



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

September 14, 2009

RE: WARREN TRUCK REPAIR
WARREN, TRUMBULL COUNTY
NON-NOTIFIER
COMPLAINT INVESTIGATION
CESQG - NOV

Tom Sikora, Owner
Warren Truck Repair
2421 W. Market St.
Warren, OH 44484

Dear Mr. Sikora:

On August 19, 2009, Ron Fodo and I visited your site to follow-up on hazardous waste violations cited as a result of the April 14, 2009 investigation of your property. We met with you and your son, Chris Sikora and walked through the large four story building, the smaller building to the west of the four story building and the truck repair building on the southeast portion of the site. Pictures were taken within the large building.

On April 14, 2009, investigators observed approximately fifty 55-gallon drums and numerous 5-gallon and other various sized containers located in the large four story building. Many of the drums and containers were in very poor condition and some had leaked their contents onto the floor. At that time, you indicated that you didn't know what was in the drums and containers and had not used the material for an extended period of time. You were advised that you must properly characterize the contents of the drums and containers to determine if they contain hazardous waste according to OAC 3745-51 and if the wastes were hazardous, you were instructed to arrange for proper disposal or treatment at a permitted hazardous waste facility.

On August 19, 2009, when we walked through the large 4 story building, we found among other things on the first floor, 2 pallets full of used batteries that were unlabeled and undated. You indicated these would be sent to a recycler. We found approximately thirty-two 5 gallon pails of concrete sealer stacked on pallets. The containers were in bad condition and the contents from many had leaked and pooled on the floor. We found two spent 8 foot fluorescent lamps in a trash can.

On the second floor we found a group of badly rusted drums, some were empty but two were labeled 'white paint' that you stated you would use to paint the building within the next year. One of these drums of paint appeared to be leaking onto the floor. Across the aisle was a group of nine drums and two spent fluorescent lamps under a tarp. At least three of these were acknowledged to be wastes and were labeled "hardened paint", "junk thinner and water mix", and "dried paint". The others contained hydraulic oil or paint that you plan to use. Toward the center of this floor was a disintegrating cardboard box of spent 8 foot fluorescent lamps that was unlabeled and undated. In another area we found two spent 8 foot fluorescents in a trash can and a bundle of four spent 8 foot fluorescent lamps resting across the top of the trash container. Near the stairwell was a pile of about 30 spent 8 foot fluorescent lamps on the floor.

On the third floor we found a group of 8 drums that you stated contained reacted isocyanate. They were in poor condition and it appeared they had leaked a significant amount of their contents onto the floor. You acknowledged these were a waste and needed to be disposed.

On the fourth floor were five drums you said contained roofing tar. There were another 10-20 pails that you said contained roofing compound.

In the building to the west of the 4 story building we found several unlabelled totes of used oils that you indicated would be used in trucks or in your space heater. There was one unlabeled drum you said was usable thinner (mineral spirits).

In the truck repair building on the southeast portion of the site was a maintenance area with a Dyna-Clean Zep parts washer. This building is heated in winter with a used oil space heater. An unlabeled several hundred gallon steel tank is used to store used oil to be burned. Also there were various unlabeled smaller containers of used oil sitting on the floor around the tank waiting to be emptied into the tank.

We discussed management of universal wastes such as batteries and lamps. I gave you a Universal Waste Guidance Document and a Universal Waste Rules for Handlers of Lamps Guidance Document. We also discussed the burning of used oil in space heaters and I gave you a Burning Used Oil in a Space Heater Guidance Document. We understand that on an ongoing basis the only hazardous wastes being generated are lamps, batteries, and conditionally exempt small quantities of paint thinner and parts washer solvent.

The following violations of the hazardous waste rules and laws were noted.

1. Used Oil Labeling - OAC 3745-279-22(C)(1)

The used oil tank in the truck repair building and numerous totes, drums and smaller containers throughout the site were unlabeled. All containers and tanks holding used oil are required to be labeled "used oil".

Please go through your site and label all containers and tanks of used oil with the words "used oil". It is suggested that all the containers of used oil be gathered together in one area for ease of recycling into your space heater. Submit photos documenting proper labeling and a description of actions taken to comply with this rule.

2. Universal Waste Battery Labeling - OAC 3745-273-14(A)

Two pallets full of used batteries were not labeled. You indicated they would be sent to a recycler. Each used battery or battery container must be labeled "Waste Batteries", "Used Batteries", or "Universal Waste - Batteries". Please label each pallet of used batteries or each individual battery with the proper labeling. Submit photos documenting proper labeling and a description of actions taken to comply with this rule.

3. Accumulation Time Limits for Universal Waste Batteries - OAC 3745-273-15(C)

You must be able to demonstrate the length of time that each universal waste battery has accumulated since it became a waste. This can be done by dating each battery, by dating each pallet of batteries with the earliest date that any of the batteries on the pallet became a waste, by keeping an inventory that identifies the date each battery became a waste or by one of the other methods listed in this rule. Please determine when your batteries became waste and date them accordingly and submit a picture documenting compliance or describe what method has been instituted to comply with this rule.

In general, universal wastes may not be accumulated for longer than one year from the date the wastes were generated. If any of these batteries have accumulated for longer than one year, you must arrange for their proper transport off-site to a battery recycler at once.

4. Training in Universal Waste Management - OAC 3745-273-16

You and your employees were unaware of proper universal waste management requirements. Please describe how you will inform all employees that handle or have responsibility for managing universal wastes of their proper handling, and emergency procedures related to this waste. Submit documentation such as a sign-in sheet and a description of the training provided to employees. The guidance documents provided to you during the inspection should be helpful in this regard.

5. Waste Determinations - OAC 3745-52-11

a.) Fluorescent lamps

Numerous spent fluorescent lamps have not been evaluated to determine if they are hazardous waste as required. As we discussed during the inspection, often spent fluorescent lamps are a hazardous waste because of their mercury, lead or cadmium content. Therefore if being disposed, they would need to be managed as hazardous waste unless you have documentation showing they are non-hazardous. If they are sent for recycling rather than disposal they could be managed as a universal waste rather than as hazardous waste. You can send them for recycling and comply with the universal waste rules, assume they are hazardous and manage them as a hazardous waste, or you can test them and if they are shown to be non-hazardous they can be disposed with the regular trash. The guidance documents I gave you should help you understand the universal waste rules. You asked for a list of recyclers and indicated you would have the lamps sent for recycling. I have enclosed a list of lamp recyclers.

Please confirm with an invoice or other paperwork that all of the spent fluorescent lamps have been sent for recycling. Also please discuss in writing your plan for dealing with this waste stream in the future. Discuss how you will store the spent lamps, how you will label them and how you will keep track of how long they are accumulated on-site.

b.) Concrete sealer

Approximately 32 five gallon rusty, leaking pails of concrete sealer have not been evaluated to determine if they are a hazardous waste. You need to immediately evaluate these wastes to determine if they are hazardous. Enclosed is a guidance sheet titled, Use of Generator Knowledge in Complying with OAC Rule 3745-52-11 that discusses how to make a waste determination. Please submit a written waste determination with supporting documentation. If these wastes are hazardous, they will need to be immediately managed as hazardous waste and sent off-site to a proper hazardous waste facility.

c.) Drums under tarp

The three drums on the second floor, labeled 'junk thinner & water', 'hardened paint', and 'dried paint', have not been evaluated to determine if they are a hazardous waste. You need to immediately evaluate these wastes to determine if they are hazardous.

Please submit a written waste determination with supporting documentation. If these wastes are hazardous, they will need to be immediately managed as hazardous waste and sent off-site to a proper hazardous waste facility.

d.) Drums of isocyanate

The eight rusty, leaking drums of isocyanate on the third floor have not been evaluated to determine if they are a hazardous waste. You need to immediately evaluate these wastes to determine if they are hazardous.

Please submit a written waste determination with supporting documentation. If these wastes are hazardous, they will need to be immediately managed as hazardous waste and sent off-site to a proper hazardous waste facility.

e.) Roofing tar and roofing compound

The five drums of roofing tar on the fourth floor as well as the 10-20 pails of roofing compound have not been evaluated to determine if they are a hazardous waste. You need to immediately evaluate these wastes to determine if they are hazardous.

Please submit a written waste determination with supporting documentation. If these wastes are hazardous, they will need to be immediately managed as hazardous waste and sent off-site to a proper hazardous waste facility.

Please address each of the above violations immediately and submit the requested documentation and written responses to me within 30 days of the date of this letter.

In addition, we recommend that you identify the contents of the drums and totes that contain materials you intend to use and gather like materials together near where they will be used. You should transfer the contents of any containers that are in poor condition to containers that are in good condition and keep those containers closed and safely stored.

Enclosed are the inspection checklists completed for this audit. Copies of Ohio's hazardous waste rules can be found at www.epa.state.oh.us/dhwm. If you have any questions related to this letter, feel free to call me at (330) 963-1226.

Sincerely



Sheryl K. Slone, P.E.
Environmental Engineer
Division of Hazardous Waste Management

SKS:ddw
Enclosures

ec: Ron Fodo, OSI, NEDO
Nyall McKenna, DHWM, NEDO
Natalie Oryshkewych, DHWM, NEDO
Harry Sarvis, DHWM, NEDO

NOTICE: Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with 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. Site Name	EPA ID Number: <u>NONE</u> Name: <u>WARREN TRUCK REPAIR</u> Website: <u>NONE</u> (Optional)	
Site Location Information	Street Address: <u>2421 W. Market St</u> City, Town, or Village: <u>Warren OH</u> State: <u>OH</u> County Name: <u>TRUMBULL</u> Zip Code: <u>44485</u>	
Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.htm	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"/>	
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: <u>Tom</u> MI: <u>3</u> Last Name: <u>Sikora</u> Phone Number: <u>330 395 7351</u> Phone Number Extension: <u>-</u> E-Mail Address: <u>-</u> Fax Number: <u>330 392 8090</u> Fax Number Extension: <u>-</u> Street or P.O. Box: <u>2421 West Market</u> City, Town or Village: <u>Warren</u> Zip Code: <u>44485</u> State: <u>OH</u>	
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: <u>Tom Sikora</u> Date Became Owner (mm/dd/yyyy): <u>1/1/2007</u> Owner Type: <input checked="" type="checkbox"/> 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: <u>2421 W. Market</u> City, Town or Village: <u>Warren</u> Owner Phone #: <u>330 727-0802</u> State: <u>OH</u> Country: <u>trumbull</u> Zip Code: <u>44485</u> Name of Site's Operator: _____ Date Became Operator (mm/dd/yyyy): <u>1/1/2007</u> Operator Type: <input checked="" type="checkbox"/> 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: _____ Operator Phone #: _____ City, Town or Village: _____ United States Zip Code: _____ State: _____	

VIOLATIONS CITED? Yes No

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

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

<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

<input checked="" type="checkbox"/> Batteries
<input type="checkbox"/> Pesticides
<input type="checkbox"/> Mercury containing equipment
<input checked="" type="checkbox"/> Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))

<input checked="" type="checkbox"/> Used Oil Generator
<input type="checkbox"/> Used Oil Transporter
<input type="checkbox"/> Used Oil Transfer Facility
<input type="checkbox"/> Used Oil Processor
<input type="checkbox"/> Used Oil Re-refiner
<input type="checkbox"/> Off-Specification Used Oil Burner
<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner

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

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC

Announced	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Additional Facility Representatives: CHRIS SIKORA
Tanks	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Other Comments:
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)
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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)
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**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 checked="" type="checkbox"/>

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

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

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

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input 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 "Used 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 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"/>

ON-SITE BURNING IN SPACE HEATER

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	YES
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 checked="" 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 checked="" 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 checked="" 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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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 checked="" 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.

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS – BATTERIES AND LAMPS		
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more		
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less		
PROHIBITIONS		
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
WASTE MANAGEMENT AND LABELING/MARKING		
UNIVERSAL WASTE BATTERIES		
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
UNIVERSAL WASTE LAMPS		
8.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <i>cited as 52-11</i>
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"/> <i>cited as 52-11</i>

ACCUMULATION TIME		
11.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	If yes, describe below:	
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 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, 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 type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes <input 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 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 type="checkbox"/> N/A <input type="checkbox"/>
	a. If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 one of the following:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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"/>