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State of Ohio Environmental Protection Agency

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www.epa.state.oh.us

P.O. Box 1049  
Columbus, OH 43216-1049

May 29, 2007

Re: Ohio State University-BCW  
Large Quantity Generator  
OHD986966943  
Franklin, CDO  
NOV/ Partial RTC

Mr. David Kos  
Ohio State University  
1314 Kinnear Road - # 106  
Columbus, OH 43212

Dear Mr. Kos:

Thank you to you and Mr. Stygar for accompanying me during Ohio EPA's May 17, 2007, inspection of Ohio State University Bulk Chemical Warehouse Area in Columbus, Ohio. We inspected Ohio State University to determine its 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).

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

1. **OAC Rule 3745-65-33, Testing and Maintenance of Equipment:** All facility communication or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, must be tested and maintained to assure its proper operation in time of emergency. Inspections must be recorded in a log.

Ohio State University has failed to log emergency equipment inspections at the pesticide rinse water 90 day area on Waterman Laboratory Farm. There were four full drums with the May 9, 2007, date and one almost full drum with the May 10, 2007, date at the time of the inspection.

Ohio State University must immediately begin logging emergency equipment inspections and submit a copy of the log to demonstrate compliance with this rule. As an alternative the 90 day area could be managed as a satellite area with only accumulation of 55 gallons of rinse water in a drum. Another alternative would be to move the drummed rinse water directly to the Bulk Chemical Warehouse 90 day area. If one of these alternatives is utilized, it must be stated in writing to this office. A return to compliance inspection may be conducted in this case.

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

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2. **OAC Rule 3745-66-74, Inspection of Container Storage Area:** Container storage areas must be inspected weekly. Inspections must be recorded in a log.

Ohio State University has failed to log container storage area inspections at the pesticide rinse water 90 day area on Waterman Laboratory Farm. There were four full drums with the May 9, 2007, date and one almost full drum with the May 10, 2007, date at the time of the inspection.

Ohio State University must immediately begin logging container storage area inspections. Please submit a copy of the log to demonstrate compliance with this rule. As an alternative, the 90 day area could be managed as a satellite area with only accumulation of 55 gallons of rinse water in a drum. Another alternative would be to move the drummed rinse water directly to the Bulk Chemical Warehouse 90 day area. If one of these alternatives is utilized, it must be stated in writing to this office. A return to compliance inspection may be conducted in this case.

3. **OAC Rule 3745-279-22 (C) , Used Oil Labeling:** Containers of used oil must be clearly marked "Used Oil."

Ohio State University did not label a 55 gallon drum of used oil in the Traffic and Parking Building.

Mike Stygar, Hazardous Waste Specialist for Ohio State University, labeled the drum with the words "Used Oil." Therefore this violation has been returned to compliance.

**Comment:**

While talking to Mr. Stygar about the Radiation Safety Building, he stated he usually picks up three drums from the area every four weeks. This indicates the area is being managed as a 90 day area on a regular basis. When we inspected this area it was being utilized as a satellite area, one drum with no accumulation start date. Either it is managed as 90 day with inspections or satellite with only one 55 gallon drum in place.

Any area where waste is accumulated in a 90 day area must undergo generator closure. Therefore, at some point before final closure of the facility or building the pesticide area and the radiation safety lab must undergo generator closure.

If you find ways to recycle, reduce or eliminate the amount of waste that your university generates you may be able to reduce treatment and disposal costs as well as regulatory requirements.

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The Ohio Department of Development's Office of Energy Efficiency may be able to help with energy efficiency issues. Their website is at: <http://www.odod.state.oh.us/cdd/oeef/>.

If you would like a free, non-regulatory on-site pollution prevention assessment or if you would like more information about pollution prevention, please contact me at (614) 728-5036. Ohio EPA has helpful information about this at the following web address:  
<http://www.epa.state.oh.us/ocapp/ocapp/>.

Enclosed you will find a copy of the checklists that we completed as a result of the inspection. Should you have any questions, please feel free to call me. 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,



Chris Bulinski  
District Representative  
Division of Hazardous Waste Management  
Central District Office

Enclosures

c: Tammy McConnell, DHWM/CO with Enclosures

CB/nsm OsuNOVBCW2007

**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.



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E-mail this completed form to [tammy.mccconnell@epa.state.oh.us](mailto:tammy.mccconnell@epa.state.oh.us) or mail it to Tammy McConnell, Central Office

**Ohio Environmental Protection Agency**  
**RCRA SUB E C SITE IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

2. Site EPA ID No.	EPA ID Number: OHD986966943								
3. Site Name	Name: Ohio State University - Bulk Chemical Warehouse					Website (optional):			
4. Site Location Information	Street Address: 1870 Millikin Road								
	City, Town, or Village: Columbus				State: OH				
	County Name: Franklin				Zip Code: 43210				
5. Site Land Type (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other	
							X		
6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	A. 61131			B.					
	C.			D.					
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: Michael			MI: W.	Last Name: St. Claire				
	Phone Number: 614-292-1284				Phone Number Extension:				
	E-Mail Address: st-clair.1@osu.edu							Fax Number Extension:	
	Fax Number: 614-292-6404				Fax Number Extension:				
	Street or P.O. Box: 1314 Kinnear Road							City, Town or Village: Columbus	
	State: Ohio			Country: Franklin		Zip Code: 43212			
	A. Name of Site's Legal Owner: Ohio State University			Date Became Owner (mm/dd/yyyy): 01/01/1870					
	Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
							X		
Street or P.O. Box:							City, Town, or Village:		
State:			Country:		Zip Code:				
B. Name of Site's Operator:			Date Became Operator (mm/dd/yyyy):						
Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other	
Street or P.O. Box:							City, Town, or Village:		
State:			Country:		Zip Code:				
9. Violations Cited?	Yes	X	No						
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)									
<input type="checkbox"/> Not Regulated									



## Remarks-Process Description

The Bulk Chemical Warehouse (BCW) campus of the Ohio State University (OSU) has the generator ID # OHD986966943. The hazardous waste generated in this area is primarily from Printing, the Waterman Laboratory Farm Pesticide rinse area, the Turf Grass facility, the Radiation Safety area, and Traffic and Parking. There are two laboratories in this area the Reagent Laboratory where reagents are mixed for distribution around campus and the Rothenbuhler Honey Bee Research Laboratory.

The BCW is used primarily to bulk solvents sent from the Main Campus such as the Chemistry and Engineering Departments and other OSU notification numbers. The solvents are transported to the BCW by the Environmental Health and Safety Staff and bulked into 55 gallon drums for shipping. Ohio State University signs off as the initial transporter on the manifest in this case. A second transporter takes possession of the bulked waste within 10 days and transports it to Clean Harbors Environmental Services, El Dorado, AR. There is a 90 day accumulation area in the BCW which is used by the Printing Facility, Traffic and Parking, the Pesticide rinse facility at Waterman Laboratory Farm, a pesticide rinse facility at the Turf Grass facility, the Radiation Safety Section, and the Reagent Laboratory, and the Rothenbuhler Honey Bee Research Laboratory.

The Ohio State University Printing facility generates a waste solvent which carries the following hazardous waste codes D001, D011, D018, D028. This waste stream is accumulated in a 55 gallon satellite area in a cabinet on the loading dock of the facility. These are moved to the BCW 90 day area until they are shipped to Clean Harbors Environmental Services Inc., 309 American Circle, El Dorado, AR 71739 for incineration. 5850 pounds of this waste stream were generated in 2006. 3600 pounds were generated in 2005.

The Traffic and Parking Building accumulates spent antifreeze and transmission fluid in a satellite area. The waste carries the D010 code. They were shipped to Ensco (Clean Harbors Environmental Services), El Dorado, AR for incineration. 2250 pounds of this waste stream was generated and shipped to Ensco (Clean Harbors Environmental Services), El Dorado, AR for incineration in 2006. None of the waste was shipped in 2005. Traffic and Parking also disposed of waste kerosene which is transferred to the BCW. It carries the D001 code and 1100 pounds of this waste stream was generated and shipped to Ensco (Clean Harbors Environmental Services), El Dorado, AR for incineration in 2006. 400 pounds was generated and shipped in 2005. 250 pounds of waste diesel fuel was also disposed of by Traffic and Parking in 2006 as a D001 hazardous waste. It was shipped to Ensco (Clean Harbors Environmental Services), El Dorado, AR for incineration. Traffic and parking shipped 3200 pounds of lead acid batteries to Ensco (Clean Harbors Environmental Services), El Dorado, AR for storage, bulking or off site transfer in 2006. They also generated 20 pounds of spent hydraulic oil in 2006. The oil carried the D001, D004, D005, D008, D010 codes and was shipped to Ensco (Clean Harbors Environmental Services), El Dorado, AR for fuels blending prior to energy recovery at another site. Traffic and parking also accumulates used oil

which is shipped as a nonhazardous waste to Clean Harbors Environmental Services, El Dorado, AR for incineration.

The Reagent Laboratory which prepares reagents for distribution throughout campus and the Rothenbuhler Honey Bee Research Laboratory are the only two laboratories generating hazardous waste in the area covered by this notification number. The following hazardous wastes were generated in these laboratories and moved to the BCW for accumulation in the 90 day area there. All of these wastes were shipped to the Ensco (Clean Harbors Environmental Services), El Dorado, AR. 163 pounds of discarded acutely hazardous chemicals from laboratories carrying the D001, F003, P003, P105 codes for incineration in 2006. 1969 pounds of discarded chemicals from these laboratories with the D001, D002, D003, D010, D011, D019, F003, F005, U188, U211 codes were sent for incineration in 2006. 2660 pounds of this waste was shipped during 2005. 460 pounds of D001 aerosol cans and cylinders were shipped by these labs for incineration in 2006. 35 pounds of this waste stream was shipped for incineration in 2005. 80 pounds of waste mercuric chloride and acid with the D002 and D009 waste codes was shipped for storage bulking or off site transfer in 2006 and 80 pounds was shipped in 2005. 570 pounds of spent solvent with the D001, D004, D006, D007, D008, D009, D013, D018, D019, D022, D026, D035, D036, D038, F002, F003, F004, F005 waste codes was sent for incineration. 1640 pounds was shipped in 2005. 4950 pounds of a cleaning solution with the codes D007, D026, U045, U052 and U226 was shipped for incineration in 2006. 100 pounds of solvent spill clean up with the codes D006, D007, D008, D013, D018, D019, D022, D026, D035, D036, D038, D040, F002, F003, F004, F005 was sent for incineration during 2006. 440 pounds was shipped in 2005. 30 pounds of lab samples was shipped for incineration in 2006. The waste stream had the D001 and D038 codes. 600 pounds of D009 mercury containing debris was shipped for storage bulking or off site transfer in 2006. 160 pounds of D002, D009 mercury oxide was shipped for storage bulking or off site transfer in 2006. 50 pounds of D002 waste from clean up of an acid spill cleanup in this area was shipped to Ensco (Clean Harbors Environmental Services), El Dorado, AR for incineration in 2006.

In 2006 there was a one time cleanout of the shipping and receiving building. 11700 pounds of D001 adhesive were shipped to Ensco (Clean Harbors Environmental Services), El Dorado, AR for incineration. 1000 pounds of D001 spent cleaning solution was shipped to Ensco (Clean Harbors Environmental Services), El Dorado, AR for incineration in 2006. 400 pounds of discarded resin cleaner with the D002 code was shipped to Ensco (Clean Harbors Environmental Services), El Dorado, AR for incineration in 2006.

The Radiation Safety Laboratory takes in scintillation cocktail vials from all over campus they are sorted by type and if they are below 0.05 uC/gram then they are shipped off as hazardous. If they are over they are held until they degrade to that standard or are shipped as radioactive waste. There is a satellite accumulation area for the hazardous waste vials. 7400 pounds of this waste with the codes D001, F003, F005 were shipped to Ensco (Clean Harbors Environmental Services), El Dorado, AR for incineration in 2006. 9650 pounds were shipped in 2005.

9230 pounds of discarded paint products was generated in the mechanical shop in the laundry building and sent to Ensco (Clean Harbors Environmental Services), El Dorado, AR for incineration in 2006. It carries the D001, D008, D009, D035 codes. 6840 pounds of this waste was generated and sent to Ensco (Clean Harbors Environmental Services), El Dorado, AR for incineration in 2005. 200 pounds of discarded boiler treatment chemical from the laundry building boiler was shipped to Ensco (Clean Harbors Environmental Services), El Dorado, AR for incineration in 2006.

59400 pounds of discarded pesticide was generated by the Waterman Laboratory Farm and the Turf Grass facility, and sent to Ensco (Clean Harbors Environmental Services), El Dorado, AR for incineration in 2006. It carries the D012, D013, D015, D016, D020, D031 codes. Also 40 pounds of pesticide with the D001, D013, D014 codes was shipped from these facilities for incineration. 39240 pounds of this waste stream was shipped in 2005.

1950 pounds of empty safety cans were generated at the BCW and sent to Ensco (Clean Harbors Environmental Services), El Dorado, AR for incineration in 2006. They carry the D006, D007, D008, D009, D013, D018, D019, D022, D026, D035, D036, D040 codes. 1600 pounds of this waste was generated and sent to Ensco (Clean Harbors Environmental Services), El Dorado, AR for incineration in 2005.

Lamps from the BCW are accumulated at Vivian Hall.



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**LA 3 QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

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.

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  No  N/A
2. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes  No  N/A
3. Were annual reports filed with Ohio EPA on or before March 1<sup>st</sup>? [3745-52-41(A)] Yes  No  N/A
4. Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] Yes  No  N/A
5. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] Yes  No  N/A
6. Does the generator accumulate hazardous waste? Yes  No  N/A   
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.
7. 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  No  N/A   
NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G) & (H).
8. 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  No  N/A
  - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C) and Yes  No  N/A
  - c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes  No  N/A
  - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes  No  N/A

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

9. Does the generator export hazardous waste? If so: Yes  No  N/A 
  - a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] Yes  No  N/A
  - b. Has the generator complied with special manifest requirements? [3745-52-54] Yes  No  N/A
  - c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] Yes  No  N/A

d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes  No  N/A

e. Are export related documents being maintained on-site? [3745-52-57(A)] Yes  No  N/A

### MANIFEST REQUIREMENTS

10. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes  No  N/A

11. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Yes  No  N/A

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)]

12. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] Yes  No  N/A

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)].

13. 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  No  N/A

14. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] Yes  No  N/A

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 of the waste they generate.

15. 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

16. 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

17. 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

18. 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

19. Does the personnel training program include instructions to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes  No  N/A

20. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes  No  N/A
21. 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
22. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes  No  N/A
23. Does the generator keep records including: job titles [D(1)], job descriptions [D(2)], type and amount of training given to each person [D(3)] and documentation of completed training or job experience required [D(4)]? [3745-65-16(D)] Yes  No  N/A
24. 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.

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date Trained</u>

**CONTINGENCY PLAN**

25. 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
26. 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
- e. 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)]

27. 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

28. 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

29. 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

30. 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

31. 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

32. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:

a. Internal 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? [3745-65-32(D)] Yes  No  N/A

NOTE: Verify that the equipment is listed in the contingency plan.

33. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes  No  N/A

34. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes  No  N/A   
No log or summary of the pesticide rinse water 90 day area emergency equipment.

35. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-34(A))? [3745-65-34(A)] Yes  No  N/A

36. 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
37. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes  No  N/A
38. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes  No  N/A
39. 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

40. 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 one quart of acutely hazardous waste at anyone time? [3745-52-34(C)(1)] Yes  No  N/A
  - d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes  No  N/A
  - e. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes  No  N/A
41. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:
- 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
  - c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] 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

42. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes  No  N/A
43. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes  No  N/A
44. 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 and photograph the area.

45. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A)  
"Week" means seven 7 consecutive days. Yes  No  N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes  No  N/A   
No log or summary of the pesticide rinse water 90 day area inspections.
46. 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
47. 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
48. 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
49. 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.

50. 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 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

51. 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
52. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes  No  N/A
53. 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

## 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. 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.

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

8. Has the process/operation generating the waste or the solid waste landfill facility changed? If so: Yes \_\_\_ No \_\_\_ N/A x RMK# \_\_\_
- a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] Yes \_\_\_ No  N/A x RMK# \_\_\_
- b. Has the director been notified of such changes? [3745-270-09(D)] Yes \_\_\_ No  N/A x RMK# \_\_\_

**NOTE:** *The director need only be notified on an annual basis but no later than December 31.*

9. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: Yes \_\_\_ No \_\_\_ N/A x 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 x RMK# \_\_\_
10. Does each notification/certification form completed, contain the information found in Table 1? [3745-270-07(A)(3)] Yes \_\_\_ No  N/A x 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 under 3745-51-03(F)(1) maintain the following information?
- 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) 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

## LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] (possibly also cite 3745-52-11) **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] (possibly also cite 3745-52-11) 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#\_\_\_

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#\_\_\_

**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]

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]
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? [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? [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? [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? [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: Yes  No  N/A  RMK#
- 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#

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

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#

**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. 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.

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

8. Has the process/operation generating the waste or the solid waste landfill facility changed? If so: Yes \_\_\_ No \_\_\_ N/A x RMK# \_\_\_
- a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] Yes \_\_\_ No  N/A x RMK# \_\_\_
- b. Has the director been notified of such changes? [3745-270-09(D)] Yes \_\_\_ No  N/A x RMK# \_\_\_

**NOTE:** *The director need only be notified on an annual basis but no later than December 31.*

9. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: Yes \_\_\_ No \_\_\_ N/A x 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 x RMK# \_\_\_
10. Does each notification/certification form completed, contain the information found in Table 1? [3745-270-07(A)(3)] Yes \_\_\_ No  N/A x 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 x 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 x RMK#\_\_\_
3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so: Yes\_\_\_ No\_\_\_ N/A x 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 x 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 x RMK#\_\_\_
- a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] Yes \_\_\_ No  N/A x RMK#\_\_\_
5. Is the waste a PCB waste under 40 CFR Part 761? If so: Yes\_\_\_ No\_\_\_ N/A x 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 x 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 x RMK#\_\_\_
7. Does the owner/operator of a treatment facility that claims the debris is excluded under 3745-51-03(F)(1) maintain the following information? Yes\_\_\_ No\_\_\_ N/A x RMK#\_\_\_
- a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)] Yes\_\_\_ No\_\_\_ N/A x 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) 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

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

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. Followed the testing frequency specified in the facility's WAP?

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

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**REMARKS**

LARGE QUANTITY UNIVE.

L WASTE HANDLER REQUIREME

- 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*

**GENERAL REQUIREMENTS**

- 1. Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)] Yes  No  N/A \_\_\_ RMK# \_\_\_

**PROHIBITIONS**

- 2. Did the LQUWH dispose of universal waste? [3845-273-31(A)] Yes  No  N/A \_\_\_ RMK# \_\_\_
- 3. Did the LQUWH dilute or treat universal waste, except when responding to releases or by managing specific wastes as provided in OAC 3745-273-33? [3745-273-31(B)] Yes  No  N/A \_\_\_ RMK# \_\_\_

**WASTE MANAGEMENT AND LABELING/MARKING**

**UNIVERSAL WASTE BATTERIES:**

- 4. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)] Yes \_\_\_ No  N/A  RMK# \_\_\_
- 5. If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? Yes \_\_\_ No  N/A  RMK# \_\_\_
- 6. Does the LQUWH 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. Regenerate 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 batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-33(A)(2)]

No  N/A  RMK#

7. If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)(3)]

Yes  No  N/A  RMK#

a. If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)]

Yes  No  N/A  RMK#

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)]

Yes  No  N/A  RMK#

8. Are the battery(ies) or container(s) of batteries located with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-34(A)]

Yes  No  N/A  RMK#

#### UNIVERSAL WASTE LAMPS

9. Does the LQUHW 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? [3745-273-33(D)(1)]

Yes  No  N/A  RMK#

10. 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 constituents to the environment? [3745-273-33(D)(2)]

Yes  No  N/A  RMK#

11. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamps?" [3745-273-34(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.

12. **ACCUMULATION TIME**

Is the waste accumulated for less than one year? [3745-273-35(A)] Yes  No  N/A  RMK#

a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on handler to demonstrate) [3745-273-35(B)] Yes  No  N/A  RMK#

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

13. Has the length of time the universal waste has been accumulated documented by **one** of the following: [3745-273-35(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? [3745-273-35(C)(1)] Yes  No  N/A  RMK#

b. Marking or labeling the individual item of universal waste with the date that it became a waste or was received? [3745-273-35(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? [3745-273-35(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? [3745-273-35(C)(4)] Yes  No  N/A  RMK#

- e. Placing the universal waste in a specific accumulation area and identifying the earliest that any universal waste in the area became a waste or was received? [3745-273-35(C)(5)]
- 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 is received? [3745-273-35(C)(6)]

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

Yes  No \_\_\_ N/A \_\_\_ RMK# 1.

**EMPLOYEE TRAINING**

14. Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36]

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

**RESPONSE TO RELEASES**

15. Were releases of universal waste and other residues immediately contained? [3745-273-37(A)]
16. Was the released material characterized? [3745-273-37(B)]
17. If the released material was a hazardous waste, was it managed as required in OAC 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)* [3745-273-37(C)]

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

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

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

**OFF-SITE SHIPMENTS**

**NOTE:** *If a LQUWH self-transportes wastes, then the handler must comply with the Universal Waste transporter requirements.*

18. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)]

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

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

19. 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? [3745-273-38(C)]

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

20. Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)]

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

21. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following: Yes \_\_\_ No  N/A  RMK# \_\_\_
- a. Receive the waste back? [3745-273-38(E)(1)] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- b. Agree to where shipment will be sent? [3745-273-38(E)(2)] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
22. If a handler rejects a partial or full load from another handler, does the receiver handler contact the originating handler and discuss one of the following: Yes \_\_\_ No  N/A  RMK# \_\_\_
- a. Sending the waste back to originating handler? [3745-273-38(F)(1)] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- b. Sending the shipment to a destination facility? [3745-273-38(F)(2)] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
23. If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)] Yes \_\_\_ No  N/A  RMK# \_\_\_
24. If the handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-38(H)] Yes \_\_\_ No  N/A  RMK# \_\_\_

**1. OSU accumulates the lamps and ballasts in Vivian Hall. The Lamps are completely cleaned out several times each year. They are shipped to USA Lamp and Ballast in Cincinnati. The ballasts are shipped as PCB containing.**

**TRACKING UNIVERSAL WASTE SHIPMENTS**

25. Are universal waste received from another handler? If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. Is a record of each shipment kept? [3745-273-39(A)] Yes \_\_\_ No  N/A  RMK# \_\_\_

**NOTE:** *This record can be in the form of a log, invoice, manifest, bill of lading, or other shipping document. This also applies to question No. 35(a).*

26. Does the record include the following:
- a. Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)] Yes \_\_\_ No  N/A  RMK# \_\_\_
- b. Quantity of each type of universal waste? [3745-273-39(A)(2)] Yes \_\_\_ No  N/A  RMK# \_\_\_
- c. Date received? [3745-273-39(A)(3)] Yes \_\_\_ No  N/A  RMK# \_\_\_

27. Is universal waste shipped to another handler? If so: Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Is a record of each shipment kept? [3745-273-39(B)] Yes  No  N/A \_\_\_ RMK# \_\_\_

28. Does the record include the following?
- a. Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)] Yes  No  N/A \_\_\_ RMK# \_\_\_
- b. Quantity of each type of universal waste? [3745-273-39(B)(2)] Yes  No  N/A \_\_\_ RMK# \_\_\_
- c. Date shipped? [3745-273-39(B)(3)] Yes  No  N/A \_\_\_ RMK# \_\_\_

29. Are records kept for three years? [3745-273-39(C)(1)(2)]. Yes  No  N/A \_\_\_ RMK# \_\_\_

**EXPORTS**

30. Is waste being sent to a foreign destination? If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56 and 3745-52-57? [3745-273-40(A)] Yes \_\_\_ No  N/A  RMK# \_\_\_

b. Is waste export. Only upon consent of the receiving country and in conformance with U.S. EPA "Acknowledgment of Consent" 3745-52-50 to -52-57? [3745-273-40(B)]

Yes  No  N/A  RMK#

c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)]

Yes  No  N/A  RMK#

**REMARKS**



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## USED OIL INSPECTION CHECKLIST (Short Version)

**NOTE:** This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.

### PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes  No  N/A  RMK#   
Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes  No  N/A  RMK#
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes  No  N/A  RMK#
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes  No  N/A  RMK#

### USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [3745-279-21(A)] Yes  No  N/A  RMK#
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  RMK#
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes  No  N/A  RMK#
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  RMK#
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  RMK# 1
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  RMK#
- b. Contained the release? Yes  No  N/A  RMK#

- c. Cleaned up and properly managed the used oil and other materials? Yes  No  N/A  RMK#
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes  No  N/A  RMK#
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes  No  N/A  RMK#
- 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  RMK#
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes  No  N/A  RMK#
- c. Are the combustion gases from heater vented to the ambient air? Yes  No  N/A  RMK#
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes  No  N/A  RMK#

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

**WASTE EVALUATION**

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

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**REMARKS**

1. A container of used oil in the Traffic and Parking Building was not labeled.