



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 Korfeski, Director

Re: LaRiche Toyota Subaru
OHD987024007
Used Oil Generator
Hancock County, NWDO
NOV

April 22, 2010

Mr. Charles Taylor, Parts and Service Director
LaRiche Toyota Subaru
920 Plaza Street
Findlay, Ohio 45840

Dear Mr. Taylor:

On April 13, 2010, I inspected LaRiche Toyota Subaru's facility located at 920 Plaza Street in Findlay, Ohio. I inspected LaRiche Toyota Subaru 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). My inspection included a tour of the facility as well as a review of facility records. I also helped LaRiche Toyota Subaru identify ways to prevent pollution by reducing waste the facility generates.

LaRiche Toyota Subaru is a full service automotive dealership which operates a service shop at the 920 Plaza Street location. Company records reviewed during this inspection indicate that LaRiche Toyota Subaru generates used oil which is sent off-site for recycling or fuels blending; used oil filters which are hot drained and disposed as solid waste; spent antifreeze/coolant which is sent off-site for recycling; used tires which are sent off-site for shredding; spent Freon which is captured and reused, spent lead acid batteries which are exchanged for new batteries; and oily sludge from a detergent parts washer that is mixed with used oil. LaRiche Toyota Subaru also generates spent fluorescent lamps which are currently disposed as solid waste.

I found the following violations of Ohio's hazardous waste laws. In order to correct these violations you must do the following and send me the required information **within 30 days** of your receipt of this letter:

1. **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..."
 - a. LaRiche Toyota Subaru has failed to evaluate the oily sludge discharged from the aqueous parts cleaning unit in the service department. The oily sludge is currently mixed with used oil and sent off-site for recycling or fuels blending.

To abate this violation, LaRiche Toyota Subaru must analyze a representative sample of the oily sludge generated from the aqueous parts cleaner located in the service department for total volatile organic compounds (VOC's) and Resource Conservation and Recovery Act (RCRA) metals using methods as outlined in U.S. EPA's SW-846. This information should be submitted to my attention at the Ohio EPA within 30 days of receipt of this letter.

- b. LaRiche Toyota Subaru has failed to evaluate the spent fluorescent lamps used throughout the facility to determine if they are hazardous waste. LaRiche Toyota Subaru is currently disposing of these fluorescent lamps as solid waste.

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

LaRiche Toyota Subaru has the option of handling spent fluorescent 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, LaRiche Toyota Subaru must choose one of the following options for the spent fluorescent lamps:

i. Disposal Option:

LaRiche Toyota Subaru may manage the lamps as a hazardous waste. LaRiche Toyota Subaru must sample each type and brand of lamp used at the facility for Resource Conservation and Recovery Act (RCRA) metals using a Toxicity Characteristic Leaching Procedure (TCLP) test. LaRiche Toyota Subaru must ensure that all spent fluorescent lamps that are determined to be hazardous waste are disposed of at a permitted hazardous waste disposal facility.

LaRiche Toyota Subaru 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 fluorescent lamps, LaRiche Toyota Subaru may manage spent fluorescent lamps as universal waste. Universal waste spent fluorescent 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)**". LaRiche Toyota Subaru must also track the accumulation of the spent lamps to ensure spent lamps are not stored for greater than 365 days.

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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).

I did not observe any spent lamps in storage during the inspection.

Ohio EPA recommends that spent lamps be managed as a universal waste and recycled. If LaRiche Toyota Subaru should choose the recycling option, you should submit to me updated photos of the properly labeled and closed containers as well as the name of the recycling facility LaRiche Toyota Subaru intends to use.

I provided you with the following fact sheets during the inspection: Universal Waste Rules for Handlers of Lamps, dated June 2005; Fluorescent Lamps: What You Should Know, dated January 2007; Lamp Recyclers in Ohio.

2. **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".

LaRiche Toyota Subaru failed to mark all containers used to accumulated used oil with the words, "Used Oil". Specifically, LaRiche Toyota Subaru uses one above ground tank and several portable totes to collect used oil from vehicles. The portable totes were not marked at the time of the inspection.

LaRiche Toyota Subaru labeled the portable totes used to collect used oil with the words "used oil" during the inspection. 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, and you may also want to consider the use of a used oil burner for heating the facility service shop. A used oil burner may reduce your heating costs and the need to periodically ship used oil off-site for recycling.

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

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

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, Supervisor, DHWM, NWDO
DHWM, NWDO File-General File, Hancock County 3
ec: Gary Deutschman, DHWM, NWDO

NOTICE:

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

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.

Site EPA ID No. Site Name	EPA ID Number: OHD987024007		Website: toyotabob.com (Optional)						
	Name: LaRiche Toyota Subaru								
Site Location Information	Street Address: 920 Plaza Street								
	City, Town, or Village: Findlay		State: OH						
	County Name: Hancock		Zip Code: 45840						
Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html	Private	County	District	Federal	Indian	Municipal	State	Other	
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Charles		MI:	Last Name: Taylor					
	Title: Parts and Service Manager								
	Phone Number: 419-423-5656			Phone Number Extension:					
	E-Mail Address: toyotabob.com								
	Fax Number:			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: LaRiche Properties		Date Became Owner (mm/dd/yyyy):						
	Owner Type:	Private	County	District	Federal	Indian	Municipal	State	Other
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Street or P.O. Box: 920 Plaza Street								
	City, Town or Village: Findlay		State: Oh		Owner Phone #:		Country: USA		Zip Code: 45840
	Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):						
	Operator Type:	Private	County	District	Federal	Indian	Municipal	State	Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Street or P.O. Box:		City, Town or Village:		Operator Phone #:		Zip Code:			
State:		Country:							

VIOLATIONS CITED? Yes No**TYPE OF HANDLER - MARK "X" AS APPROPRIATE** Not a HW Generator UNKNOWN:

Cited for violation of 3745-52-11

 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.*
 Large Quantity Generator (LQG) Small Quantity Generator (SQG) Conditionally Exempt Small Quantity Generator U.S. Importer of Hazardous Waste 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 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

- Batteries
 Pesticides
 Mercury containing equipment
 Lamps

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

- Used Oil Generator
 Used Oil Transporter
 Used Oil Transfer Facility
 Used Oil Processor
 Used Oil Re-refiner
 Off-Specification Used Oil Burner
 Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
 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:
Tanks	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

Name of Inspector(s) Gary Deutschman	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm) 04/13/2010
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Comments:
Lariche Toyota Subaru generates spent fluorescent lamps which the facility intends to manage as universal waste.

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name:	Facility Type: Used Oil, Conditionally Exempt Small Quantity Generator	Date of Inspection: 4/13/10	EPA ID #: OHD987024007
LaRiche Toyota Subaru			

Waste Generated			On- or Off-Site Management		P2 Activities		
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Actlvitles	P2 Opportunities	
1	Battery Replacement	Spent Lead Acid Batteries	10 / month		Interstate Battery, 1158 East Kibby Street, Lima, Ohio 45804, 419-222-0036	Shipped off-site for Recycling	
2	Oil Change	Used Oil	400 gallons / month		DISC Environmental Services, 151 East Andrus Road, Northwood, Ohio 43619		Used for heating value
3	Oil Change	Used Oil Filters	80-100 filters / month	Hot Drained	Disposed as Solid Waste		Recycle metal content
4	Coolant Replacement	Used Anti-freeze	15 gallons / months		DISC Environmental Services, 151 East Andrus Road, Northwood, Ohio 43619	Recycling	

5	Lighting	Spent Fluorescent Light Bulbs	Varies		Disposed as Solid Waste	Shipped off-site for Recycling	
6	Air Conditioning Re-charge	Spent Freon	Varies	Captured and Re-generated on-site			
7	Tire Replacement	Used Tires	80 / month		Enviro Tire, 2709 Bradeberry Road, Fostoria, Ohio (419)435-5611		
8	Steam Parts Cleaning	Oily Sludge	<1 gallon	Mixed W/Used Oil	DISC Environmental Services, 151 East Andrus Road, Northwood, Ohio 43619		
9	Cleaning	Contaminated rags	Varies	Laundered	City Laundry, Findlay, Ohio	Laundering	

REMARKS-GENERAL INFORMATION

General Process Information: Retailer of Toyota and Subaru Trucks and Automobiles. Service Shop On-Site.

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information: LaRiche Toyota Subaru should consider sending used oil filters off-site for metal recycling and recycling spent fluorescent lamps.

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 or 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"/>
<i>NOTE: For example, used oil contaminated scrap metal stored in a pile.</i>		
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"/>
<i>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.</i>		
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"/>

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 generators?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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#? [3745-279-24]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
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 type="checkbox"/> No <input checked="" 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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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.

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"/>