



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Rd.  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468  
www.epa.ohio.gov

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

Re: *OH R 00133 348*  
**Barnes Nursery**  
Erie County, NWDO  
NOV/RTC

July 16, 2010

Ms. Sharon Barnes  
Barnes Nursery Inc.  
3511 West Cleveland Road  
Sandusky, Ohio 44839

Dear Ms. Barnes:

Thank you for accompanying me during Ohio EPA's June 29, 2010, inspection of Barnes Nursery located at 3511 West Cleveland Road in Sandusky, Ohio. I inspected Barnes Nursery to determine the facility's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). This letter will explain the violations and concerns discovered as a result of this inspection and what you need to do to address them.

Barnes Nursery is a wholesale and retail greenhouse and nursery. Facility records reviewed during this inspection indicate that Barnes Nursery does not typically generate hazardous waste at this location. On July 4, 2006, Barnes Nursery notified Ohio EPA as a conditionally exempt small quantity generator of hazardous waste for the disposal of outdated and unusable agricultural chemicals. Barnes Nursery owns and operates a small fleet of delivery vehicles and agricultural equipment at this location. As a result of facility operations, Barnes Nursery generates used oil, spent lead acid batteries and tires at this location. All used oil generated at this facility is burned in a used oil burner to provide heat in the maintenance building. Barnes Nursery also generates spent fluorescent lighting at the facility.

I found the following violations of Ohio's hazardous waste laws during this inspection.

1. **OAC Rule 3745-279-22(C)(1) – Marking of Used Oil Containers:** "Containers and above ground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil"."

Barnes Nursery failed to mark the totes and tank used to accumulate used oil with the words, "Used Oil".

Each of the totes and the tank were marked with the words "Used Oil" during the inspection. Therefore, this violation has been abated.

- 2 **OAC Rule 3745-52-11, Hazardous Waste Determination:** "Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste..."

Barnes Nursery failed to evaluate the spent fluorescent lamps used throughout the facility to determine if they are hazardous waste. Barnes Nursery currently manages the spent lamps as solid waste and disposes of the spent lamps in a solid waste dumpster.

Barnes Nursery must immediately cease disposing of the spent lamps as non-hazardous waste until a proper waste evaluation has been completed. The spent lamps typically contain mercury and other heavy metals which could make them a hazardous waste.

Barnes Nursery has the option of handling spent lamps as hazardous waste or as universal waste. Managing hazardous waste lamps under the universal waste rules eases certain regulations imposed on generators of spent fluorescent lamps.

**To abate this violation, Barnes Nursery must choose one of the following options for the spent lamps:**

i. **Disposal Option:**

Barnes Nursery may manage the lamps as a hazardous waste. Barnes Nursery must sample each type and brand of lamp used at the facility for RCRA metals using a Toxicity Characteristic Leaching Procedure (TCLP) test. Barnes Nursery must ensure that all spent lamps that are determined to be hazardous waste are disposed of at a permitted hazardous waste disposal facility. Barnes Nursery must submit all analytical results to Ohio EPA along with a description of how the spent lamps will be managed or,

ii. **Recycling Option:**

In lieu of evaluating and disposing of the spent lamps, Barnes Nursery may manage spent lamps as universal waste. Universal waste spent lamps must be stored in a closed and labeled container. This container must be properly labeled with the wording "**Universal Waste Lamp(s)**", "**Waste Lamp(s)**", or "**Used Lamp(s)**".

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Barnes Nursery must also track the accumulation of the spent lamps to ensure spent lamps are **not stored for greater than 365 days**. This can be accomplished with recycling receipts or by marking the container with the accumulation start date (the day the first spent lamp is placed in the container).

No spent lamps were in storage at the time of the inspection.

Ohio EPA recommends that spent lamps be managed as a universal waste and recycled. If Barnes Nursery should choose the recycling option, you should submit to me the name of the recycling facility Barnes Nursery intends to use.

I provided Barnes Nursery with the following fact sheets at the time of the inspection: Universal Waste Rules for Handlers of Lamps, dated June 2005; Fluorescent Lamps: What You Should Know, dated January 2007; and Computer, Fluorescent Lamp and Ballast Recyclers, dated April 2008.

**On July 1, 2010, I received an e-mail from you indicating that Barnes Nursery has begun a program to collect spent fluorescent lamps for recycling as a universal waste. Therefore, this violation has been abated.**

As we discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce or eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs as well as regulatory requirements. During the inspection, I observed potential P2 opportunities associated with your operation(s). **P2 options that you may want to evaluate for this operation include sending your spent used oil filters off-site for recycling of the metal content.**

The Ohio Department of Development's Office of Energy Efficiency may be able to help with energy efficiency issues. Their website is at:  
<http://www.development.ohio.gov/cdd/oeef/>

If you would like a free, non-regulatory on-site pollution prevention assessment or if you would like more information about pollution prevention, please contact me at (419) 373-3056. Ohio EPA has helpful information about this at the following web address: <http://www.epa.ohio.gov/ocapp/>

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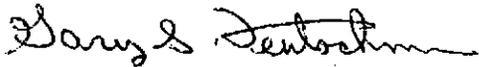
The Division of Hazardous Waste Management (DHWM) has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link:

[http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc\\_serve.php?2=subscriptionpage](http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage)

Enclosed is a copy of the checklists that I completed as a result of the inspection. You can find Ohio's hazardous waste rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>

Should you have any questions, please feel free to call me at 419 (373-3056).

Sincerely,



Gary S. Deutschman  
Environmental Specialist III  
Division of Hazardous Waste Management

//lr

Enclosures

pc: Cindy Lohrbach, DHWM, NWDO  
Colleen Weaver, Supervisor, DHWM, NWDO  
DHWM, NWDO File-Barnes Nursery, Erie County *General File*

ec: Gary Deutschman, DHWM, NWDO

Send to Central Office

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

For Ohio EPA use only

Completed verification forms required to be submitted to CO should be e-mailed to [kristina.durnell@epa.state.oh.us](mailto:kristina.durnell@epa.state.oh.us).

Site EPA ID No. Site Name	EPA ID Number: <b>OHR000133348</b>		Website: <b>barnesnursery.com</b> (Optional)	
	Name: <b>Barnes Nursery Inc</b>			
Site Location Information	Street Address: <b>3511 West Cleveland Road</b>			
	City, Town, or Village: <b>Sandusky</b>		State: <b>OH</b>	
Site Land Type (check only one) NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	County Name: <b>Erie</b>		Zip Code: <b>44839</b>	
	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>
				Municipal <input type="checkbox"/>
				State <input type="checkbox"/>
				Other <input type="checkbox"/>
	<b>111421</b>			

Facility Representative  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: <b>Sharon</b>		MI:	Last Name: <b>Barnes</b>	
	Title:				
	Phone Number: <b>419-433-5525</b>			Phone Number Extension:	
	E-Mail Address: <b>slbarnes@barnesnursery.com</b>				
	Fax Number: <b>419-433-3555</b>			Fax Number Extension:	
	Street or P.O. Box:				
City, Town or Village:					
State:			Zip Code:		

Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: <b>Barnes Nursery &amp; Garden Center Inc.</b>		Date Became Owner (mm/dd/yyyy):		
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>
					Indian <input type="checkbox"/>
					Municipal <input type="checkbox"/>
					State <input type="checkbox"/>
					Other <input type="checkbox"/>
Street or P.O. Box: <b>3511 West Cleveland Road</b>					
City, Town or Village: <b>Sandusky</b>			Owner Phone #:		
State: <b>Oh</b>			Country: <b>Erie</b>	Zip Code: <b>44839</b>	
Name of Site's Operator: <b>Barnes Nursery &amp; Garden Center Inc.</b>		Date Became Operator (mm/dd/yyyy):			
Operator Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	
				Indian <input type="checkbox"/>	
				Municipal <input type="checkbox"/>	
				State <input type="checkbox"/>	
				Other <input type="checkbox"/>	
Street or P.O. Box:					
City, Town or Village:			Operator Phone #:		
State:			Country:	Zip Code:	

**VIOLATIONS CITED?**     Yes     No

**TYPE OF HANDLER - MARK "X" AS APPROPRIATE**

<input checked="" type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
	<input type="checkbox"/> Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.	<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

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)	
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Hazardous Waste Transfer Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility
	<input type="checkbox"/> Receives Hazardous Waste from Off-site

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 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 or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. 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 type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:	Gary Dugan
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Gary Deutschman		06/29/2010

**Comments:**

Barnes Nursery disposed of spent fluorescent lamps as solid waste prior to inspection. Facility will be generating universal waste lamps as a result of this inspection.

**PROCESS, WASTE, P2 SUMMARY SHEET**

<b>Facility Name:</b>	<b>Facility Type: Used Oil, Fluorescent Lamps</b>	<b>Date of Inspection: 6/29/10</b>	<b>EPA ID #: OHR000133348</b>
Barnes Nursery			

<b>Waste Generated</b>			<b>On- or Off-Site Management</b>		<b>P2 Activities</b>	
<b>Process/Activity Generating Waste</b> (e.g. plating bath, machining, baghouse, painting, general maintenance, etc.)	<b>Waste Description</b> (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	<b>QTY Generated per Month, Type of Accumulation</b> (container, tank, etc) and location of waste accumulation area	<b>Type of On-Site Treatment</b> (recycle, wwt, etc)	<b>Name, state, and type of activity occurring at the off-site facility.</b>	<b>Current P2 Activities</b>	<b>P2 Opportunities</b>
1 Battery Replacement	Spent Lead Acid Batteries	2 / month		Crown Battery, 1445 Majestic Drive, P.O. Box 990, Fremont, Ohio 43420 (419) 334-7181	Shipped off-site for Recycling	
2 Oil Change	Used Oil	100 gallons / month	Burning in one on-site heating unit		Used for heating value	
3 Oil Change	Used Oil Filters	10-20 filters / month	Hot Drained	Solid Waste Disposal		Recycle metal content
4 Lighting	Spent Fluorescent Light Bulbs	8-10 / year		Solid Waste Disposal		Recycle mercury content
5 Tire Replacement	Used Tires	4 / month		Enviro Tire, 2709 Bradeberry Road, Fostoria, Ohio (419)435-5611		

**REMARKS-GENERAL INFORMATION**

**General Process Information: Wholesale and retail sales of plants, hardware and garden supplies. Greenhouse and nursery operator. Limited vehicle fleet maintenance. .**

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**Regulatory/Enforcement History** (if applicable): Not a regular generator of hazardous waste. May occasionally need to dispose of outdated or newly banned herbicides/pesticides.

**Additional P2 remarks and information:** Recycling of spent fluorescent lamps and oil filters should be considered.

Would this facility be interested in a P2 assessment? Yes\*  No

\*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.ohio.gov/ocapp](http://www.epa.ohio.gov/ocapp)

**Other:**

**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 type="checkbox"/> N/A <input checked="" 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:	
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	generators?		
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#? [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
12.	If the generator self-transported 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.*

**OAC 3745-266-80 SPENT LEAD ACID BATTERIES BEING RECLAIMED**

1.	Has the handler of reclaimed batteries notified Ohio EPA or US EPA of regulated waste activity?		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Are the handler's batteries reclaimed through regeneration (such as by electrolyte replacement)?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: If yes, the handler is subject to OAC Chapter 3745-51 and OAC rule 3745-52-11</i>			
3.	Are the handler's batteries reclaimed other than through regeneration?		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a.	If yes, does the handler:	
	i.	Generate, collect, and/or transport these batteries?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	ii.	Store these batteries but is not the reclaimer?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iii.	Store these batteries before reclaiming them?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iv.	Not store these batteries before reclaiming them?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: If the answer to any question 3ai through 3aiv is yes, the handler is subject to OAC Chapters 3745-51 and 3745-270, and OAC rule 3745-52-11. If the handler stores batteries before reclaiming them, the handler is subject to permitting requirements (e.g., general or interim standard facilities). Complete other appropriate checklists (e.g., LDR, TSD).</i>			
4.	Has the handler adequately evaluated all waste generated at their facility?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>