



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
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: Seneca Wire & Manufacturing Co.  
OHD 004 177 374  
Hancock County  
Hazardous Waste  
Notice of Violation/PRTC

January 28, 2008

Mr. Thomas Kellogg, Manufacturing Manager  
Seneca Wire & Manufacturing Company  
319 S. Vine Street  
Fostoria, Ohio 44830

Dear Mr. Kellogg:

On October 16, 2007, Ohio EPA conducted a hazardous waste compliance evaluation inspection (CEI) of Seneca Wire & Manufacturing Company (Seneca Wire) located at 319 S. Vine Street, Fostoria, Ohio. This inspection was conducted to determine Seneca Wire's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC), and Ohio's hazardous waste regulations as adopted under Chapter 3745. of the Ohio Administrative Code (OAC). Seneca Wire was represented by you. Ohio EPA was represented by Kara Reynolds and the writer. The inspection included a tour of facility operations and a review of facility paperwork. This letter will explain the violations I found, what you need to do to correct these violations, two areas of general concern, what you need to do to address these areas of concern, one general comment, pollution prevention information pertaining to the CEI, and other outstanding compliance issues.

Seneca Wire converts steel rod into wire. This wire is manufactured into springs or other types of wire for the automotive, agricultural, and other industries. Some wire is heat-treated and some wire is hard drawn. Seneca Wire is a large quantity generator of hazardous waste. The only hazardous waste currently being generated at the facility is lead-contaminated fire brick (D008). This waste stream is not generated on a consistent per month basis. This waste stream is often generated, but only when lead pans leak onto the fire brick during the heat treatment process. The facility shut down operations of its cleaning/de-scaling operations approximately a year ago. During this time other hazardous wastes generated included pickle liquor (K062) and waste liquid sodium hydroxide (D002). Universal wastes generated at Seneca Wire are used lamps. Other wastes generated at Seneca Wire are batteries, oily rags, and used oil.

Seneca Wire also generates a recyclable by-product from the heat treatment of wire. Blankets of anthracite coal are placed on top of lead baths as an insulating layer and to reduce fumes. Once this material is oxidized, it must be removed and replaced. Upon removal this material is stored and then sent 4-5 times a year to The Doe Run Company in Missouri for lead reclamation.

During the CEI, I provided you with the following Ohio EPA Fact Sheets: [The Regulation of Used Oil: An Overview for Ohio Businesses](#), [Used Oil Generators](#), [Universal Waste Rules for Handlers of Lamps](#), [Satellite Accumulation under Ohio Hazardous Waste Rules](#), and [Cessation of Regulated Operations \(CRO\) Program](#).

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. Waste Evaluation.**  
**OAC Rule 3745-52-11**

Any person who generates a waste must determine if that waste is a hazardous waste in accordance with the criteria for hazardous waste as set forth in Chapter 3745-51 of the Administrative Code.

Seneca Wire has failed to evaluate the used rags in the flat wire, maintenance and other areas through out the plant to determine if they are hazardous. I observed many used rags (oily, dirty, etc.) all over the plant in boxes, on tables, and in garbage cans. Seneca Wire is currently disposing of this waste stream in the local landfill.

To properly evaluate the above waste stream, Seneca Wire must do one of three options: 1) Seneca Wire must take a representative sample of this waste to properly evaluate this waste stream through a laboratory analysis which lists constituents present and at what concentration. Seneca Wire must sample their oily rags to determine the concentrations of the Resource Conservation and Recovery Act (RCRA) constituents that may be present in light of the materials or the processes used to generated this waste stream as listed in the Ohio Administrative Code Rule 3745-51-24 following the methods as outlined in U.S. EPA's SW-846. Seneca Wire may run total concentrations for these constituents as a *screening tool*. If the concentrations are detected for the constituents at or above the regulatory limit, a TCLP may be required to ensure this constituent is not present above the Ohio EPA regulatory level, or 2) Seneca Wire must apply generator knowledge of the hazardous characteristic(s) of the waste in light of the materials or the processes used through adequate documentation, or 3) a combination of one and two.

To abate this violation, Seneca Wire must submit the analytical information or the documentation for generator knowledge to me. Your results must document if the waste is hazardous or not and whether it is restricted from land disposal. If it is hazardous, you must explain what treatment, storage, or disposal facility you will send it to. If the waste is hazardous, I will determine the status of your compliance with other hazardous waste laws and notify you of my findings in a separate letter.

If you perform sampling, Ohio EPA will use the data you provide, in addition to other documentation, to make regulatory decisions concerning the wastes tested. The data you submit should be reviewed using a data review process, referred to as data validation, to confirm the validity of your data prior to submission. Data validation includes a review of the following components: laboratory test methods, laboratory data completeness, documentation of holding time(s), chain(s) of custody, and quality assurance/quality control (QA/QC) data. To confirm the validity of your data, you may use Ohio EPA's tier 1 data validation plan review form which can be obtained from Ohio EPA's web page:

[http://www.epa.state.oh.us/dhwm/tier\\_1\\_data\\_validation\\_manual.html](http://www.epa.state.oh.us/dhwm/tier_1_data_validation_manual.html). Ohio EPA may request the documentation needed to confirm the validity of the data submitted.

Please submit a brief narrative of each sampling event which includes: process generating the waste, point in the process the sample was obtained, sampling techniques used to obtain the sample and a description of how this sample was determined to be a representative sample of the waste tested.

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*In addition, if sampling is performed, please notify me at least seven days prior to taking the samples so that I or an Ohio EPA representative may be present.*

**2. Personnel Training.  
OAC Rule 3745-65-16(A) (2)**

Facility personnel shall take part in hazardous waste training. This program of classroom instruction or on-the-job training must adequately teach hazardous waste management procedures including, but not limited to, contingency plan implementation, emergency procedures, emergency equipment, and emergency systems including, where applicable, the systems listed in OAC 3745-54-16 (A) (3) (a-f) and OAC 3745-65-16 (A) (3) (a-f), *relevant to the positions in which they are employed.*

Seneca Wire does conduct hazardous waste training; however, this training does not meet the regulation as stated in the above rule for hazardous waste management procedures. This training does not specifically teach employees hazardous waste management procedures relevant to their positions (what employees must know day to day as it pertains to their job). For example, this training does not provide information on the labeling of hazardous waste containers as "Hazardous Waste"; how and when to conduct hazardous waste container storage inspections (when applicable); and container management guidelines (all containers must be closed unless adding or removing waste), etc. In addition, the training shall include, but is not limited to, instruction in safe equipment operation, emergency procedures and the generator's contingency plan.

To abate this violation, Seneca Wire must submit to me a training outline which meets the requirements of this rule (training provides hazardous waste management procedures relevant to employee job positions).

**3. Container Storage Inspections.  
OAC Rule 3745-66-74**

Container storage area(s) must be inspected, at least weekly, looking for leaks and deterioration, and these inspections must be recorded in an inspection log or summary.

Seneca Wire does inspect their container storage area, however, the facility often failed to conduct these inspections weekly (defined as every seven days); or it was difficult to decipher if the inspections were conducted every seven days. Since Seneca Wire may go months without any hazardous waste storage (waste is only generated when lead pans leak during the heat treatment process), they must develop a better method of indicating on their inspection log whether material is present in the container storage area.

To abate this violation, Seneca Wire must submit to me a summary outlining the procedures the facility will follow to ensure that container storage area inspections are conducted every seven days when waste is present in the container storage area. In addition, include in this procedure a system or method of better indicating if waste is present and how long it has been present in the container storage area.

**4. Waste management - standards for small quantity handlers of universal waste (lamps).  
OAC Rule 3745-273-13 (D) (1)**

A small quantity handler of universal waste must manage lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment by containing lamps in containers or packages and such containers must remain closed.

Seneca Wire was storing three containers of spent lamps without a lid. Thus, these lamps were not in a container that was closed.

***All boxes that contained spent lamps were closed during the CEI, thus this violation is abated.***

5. **Waste management - Labeling/marketing standards for small quantity handlers of universal waste (lamps).**  
OAC Rule 3745-273-14 (E)

A small quantity handler of universal waste must label or mark a container or package with such lamps with one of the following phrases: "Universal Waste-Lamps," or "Waste Lamps," or "Used Lamps."

Seneca Wire failed to mark their used lamps with a proper label.

***All boxes that contained spent lamps were labeled with the words "Used Lamps" during the CEI, thus this violation is abated.***

6. **Used oil storage requirements - proper labels.**  
OAC 3745-279-22 (C) (1)

Containers used to store used oil shall be labeled or marked clearly with the words "Used Oil."

Seneca Wire failed to mark one 800-gallon tank, one 55-gallon drum, and four buckets storing used oil with the words "Used Oil."

***"Used Oil" was written on the above containers during the CEI, thus, this violation was abated.***

**Areas of Concern:**

**Satellite Accumulation.**

Seneca Wire only generates hazardous waste when lead pans leak onto the fire brick during the heat treatment process (lead-contaminated fire brick - D008). Seneca Wire may go months without generating hazardous waste.

When these leaks occur, the fire brick must be manually removed from the furnaces, placed into containers, then moved to the container storage area. The cleaning out of brick from the furnaces can take more than one day. The material is placed into a Gaylord (small box larger than a 55-gallon drum). You stated that you label the container with the date when waste first enters the Gaylord (the satellite container). We discussed in length the proper procedure that Seneca Wire must follow when emptying out the furnaces. We discussed that the moment the Gaylord exceeds 55-gallons of waste, then this is when the date should be applied onto the container and you have 3 days from this point to get this container into the container storage area (regardless of whether the Gaylord is full or not). You stated that the best option may be for

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Seneca Wire to utilize only 55-gallon drums for satellite containers in this process. Please refer to the fact sheet Satellite Accumulation under Ohio Hazardous Waste Rules given to you during the CEI which outlines the guidelines for satellite accumulation including to ensure satellite areas are under control of an operator at all times, etc.

To satisfy this area of concern, please submit to me a summary of the procedure that Seneca Wire will put in place pertaining to satellite accumulation during the clean-out of lead-contaminated fire brick from the furnaces.

**Job descriptions.**

You stated that there are generally only 2 positions within the plant. All the positions state something to the effect of "employees may be tasked other duties upon request". You stated this is the "catch-all" for any hazardous waste activities that an employee may be asked to conduct. I stated that there should be more specific language in the job descriptions outlining hazardous waste duties.

To satisfy this area of concern, please submit to me the revised job descriptions which specifically state hazardous waste duties pertaining to the job descriptions.

**General Comment:**

**Generator closure of a hazardous waste storage area.**

You stated that you moved your container storage area (CSA) during the CEI. Your current CSA is within the same "room" as your former CSA however, it is now closer to the door which leads to the heat-treatment (furnace area). Both your former and current CSA are inside, within your facility, with a concrete floor (not outside or on dirt).

Please be advised that you should perform a generator closure of this area. Please consult Section 1.9 of DHWM's Closure Plan Review Guidance for RCRA Facilities - May 2006 which can be found on the internet at <http://www.epa.state.oh.us/dhwm/cprg.html>.

Section 1.9 states the following: "Ohio EPA recommends that generator accumulation areas (particularly hazardous waste accumulation areas which are comprised of or are located directly on soil) be closed as soon as possible in order to avoid future problems. If a generator decides not to close an accumulation area when it is no longer used to store hazardous waste, any future contamination which occurs in that area may be attributed to the accumulation of hazardous waste. The longer a generator waits to close a hazardous waste accumulation area, the more complicated the closure may become due to the possibility of contamination spreading into or out of the unit. Therefore, in the best interest of the generator and the environment, the accumulation area should be closed as soon as possible when hazardous wastes are no longer managed in the area."

For questions pertaining to generator closure, please contact Michael Terpinski, Environmental Supervisor, Remediation Section at 419-373-3075.

**Pollution Prevention:**

- You stated that Seneca Wire is looking at possible alternatives to utilizing lead in its heat treatment process. Since this is currently your only hazardous waste stream, this could greatly

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reduce the amount of hazardous waste you generate and possibly reduce your regulatory burden. Our Office of Compliance Assistance and Pollution Prevention (OCAPP) may be able to assist you finding in alternatives (or have information pertaining to alternatives that you already know about). This assessment is free and does not encompass compliance issues. If you are interested, please contact me or Ron Nabors, OCAPP, at 419-373-3147, to discuss an assessment or other possible pollution prevention options.

- Seneca Wire currently recycles their vermiculite/coal mixture, used oil, scrap metal, batteries, and lamps. Your solvent is also recycled through Safety-Kleen's continuous use program.
- You stated that you launder all of your facility gloves. I stated during the CEI, that in addition, you should consider laundering the cloth rags generated at your facility.
- Seneca Wire should also consider finding a recycler for their cardboard as this material is currently being disposed as solid waste in the local landfill.
- If you find additional ways to recycle, reduce, or altogether eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs. Furthermore, you may possibly reduce your regulatory requirements. You can find helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp.html>.

**Other compliance issues:**

I went back and reviewed Seneca's compliance status for the past 2.5 years to outline any other compliance issues that may still be outstanding. Please see the table below:

Investigation / Date	Notice of Violation	Return to Compliance Letter	Possible further action?
Complaint #2435 / 6-23-05	7-7-05	1-28-08	Yes**
Complaint #2446 / 8-25-05	9-29-05	2-13-06	No
Complaint #2582 / 1-11-07	1-23-07	3-9-07	No

**\*\*Complaint # 2435 investigated on 6-23-05**

Seneca Wire received a waste evaluation violation for not properly evaluating the structural fire waste (prior to placing this material on the ground) to determine if it was a hazardous waste in Ohio EPA's 7-7-05, Notice of Violation. Seneca Wire conducted sampling of the fire waste material on 8-25-05 and 9-2-05. Analytical from these sampling events were submitted to this office on 10-14-05 (your letter was dated 10-13-05), indicating the structural fire waste was a hazardous waste for lead (D008). In addition, on 10-14-05, Seneca Wire submitted the hazardous waste manifests for the off-site shipment of this hazardous waste. On 10-26-05, per email, you submitted a response stating that Heritage Environmental Services, LLC had power-washed the concrete pad where the waste piles had been stored. You also included the waste evaluation for the rinseate generated indicating this waste was non-hazardous.

My review of the documentation submitted on 10-14-05, indicates that Seneca Wire has adequately demonstrated abatement of the violation discovered during the 6-23-05, investigation (as cited in the 7-7-05, Notice of Violation) as listed below:

1. OAC Rule 3745-52-11, Waste Evaluation. ***This violation was abated with your October 14, 2005, response.***

**However, based on the analytical received on October 14, 2005, Seneca Wire is in violation of the following:**

**7. Treatment, storage, or disposal of a hazardous waste.  
ORC Section 3734.02 (E) & (F)**

No person shall treat, store, or dispose of hazardous waste without a hazardous waste facility installation and operation permit.

Seneca Wire disposed of their lead-contaminated structural fire waste (D008) from the building fire that occurred on 7-24-04, by piling this waste stream onto the ground onto a concrete pad, outside behind the facility (courtyard area), thus creating hazardous waste piles. Seneca Wire did not obtain a hazardous waste installation and operation permit or a permit by rule, to dispose of a hazardous waste, in violation of ORC Section 3734.02 (E) & (F).

Seneca Wire stored some of their lead-contaminated structural fire waste (D008) from the building fire that occurred on 7-24-04 in excess of 90 days (from at least 6-17-05).

Beginning Storage Date	Date of Shipment	Amount of Waste Shipped (lbs.)	Days waste stored
6-17-05	9-16-05	42,100	91
6-17-05	9-19-05	23,274	94
6-17-05	9-19-05	32,314	94
6-17-05	9-20-05	32,340	95
6-17-05	9-21-05	17,778	96

Total amount of waste stored for greater than 90 days = 147,806 pounds.

Seneca Wire did not obtain a hazardous waste installation and operation permit or a permit by rule, to store hazardous waste for greater than 90 days, in violation of ORC Section 3734.02 (E) & (F).

Seneca Wire demolished the burnt structural building which contained the lead furnaces between 8/15/04 - 10/9/04. This material was taken off-site by Whitta Construction (demolition company) and sold as scrap metal during the fall of 2004. The lead furnaces were left intact. Seneca Wire did not know at this time whether they were going to rebuild the furnaces that had been damaged by the fire. When Seneca Wire determined they were not going to rebuild the furnaces, they then dismantled the furnaces (approximately sometime between 6/13/05 - 6/17/05). Between these dates is when the hazardous waste piles were created (lead-contaminated fire brick was removed from the furnaces), thus D008 waste was placed onto the ground.

Seneca Wire dismantled the furnaces to segregate material that could be recycled versus material that had to be disposed. Segregation of the furnace material (sorting out metal which could be scrapped, etc.) began on 6-20-05. Seneca Wire thus created 4-6 hazardous waste piles outside of the facility in the courtyard (the courtyard is the location of the building that burned down - furnaces were dismantled in place). Based on information submitted on July 18, 2005, by Thomas Kiger, your consultant, the piles were comprised of approximately 40-45 cubic yards each for a total of approximately 122-168 cubic yards of material.

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Ohio EPA's initial investigation where we discovered the waste piles occurred on 6-23-05. Seneca Wire submitted to me a response dated 6-28-05, (received in this office on 6-29-05) stating that the piles were placed onto tarps and covered. The largest waste pile was removed and placed into 82 gaylord boxes and moved inside the facility and placed into the hazardous waste storage area. By 6-28-05, all the waste piles had been removed from the ground. Thus, this hazardous waste was disposed on the ground for at least 11 days, but at most 15 days.

Sampling of this waste was conducted on 8-25-05 and 9-2-05. Analytical from this sampling indicated this waste was hazardous (D008).

All hazardous waste generated from the fire (253,938 pounds) was removed from the facility by 9-21-05. Seneca Wire power-washed the concrete pad on 9/20/05 and 9/21/05. This rinseate was sampled on 9-27-05, indicating this waste was non-hazardous.

Since Seneca Wire violated ORC §3734.02(E) and (F), Seneca Wire is subject to all applicable general facility standards found in OAC chapters 3745-54 and 55. Additionally, at any time Ohio EPA may assert its right to have Seneca Wire begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

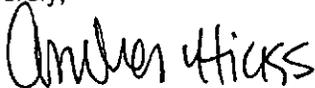
Please be advised that due to the nature of the violation, Ohio EPA may require closure pursuant to OAC rules 3745-55-11 through 3745-55-20 and OAC rules 3745-55-42 through 3745-55-47 at this site. In addition, please note that violation of ORC 3734.02 (E) & (F) is a serious violation of Ohio's hazardous waste laws and Seneca Wire will be referred to Ohio EPA's Central Office for possible escalated enforcement action.

The Division of Hazardous Waste Management (DHWM) 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>. Please feel free to share this information with your colleagues.

Enclosed you will find a copy of the checklists that I completed during the inspection. Please address all correspondence to Amber Hicks, Ohio EPA, 347 N. Dunbridge Road, Bowling Green, Ohio 43402. Should you have any questions, please feel free to call me at (419) 373-3082.

You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,



Amber M. Hicks  
Division of Hazardous Waste Management  
/lb

Enclosures

pc: Colleen Weaver, DHWM, NWDO  
Cindy Lohrbach, DHWM, NWDO  
~~DHWM, NWDO File: Seneca Wire & Manufacturing Company (w/ original checklists)~~  
ec: Amber Hicks, 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 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: OHD 004 177 374								
3. Site Name	Name: Seneca Wire & Manufacturing Company					Website: www.senecawire.com (Optional)			
4. Site Location Information	Street Address: 319 S. Vine Street								
	City, Town, or Village: Fostoria					State: OH			
	County Name: Hancock					Zip Code: 44830			
5. Site Land Type (check only one)	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"/>	
6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	33122								
7. Facility Representative  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: Thomas			MI:	Last Name: Kellogg				
	Phone Number: 419-435-9261				Phone Number Extension: 244				
	E-Mail Address: tom.kellogg@senecawire.com								
	Fax Number: 419-435-9265				Fax Number Extension:				
	Street or P.O. Box:								
	City, Town or Village:			State:			Country: USA		Zip Code:
8. 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:					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:								
	City, Town or Village:				Owner Phone #:				
	State:			Country:		Zip Code:			
	Name of Site's Operator:					Date Became Operator (mm/dd/yyyy):			
	Owner Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box:								
	City, Town or Village:				Operator Phone #:				
	State:			Country:		Zip Code:			
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 checked="" 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))			
<input checked="" type="checkbox"/> <b>Small Quantity Handler of Universal Waste</b>		<input type="checkbox"/> <b>Large Quantity Handler of Universal Waste</b> (accumulates 5,000 kg. or more)	
<input type="checkbox"/> <b>Destination Facility for Universal Waste</b>			
Check all boxes below that apply for each of the three types of facilities above		10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
	<b>Managed</b>	<input checked="" type="checkbox"/> <b>Used Oil Generator</b>	<input type="checkbox"/> <b>Off-Specification Used Oil Burner</b>
<b>Batteries</b>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Transporter</b>	<input type="checkbox"/> <b>Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil</b>
<b>Pesticides</b>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Transfer Facility</b>	<input type="checkbox"/> <b>Used Oil Fuel Marketer to Off-Specification Used Oil Burner</b>
<b>Mercury containing equipment</b>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Processor</b>	
<b>Lamps</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Re-refiner</b>	
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, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.			
D008			
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.			
<b>Announced</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Additional Facility Representatives:</b>
<b>Tanks</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Other Comments:</b>
<b>Containers</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Amber Hicks		Kara Reynolds	10/16/2007 9:15-13:44
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 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

Facility Name: Seneca Wire & Manufacturing Co. Facility Type: LQG SQG CESQG TSD Date of Inspection: 10-16-07 EPA ID#: OHD004177374

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 Activities	P2 Opportunities	
1	Lead pans leak causing molten lead to spill onto fire brick inside of heat-treatment furnances	lead-contaminated fire brick (D008)	varies- only generate waste when a lead pan leaks-could go months w/o a leak. However, when a leak occurs, facility generates enough to be a LQG.	NA	Disposal - Michigan Disposal Waste Treatment Plant - MI	None	Facility is considering possible alternatives to utilizing molten lead in wire heat-treatment process.
2	Insulating coal layer on top of lead pans in furnances	vermiculite/coal (not considered waste since reclaimed)	~ 30,000 lbs 4 or 5 times a year.	NA	Reclaimed - The Doe Run Company - MO	This material is a byproduct which is reclaimed for lead.	NA
3	Cooling mills	Used Oil	Not sure	Water-soluble oil goes to an evaporator which boils off water & used oil is recycled by SK.	Safety-Kleen	Recycling.	NA
4	Equipment Oil changes	Used Oil	Not sure	NA	Safety-Kleen	Recycling.	NA

5	Equipment battery changes	Used lead-acid batteries	Not sure	NA	Crown Battery - OH	Recycling.	NA
6	Lighting	Lamps	~15	NA	Environmental Recycling- OH	Recycling.	NA
7	Maintenance activities	Oily cloth rags	Not sure	NA	Facility disposes as solid waste in local landfill - cited for 52-11.	None.	Suggested have cloth rags laundered.
8							
9							

### REMARKS-GENERAL INFORMATION

**General Process Information:**

Facility converts steel rod into wire either through heat-treatment or hard drawn processes.

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

Facility has incurred an ORC 3734.02 (E) & (F) violation which was cited in this NOV from a complaint investigation conducted on 6-23-05.

**Additional P2 remarks and information:**

In letter asked facility if interested in a P2 assessment.

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:**

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

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:

**GENERAL REQUIREMENTS**

- |   |     |                                     |    |                                     |     |                          |
|---|-----|-------------------------------------|----|-------------------------------------|-----|--------------------------|
| 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"/> |
| 2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)]   | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/> |
| 3. Has the generator obtained a U.S. EPA identification number? [3745-52-12]  | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/> |
| 4. Were annual reports filed with Ohio EPA on or before March 1 <sup>st</sup> ? [3745-52-41(A)]   | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/> |
| 5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)]   | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/> |
| 6. Has the generator transported or caused to be transported hazardous waste to <b>other</b> than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]                                   | Yes | <input type="checkbox"/>            | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 7. Has the generator disposed of hazardous waste <b>on-site without a permit</b> or at another facility <b>other</b> than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/> |
| 8. Does the generator accumulate hazardous waste?   | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/> |

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

- |   |     |                                     |    |                          |     |                          |
|---|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| 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 | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
|---|-----|-------------------------------------|----|--------------------------|-----|--------------------------|

NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G) & (H).

- |   |     |                          |    |                          |     |                                     |
|---|-----|--------------------------|----|--------------------------|-----|-------------------------------------|
| 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 | <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 waste is treated to meet LDRs, use LDR checklist.

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

**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 | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)]                                       | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

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 | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
|--|-----|-------------------------------------|----|--------------------------|-----|--------------------------|

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 | <input type="checkbox"/>            | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)]   | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/>            |

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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 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

NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.

**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, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste 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:
- a. Job titles [3745-65-16D(1)]? Yes  No  N/A
  - b. Job descriptions [3745-65-16D(2)]? Yes  No  N/A
  - c. Type and amount of training given to each person [3745-65-16D(3)]? Yes  No  N/A
  - d. Completed training or job experience required [3745-65-16D(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

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

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

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6. 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 communications or 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 per documentation or facility rep? [3745-65-32(D)] 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 a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes  No  N/A

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- d. Do not exceed one quart of acute, hazardous waste at any one time? [3745-52-34(C)(1)] Yes  No  N/A
- e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes  No  N/A
- f. 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: Yes  No  N/A
- 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

*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, photograph the area, and record on facility map.*

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 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 for the file 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

## LDR CHECKLIST

### GENERAL LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] If so: Yes  No  N/A  RMK#
- a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)] Yes  No  N/A  RMK#
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes  No  N/A  RMK#
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] Yes  No  N/A  RMK#
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes  No  N/A  RMK#
4. Does the generator generate a characteristic hazardous waste? If so: Yes  No  N/A  RMK#
- 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: Yes  No  N/A  RMK#
- 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#

**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#

**NOTE: Wastes with EPA hazardous waste numbers K174 and K175 (chlorinated aliphatic wastes) have specific requirements in rule 3745-270-33. Waste with EPA hazardous waste numbers K176, K177 and K178 (inorganic chemical wastes) have specific requirements in rule 3745-270-36.**

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# \_1\_

**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] Yes  No  N/A  RMK#

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] Yes  No  N/A  RMK#

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 of 3745-270-07? [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 of 3745-270-07? [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 of 3745-270-07? [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 of 3745-270-07? [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:  
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# \_\_\_\_\_
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# \_\_\_\_\_

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

### REMARKS

## GENERATORS TREATING HAZARDOUS WASTE

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. Has the generator followed their WAP [3745-270-07(A)(5)? Yes\_\_ No  N/A  RMK#\_\_
5. 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.*

6. 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#\_\_
7. 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#\_\_
8. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following:
- a. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes\_\_ No  N/A  RMK#\_\_
- b. 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.*

9. 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.**

10. 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#\_\_
11. 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 from regulation as a hazardous waste 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  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  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)(1) have the following information? [3745-270-07(D)(3)]

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

c. Technology used from Table 1? [3745-270-07(D)(1)(c)]

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

9. Has the above notification been sent to the director? [3745-270-07(D)(1)]

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

**REMARKS**

## TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS

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:**
- a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)]
5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? **If so:**
- 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:
- a. Copies of all notices and certifications required in 3745-270?  
Yes \_\_\_ No  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  N/A  RMK# \_\_\_

c. The testing frequency specified in the facility's WAP and have they followed the protocol?

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

### REMARKS

1 - For all questions marked with N/A, the facility does not do this activity or does not generate the waste applicable to the question.

**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  No  N/A
- a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] Yes  No  N/A
2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes  No  N/A
3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? Yes  No  N/A

*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  No  N/A
- a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] Yes  No  N/A

*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  No  N/A

*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  No  N/A
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
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

9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes  No  N/A
- b. Contained the release? Yes  No  N/A
- c. Cleaned up and properly managed the used oil and other materials? Yes  No  N/A
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes  No  N/A

**ON-SITE BURNING IN SPACE HEATER**

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: Yes  No  N/A
- 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
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes  No  N/A
- c. Are the combustion gases from heater vented to the ambient air? Yes  No  N/A

**GENERATOR TRANSPORTATION**

11. 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  No  N/A
- a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24] Yes  No  N/A
- b. Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24] Yes  No  N/A

*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**

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
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes  No  N/A
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

*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.*

Keyword: UsedOilChecklistforGenerators.Oct.2007.doc

**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 LAMPS\*\*\* (Facility only manages lamps as UW)**

3. 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
4. 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# \_\_\_
5. 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# 2

**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**

6. 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.

7. 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# 3

### EMPLOYEE TRAINING

8. 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], spillage, or damage? [3745-273-13(B)(1)]

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

### RESPONSE TO RELEASES

9. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]

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

10. Is the material released characterized? [3745-273-17(B)]

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

11. 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.*

12. 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.*

13. 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# \_\_\_
14. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes  No  N/A \_\_\_ RMK# \_\_\_
15. 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# \_\_\_
16. 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# \_\_\_
17. 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# \_\_\_
18. 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**

19. 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

1. Seneca Wire was storing three containers of spent lamps without a lid. Thus, these lamps were not in a container that was closed. *All boxes that contained spent lamps were closed during the CEI, thus this violation is abated.*
2. Seneca Wire failed to mark their used lamps with a proper label. *All boxes that contained spent lamps were labeled with the words "Used Lamps" during the CEI, thus this violation is abated.*
3. Facility shows lamps off-site w/in a year through waste disposal (recycling) receipts.