



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 27, 2007

Ms. Susan Viglione, Associate Director  
Dept. of Env. and Occupational Safety and Health  
Youngstown State University  
One University Plaza  
Youngstown, OH 44555

**RE: YOUNGSTOWN STATE UNIVERSITY, EPA ID NO. OHD 073 131 237, EPA ID NO. OHD 982 634 255, MAHONING COUNTY, LQG COMPLIANCE INSPECTION, NOV**

Dear Ms. Viglione:

On September 25, 2007, I, as a representative of the Ohio EPA Division of Hazardous Waste Management, conducted an inspection of the Youngstown State University facility (Youngstown State) in Youngstown, Ohio. I inspected the facility to determine Youngstown State's compliance with Ohio's hazardous waste, universal waste and used oil laws and regulations as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). Youngstown State University was represented by Dan Sahli and you.

The inspection included reviews of facility records, interviews with facility personnel and a facility walk through. The results of these reviews are discussed below.

Youngstown State University holds two EPA ID numbers. One of the numbers is for all portions of the campus except for the motor pool building on Wood Street. Because of the location of the motor pool building it has a separate ID number.

Based on the facility documents reviewed and observations made during the facility walk-through, Ohio EPA has determined that Youngstown State has violated the following state hazardous waste regulation:

1. OAC Rule 3745 52 11 Hazardous waste determination

Youngstown State has not evaluated all wastes generated at the facility to determine if they are hazardous wastes as required by OAC 3745 52 11. During the inspection, I observed about a cup of liquid in a trash container in the print shop. Reportedly the liquid consisted of a 50/50 mixture of Auto Wash 6000 and water and inks removed from the printer by use of this mixture. Youngstown State had not evaluated this material to determine if it is a hazardous waste. (The MSDS for Auto Wash 6000 states that the flash point of neat Auto Wash 6000 is 105 F. No information was available on the flash point of the waste.)

To return to compliance Youngstown State must immediately either manage the 50/50 mixture of Auto Wash 6000 and water and inks removed from the printer as a hazardous waste or evaluate it to determine if it is a hazardous waste, and if so, manage as a hazardous waste.

Please submit all of the above requested documentation to this office within 30 days of receipt of this letter demonstrating the above violation has been abated and that the designated actions have been taken.

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

**Other Information**

Environmental compliance guides relevant to your facility can be accessed at the following internet site: <http://www.epa.state.oh.us/ocapp/sb/autoindex.html> . DHWM's policy on *Solvent Contaminated Rags and Wipers* can be found in the Spring 2006 Notifier Article I mentioned on page 8 at <http://www.epa.state.oh.us/dhwm/pdf/NotifierSpring06.pdf>. This guidance contains relevant information on management of the methylene chloride contaminated rags in the print shop.

A list of Ohio EPA DHWM guidance documents can be found at the following internet site: <http://www.epa.state.oh.us/dhwm/guidancedocuments.html>. You can find copies of Ohio's hazardous waste laws and regulations at our web page at: <http://www.epa.state.oh.us/dhwm/Law&Regs.html>.

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign up for this free service. You can find more information at the following Web link <http://www.epa.state.oh.us/dhwm/listserv.html>.

The OEPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes and pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image through pollution prevention. More information about pollution prevention can be found on our website at <http://www.epa.state.oh.us/ocapp/ocapp.html>.

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

Sincerely,



Neil J. Wasilk  
Environmental Specialist  
Division of Hazardous Waste Management

NJW:ddw

Enclosure

cc: Natalie Oryshkewych, Ohio EPA, NEDO  
Harry Sarvis, Ohio EPA, DHWM, CO

**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 [tammy.mcconnell@epa.state.oh.us](mailto:tammy.mcconnell@epa.state.oh.us) or mail it to Tammy McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OHD073 131 237	
3. Site Name	Name: Youngstown State University	Website: (Optional)
4. Site Location Information	Street Address: One University Plaza	
	City, Town, or Village: Youngstown	State: OH
	County Name: Mahoning	Zip Code: 44555
5. Site Land Type (check only one)	<input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input checked="" type="checkbox"/> State <input type="checkbox"/> Other	
6. NAICS code(s) <a href="http://www.epa.gov/epaosopr/nhairs.html">www.epa.gov/epaosopr/nhairs.html</a>		
7. Facility Representative  Additional names can be recorded in numerical order.  Only provide address information if it is different than the site address.	First Name: Susan	MI:
	Phone Number: 330-941-3700	Last Name: Viglione
	E-Mail Address: smviglione@ysu.edu	Phone Number Extension:
	Fax Number: 330-941-3798	Fax Number Extension:
	Street or P.O. Box:	
	City, Town or Village:	State:
8. Legal Owner and/or Operator of the Site List Additional Owners and/or Operators in the Comment Section of another copy of this form page.	Name of Site's Legal Owner:	Date Became Owner (mm/dd/yyyy):
	<input type="checkbox"/> Owner Type: <input 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	
	Street or P.O. Box:	
	City, Town or Village:	Owner Phone #:
	State:	Country:
	Name of Site's Operator:	Date Became Operator (mm/dd/yyyy):
	<input type="checkbox"/> Owner Type: <input 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	
	Street or P.O. Box:	
	City, Town or Village:	Operator Phone #:
	State:	Country:
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)		
<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 checked="" type="checkbox"/> Large Quantity Generator (LQG)	<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator	
<input type="checkbox"/> Small Quantity Generator (SQG)		
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace	
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Small Quantity On-Site Burner Exemption	
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption	
<input type="checkbox"/> Underground Injection Control Facility		

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))

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

Destination Facility for Universal Waste

Check all boxes below that apply for each of the three types of facilities above

	Managed	10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
Batteries	<input type="checkbox"/>	<input 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	

11. 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, etc.). 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 RCRA Info source record, you do not need to list them all. Instead just indicate the name of the most recent source record.

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

Same Annual report:  Yes  No

Announced:  Yes  No

Tanks:  Yes  No

Containers:  Yes  No

Additional Facility Representatives: Dan Sahli

Other Comments:

13. Name of Inspector(s): Neil Wasilk

Name of Inspector(s):

Date of Inspection/Time (mm/dd/yyyy) (hh:mm): 9/25/2007 11:00 a.m.

14. 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 persons properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, and 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)

Youngstown State University  
One University Plaza  
Youngstown, OH 44555

\*\*\*\*\*

## PROCESS DESCRIPTION SECTION

Give a general process description (include all processes at the facility)

Frequently the facility is a SQG for a calendar month. However, it is not uncommon to generate more than 1 kg/calendar month of acutely hazardous waste. Also about once every four years the sand at the rifle range is removed and this exceeds more than 2,200 lbs. Consequently the facility is a LQG for several months each year and operates to comply with LQG regulations.

Violia is contracted to perform lab packing, Violaia also helps evaluate whether a waste is a haz waste.

Waste generation activities include:

- Print shop.
- Rifle range. Spent sand from range is largest volume haz waste stream. Changed about once every 4 years.
- Art department. Waste includes developer from photography. Paint wastes from set production.
- Vehicle maintenance shop for maintaining vehicles owned by the school
- Building maintenance shop
- Chemical and biology labs. Laboratory wastes from various campus laboratories including chemistry and biology teaching and research labs. Hazardous wastes from those sources are collected in satellite accumulation containers in the laboratories. When full, or after the lab no longer generates a waste stream (e.g., the lab course is completed), the containers are moved to a 90-day accumulation area in the basement of Ward Beecher Building.
- Spent fluorescent bulbs. Recently moved from a centralized collection point to a decentralized system with about a dozen collection points in boxes supplied by Violaia.
- Ni-Cad batteries picked up by Violaia.
- Old computer monitors reportedly recycled through a jail or prison-recycling program. Not handled by environmental group.

Steam heat is from steam provided by Youngstown Thermal. Not operated by the university.

University newspaper and media center are 100% digital photography; no longer generate spent developer and fixer.

Walk-Through Observations.

The 90-day accumulation area is in the basement of Ward Beecher Building. Well designed room. Response equipment in room across the hall from 90-day room.

Inspection logs are upstairs.

Room next to 1262 in Bliss Hall has one of the centralized collection points for fluorescent bulbs. Two fiber drums for fluorescent bulbs.

Rifle range. Sand recently replaced. Did not appear to have been used much. Backstop is angled to direct projectiles into the sand bed. Dust vacuumed from the range also managed as haz waste for lead.

### Salada Facilities Complex

Paint shop. Safety Klein Model 1107 Gun and equipment cleaner in room 30-gallon container of haz waste marked "Property of Safety Klein"

Motor Pool. One drum of used oil in shop and two in cabinets. All marked "Used Oil". Lead acid batteries in cage awaiting recycling via battery supplier or for odd batteries via Viola.

Print Shop. One of the clean up solvents container methylene chloride. Spent solution collected on rags and rags are laundered through a commercial laundry. About a cup of liquid in a trash container in the print shop. Reportedly the liquid consisted of a 50/50 mixture of Auto Wash 6000 and water and inks removed from the printer by use of this mixture. Not evaluated.

\*\*\*\*\*

### **WASTE ACTIVITIES AND P2 SUMMARY SECTION**

For each of the processes listed above that generate a waste give the following information: (1) name of process generating waste, (2) name or description of waste generated (e.g. sludge, solvent, ash, used oil, spent lamps, etc.), (3) EPA waste codes, if applicable, (4) quantity generated per month, (5) type of accumulation (container, tank, etc.) (6) waste accumulation location in facility, (7) type of on-site treatment (if used), (8) name of off-site management facility and type of waste management activity occurring there, (9) Current P2 activities, and (10) P2 opportunities

### **REMARKS-GENERAL INFORMATION**

**Regulatory/Enforcement History (if applicable):**

**Additional P2 remarks and information:**

Would this facility be interested in a P2 assessment?

\*If yes, refer promptly to your district P2 coordinator.

Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or  
[p2mail@epa.state.oh.us](mailto:p2mail@epa.state.oh.us) or [www.epa.state.oh.us/ocapp/ocapp.html](http://www.epa.state.oh.us/ocapp/ocapp.html)

**Other:**

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

Facility Name: YOUNGSTOWN STATE UNIVERSITY

Facility Hazardous Waste ID#: OH0 073 131 237 Date of CEI: 9-25-07

CESQG: <100Kg. (Approximately 25-30 gallons) of waste in a calendar month.  
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.  
 LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or >1 Kg. Of acutely hazardous waste in a calendar month.  
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

**GENERAL REQUIREMENTS**

- 1 Have all wastes generated at the facility been adequately evaluated? [3745-52-11] *Liquid (about one cup) in trash in print shop not evaluated.* Yes  No  N/A
- 2 Are records of waste determinations being kept for at least 3 years? [3745-52-40(C)] Yes  No  N/A
- 3 Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes  No  N/A
- 4 Were annual reports filed with Ohio EPA on or before March 1<sup>st</sup>? [3745-52-41(A)] Yes  No  N/A
- 5 Are annual reports kept on file for at least 3 years? [3745-52-40 (B)] Yes  No  N/A
- 6 Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] Yes  No  N/A
- 7 Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] Yes  No  N/A
- 8 Does the generator accumulate hazardous waste? Yes  No  N/A
- 9 Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)? Yes  No  N/A
- 10 Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]
  - a. Container that meets 3745-66-70 to 3745-66-77? Yes  No  N/A
  - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C) and Yes  No  N/A
  - c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes  No  N/A
  - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes  No  N/A

- 11 Does the generator export hazardous waste? If so: Yes  No  N/A
- a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] Yes  No  N/A
- b. Has the generator complied with special manifest requirements? [3745-52-54] Yes  No  N/A
- c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] Yes  No  N/A
- d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes  No  N/A
- e. Are export related documents being maintained on-site? [3745-52-57(A)] Yes  No  N/A

### MANIFEST REQUIREMENTS

12 Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes  No  N/A

13 Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Yes  No  N/A

*NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]*

14 Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] Yes  No  N/A

*NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].*

15 If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes  No  N/A

16 Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] Yes  No  N/A

*NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity of the waste they generate.*

17 If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes  No  N/A

18 If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes  No  N/A

19 Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes  No  N/A

**PERSONNEL TRAINING**

20 Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes  No  N/A

21 Does the personnel training program include instructions to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes  No  N/A

22 Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes  No  N/A

23 Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes  No  N/A

24 Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes  No  N/A

25 Does the generator keep records and documentation of: [3745-65-16(D)]  
a. Job titles? [3745-65-16(D)(1)] Yes  No  N/A

b. Job descriptions? [3745-65-16(D)(2)], Yes  No  N/A

c. Type and amount of training given to each person? [3745-65-16(D)(3)], Yes  No  N/A

d. Completed training or job experience required? [3745-65-16(D)(4)], Yes  No  N/A

26 Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility: [3745-65-16(E)] Yes  No  N/A

Job Performed

Name of Employee

Date Trained

---

---

---

---

---

---

**CONTINGENCY PLAN**

27 Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes  No  N/A

28 Does the plan describe the following:

a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes  No  N/A

b. Arrangements with emergency authorities [3745-65-52(C)]. Yes  No  N/A

c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes  No  N/A

d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes  No  N/A

e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes  No  N/A

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

29 Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes  No  N/A

30 Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] Yes  No  N/A

31 Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes  No  N/A

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

## EMERGENCY PROCEDURES

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

NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

## PREPAREDNESS AND PREVENTION

- 33 Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes  No  N/A
- 34 Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:
- a. Internal alarm system? [3745-65-32(A)] Yes  No  N/A
- b. Emergency communication device? [3745-65-32(B)] Yes  No  N/A
- c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes  No  N/A
- d. Water of adequate volume/pressure? [3745-65-32(D)] (per facility rep) Yes  No  N/A
- NOTE: Verify that the equipment is listed in the contingency plan.
- 35 Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes  No  N/A
- 36 Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes  No  N/A
- 37 Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] Yes  No  N/A
- 38 If there is only one employee on the premises is there immediate access to a device (ex.: phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] Yes  No  N/A

- 39 Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes  No  N/A
- 40 Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes  No  N/A
- 41 Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes  No  N/A

### SATELLITE ACCUMULATION AREA REQUIREMENTS

- 42 Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes  No  N/A
  - b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes  No  N/A
  - c. Do not exceed one quart of acutely hazardous waste at anyone time? [3745-52-34(C)(1)] Yes  No  N/A
  - d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes  No  N/A
  - e. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes  No  N/A
- 43 Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:
- a. Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes  No  N/A
  - b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes  No  N/A
  - c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes  No  N/A

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

## USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

44 Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes  No  N/A

45 Is the accumulation date on each container? [3745-52-34(A)(2)] Yes  No  N/A

46 Are hazardous wastes stored in containers which are:

a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes  No  N/A

b. In good condition? [3745-66-71] Yes  No  N/A

c. Compatible with wastes stored in them? [3745-66-72] Yes  No  N/A

d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes  No  N/A

*NOTE: Record location on process summary sheets and photograph the area.*

47 Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven 7 consecutive days. Yes  No  N/A

a. Are inspections recorded in a log or summary? [3745-66-74] Yes  No  N/A

48 Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes  No  N/A

49 Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes  No  N/A

50 If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] Yes  No  N/A

51 If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] Yes  No  N/A

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

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

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

**PRE-TRANSPORT REQUIREMENTS**

- 53 Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes  No  N/A
- 54 Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes  No  N/A
- 55 Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes  No  N/A

YOUNG STOWN STATE

LDR REQUIREMENTS

- 1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] (possibly also cite 3745-52-11) **If so:**
  - a. **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-270-07(A)(6)]
  - b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-270-07(A)(6)]
- 2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] (possibly also cite 3745-52-11)
- 3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1]
- 4. Does the generator generate a characteristic hazardous waste? **If so:**
  - a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)]

Yes  No  N/A \_\_\_ RMK# \_\_\_

**NOTE:** *If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*

- 5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] **If so:**
  - a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)]

Yes  No  N/A \_\_\_ RMK# \_\_\_

Yes  No  N/A \_\_\_ RMK# \_\_\_

**NOTE:** *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*

6. Has the generator **correctly** determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)] Yes  No  N/A \_\_\_ RMK# \_\_\_

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] Yes  No  N/A \_\_\_ RMK# \_\_\_

**NOTE:** *A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (§402 of CWA), that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater.*[3745-270-03(B)]

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

**Note:** In other words, is combustion a legitimate treatment method

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes  No  N/A \_\_\_ RMK# \_\_\_

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] **If so:** Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05]

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] **If so:**

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

a. The facility can land dispose of the waste. [3745-270-06]

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment?  
**If so:**

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

a. Has the facility complied with 3745-270-04?

Yes \_\_\_ No  N/A  RMK# \_\_\_

**REMARKS**

**NOTIFICATION AND CERTIFICATION REQUIREMENTS**

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1? [3745-270-07(A)(2)] Yes  No  N/A  RMK#
14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1? [3745-270-07(A)(3)] Yes  No  N/A  RMK#
15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1? [3745-270-07(A)(4)] Yes  No  N/A  RMK#
16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1? [3745-270-07(A)(9)] Yes  No  N/A  RMK#
17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] **If so:** Yes  No  N/A  RMK#
- a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes  No  N/A  RMK#

**NOTE:** Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit.(See 270-07(A)(7))

18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)] Yes  No  N/A  RMK#

**REMARKS**

**GENERATORS TREATING HAZARDOUS WASTE**

*NOT TREATING*

- 1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- 2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
  - a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
  - b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- 3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- 4. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

**NOTE:** *If the waste is a characteristic waste, which has been treated to render it non hazardous and subsequently sent to a solid waste landfill, proceed to question 7 & 8.*

- 5. Has the generator sent a notification and certification with the initial shipment of waste?[3745-270-07(A)(5)(c)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- 6. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- 7. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following:
  - i. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
  - ii. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)] Yes \_\_\_ No  N/A  RMK# \_\_\_

**NOTE:** *If the waste will be treated and monitored for all UHCs then they do not need to be listed on the notice.*

8. Has the process/operation generating the waste or the solid waste landfill facility changed? If so: Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- b. Has the director been notified of such changes? [3745-270-09(D)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

**NOTE:** The director need only be notified on an annual basis but no later than December 31.

9. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49(C)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
10. Does each notification/certification form completed, contain the information found in Table1? [3745-270-07(A)(3)] Yes \_\_\_ No  N/A  RMK# \_\_\_

**NOTE:** If the waste will be treated and monitored for all constituents, there is no need to put them all on the LDR notice.

**REMARKS**

**HAZARDOUS DEBRIS**

- 1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)? Yes\_\_\_ No\_\_\_ N/A\_\_\_ RMK#\_\_\_
  - 2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.) Yes\_\_\_ No\_\_\_ N/A\_\_\_ RMK#\_\_\_
  - 3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so: Yes\_\_\_ No\_\_\_ N/A\_\_\_ RMK#\_\_\_
    - a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)] Yes \_\_\_ No  N/A \_\_\_ RMK#\_\_\_
- NOTE:** *If immobilization has been used in a treatment train, it must be the last treatment technology used.*
- 4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so: Yes\_\_\_ No\_\_\_ N/A\_\_\_ RMK#\_\_\_
    - a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] Yes \_\_\_ No  N/A \_\_\_ RMK#\_\_\_
  - 5. Is the waste a PCB waste under 40 CFR Part 761? If so: Yes\_\_\_ No\_\_\_ N/A\_\_\_ RMK#\_\_\_
    - a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)] Yes \_\_\_ No  N/A \_\_\_ RMK#\_\_\_
  - 6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)] Yes \_\_\_ No  N/A \_\_\_ RMK#\_\_\_
  - 7. Does the owner/operator of a treatment facility that claims the debris is excluded under 3745-51-03(F)(1) maintain the following information? Yes\_\_\_ No\_\_\_ N/A\_\_\_ RMK#\_\_\_
    - a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)] Yes\_\_\_ No\_\_\_ N/A\_\_\_  RMK#\_\_\_

- |    |  |  |
|----|--|--|
| b. | Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)]  | Yes ___ No <input type="checkbox"/> N/A ___ RMK# ___                                 |
| c. | A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)]  | Yes ___ No <input type="checkbox"/> N/A ___ RMK# ___                                 |
| 8. | Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F) have the following information? [3745-270-07(D)(3)] | Yes ___ No <input type="checkbox"/> N/A ___ RMK# ___                                 |
| a. | Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)]   | Yes ___ No ___ N/A ___ RMK# ___  |
| b. | Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)]   | Yes ___ No <input type="checkbox"/> N/A ___ RMK# ___                                 |
| c. | Technology used from Table 1? [3745-270-07(D)(1)(c)]   | Yes ___ No <input type="checkbox"/> N/A ___ RMK# ___                                 |
| 9. | Has the above notification been sent to the director? [3745-270-07(D)(1)]  | Yes ___ No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> RMK# ___ |

**REMARKS**

**TREATING FACILITIES**

- 1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13?[3745-270-07(B)] Yes \_\_\_ No  N/A / RMK#\_\_\_
- 2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)] Yes \_\_\_ No  N/A \_\_\_ RMK#\_\_\_
- Note:** *No further notification is necessary until such time that the waste changes or the receiving facility changes.*
- 3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07?[3745-270-07(B)(3)] Yes \_\_\_ No  N/A \_\_\_ RMK#\_\_\_
- 4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so:** Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK#\_\_\_
  - a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)] Yes \_\_\_ No  N/A \_\_\_ RMK#\_\_\_
- 5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? **If so:** Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK#\_\_\_
  - a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)), excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)] Yes \_\_\_ No  N/A \_\_\_ RMK#\_\_\_
  - b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4)[3745-270-07(B)(6)] Yes \_\_\_ No  N/A \_\_\_ RMK#\_\_\_
  - c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)] Yes \_\_\_ No  N/A \_\_\_ RMK#\_\_\_
- 6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)] Yes \_\_\_ No  N/A \_\_\_ RMK#\_\_\_
- 7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have: Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK#\_\_\_

- |   |  |
|---|--|
| a. Copies of all notices and certifications required in 3745-270?   | Yes ___ No <input type="checkbox"/> N/A ___ RMK# ___                                 |
| b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49? | Yes ___ No <input type="checkbox"/> N/A ___ RMK# ___                                 |
| c. Followed the testing frequency specified in the facility's WAP?  | Yes ___ No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> RMK# ___ |

C:\My Documents\OEPA Forms\LDR\_11\_2004.wpd

**REMARKS**

YOUNGSTOWN STATE  
USED OIL INSPECTION CHECKLIST (Short Version)

**NOTE:** This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.

**PROHIBITIONS**

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_  
Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes \_\_\_ No  N/A  RMK# \_\_\_
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes  No  N/A \_\_\_ RMK# \_\_\_
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

**USED OIL GENERATOR STANDARDS**

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes \_\_\_ No  N/A  RMK# \_\_\_
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes \_\_\_ No  N/A  RMK# \_\_\_
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes  No  N/A \_\_\_ RMK# \_\_\_
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes  No  N/A \_\_\_ RMK# \_\_\_
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes  No  N/A \_\_\_ RMK# \_\_\_
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] *NO RELEASES OBSERVED*
- a. Stopped the release? Yes \_\_\_ No  N/A  RMK# \_\_\_
- b. Contained the release? Yes \_\_\_ No  N/A  RMK# \_\_\_

- c. Cleaned up and properly managed the used oil and other materials? Yes \_\_\_ No  N/A  RMK# \_\_\_
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes \_\_\_ No  N/A  RMK# \_\_\_
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- 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 \_\_\_ No  N/A  RMK# \_\_\_
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes \_\_\_ No  N/A  RMK# \_\_\_
- c. Are the combustion gases from heater vented to the ambient air? Yes \_\_\_ No  N/A  RMK# \_\_\_
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes  No  N/A \_\_\_ RMK# \_\_\_

**USED OIL COLLECTION CENTERS AND AGGREGATION POINTS**

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes \_\_\_ No  N/A  RMK# \_\_\_
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes \_\_\_ No  N/A  RMK# \_\_\_
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes \_\_\_ No  N/A  RMK# \_\_\_

**WASTE EVALUATION**

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

*See LQG checklist for more info.*

C:\My Documents\OEPA Forms\USED OIL.SHORT.11.2004.wpd

**REMARKS**

YOUNG TOWN STATE  
SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

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

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

**PROHIBITIONS**

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
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  No  N/A \_\_\_ RMK# \_\_\_

**WASTE MANAGEMENT & LABELING/MARKING**

UNIVERSAL WASTE BATTERIES - NO UNIVERSAL WASTE BATTERIES OBSERVED.

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - b. Mix battery types in one container? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - c. Discharge batteries to remove the electric charge? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - d. Regenerated used batteries? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - e. Disassemble them into individual batteries or cells? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - f. Remove batteries from consumer products? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_
  - g. Remove the electrolyte from the battery? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)]

Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

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 \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

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 \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

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 \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

**UNIVERSAL WASTE PESTICIDES** - NO UNIVERSAL WASTE PESTICIDES

8. Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

9. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

10. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97; 3745-66-100 and -66-101 of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

11. If pesticides are stored in a transport vehicle, is it closed, structurally sound and compatible with the pesticide(s)? [3745-273-13(B)(4)]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

12. Are containers, tanks, or transport vehicles that contain universal waste pesticides, labeled with either "Universal Waste Pesticides" or "Waste Pesticides"? [3745-273-14(B)]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

UNIVERSAL WASTE THERMOSTATS - NO UNIVERSAL WASTE THERMOSTATS OBSERVED.

13. Are thermostats that show evidence of leaking, spilling, or damage that could cause leaks, properly contained? [3745-273-13(C)(1)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
14. If the thermostats are contained, are the containers closed, structurally sound, compatible with contents of the thermostats and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(C)(1)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
15. If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]
- a. Remove the ampules in a manner to prevent breakage and are they removed over or in a containment device? [3745-273-13(C)(2)(a)(b)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- b. Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)(d)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- d. Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- e. Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- f. Pack removed ampules in containers with packing material to prevent breaking during storage, handling and transportation? [3745-273-13(C)(2)(h)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
16. If mercury, clean-up residues, or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-13(C)(3)(a)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

a. If the waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to Chapter 3745-52.) [3745-273-13]

Yes \_\_\_ No  N/A \_\_\_RMK#\_\_\_

b. If the mercury, residues and/or other wastes are not hazardous, are they managed in compliance with applicable law? [3745-273-13(C)(3)(c)]

Yes \_\_\_ No  N/A \_\_\_RMK#\_\_\_

17. Are thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)?" [3745-273-14[D]]

Yes \_\_\_ No  N/A \_\_\_RMK#\_\_\_

### **UNIVERSAL WASTE LAMPS**

18. Does the SQGUHW 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  No  N/A \_\_\_RMK#\_\_\_

19. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]

Yes  No  N/A \_\_\_RMK#\_\_\_

20. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)]

Yes  No  N/A \_\_\_RMK#\_\_\_

**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**

21. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes  No  N/A  RMK#
- 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  No  N/A  RMK#

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

22. Is the length of time the universal waste is stored documented by **one** of the following: [3745-273-15(C)] Yes  No  N/A  RMK#
- 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  No  N/A  RMK#
- 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  No  N/A  RMK#
- 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  No  N/A  RMK#
- 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  No  N/A  RMK#
- 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  No  N/A  RMK#
- 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  No  N/A  RMK#

**EMPLOYEE TRAINING**

23. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] Yes  No  N/A  RMK#

**RESPONSE TO RELEASES**

24. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes  No  N/A  RMK#   
*NO EVIDENCE OF RELEASES*
25. Is the material released characterized? [3745-273-17(B)] Yes  No  N/A  RMK#
26. 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  No  N/A  RMK#

**OFF-SITE SHIPMENTS**

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

27. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes  No  N/A  RMK#

**NOTE:** *SQUWHs are prohibited to send waste to any other facility.*

28. 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)] Yes  No  N/A  RMK#
29. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes  No  N/A  RMK#
30. 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  No  N/A  RMK#

- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
31. 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 \_\_\_ No  N/A  RMK# \_\_\_
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
33. 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 \_\_\_ No  N/A  RMK# \_\_\_
34. 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 \_\_\_ No  N/A  RMK# \_\_\_

**EXPORTS**

35. Is waste being sent to a foreign destination? If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- 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 \_\_\_ No  N/A  RMK# \_\_\_
- 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 \_\_\_ No  N/A  RMK# \_\_\_
- c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes \_\_\_ No  N/A  RMK# \_\_\_

**REMARKS**