



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

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

February 22, 2008

**MUSKINGUM COUNTY
GENERAL FILE
(AUTOZONE ZANESVILLE DIST. CTR.)
DHWMS/SEDO
OHR000142836**

Mr. Justin Tolpa
AutoZone Zanesville Distribution Center
2110 Sonora Road
Zanesville, Ohio 43701

Dear Mr. Tolpa:

On February 11, 2008, Melody Stewart and I inspected AutoZone Zanesville Distribution Center (AutoZone) to determine compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). This letter will explain the violations discovered during the inspection and what you need to do to correct them, the general concerns we have and what you can do to respond to those concerns, and any pollution prevention opportunities we identified.

We found the following violations of Ohio's hazardous waste laws:

- (1) **OAC Rule 3745-273-14(E), Labeling/Marking Standards for Small Quantity Handlers of Universal Waste.** Small quantity handlers of universal waste must label universal waste to identify the type of universal waste. Each spent lamp, or container in which the spent lamps are contained, must be labeled clearly with one of the following phrases: "Universal Waste - Lamps" or "Waste Lamps" or "Used Lamps".

At the time of the inspection, the containers holding spent fluorescent lamps were not labeled. On the same day as the inspection, AutoZone submitted photographic documentation to this office demonstrating that the containers of universal waste spent lamps had been properly labeled in accordance with this rule.

AutoZone has demonstrated a return to compliance with this rule. No further action is necessary on your part to address this matter.

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- (2) **OAC Rule 3745-273-15(C), Accumulation Time Limits - Standards for Small Quantity Handlers of Universal Waste.** Small quantity handlers of universal waste who accumulate universal waste shall be able to demonstrate the length of time the universal waste has been accumulated from the date it becomes a waste. This can be demonstrated by one of the methods outlined in OAC Rule 3745-273-15(C)(1) through (6).

At the time of the inspection, AutoZone had not labeled spent lamps or containers holding spent lamps with a date to identify when they became a waste, and no other method was in place to ensure the spent lamps were not accumulated for more than one year after generation. On the same day as the inspection, AutoZone submitted photographic documentation to this office demonstrating that each container of universal waste spent lamps had been labeled with the earliest date that any lamp in the container became a waste, in accordance with this rule.

AutoZone has demonstrated a return to compliance with this rule. No further action is necessary on your part to address this matter.

GENERAL COMMENTS:

- (a) As we discussed during the inspection, OAC Rule 3745-279-22(C) requires that containers, above ground tanks, and fill pipes for underground tanks that store used oil must clearly labeled or marked "Used Oil". At the time of the inspection, the label on the 250-gallon used oil tank was not completely legible. On the same day as the inspection, AutoZone submitted photographic documentation to this office demonstrating that the tank had been re-labeled and the words "Used Oil" were clearly legible. No further action is necessary to address this matter.
- (b) AutoZone indicated that the truck maintenance bays connect to an oil-water separator. Since the oil-water separator has been in place for only eight months, it has not yet been cleaned out. As we discussed, when the oil-water separator is cleaned out, AutoZone must evaluate the solids (oil sludge, etc.) to determine if they are a hazardous waste prior to disposing of them.
- (c) During the inspection, we observed a potential pollution prevention opportunity associated with your parts cleaning operation. AutoZone has one 55-gallon parts washer located in the maintenance garage. Currently, 55 gallons of spent parts washer solvent is picked up by Safety-Kleen every eight weeks and is managed as a D001(ignitable), D018 (benzene), D039 (tetrachloroethylene), D040 (trichloroethylene) hazardous waste. There are several pollution prevention options you may want to evaluate for this operation, including switching to non-hazardous

Mr. Justin Tolpa
AutoZone Zanesville Distribution Center
February 22, 2008
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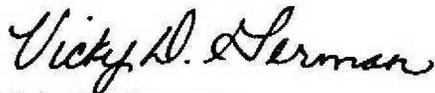
or less hazardous solvents, using a solvent filtration unit, or switching to a hot-water parts cleaning unit. I have enclosed Ohio EPA's Parts Washer Handbook, which discusses these options in detail and includes case studies/success stories of companies that implemented these options.

Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. If you find 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 and possibly reduce your regulatory requirements. You can find more pollution prevention information as well as compliance assistance information at <http://www.epa.state.oh.us/ocapp/ocapp.html>.

Enclosed you will find a copy of the checklists that were completed during the inspection. You can find copies of the hazardous waste rules and other information on our division's web page at <http://www.epa.state.oh.us/dhwm>.

If you should have any questions, please feel free to call me at (740) 380-5237.

Sincerely,



Vicky D. German
Environmental Specialist
Division of Hazardous Waste Management
Ohio EPA, Southeast District Office

VDG/mlm

Enclosure

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 or mail it to
Tammy McConnell, Central Office

Site EPA ID No.	EPA ID Number: OHR000142836							
Site Name	Name: AutoZone Zanesville Distribution Center					Website: (Optional)		
Site Location Information	Street Address: 2110 Sonora Road							
	City, Town, or Village: Zanesville					State: OH		
	County Name: Muskingum					Zip Code: 43701		
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"/>
NAICS code(s) www.census.gov/epcd/www/naics.html	42112							
Facility Representative Additional names can be recorded in "Comments" below Only provide address information if it is different than the site address	First Name: Justin			MI:	Last Name: Tolpa			
	Phone Number: 740-450-5670				Phone Number Extension:			
	E-Mail Address: justin.tolpa@autozone.com							
	Fax Number: 740-453-9220				Fax Number Extension:			
	Street or P.O. Box: same as above							
	City, Town or Village:							
	State: OH			Country: USA		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: AutoZone Inc.				Date Became Owner (mm/dd/yyyy): 09/08/1994			
	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: 123 South Front Street							
	City, Town or Village: Memphis				Owner Phone #: 901-495-7217			
	State: TN				Country: USA		Zip Code: 38103	
	Name of Site's Operator: AutoZone Zanesville Distribution Center				Date Became Operator (mm/dd/yyyy):			
	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: same as above							
	City, Town or Village:				Operator Phone #:			
	State:			Country: USA		Zip Code:		
Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No							
Type of Generator:								
<input type="checkbox"/> Not Regulated				<input checked="" 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 type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator				
<input type="checkbox"/> Small Quantity Generator (SQG)								
Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)								
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace				
<input type="checkbox"/> Underground Injection Control Facility				<input type="checkbox"/> Small Quantity On-Site Burner Exemption				
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption				
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste								

Universal Waste Activities					
<i>(Indicate types of universal waste generated and/or accumulated (check all boxes that apply))</i>					
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste		<input type="checkbox"/> Large Quantity Handler of Universal Waste <i>(accumulates 5,000 kg. or more)</i>			
<input type="checkbox"/> Destination Facility for Universal Waste					
<i>(Check all boxes below that apply for each of the three types of facilities above)</i>			Used Oil Activities <i>(Indicate Type(s) of Activity(ies))</i>		
	Generated	Accumulated	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner	
Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil	
Pesticides	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner	
Thermostats	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor		
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner		
Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your 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.					
D001	D018	D039	D040		
Comments: <i>Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.</i>					
Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:	Mr. Randy Porter, Mr. Bryan Blair	
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments		
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No			
Name of Inspector(s)		Name of Inspector(s)		Date of Inspection/Time (mm/dd/yyyy) (hh:mm)	
Vicky German, DHWM-SEDO		Melody Stewart, DHWM-SEDO		02/11/2008	
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)	

CONDITIONALLY EXEMPT SMALL QUANTITY (CESQG) GENERATOR REQUIREMENTS

CESQG: <100Kg. (Approximately 25-30 gallons) of waste in a calendar month.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or >1 Kg. of acutely hazardous waste in a calendar month.

WASTE EVALUATION

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No NA

GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator (CESQG)] Yes No NA

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).

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 No NA

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 No NA
 - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes No NA
 - c. Drip pad that meets 3745-69-40 to 3745-69-45? Yes No NA
 - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No NA

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements. If waste is treated to meet LDRs, use the LDR checklist.

REMARKS

USED OIL GENERATOR, COLLECTION CENTER, AND AGGREGATION POINT REQUIREMENTS

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

At the time of the inspection, the label on the 250-gallon used oil tank was not completely legible. On the same day as the inspection, AutoZone submitted photographic documentation to this office demonstrating that the tank had been properly labeled in accordance with OAC Rule 3745-279-22(C).

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 HEATERS

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-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 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.

GENERAL FACILITY INFORMATION

Process Information:

AutoZone is retailer and distributor of auto and light truck replacement parts and accessories, operating over 3,000 AutoZone retail stores in 48 states. AutoZone distribution centers procure merchandise for all the stores through support centers located in Tennessee and Mexico.

AutoZone's Zanesville Distribution Center is one of seven distribution centers located throughout the United States. The distribution center receives and stocks merchandise, pulls orders, coordinates vendor pickups, and dispatches driver delivery of merchandise to local AutoZone retail stores. The truck fleet is maintained and serviced in the on-site maintenance garage.

Waste Management Information:

Waste Generated			On-Site and Off-Site Management		
Process	Waste Generated	Waste Code	Amount Generated	Type and Location of Accumulation, Storage	Name, State, and Type of Activity Occurring at the Facility
Truck maintenance	Used oil Spent oil filters	NA		250-G used oil tank inside maintenance building	Safety Kleen
	Spent antifreeze	NA	25 G/mo	55-G drum inside maintenance building	Safety Kleen
	Spent parts washer solvent	D001 D018 D039 D040	25 G/mo	55-G drum inside maintenance building	Safety Kleen
	Spent lead-acid batteries	NA	Varies	Inside maintenance building	JCI Smelting Indianapolis IN Core exchange
Oil-Water separator	Has not yet been cleaned out, in operation only 8 mo. Must analyze solids prior to disposal.	NA	NA	NA	NA
Building maintenance	Spent fluorescent lamps and ballasts	NA	Varies	Original lamp shipment containers inside main building	American Electric Zanesville OH Recycled

Regulatory/Enforcement History:

AutoZone's Zanesville Distribution Center notified Ohio EPA of its waste generation activities on 7/11/2007 as a Small Quantity Generator (SQG) of hazardous waste. During the inspection, it was determined that the company is currently operating as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste (generating approximately 25 gallons of waste in a calendar month) and also generates universal waste lamps. The company has not been previously inspected for compliance with Ohio's hazardous waste regulations.

Pollution Prevention Remarks and/or Other Information:

Would this facility be interested in a P2 assessment?

Yes No NA

If yes, refer to Ohio EPA Southeast District Office Pollution Prevention Coordinator or to Ohio EPA's Office of Compliance Assistance and Pollution Prevention at 1-800-329-7518, p2mail@epa.state.oh.us, or www.epa.state.oh.us/ocapp/ocapp.html.

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - LAMPS

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

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No NA
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 NA

WASTE MANAGEMENT - LABELING/MARKING

UNIVERSAL WASTE LAMPS

8. Does the SQUWH 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 NA
9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? [3745-273-13(D)(2)] Yes No NA
- a. 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 NA

No lamps showed evidence of breakage. Containers were closed and appeared structurally sound.

10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamps" or "Waste Lamps" or "Used Lamps"? [3745-273-14(E)] Yes No NA

At the time of the inspection, the containers holding spent lamps were not labeled with the words: "Universal Waste - Lamps" or "Waste Lamps" or "Used Lamps". On the same day as the inspection, AutoZone submitted photographic documentation to this office demonstrating that the containers of universal waste spent lamps had been properly labeled in accordance with OAC Rule 3745-273-14 (E).

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

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

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes No NA
- 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 NA

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)]

- 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 NA
- 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 NA
- 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 NA
- 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 NA
- 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 NA
- 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 NA

At the time of the inspection, AutoZone had not labeled spent lamps or containers holding spent lamps with a date to identify when they became a waste, and no other method was in place to ensure the spent lamps were not accumulated for more than one year after generation. On the same day as the inspection, AutoZone submitted photographic documentation to this office demonstrating that the containers of universal waste spent lamps had been labeled with the earliest date when the spent lamps became a waste, in accordance with OAC Rule 3745-273-15(C).

EMPLOYEE TRAINING

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

RESPONSE TO RELEASES

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

OFF-SITE SHIPMENTS

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

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

EXPORTS

24. Is waste being sent to a foreign destination? If so: Yes No NA
- 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 NA
- 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 3745-52-57? [3745-273-20(B)] Yes No NA
- c. Is a copy of U.S. EPA' s "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes No NA