



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: BP Pipelines Inc.
Seneca County
OHD 000 723 031
NOV

April 9, 2008

Mr. James Fries
BP Pipelines Inc.
197 Wall Street
Tiffin, Ohio 44883

Dear Mr. Fries:

On March 20, 2008, the Ohio Environmental Protection Agency (Ohio EPA) conducted a compliance evaluation inspection of BP Oil Pipeline (BP) in Tiffin, Ohio. The purpose of the inspection was to determine BP's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). BP was represented by Jerry Tiell, and I represented Ohio EPA.

BP is a petroleum storage and distribution facility. BP is currently listed as a small quantity generator (SQG) of hazardous waste. However, your facility conducts infrequent tank cleanings (every 3-5 years) and spill clean ups that episodically raise your generator status to a large quantity generator. At the time of inspection, for the month of February, Ohio EPA considered BP a conditionally exempt small quantity generator (CESQG) of hazardous waste due to the fact that you did not produce over 25 gallons of hazardous waste in a calendar month.

Ohio EPA has found the following additional 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 by using generator knowledge or by testing the waste.

BP failed to evaluate the phosphoric acid water to determine if it is hazardous. Permafrix filed an unmanifested waste report regarding the one 10-gallon container of phosphoric acid waste water that was sent to Permafrix by BP on June 12, 2007. Permafrix determined the waste to be characteristic for chromium making it a hazardous waste (D007). This waste was then disposed of as a hazardous waste by Permafrix.

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Currently, BP samples all wastes streams prior to disposal, however, no analytical was present at the facility concerning the shipment of the phosphoric acid waste water on June 12, 2007.

To abate this violation, BP must submit the analytical information for the phosphoric acid waste water (D007) to me along with a plan outlining how BP will ensure that all wastes are evaluated once they are generated to ensure proper management of the wastes.

2. Manifest Requirements, OAC Rule 3745-52-20(A)

Any generator who transports, or offers for transportation, hazardous waste for off-site treatment, storage, or disposal must prepare a uniform hazardous waste manifest, before transporting the hazardous wastes off-site.

BP failed to prepare a uniform hazardous waste manifest prior to the shipment of phosphoric acid water (D007) that was shipped off-site to PermaFix on June 12, 2007. BP was a small quantity generator of hazardous waste in June 2007 and therefore was required to fill out the hazardous waste manifest.

Permafrix filed an unmanifested waste report regarding the one 10-gallon container of phosphoric acid water that was sent to Permafrix on June 12, 2007. **Therefore, this violation has been abated.**

3. Land Disposal Restriction (LDR) Determination, OAC Rule 3745-270-07(A)(2)

If the hazardous waste being shipped off-site does not meet treatment standards, the generator must send, with the **initial** shipment of waste, a one-time written notice to each treatment or storage facility receiving the waste, and place a copy in the generator's files. The notice shall include the information in Column A of Table 1 of this rule. No further notification is necessary until such time as the waste changes or the treatment or storage facility changes, in which case a new notification shall be sent to the new treatment or storage facility and a copy placed in the generator's files.

BP failed to send a completed LDR form for the phosphoric acid water (D007) with the initial shipment of waste.

Permafrix provided a copy of the completed LDR form that was filled out for the hazardous waste shipment on June 12, 2007. **Therefore, this violation has been abated.**

4. LDR Determination, OAC Rule 3745-270-09(A)

The initial generator of a waste shall determine each EPA hazardous waste number (waste code) applicable to the waste in order to determine the applicable treatment standards under rules 3745-270-40 to 3745-270-49 of the Administrative Code. Also, if the generator determines that the waste displays a hazardous characteristic, the generator shall determine underlying hazardous constituents (UHCs) in the characteristic waste.

BP failed to know whether the wastes they generated were hazardous waste. Therefore, BP did not determine each EPA hazardous waste code applicable to the waste or determine if any UHCs were present in the characteristic waste.

Permafrix provided a copy of the completed LDR forms which showed the applicable Ohio EPA waste codes and UHCs for the phosphoric acid waste water that was transported to PermaFix on June 12, 2007. **Therefore, this violation has been abated.**

5. LDR Determination, OAC Rule 3745-270-07(A)(1)

A generator of a hazardous waste shall determine if the waste has to be treated before it can be land disposed. This is done by determining if the hazardous waste meets the treatment standards in rules 3745-270-40, 3745-270-45, or 3745-270-49 of the Administrative Code. This determination can be made either by testing the waste, or by using generator knowledge of the waste.

BP failed to determine whether their phosphoric acid waste water hazardous waste stream needed to be treated prior to land disposal.

Permafrix provided a copy of the completed LDR form which determined the correct treatability group(s) (e.g. wastewater, non-wastewater, etc.) and whether the waste needs to be treated prior to land disposal. **Therefore, this violation has been abated.**

You can find copies of Ohio EPA's rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address:
<http://www.epa.state.oh.us/ocapp/ocapp.html>

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Enclosed you will find a copy of the checklists that I completed during the inspection. Please address all correspondence to Amy Heller, Ohio EPA, 347 N. Dunbridge Road, Bowling Green, Ohio 43402. Should you have any questions, please feel free to call me at (419) 373-3058.

Sincerely,



Amy Heller
Division of hazardous Waste Management

/csl

Enclosure

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
; DHWM, NWDO File: Seneca County
ec: Amy Heller, 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 or mail it to Tammy
McCConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OHD00723031									
3. Site Name	Name: BP Pipelines Inc.					Website: (Optional)				
4. Site Location Information	Street Address: 197 Wall Street									
	City, Town, or Village: Tiffin					State: OH				
	County Name: Seneca					Zip Code: 44883				
5. Site Land Type (check only one)	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"/>		
6. NAICS code(s) www.census.gov/epcd/www/naics.html										
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: James				MI:		Last Name: Fries			
	Phone Number: 419-448-9691					Phone Number Extension:				
	E-Mail Address:									
	Fax Number:					Fax Number Extension:				
	Street or P.O. Box:									
	City, Town or Village:					State:				
						Country:		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 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 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)										
<input type="checkbox"/> Hazardous Waste Transporter					<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input 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"/> 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		10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
	Managed	<input type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<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"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
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.			
D001	D007	D008	D018
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.			
Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments:
Containers	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Amy Heller			3/20/2008
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)

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS

CESQG: < 100 Kg. (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

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

POLLUTION PREVENTION

Note to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention (P2) practices that the company may have initiated or attempted to initiate. The checklist is also used to:

- ◇ Facilitate P2 discussions;
- ◇ Identify barriers to P2;
- ◇ Define the P2 universe;
- ◇ Identify the need for future P2 initiatives;
- ◇ Identify partnership opportunities; and
- ◇ Link companies with better P2 resources.

As a prelude to completing this checklist the inspector should use the following list of questions as a way to initiate a dialogue concerning P2:

1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate?
2. What is the largest waste stream that you generate?
3. How important would it be to you to eliminate that waste stream?
4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have?
5. Could you use better housekeeping practices to reduce the amount of waste that you generate?

If the company responds with one of the answers below, the appropriate box should be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided in the remarks section.

1. Has the company undertaken any P2 activities to reduce the amount of waste generated? Yes No N/A RMK#

a. If so, what has the company done to minimize waste generation?

- A change in the process resulting in less waste.
- A change in the product resulting in less waste.
- Use of fewer and less toxic hazardous raw materials.
- Better operations/improved housekeeping.
- On-site recycling/reuse of hazardous materials.
- Sending waste off-site for recycling/reuse.
- Other activities (specify):

b. *If so*, what wastes have been addressed?

- | | |
|---|---|
| <input type="checkbox"/> Solvents | <input type="checkbox"/> Waste water |
| <input type="checkbox"/> Paint related wastes | <input type="checkbox"/> Solid waste (paper, plastic, metal, wood, blasting material) |
| <input type="checkbox"/> Industrial process wastes (sludges, slags, contaminated wastes waters, etc.) | <input type="checkbox"/> Air emissions |
| <input type="checkbox"/> Contaminated oils/hydraulic fluids | <input type="checkbox"/> Energy use |
| <input type="checkbox"/> Off-spec chemicals | <input checked="" type="checkbox"/> Fluorescent light bulbs |
| <input type="checkbox"/> Shop rags | <input type="checkbox"/> Used batteries |
| <input type="checkbox"/> Other (specify): | |

c. If they haven't minimized waste are there barriers that are preventing them from doing it?

- Lack of information about practical alternatives.
- Lack of capital to make process changes.
- Lack of internal management support.
- The company does not generate enough waste to consider P2.
- Other reason given (specify):

- | | |
|--|--------------------------------------|
| 2. Does the company plan to do P2 activities in the future? | ___ Yes <u>Y</u> No ___ N/A ___ RMK# |
| 3. Would the company be interested in receiving additional information from Ohio EPA about P2? | ___ Yes <u>Y</u> No ___ N/A ___ RMK# |
| 4. Did you give the company information about P2 during the inspection? | ___ Yes <u>Y</u> No ___ N/A ___ RMK# |

5. Would the company like a P2 assessment?

Yes No N/A RMK#

- A. If yes, provide information that makes the company a good candidate for an assessment (i.e., known specific P2 opportunities exist, the company is willing to cooperate and commit resources to the assessment, the company fully understands DHWM's P2 assessment process, etc.)
- B. If no, list the reasons the facility representative gave for not wanting an assessment.

If the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the Pollution Prevention for Hazardous Waste Generators document and discuss it with them.

REMARKS

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION

1. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes ___ No N/A ___ RMK# 1

GENERATOR CLASSIFICATION

2. Does the generator produce ≤ 100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes No ___ N/A ___ RMK# ___

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

NOTE: To convert from gallons to pounds:

Amount in gallons x Specific Gravity x 8.345 = Amount in pounds

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3745-51-05(G)(3)] Yes No ___ N/A ___ RMK# ___

REMARKS

1. Waste evaluation results were not received prior to shipment of phosphoric acid water - told them not hazardous and it was hazardous for DOT.

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: *BP Pipelines Terminal*

Facility Type: LQG/SQG/CESQG/TSD

EPA ID#: *OH000723031*

Description of Waste				On-Site Management			Off-Site Management	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	Waste Generated (e.g. sludge, spent solvent, ash, etc)	EPA Waste Code	QTY Generated per Month	Type of Accumulation/Storage (e.g. container, tank, etc)	Type of On-Site Treatment (recycle, vwt, etc)	Waste Location (Include map if possible)	Name, state, and type of activity occurring at the facility.	P2 Activities
<i>Run off from loading area</i>	<i>oil/water separator sludge</i>	<i>D001 D008</i>	<i>disposed of every couple of years</i>	<i>NO storage pumped directly to tanker truck</i>				
<i>2 cleaning new hoses</i>	<i>oily rags hoses</i>	<i>D018</i>	<i>Varies</i>	<i>containers</i>				
<i>3 fluorescent bulbs</i>	<i>spent bulbs</i>	<i>varies universal waste</i>	<i>varies</i>	<i>containers</i>				
<i>4 phosphoric acid water</i>	<i>cleaning up old material phosphoric acid water</i>	<i>unmanifested waste D007</i>	<i>manifested report</i>	<i>container</i>				
<i>5 tank clean outs</i>	<i>sludge etc</i>	<i>varies</i>	<i>every 3-5 years</i>	<i>tanker truck</i>				

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

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

PROHIBITIONS

- 1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No N/A ___ RMK# ___
- 2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes No N/A ___ RMK# ___

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

- 3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes ___ No N/A RMK# ___
- 4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes ___ No N/A ___ RMK# ___
- 5. Does the SQUWH conduct any of the following activities:
 - a. Sort batteries by type? Yes ___ No ___ N/A ___ RMK# ___
 - b. Mix battery types in one container? Yes ___ No ___ N/A ___ RMK# ___
 - c. Discharge batteries to remove the electric charge? Yes ___ No ___ N/A ___ RMK# ___
 - d. Regenerated used batteries? Yes ___ No ___ N/A ___ RMK# ___
 - e. Disassemble them into individual batteries or cells? Yes ___ No ___ N/A ___ RMK# ___
 - f. Remove batteries from consumer products? Yes ___ No ___ N/A ___ RMK# ___
 - g. Remove the electrolyte from the battery? Yes ___ No ___ N/A ___ RMK# ___
- If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] Yes No ___ N/A ___ RMK# ___

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)]
- Yes No N/A RMK# _____
- a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]
- Yes No N/A RMK# _____
- b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]
- Yes No N/A RMK# _____
7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]
- Yes No N/A RMK# _____

UNIVERSAL WASTE LAMPS

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]
- Yes No N/A RMK# _____
9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]
- Yes No N/A RMK# _____
10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)]
- Yes No N/A RMK# _____

NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of

generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes No N/A RMK#
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes No N/A RMK#

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

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes No N/A RMK#
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes No N/A RMK#
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes No N/A RMK#
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes No N/A RMK#
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes No N/A RMK#
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes No N/A RMK#
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes No N/A RMK#

EMPLOYEE TRAINING

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

RESPONSE TO RELEASES

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

OFF-SITE SHIPMENTS

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

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

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

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes No N/A RMK#
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No N/A RMK#
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes No N/A RMK#
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes No N/A RMK#

21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes ___ No ___ N/A RMK# ___
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes ___ No ___ N/A RMK# ___
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes ___ No ___ N/A RMK# ___
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes ___ No ___ N/A RMK# ___

EXPORTS

24. Is waste being sent to a foreign destination? If so: Yes ___ No ___ N/A RMK# ___
- a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes ___ No ___ N/A RMK# ___
- b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)] Yes ___ No ___ N/A RMK# ___
- c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes ___ No ___ N/A RMK# ___

REMARKS