



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.state.oh.us

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

Re: Victory Honda  
Erie County, NWDO  
NOV

April 6, 2009

Mr. Gene DeGiau, Sales  
Victory Honda of Sandusky  
2301 Hayes Avenue  
Sandusky, Ohio 44870

Dear Mr. DaGiau:

Thank you for accompanying me during Ohio EPA's March 17, 2009, inspection of Victory Honda of Sandusky's facility (Victory Honda) located at 2301 Hayes Avenue in Sandusky, Ohio. I inspected Victory Honda 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.

Victory Honda is a full-service automotive dealership which operates a service shop at the 2301 Hayes Avenue location. Facility records reviewed during this inspection indicate that Victory Honda generates a D001 ignitable hazardous waste from one petroleum naphtha based parts cleaner which is recycled off-site by a third party. Victory Honda also generates spent lead acid automotive batteries that are exchanged with new batteries by the battery wholesaler, used oil which is recycled off-site, used anti-freeze/coolant which is recycled off-site, spent Freon which is regenerated on-site, scrap metal which is recycled off-site, cardboard which is recycled off-site, contaminated shop rags which are laundered off-site, and universal waste spent fluorescent light bulbs and HID lamps which are recycled off-site. Victory Honda is a conditionally exempt small quantity generator of hazardous waste, a used oil generator, and a small quantity handler of universal waste fluorescent light bulbs.

I found the following violation 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"."

Victory Honda marked the bulk tank used to store used oil on-site. However, Victory Honda failed to mark the portable used oil containers used to capture used oil when drained from automobiles with the words, "Used Oil".

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To abate this violation, Victory Honda should photograph the labeled or marked mobile collection devices and send a copy of the photographs to me. **This information should be submitted to my attention at the Ohio EPA within 30 days of receipt of this letter.**

Concern:

1. During the inspection, Victory Honda stated that the facility, which is relatively new, has not disposed of any fluorescent lamps. However, HID lamps, which are used to illuminate the parking area, are serviced by a contractor who takes the spent lamps with him when he leaves. The contractor accumulates the lamps at his location and sends the lamps off-site for recycling. Victory Honda did not have any lamps in storage at the time of the inspection. Please be advised that if Victory Honda must store spent fluorescent or HID lamps at the facility, Victory Honda must place the spent mercury-containing lamps 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)**". Victory Honda 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 lamp is placed in the container).

Additional information regarding the requirements for universal waste lamps can be found at <http://www.epa.state.oh.us/dhwm/guidancedocs.html#fluorescent>.

Ohio EPA will issue an EPA ID number to track my inspection activity at Victory Honda. Victory Honda cannot use this number for manifesting hazardous waste shipments. If Victory Honda wants to use an EPA ID number for manifesting or other hazardous waste, used oil or universal waste activities, Victory Honda must complete and submit a Notification of Regulated Waste Activity form (EPA Form 9029 [Rev. 11/2002]) to Ohio EPA. This form is available on our web page at <http://www.epa.state.oh.us/dhwm/notiform.html> or Victory Honda can call me at (419) 373-3056 or the Division of Hazardous Waste Management, Central Office, RIS at (614) 644-2977 and we will mail you a copy.

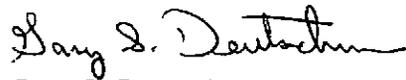
As we discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce or eliminate the amount of waste that your company generates, you may be able to reduce treatment and disposal costs as well as regulatory requirements. During the inspection, we observed potential pollution prevention (P2) opportunities associated with your operations. P2 options that you may want to evaluate for include purchasing a used oil burner to heat your service area. Your records indicate that Victory Honda generates approximately 300 gallons of used oil per month. The installation of a used oil burner in your service area could reduce your costs to heat your building and ship the used oil off-site. In addition, another P2 opportunity I observed is the substitution of a water-based solvent for the petroleum naphtha based parts washer solvent. The Ohio Department of Development's Office of Energy Efficiency may be able to help with energy efficiency issues. Their website is <http://www.odod.state.oh.us/cdd/oeef/>.

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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 <http://www.epa.state.oh.us/ocapp/ocapp>.

Enclosed you will find a copy of the checklists that I completed as a result of the inspection. Should you have any questions, please feel free to call me at (419) 373-3056. You can find copies of the rules and other information at <http://www.epa.state.oh.us/dhwm>.

Sincerely,



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

/cs

Enclosures

pc: Cindy Lohrbach, DHWM, NWDO  
Colleen Weaver, Supervisor, DHWM, NWDO  
DHWM; NWDO File - Victory Honda, Erie County

ec: Gary Deutschman, DHWM, NWDO

**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](mailto:kristina.durnell@epa.state.oh.us)  
or mail it to Kristina Durnell, Central Office

<p><b>Site EPA ID No.</b> <b>Site Name</b></p> <p><b>Site Location Information</b></p> <p><b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a></p>	<p><b>EPA ID Number:</b> Name: Victory Honda of Sandusky</p> <p>Website: <a href="http://victorysandusky.com">victorysandusky.com</a> (Optional)</p> <p>Street Address: 2301 Hayes Avenue City, Town, or Village: Sandusky County Name: Erie</p> <p>State: OH Zip Code: <b>44870</b></p> <p>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"/></p> <p><b>44110</b> <b>441310</b></p>
<p><b>Facility Representative</b></p> <p>Additional names can be recorded in number 12</p> <p>Only provide address information if it is different than the site address</p>	<p>First Name: Gene MI: Last Name: DaGiau Phone Number: <b>419-626-1061</b> Phone Number Extension: E-Mail Address: Fax Number: <b>419-626-1132</b> Fax Number Extension: Street or P.O. Box: 2301 Hayes Avenue City, Town or Village: Sandusky State: OH Zip Code: <b>44870</b></p>
<p><b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page</p>	<p>Name of Site's Legal Owner: Cappo Properties LLC Date Became Owner (mm/dd/yyyy): 11/30/2004</p> <p>Owner Private County District Federal Indian Municipal State Other Type: <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>Street or P.O. Box: 5496 W. Andrew Johnson Hwy. City, Town or Village: Morristown Owner Phone #: State: Tn Country: <b>USA</b> Zip Code: 37814</p> <p>Name of Site's Operator: Victory Date Became Operator (mm/dd/yyyy): Automotive Group</p> <p>Owner Private County District Federal Indian Municipal State Other Type: <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>Street or P.O. Box: City, Town or Village: Operator Phone #: 423-586-9657 State: United States Zip Code:</p>

**VIOLATIONS CITED?**  Yes  No

**TYPE OF HANDLER— A MINIMUM OF ONE BOX MUST BE CHECKED**

<p><input type="checkbox"/> Not a HW Generator</p>	<p><input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11</p>	<p><input type="checkbox"/> Large Quantity Generator (LQG)</p> <p><input type="checkbox"/> Small Quantity Generator (SQG)</p> <p><input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator</p> <p><input type="checkbox"/> U.S. Importer of Hazardous Waste</p> <p><input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator</p>
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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 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 RCRA Info 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 type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments:
Containers	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Gary Deutschman		3/17/2009

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

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

## PROCESS, WASTE, P2 SUMMARY SHEET

<b>Facility Name:</b> Victory Honda of Sandusky		<b>Facility Type:</b> CESQG		<b>Date of Inspection:</b> 3/17/09		<b>EPA ID #:</b>	
Waste Generated			On- or Off-Site Management		P2 Activities		
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation <small>(container, tank, etc) and location of waste accumulation area</small>	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities	
1	Parts Cleaning	D001 Spent Solvent	16 gallons		Safety Kleen, Brunswick Ohio 330-273-3111- bulked and re-refined in Dalton, IL	re-refined	Solvent Substitution with high flash or water based solvent.
2	Battery Replacement	Spent Lead Acid Batteries	5-10		Interstate Battery, 320 N. Mulberry Street, Mansfield Ohio 44902 – Smelted by Johnson Controls in Indiana 419-526-1570	Old Batteries Smelted for Recovery of Lead.	
3	Oil Change	Used Oil	300 gallons		Safety Kleen, Brunswick Ohio 330-273-3111- bulked and re-refined in East Chicago, In.	re-refined	
4	Coolant Replacement	Used Anti-freeze	100 gallons		Safety Kleen, Brunswick Ohio 330-273-3111 – bulked and re-generated.	Re-Use	

5	Lighting	Spent Fluorescent Light Bulbs, HID Lamps	Varies		All-Phase Lighting, Sandusky, Ohio, 419-626-8140 – bulked and recycled at Luminaire Recycling, Inc., Mn	recycled	Recycling of bulbs
6	Air Conditioning Re-charge	Spent Freon	Varies	Captured and Re-generated on-site		Re-Use	
7	Parts Replacement	Scrap Metal	Not tracked at this time		Sandusky Scrap Iron – recycled	Recycled as scrap or returned as Cores	
8	New Parts Packaging	Cardboard	Not tracked at this time		BFI - recycled	Recycled	
9	Cleaning of Parts/Hands	Contaminated Shop Rags	Not tracked at this time		Cintas Laundered -	Laundered	
	Tire Replacement	Used Tires	Not Tracked at this time		Records could not be located.	?	

**REMARKS-GENERAL INFORMATION**

General Process Information: Automotive Service. Retailer of Honda automobiles and trucks.

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

**Additional P2 remarks and information:** Facility is new, should look into recycling light bulbs when they burn out and installation of Used Oil Burner.

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.state.oh.us/ocapp/ocapp.html](http://www.epa.state.oh.us/ocapp/ocapp.html)

**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 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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Stopped the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Contained the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input 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 generators?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

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

**GENERATOR TRANSPORTATION**

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

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

CESQG: ≤ 100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.  
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.  
 LQG: ≥1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

**WASTE EVALUATION**

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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**GENERATOR CLASSIFICATION**

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

**OFF-SITE SHIPMENT OF HAZARDOUS WASTE**

3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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**TREATMENT OF HAZARDOUS WASTE**

4.	Does the generator treat hazardous waste in a:			
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

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

**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  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**

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?

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 LAMPS**

8. 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# 1
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 \_\_\_ No  N/A X RMK#
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 \_\_\_ No  N/A x 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**

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes \_\_\_ No  N/A \_\_\_ RMK# 1
- 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.*

12. 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**

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  No  N/A  RMK#

**RESPONSE TO RELEASES**

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes  No  N/A  RMK#
15. Is the material released characterized? [3745-273-17(B)] Yes  No  N/A  RMK#
16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes  No  N/A  RMK#

**OFF-SITE SHIPMENTS**

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

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes  No  N/A  RMK# 1

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

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes \_\_\_ No  N/A  RMK#
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes \_\_\_ No  N/A  RMK#
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes \_\_\_ No \_\_\_ N/A  RMK#
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes \_\_\_ No \_\_\_ N/A  RMK#
21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
- 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#
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes \_\_\_ No  N/A  RMK#
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes \_\_\_ No  N/A  RMK#

**EXPORTS**

24. 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

Victory Honda of Sandusky indicated that the facility has not yet generated any spent fluorescent bulbs as the facility is new. However, the facility indicated that they may have generated HID bulbs from the parking lot. The lighting contractor takes removed lamps back to their facility where they are bulked and recycled at a recycling facility.