



State of Ohio Environmental Protection Agency

**Southeast District Office**

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

July 14, 2008

**MUSKINGUM COUNTY  
OWENS-BROCKWAY GLASS CONTAINER  
DHWM-SEDO  
OHD986971687**

Mr. Chris Swingle  
Owens-Brockway Glass Container  
1700 S. State Street  
Zanesville, Ohio 43701

Dear Mr. Swingle:

On July 1, 2008, Melody Stewart and I inspected Owens-Brockway Glass Container in Zanesville, Ohio, 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 any violations we found and what you need to do to correct them, as well as other general concerns or comments we have and what you can do to respond to those concerns.

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

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

The tote in the basement containing used oil from the API separator was not labeled "Used Oil". During the inspection, Owens-Brockway Glass Container labeled the tote with the words "Used Oil", in accordance with this rule.

***Owens-Brockway Glass Container has demonstrated a return to compliance with this rule.*** No further action is necessary on your part to address this matter.

**GENERAL COMMENTS:**

- Owens-Brockway Glass Container conducts furnace cleanouts every 6 years and furnace rebuilds every 8 to 12 years. Although currently operating as a conditionally exempt small quantity generator (CESQG), the amount of hazardous waste generated from cleanouts/rebuilds (refractory brick, checker dust, and other solid metal-bearing waste) causes Owens-Brockway Glass Container to become a large

Mr. Chris Swingle  
Owens-Brockway Glass Container  
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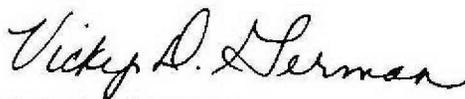
quantity generator (LQG) when these events occur (i.e., episodic generator). As you are aware, Owens-Brockway Glass Container must follow all applicable regulations for the generator category in which it falls when the company exceeds its normal CESQG status. I have enclosed Ohio EPA's fact sheet on Generator Categories and Episodic Generation.

- I am also enclosing information regarding used oil management for generators, and management of spent fluorescent lamps under Ohio's Universal Waste Rule.

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>. Compliance assistance and pollution prevention information is available at <http://www.epa.state.oh.us/ocapp/ocapp.htm>. You may also wish to visit "The Answer Place", which can be accessed from our division's web page or at [http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/std\\_alp.php](http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/std_alp.php); it contains answers to frequently asked questions and has the option to ask a question directly if the answer to your question is not already available in the database.

If you have any questions or require assistance, 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  
[kristina.durnell@epa.state.oh.us](mailto:kristina.durnell@epa.state.oh.us) or mail it to  
 Kristina Durnell, Central Office

Site EPA ID No.	EPA ID Number: OHD004497483							
Site Name	Name: Owens-Brockway Glass Container				Website: (Optional)			
Site Location Information	Street Address: 1700 S. State Street							
	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) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	327213							
Facility Representative  Additional names can be recorded in "Comments" below  Only provide address information if it is different than the site address	First Name: Chris			MI:	Last Name: Swingle			
	Phone Number: 740-455-4590				Phone Number Extension: 4590			
	E-Mail Address: <a href="mailto:chris.swingle@o-i.com">chris.swingle@o-i.com</a>							
	Fax Number: 740-455-4575				Fax Number Extension:			
	Street or P.O. Box:							
	City, Town or Village: same as above				State: OH			
					Country: USA		Zip Code: 43701	
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: Owens-Illinois, Inc.				Date Became Owner (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: One Michael Owens Way							
	City, Town or Village: Perrysburg				Owner Phone #: 567-336-5000			
	State: OH				Country: USA		Zip Code: 43551-2999	
	Name of Site's Operator: Owens-Brockway Glass Container				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: OH				Country: USA		Zip Code:	
Violations Cited?	<input type="checkbox"/> Yes <input checked="" 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				
(Indicate types of universal waste generated and/or accumulated (check all boxes that apply))				
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste		<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)		
<input type="checkbox"/> Destination Facility for Universal Waste				
(Check all boxes below that apply for each of the three types of facilities above)		Used Oil Activities (Indicate Type of Activity)		
	Generated	Accumulated	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input checked="" type="checkbox"/>	<input checked="" 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 checked="" 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.				
See 10/31/2006 Site ID Form and 2005 Annual Hazardous Waste Report.				
Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.				
Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:	Angela Reinbolt, Materials Manager
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments: Facility is an Episodic LQG	
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		
Name of Inspector		Name of Inspector		Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Vicky German, DHWM-SEDO		Melody Stewart, DHWM-SEDO		07/02/2008
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? Yes  No  NA   
(CESQG - Conditionally Exempt Small Quantity Generator)

*At the time of the inspection, Owens-Brockway Glass Container was operating as a CESQG. During furnace cleanouts or rebuilds, the company becomes a Large Quantity Generator (LQG) of hazardous waste.*

**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 - the company is operating as a Small Quantity Generator (CESQG).**

## OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? Yes  No  NA   
[ORC §3734.02(F)]

## 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.**

## 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 tote in the basement containing used oil from the API separator was not labeled "Used Oil". The company correctly labeled the tote during the inspection, returning to compliance with this rule.

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-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.**

## WASTE ACTIVITIES SUMMARY

Owens-Brockway Glass Container, Inc.

CESQG

OHD004282216

Description of Waste				On-Site Management			Off-Site Management
Process Generating Waste	Waste Generated	EPA Waste Code	QTY Generated per Month	Type of Accumulation/ Storage	Type of On-Site Treatment	Waste Location	Name, type of activity
Bottle coding process	MEK waste MEK-containing rags	D001 D035 F005	55 G /yr	55-G drum	NA	Bottle coding area	Safety-Kleen
Parts cleaning - aluminum parts (1 caustic parts washer)	Spent immersion cleaner solvent containing monoethanolamine	D018 D027 D039 D040	6 G/ mo	NA	NA	Machine Shop	Safety-Kleen
Parts cleaning - general (8 parts washers)	Non-hazardous spent parts washer solvent	NA	NA	NA	NA	Various locations; Tractor Shop, Maintenance Shop	Safety-Kleen Continued use program
Furnace cleanouts and/or rebuilds	Refractory brick Checker dust	D004 D006 D007 D008 D010	Cleanout wastes every 6 yrs Rebuild wastes every 12 yrs	~500,000 P/yr when rebuilds take place	NA	NA	Michigan Disposal
Spray painting misc. parts in Maintenance, Machine, or Tractor Shop	Aerosol cans	D001	Varies	55 G drums	NA	55-G drums in shops, various locations	Safety-Kleen

## WASTE ACTIVITIES SUMMARY

Owens-Brockway Glass Container, Inc.

CESQG

OHD004282216

Description of Waste				On-Site Management			Off-Site Management
Process Generating Waste	Waste Generated	EPA Waste Code	QTY Generated per Month	Type of Accumulation/ Storage	Type of On-Site Treatment	Waste Location	Name, state, and type of activity
Maintenance of process lines and equipment (forklifts, trucks, etc.)	Used oil	NA	NA	55-G drums in shops	NA	55-G drums in shops	Safety-Kleen
Bottle machine	API separator oil	NA	NA	5000-G used oil storage tank in basement	NA	5000-G used oil storage tank in basement	Safety-Kleen
Building and equipment maintenance	Batteries Fluorescent lamps	NA	NA	Managed as Universal Waste	NA	Maintenance Shop	Safety-Kleen
Cleanout of expired other unused materials, chemicals	Misc. hazardous waste	Codes vary	Varies	55-G drums	NA	NA – none on site	Safety-Kleen
Cleanout of basement bins	Basement sludge – dirt, glass, oil, water	NA	2-3 cu yds/ mo	Bins in basement	NA	Bins in basement	BFI

## WASTE ACTIVITIES SUMMARY

Owens-Brockway Glass Container, Inc.

CESQG

OHD004282216

Description of Waste				On-Site Management			Off-Site Management
Process Generating Waste	Waste Generated	EPA Waste Code	QTY Generated per Month	Type of Accumulation/ Storage	Type of On-Site Treatment	Waste Location	Name, state, and type of activity
Glass making scrap	Cullet	NA	NA	Bins in basement	NA	Bins in basement	Recycled back into process or taken for off-site recycling
Mold shop - used in repair of glass molds	Solid film lubricant waste	NA	NA	Container in Mold Shop	NA	Mold Shop	BFI
Maintenance of baghouse in are where tin is added to bottles	Baghouse dust tin	NA	NA	Baghouse	NA	NA	Reclaimed

## PROCESS DESCRIPTION

Owens-Brockway Glass Container Inc. is a division of Owens-Illinois, Inc.; Owens-Brockway owns all of Owens-Illinois' glass container operations. The Owens-Brockway Zanesville plant manufactures glass bottles and containers, primarily for the liquor industry (Jack Daniels, Jim Beam, Wild Turkey, Captain Morgan, Southern Comfort, Early Time). Approximately 10,000 bottles per day are manufactured here. The company has been in this location since 1924 and the process has essentially remained unchanged.

The company operates two natural gas-fired furnaces, referred to as "A Tank" and "B Tank". Sand, soda ash, limestone, cullet (crushed recycled glass), and other raw materials are mixed and then melted in the furnaces at temperatures of approximately 1600° F. The melting process is controlled by a computer system in the furnace control room. The molten glass moves from the furnace into a refiner area which brings the molten glass to a uniform temperature prior to its entering the feeder. Glass "gobs", each containing the right amount of molten glass to produce one bottle, are cut from a constant flow from the feeder. The molten gobs drop by gravity to the forming machine where they are pushed into the mold; the molds are lubricated on a regular basis in order to keep the glass from sticking to them. Air is blown into each gob to make it hollow and to push it into the mold shape. Once the glass is blown, the bottom of the bottle is cooled with air to make sure it does not collapse, then it is pushed on to a conveyor and transported to a cooling line. Most bottles go through an annealing furnace, where they are reheated to nearly the melting point, then cooled down gradually. Because glass is a poor conductor of heat and cools unevenly when it emerges from the forming machine, annealing ensures that the whole bottle is cooled evenly; reducing the residual stress inside the glass and making the bottle stronger and more shock resistant. Bottles may also be surface treated during the annealing process to make them more scratch resistant and slick so they move smoothly through the line for packaging.



The bottles pass through an inspection area where they are visually and physically tested for defects. Rejected bottles are removed from the conveyor line and sent down chutes to bins in the basement, where they are collected and crushed as cullet to be reused in the glass-making process. Finished bottles are stamped in ink with a time and date code on the bottom of the bottle. The bottles are boxed, palletized, and stored for shipment.

The company also operates a Maintenance Shop, a Machine Shop, and a Tractor Shop for maintaining equipment and process lines.

## WASTE MANAGEMENT INFORMATION

The company operated three furnaces in the past; the third furnace, "C Tank", has been permanently idled since the mid-1990's. The remaining two furnaces are cleaned out approximately every 6 years and are completely reconstructed every 8 to 12 years. Although currently operating as a CESQG, when cleanouts /rebuilt occur Owens-Brockway Glass becomes a Large Quantity Generator (LQG) of hazardous waste (i.e., "episodic generator"). The company's most recent LQG status was in 2005 when "A Tank" was rebuilt; a rebuild on "B Tank" is scheduled for summer 2008.

## REGULATORY HISTORY

Owens-Brockway Glass Container, Inc. notified EPA of its waste generation activities as a LQG on 8/18/1980. The company was last inspected on 5/16/1996 to determine compliance with Ohio's hazardous waste laws; no violations were discovered during the inspection.

*Additional process information sources used:*  
<http://www.recycleglass.co.nz/glassmaking.htm>  
[http://www.o-i.com/about\\_oi.aspx?id=1352](http://www.o-i.com/about_oi.aspx?id=1352)

# SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS BATTERIES AND LAMPS

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

## PROHIBITIONS

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

3. Are batteries that show evidence of leakage spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes  No  NA
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the batteries, and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes  No  NA
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes  No  NA
  - b. Mix battery types in one container? Yes  No  NA
  - c. Discharge batteries to remove the electric charge? Yes  No  NA
  - d. Regenerate used batteries? Yes  No  NA
  - e. Disassemble them into individual batteries or cells? Yes  No  NA
  - f. Remove batteries from consumer products? Yes  No  NA
  - g. Remove the electrolyte from the battery? Yes  No  NA
- If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] Yes  No  NA
6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] Yes  No  NA
- a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] Yes  No  NA
  - b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] Yes  No  NA
7. Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Batteries" or "Used Batteries"? [3745-273-14(A)] Yes  No  NA

### 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? 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
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

**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

## 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

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

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)]
- Yes  No  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:
- 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