. Box: | | | | | | | | |
| Only provide address information if it is different than the site address | City, Town or Village: | | | | | | | | |
| | State: | | | | Country: | | Zip Code: | | |
| | | | | | | | | | |
| Legal Owner and Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page. | Name of Site's Legal Owner: HGF Associates | | | | Date Became Owner (mm/dd/yyyy): 01/02/1985 | | | | |
| | Owner Type: | Private <input checked="" type="checkbox"/> | County <input type="checkbox"/> | District <input type="checkbox"/> | Federal <input type="checkbox"/> | Indian <input type="checkbox"/> | Municipal <input type="checkbox"/> | State <input type="checkbox"/> | Other <input type="checkbox"/> |
| | Street or P.O. Box: 13700 Broadway Ave. | | | | | | | | |
| | City, Town or Village: Cleveland | | | | Owner Phone #: 216-587-3400 | | | | |
| | State: Ohio | | | | Country: USA | | Zip Code: 44125-1992 | | |
| | Name of Site's Operator: same | | | | Date Became Operator (mm/dd/yyyy): | | | | |
| | Owner Type: | Private <input type="checkbox"/> | County <input type="checkbox"/> | District <input type="checkbox"/> | Federal <input type="checkbox"/> | Indian <input type="checkbox"/> | Municipal <input type="checkbox"/> | State <input type="checkbox"/> | Other <input type="checkbox"/> |
| | Street or P.O. Box: | | | | | | | | |
| | City, Town or Village: | | | | Operator Phone #: | | | | |
| | State: | | | | Country: | | Zip Code: | | |
| Violations Cited? | <input type="checkbox"/> Yes <input type="checkbox"/> No | | | | | | | | |
| Type of Generator | | | | | | | | | |
| <input type="checkbox"/> Not Regulated | | | | <input type="checkbox"/> Conditionally Exempt Small Quantity Generator | | | | | |
| <input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 | | | | <input type="checkbox"/> United States Importer of Hazardous Waste | | | | | |
| <input type="checkbox"/> Large Quantity Generator (LQG) | | | | <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator | | | | | |
| <input checked="" type="checkbox"/> Small Quantity Generator (SQG) | | | | | | | | | |
| Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes) | | | | | | | | | |
| <input type="checkbox"/> Recycler of Hazardous Waste | | | | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace | | | | | |
| <input type="checkbox"/> Underground Injection Control Facility | | | | <input type="checkbox"/> Small Quantity On-Site Burner Exemption | | | | | |
| <input type="checkbox"/> Hazardous Waste Transporter | | | | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption | | | | | |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | | | | | | | | | |

Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply))

Small Quantity Handler of Universal Waste **Large Quantity Handler of Universal Waste**
(accumulates 5,000 kg. or more)

Destination Facility for Universal Waste
(Check all boxes below that apply for each of the three types of facilities above)

| | Managed | Used Oil Activities (Indicate Type(s) of Activity(ies)) | |
|-------------------------------------|-------------------------------------|---|--|
| Batteries | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> Used Oil Generator | <input type="checkbox"/> Off-Specification Used Oil Burner |
| Pesticides | <input type="checkbox"/> | <input type="checkbox"/> Used Oil Transporter | <input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil |
| Mercury containing equipment | <input type="checkbox"/> | <input type="checkbox"/> Used Oil Transfer Facility | <input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner |
| Lamps | <input checked="" type="checkbox"/> | <input type="checkbox"/> Used Oil Processor | |
| | | <input type="checkbox"/> Used Oil Re-refiner | |

Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

D001 D007 D008 D035 F003 F005 F006

Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

| | | | | |
|-------------------|------------------------------|--|--|---|
| Announced | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Additional Facility Representatives: | Christine Lucas, Jim Jarden, Tim |
| Tanks | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Other Comments: will finish inspection on 1-27-09 | |
| Containers | <input type="checkbox"/> Yes | <input type="checkbox"/> No | | |

| | | |
|----------------------|----------------------|--|
| Name of Inspector(s) | Name of Inspector(s) | Date of Inspection/Time (mm/dd/yyyy) (hh:mm) |
| Robert Almquist | | 1/21/2009 01:43 |

OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

| | | |
|---|------------------------|-------------------|
| Signature of Owner, Operator, or an Authorized Representative | Name and Title (Print) | Date (mm/dd/yyyy) |
| | | |

| Process and Waste Summary for: | | | | | | | | |
|--|---|--|-----------|-----------------------|------------------|-------------------------------|--|---|
| Tomlinson, OHD 004 166 120, SQG, 1-21 and 27-09 inspection | | | | | | | | |
| # | Process generating the waste | Waste description and haz. codes | Profile # | Date of last analysis | Date of last LDR | Amount generated | On-site management | Off-site management |
| 1 | Buffing stainless steel, brass, and aluminum | Roto clone (wet scrubber) sludge and material swept off the floor in the buffing area, non hazardous waste | | 12-6-04 | NA | | Shoveled out of the collection bin on the wet scrubber. Floor sweepings collected in container in buffing area | Disposed of as solid waste |
| 2 | General cleaning and cleaning of buffing compound off parts in heated (180 to 200 degrees F) alkaline cleaning tank and associated water rinse tank | Waste soap solution and rinse water | | | | | | Discharged to sanitary sewer |
| 3 | Polishing stainless steel, brass, and aluminum | Polishing dust – swept off the floor around the polishers and collected in drum | CS 5317 | 12-6-04 | ? | Last shipped 706 P on 7-21-08 | Lined cubic yard box for floor sweepings on 1-21-09 but now will use a drum | Shipped to Envirote, Canton, OH for stabilization or chemical |

| | | | | | | | | |
|---|---|--|------------|--|--------|--|---|--|
| | | under the dust collector just for the polishers, D008 (lead) | | | | | to collect them. Metal drum under dust collector outlet. | fixation prior to disposal at another site (code H111) |
| 4 | Nickel and chrome plating, stripping | Wastewaters from these processes | NA | | NA | | Treated in wastewater treatment unit | Treated water discharged to sanitary sewer |
| 5 | Treatment of electroplating waste water | Plating sludge, F006 | CS5316 | | 2-8-07 | Last shipped 1162 P on 7-21-08 | Collected in a satellite drum by the filter press, when drum is full it is taken to a less than 180 day accumulation area at the south corner of the building | Shipped to Envirite, Canton, OH for stabilization or chemical fixation prior to disposal at another site (code H111) |
| 6 | Wet scrubber for air pollution control on chrome tank | Chrome filters, D007 | | | | Shipped 0.03 tons out during 2007, none have been generated since then | | Shipped to Envirite, Canton, OH for stabilization or chemical fixation prior to disposal at another site (code H111) |
| 7 | Stripping of reject parts without use of cyanide | Aqueous stripping solution (shipping name) used nickel strip solution (label | CSI 024557 | | NA | Last shipped 1813 P on 6-30-06 | Filling one drum which is stored by the wastewater | Shipped to Chemical Solvents, Cleveland, OH |

| | | | | | | | | |
|----|--|--|--|--|---|--|---|---------------------------------|
| | | on drum), non hazardous | | | | | treatment system | |
| 8 | Stripping of reject parts using cyanide | Waste stripper, D002 (corrosive), D003 (reactive), D009 (mercury), F007 | | | ? | | Satellite drum next to cyanide destruct of the wastewater treatment system | |
| 9 | Stripping line | Liquid caustic strip solution, D007 (chromium) | | pH less than 12.5 by generator knowledge | ? | | Satellite drum next to caustic tank on the strip line | |
| 10 | Leaks from chrome and nickel electroplating line | Solid material buildup in the secondary containment system under the tanks | | | | | | |
| 11 | Bags to hold anode nickel balls in the nickel tank | Used nickel bags | | Generator knowledge used to determine that it is hazardous waste | ? | | Stored in drum by the nickel tank. On 1-27-09 it had been moved to the main storage area. | |
| 12 | Filtering of nickel tank | Nickel filters | | Generator knowledge used to determine | ? | | Stored in containers by the nickel filter. Filters are put | Shipped to Envirite, Canton, OH |

| | | | | | | | | |
|----|---|--|------------|--|----|--|--|--|
| | | | | that it is hazardous waste | | | into the F006 filter press sludge drum a little at a time. | |
| 13 | Cleaning and also removing dropped parts from nickel plating tank when it was cleaned out | Rags, brass parts, etc., hazardous | | Generator knowledge used to determine that it is hazardous waste | ? | | Stored in drum by plating line. On 1-27-09 it had been moved to the main storage area. | |
| 14 | Spill response | Oil dry used to clean up nickel plating leaks | | Generator knowledge used to determine that it is hazardous waste | ? | | Stored in two drums by nickel tank. On 1-27-09 it had been moved to the main storage area. | |
| 15 | Machining and (at 13900 Broadway) plastic injection molding | Used oil/water/coolant | CSI 024559 | | NA | Last shipped 2677 P on 6-30-06 | Stored in drums inside | Shipped to Chemical Solvents, Cleveland, OH |
| 16 | Printing ink on plastic parts (pad printing) and painting | Rags used for wiping up spills, may not be hazardous waste | CSI 024561 | | | Last shipped 248 P on 11-26-08 using waste codes of D001 (ignitable), D007 | Stored in drum by pad printing | Shipped to Chemical Solvents, Cleveland, OH for storage, bulking, and/or transfer off-site |

| | | | | | | | | |
|----|---|---|--------------------|--|---|--|--|--|
| | | | | | | (chromium), D008 (lead), D035 (MEK), F003, F005 | | (code H141) |
| 17 | Solvent cleaning tank used for pad printing operation | They were not sure what the solvent used is | | | | Not generated in the recent past but I was told is now close to needing to be replaced | | |
| 18 | Painting | Waste paint booth filters | | | | | Disposed of as solid waste | |
| 19 | Painting | Paint waste | CSI 024560 | | | Last shipped 472 P on 11-26-08 using waste codes of D001, D007, D008, D035, F003, F005 | Stored in a satellite drum by the paint booth. When full it is taken to a less than 180 day accumulation area at the south corner of the building. | Shipped to Chemical Solvents in Cleveland for fuel blending prior to energy recovery at another site (code H061) |
| 20 | Priming | Priming waste | Same as waste # 19 | | ? | Same as waste # 19 | Stored in a satellite drum by the paint booth. When full it is taken to a less than 180 day accumulation | Same as waste # 16 |

| | | | | | | | | |
|----|-------------------------------|---------------|--|--|--|--|----------------------------------|--|
| | containing acetone and xylene | | | | | | | |
| 26 | Shipping | Waste pallets | | | | | Stored outside at 13900 Broadway | They are picked up – some to be made into mulch and some to be refurbished |

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

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: Safety boots and glasses

GENERAL REQUIREMENTS

| | | |
|----|---|--|
| 1. | Have all wastes generated at the facility been adequately evaluated? [3745-52-11] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 2. | Has the generator obtained a U.S. EPA I.D. number? [3745-52-12] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 3. | Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 4. | Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 5. | Does the generator accumulate hazardous waste? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: If the SQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements might still apply, e.g. manifest, marking, LDR, etc.

| | | |
|----|---|--|
| 6. | Has the generator accumulated hazardous wastes <u>in excess of</u> (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|--|

NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]

| | | |
|----|---|--|
| 7. | Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|--|

NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.

| | | |
|----|--|--|
| 8. | Does the generator treat hazardous waste in a: | |
| a. | Container that meets 3745-66-70 to 3745-66-77? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? | Yes <input type="checkbox"/> No <input checked="" 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 checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| d. | Containment building that meets 3745-256-100 to 3745-256-102? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

MANIFEST REQUIREMENTS

| | | |
|-----|--|--|
| 9. | Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 10. | Are wastes reclaimed under a contractual agreement? If so: [3745-52-0(E)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Does the contractual agreement specify the type of waste and frequency of shipment? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Is the transport vehicle owned and operated by the reclaimer? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

| | | |
|--|---|--|
| c. | Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist. | | |
| 11. | Have items 1 through 20 of each manifest been completed?[3745-52-20(A)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 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 complete. [3745-52-20 (A)] | | |
| 12. | 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"/> |
| NOTE: The generator may designate on the manifest one alternative 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)] | | |
| 13. | If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative 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"/> |
| 14. | Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation | | |
| 15. | If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? [3745-52-42(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 16. | Are signed copies of all manifests being retained for at least three years? [3745-52-40] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> unknown |
| 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. | | |
| PREPAREDNESS AND PREVENTION | | |
| 17. | Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 18. | Has the following been posted by the telephone: [3745-52-34(D)(5)(b)] | |
| a. | Name and telephone number of emergency coordinator? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Location of fire and spill control equipment, and, if present, fire alarm(s)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Telephone number of local fire department? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 19. | Are employees familiar with waste handling and emergency procedures? [3745-52-34(D)(5)(c)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 20. | Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 21. | Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 22. | Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste: | |
| a. | Internal Alarm system? [3745-65-32(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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 type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> unkno wn |
| 23. | | 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"/> |
| | a. | Are inspections recorded in a log or summary? [3745-65-33] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 24. | | Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (<i>unless the device is not required under OAC 3745-65-32</i>)? [3745-65-34(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 25. | | If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance (<i>unless not required under OAC 3745-65-32</i>)? [3745-65-34(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 26. | | 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"/> |
| 27. | | Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 28. | | 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"/> |
| SATELLITE ACCUMULATION AREA REQUIREMENTS | | | |
| 29. | | 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 the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 30. | | Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: | Yes <input checked="" 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 the 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 | | | |

| | | |
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| 31. | Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(D)(4)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 32. | Is the accumulation date on each container? [3745-52-34(D)(4)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 33. | 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"/> |
| <i>NOTE: Record location on process summary sheets and photograph the area.</i> | | |
| 34. | Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days. | 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"/> |
| 35. | Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 36. | If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 37. | 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"/> |
| <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> | | |
| PRE-TRANSPORT REQUIREMENTS | | |
| 38. | Does each 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 type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> unkno wn |
| 39. | Does each container ≤100 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"/> |
| 40. | Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> unkno wn |

**GENERATOR LDR CHECKLIST
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).

| | | |
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| 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 AYes@ 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)] | Unknown Yes <input 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)] | Unknown Yes <input 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 type="checkbox"/> No <input checked="" 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 type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |

NOTIFICATION FORM

| | | |
|-----|---|--|
| 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 type="checkbox"/> No <input checked="" 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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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 checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents. | | | |
| PROHIBITED DILUTION | | | |
| 12. | | Is the HW treated by burning? If A No, @ go to #15. | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 13. | | Is the HW a metal-bearing HW? | Yes <input checked="" type="checkbox"/> No <input 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 <u>one</u> of the following conditions apply. [3745-270-03(c)] | Concern listed in letter |
| | i. | Contains > 1% TOC? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input 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 type="checkbox"/> |
| | iii. | Is made up of combustible material e.g., paper, wood, plastic? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | iv. | Has a reasonable heating value (e.g., > 5000 Btu)? | Yes <input 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 type="checkbox"/> |
| | b. | If all responses to 14 a.i. through 14 a.v. are A 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 type="checkbox"/> N/A <input type="checkbox"/> |
| 15. | | Was the HW treated by wastewater treatment? | Yes <input type="checkbox"/> No <input 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 type="checkbox"/> |
| NOTE: If Yes, HW is improperly being treated by dilution. | | | |
| | b. | Does the waste carry the D001 code and contain ≥10% TOC? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input 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 type="checkbox"/> |
| NOTE: If the answers to b & c are A yes @ and A no @, respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B) and 3745-270-40(A)(3)]. | | | |
| NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG. | | | |

| GENERATOR TREATMENT | | | |
|--|--|--|--|
| 16. | Does the generator treat to meet LDRs on-site [3745-270-40(A)]? | | Yes <input type="checkbox"/> No <input checked="" 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 to meet the LDR treatment standard? | | Yes <input type="checkbox"/> No <input 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"/> |
| <i>NOTE: This is a laboratory analysis but it does not have to be kept by the generator.</i> | | | |
| 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"/> |
| NOTIFICATION FORM | | | |
| 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: A 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 | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

| | | | |
|--|--|-------------------|--|
| | | 3745-70-07(b)(4)? | |
|--|--|-------------------|--|

| 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 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| WASTE MANAGEMENT & LABELING/MARKING | | |
| UNIVERSAL WASTE BATTERIES I didn't see any battery storage | | |
| 3. | Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 4. | If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 5. | Does the SQUWH conduct any of the following activities: | |
| | a. Sort batteries by type? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. Mix battery types in one container? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | c. Discharge batteries to remove the electric charge? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | d. Regenerated used batteries? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | e. Disassemble them into individual batteries or cells? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | f. Remove batteries from consumer products? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | g. Remove the electrolyte from the battery? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 6. | If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 7. | Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| UNIVERSAL WASTE LAMPS | | |
| 8. | Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are 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 | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

| | | |
|-----|--|--|
| | releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] | |
| 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"/> |

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 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

| | | |
|-----|--|--|
| 11. | Is the waste accumulated for less than one year? [3745-273-15(A)] If not: | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: Accumulation is defined as date generated or date received from another handler.

| | | |
|-----|---|--|
| 12. | Is the length of time the universal waste is stored documented by <u>one</u> of the following: [3745-273-15(C)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d. | Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| e. | Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| f. | Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] | 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] | Covered by violation of 52-34(D) – see letter Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|-----|---|---|

RESPONSE TO RELEASES

| | | |
|-----|---|--|
| 14. | Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 15. | Is the material released characterized? [3745-273-17(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 16. | If the material released is a hazardous waste, is 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 Chapter 3745-52) [3745-273-17 (B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

OFF-SITE SHIPMENTS

NOTE: If a SQUWH self-transport waste, then they must comply with the Universal Waste transporter requirements.

| | | |
|---|---|--|
| 17. | Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| NOTE: SQUWHs are prohibited to send waste to any other facility. | | |
| 18. | If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] | unknown Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 19. | Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 20. | If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following: | |
| | a. Receive the waste back? [3745-273-18(E)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | b. Agree to where the shipment will be 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 one of the following: | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 22. | If the handler received a shipment of hazardous waste that was not 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"/> |
| 23. | If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| EXPORTS | | |
| 24. | 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 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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

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

PROHIBITIONS

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

NOTE: For example, used oil contaminated scrap metal stored in a pile.

| | | |
|----|---|---|
| 2. | Is used oil used as a dust suppressant? [3745-279-12(B)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 3. | Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? | Tomlinson sends it to Chemical Solvents, Cleveland Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

| | | |
|----|---|--|
| 4. | Does the generator mix hazardous waste with used oil? If so, | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input 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)] | I don't know the halogen content Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input 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"/> |
| 7. | Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 8. | Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked AUsed Oil? [3745-279-22(C)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 9. | Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| a. | Stopped the release? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Contained the release? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input 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 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 type="checkbox"/> |

ON-SITE BURNING IN SPACE HEATER

| | | |
|-----|--|----|
| 10. | Does the generator burn used oil in used-oil fired space heaters? [3745-279- | no |
|-----|--|----|

| | | |
|------------|--|---|
| 23] If so: | | |
| a. | Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Are the combustion gases from heater vented to the ambient air? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

GENERATOR TRANSPORTATION

| | | |
|-----|--|--|
| 11. | Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 12. | If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| a. | Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

COLLECTION CENTERS AND AGGREGATION POINTS

| | | |
|-----|---|--|
| 13. | Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 14. | Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 15. | Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.