OhioEPA

State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.ohio.gov

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

Re: American Trim
OHD000804724
Auglaize County
DHWM, NWDO
Notice of Violation

June 15, 2010

Mr. Chad Ulm
American Trim
317 Krein Avenue
Wapakoneta, Ohio 45895

Dear Mr. Ulm:

Thank you for accompanying Colleen Weaver and me during the Ohio Environmental Protection Agency's (Ohio EPA's) May 25, 2010, compliance evaluation inspection of the American Trim (AT) facility located at 317 Krein Avenue, Wapakoneta, Ohio. We inspected the facility 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). During the inspection we also helped you identify ways to prevent pollution by reducing waste.

This letter will explain the violations we found, what you need to do to correct the violations, other general concerns we have, what you need to do to respond to the general concerns, and the pollution prevention opportunities we identified.

AT manufactures burner bowls and burner rings for the appliance industry. Processes include stamping steel, zinc electroplating, and nickel-chrome electroplating. AT is currently a large quantity generator of hazardous waste. The facility has an on-site wastewater treatment system that generates F006 hazardous waste sludge. Other hazardous waste streams that are generated on a regular basis include chrome contaminated debris (D007), carbon treated nickel (D007), chromic acid (D002, D007), and oily wastewater (D002, D007). Paint related waste from aerosol cans (D001) is being generated in a satellite accumulation area but has yet to be disposed. Also, AT recently installed a parts washer that may generate hazardous spent solvent and/or hazardous spent filters, however, these wastes have not yet been generated. AT also generates used oil, universal waste lamps, and universal waste batteries. Recycled material at the facility includes a large amount of scrap metal and cardboard.

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 receipt of this letter.**

Violations

1. **OAC Rule 3745-52-34(C)(1)(a), Accumulation time of hazardous waste:** "A generator may accumulate as much as fifty-five gallons of hazardous waste...at or near any point of generation...provided he...complies with rules...3745-66-73...". OAC Rule 3745-66-73(A) states "A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste."

   AT failed to keep the tote located near the wastewater treatment plant closed at all times except when adding or removing waste.

   AT closed the tote located near the wastewater treatment plant while Ohio EPA was on site.

   Therefore, this violation is considered abated on May 25, 2010.

2. **OAC Rule 3745-66-74: Inspections:** "The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The owner or operator must record inspections in an inspection log or summary."

   On several occasions, AT failed to inspect the less than 90 day hazardous waste storage area at the wastewater treatment plant on a weekly basis.

   In order to abate this violation, AT must immediately begin inspecting the storage areas every seven days. AT must submit copies of four consecutive weeks of inspection logs for the storage area at the wastewater treatment plant showing that 7 days have not been exceeded between inspections. This information should be submitted to Ohio EPA **within 30 days of receipt of this letter.**

General Concerns

A. **Aerosol Can Satellite Storage Area:** During the May 25, 2010, inspection, Ohio EPA observed a satellite accumulation area (SAA) located inside the less than 90 day storage area in the PC3 Annex Building. This 55 gallon drum was closed, labeled "Hazardous Waste", and was attached to an aerosol can puncturing device purchased by AT. According to AT inspection records, this SAA is inspected weekly along with the less than 90 day storage area.

   The SAA is located in a room that is separated by a berm from the rest of the building for secondary containment, connected to the fire control system, and also contains spill control and containment equipment. Although this room is not separated from the rest of the building by locked fence or other security system, the entire building is kept locked at all times unless shipments and/or truck loading are occurring. Access to the building is limited to individuals with a key which includes maintenance workers, wastewater operators, and environmental, health, and safety personnel. The process that generates the waste is the physical puncturing and draining of the aerosol cans into the 55 gallon drum in this centralized aerosol can accumulation area. The SAA is under the control of the operator while the waste is being generated (while the cans are physically being punctured and drained).

   At this time, Ohio EPA will not cite a violation concerning the SAA. Ohio EPA views the overall management of the area to go above and beyond what is required for a SAA while also meeting the definition of a SAA based on Ohio EPA's interpretation of the rules and regulations. However, AT should be aware that the United States Environmental Protection Agency (USEPA) may not agree with Ohio EPA's interpretation of the rules. This potential difference in opinion may result in future violations or enforcement actions taken upon AT from either agency.

   For more information I have enclosed the fact sheet titled Satellite Accumulation Under Ohio Hazardous waste Rules, dated July 2004.

As we discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce, or altogether eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs as well as regulatory requirements. Ohio EPA has helpful information about pollution prevention at the following web address: http://www.epa.ohio.gov/ocapp/. If you would like to be considered for a free, non-regulatory on-site pollution prevention assessment, or if you would like more information about pollution prevention assessments, please contact me at the number listed below. The Ohio Department of Development's Office of Energy Efficiency may also be able to help with energy efficiency issues. Their website is at http://www.development.ohio.gov/cdd/oee/.

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign up for this free service. You can find more information at the following web link: http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage . Please feel free to share this with your colleagues.

Enclosed you will find a copy of the checklists that were completed during the inspection. Should you have any questions, please feel free to call me at (419) 373-3065. You can find copies of the rules and other information on the division's web page at http://www.epa.ohio.gov/dhwm/ .

Please send all correspondence **within 30 days of receipt of this letter** to Ohio EPA, Northwest District Office, Attn: Kara Reynolds, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,

Kara Reynolds

Kara Reynolds
Environmental Specialist
Division of Hazardous Waste Management

/llr

Enclosures

pc: Colleen Weaver, DHWM, NWDO
Kara Reynolds, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
DHWM, NWDO Allen County File: American Trim Plt#3 1995-

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.

Send to Central Office ☒	Ohio Environmental Protection Agency **RCRA SUBTITLE C SITE** **IDENTIFICATION/VERIFICATION FORM**	For Ohio EPA use only

Completed verification forms required to be submitted to CO should be e-mailed to paula.canter@epa.state.oh.us.

Site EPA ID No.	EPA ID Number: **OHD000804724**							
Site Name	Name: **American Trim**				Website: (Optional)			
Site Location Information	Street Address: **317 Krein Avenue**							
	City, Town, or Village: **Wapakoneta**				State: OH			
	County Name: **Auglaize**				Zip Code: **45895**			
Site Land Type (check only one)	Private ☒	County ☐	District ☐	Federal ☐	Indian ☐	Municipal ☐	State ☐	Other ☐
NAICS code(s) www.census.gov/epcd/www/naics.html	**332813**							
Facility Representative	First Name: **Chad**		MI: **M**		Last Name: **Ulm**			
Additional names can be recorded in number 12	Title: **Corporate Environmental Engineer**							
	Phone Number: **419-739-4418**				Phone Number Extension:			
	E-Mail Address: **culm@amtrim.com**							
Only provide address information if it is different than the site address	Fax Number:				Fax Number Extension:			
	Street or P.O. Box:							
	City, Town or Village:							
	State:				Zip Code:			
Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: **American Trim**				Date Became Owner (mm/dd/yyyy): **08-01-1968**			
	Owner Type:	Private ☒	County ☐	District ☐	Federal ☐	Indian ☐	Municipal ☐	State ☐	Other ☐
	Street or P.O. Box: **1005 West Grand Avenue**							
	City, Town or Village: **Lima**				Owner Phone #:			
	State: **Ohio**				Country: **USA**		Zip Code: **45801**	
	Name of Site's Operator: **American Trim**				Date Became Operator (mm/dd/yyyy): **08-01-1968**			
	Operator Type:	Private ☒	County ☐	District ☐	Federal ☐	Indian ☐	Municipal ☐	State ☐	Other ☐
	Street or P.O. Box: **1005 West Grand Avenue**							
	City, Town or Village: **Lima**				Operator Phone #:			
	State: **Ohio**				Country**USA**		Zip Code: **45801**	

VIOLATIONS CITED? ☒ Yes ☐ No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

☐ Not a HW Generator	☐ UNKNOWN: Cited for violation of 3745-52-11	☒ Large Quantity Generator (LQG)
	☐ Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). *Check the box for the applicable generator status and provide a comment.*	☐ Small Quantity Generator (SQG)
		☐ Conditionally Exempt Small Quantity Generator
		☐ U.S. Importer of Hazardous Waste
		☐ Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

- ☐ Hazardous Waste Transporter
- ☐ Hazardous Waste Transfer Facility
- ☐ Treater, Storer or Disposer of Hazardous Waste
- ☐ Recycler of Hazardous Waste
- ☐ Exempt Boiler and/or Industrial Furnace
  - ☐ Small Quantity On-Site Burner Exemption
  - ☐ Smelting, Melting, Refining Furnace Exemption
- ☐ Underground Injection Control Facility
- ☐ Receives Hazardous Waste from Off-site

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY)

- ☒ Small Quantity Handler of Universal Waste
- ☐ Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)
- ☐ Destination Facility for Universal Waste

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

- ☒ Batteries
- ☐ Pesticides
- ☐ Mercury containing equipment
- ☒ Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S)

- ☒ Used Oil Generator
- ☐ Used Oil Transporter
- ☐ Used Oil Transfer Facility
- ☐ Used Oil Processor
- ☐ Used Oil Re-refiner
- ☐ Off-Specification Used Oil Burner
- ☐ Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
- ☐ Used Oil Fuel Marketer to Off-Specification Used Oil Burner

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 or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

D002 **D007** **F006**

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

Announced	☒ Yes	☐ No	Additional Facility Representatives: **Michael Wittman**
Tanks	☐ Yes	☒ No	
Containers	☒ Yes	☐ No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Kara Reynolds	**Colleen Weaver**	**05-25-2010 9:30 AM**

Comments:

Revised 03.11.10

PROCESS, WASTE, P2 SUMMARYSHEET

Facility Name: American Trim **Facility Type:** LQG **Date of Inspection:** 05-25-2010 **EPA ID#:** OHD000804724

Waste Generated				*On- or Off-Site Management*		P2 Activities	
	Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	**Waste Description** (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and **EPA Waste Code, if applic.**	**QTY Generated per Month, Type of** Accumulation (container, tank, etc) and location of waste accumulation area	**Type of On-Site Treatment** (recycle, wwt, etc)	**Name, state, and type of activity occurring at the off-site facility.**	**Current P2 Activities**	**P2 Opportunities**
1	Wastewater Treatment Plant	Sludge F006	20 cubic yards every 80 days Roll-off box Wastewater Treatment Area	Storage	Envirite of Ohio, Inc.; Ohio Stabilization		
2	Process Maintenance	Chrome Contaminated Debris D007	18000 Pounds Last Year Drums or Gaylord Boxes PC3 Annex Building	Storage	Michigan Disposal Waste Treatment Plant, Michigan Stabilization		
3	Plating Waste	Carbon Treated Nickel D007	19000 Pounds Last Year Drums/Totes PC3 Annex Building	Storage	Inmetco, Pennsylvania Metals Recovery		
4	Plating Waste	Chromic Acid D002, D007	26000 Pounds Last Year Totes PC3 Annex Building	Storage	Inmetco, Pennsylvania Metals Recovery		

5	Wastewater Treatment Plant	Oily Water D002, D007	18000 Pounds Last Year Totes PC3 Annex Building	Storage	Inmetco, Pennsylvania Metals Recovery		
6	Wastewater Treatment Plant Upset	Alkaline Cleaner D007	82000 Pounds Last Year Totes PC3 Annex Building	Storage	Inmetco, Pennsylvania Metals Recovery		
7	Tri-chrome Plating Line	Tri-chrome Bath D007	17000 Pounds Last Year Totes PC3 Annex Building	Storage	Inmetco, Pennsylvania Metals Recovery		
8	Off Spec Material	Sulfuric Acid with Oil D002	5504 Pounds Last Year Totes PC3 Annex Building	Storage	Inmetco, Pennsylvania Metals Recovery		
9	Contaminated Absorbents	Contaminated Absorbents D002	1700 Pounds Last Year Drums PC3 Annex Building	Storage	Inmetco, Pennsylvania Metals Recovery		
10	Plating Process	Non-Hazardous Nickle Filters	Minimal Roll-off with F006 Wastewater Treatment Area	Storage	Disposed of with the F006 out of convenience Envirite of Ohio, Inc.; Ohio Stabilization		

11	Maintenance	Used Oil & Water	~700 Gallons Totes PC3 Annex Building	Storage	United Waste Waters Services, Inc.; Ohio		
12	Maintenance	UW Lamps & Ballasts	~10 Lamps Boxes PC3 Annex Building	Storage	Resource One, Ohio	Recycle	
13	Maintenance	UW Batteries	~10 Pounds Boxes PC3 Annex Building	Storage	Resource One, Ohio	Recycle	
14	Process Waste	Scrap Cardboard	Boxes	Storage	Resource One, Ohio	Recycle	
15	Process Waste	Scrap Metal	Large Amounts Roll-off Boxes Stamping Area	Storage	Omni Source, Ohio	Recycle	
16	New Parts Washer	Filters and Possibly Spent Solvent	May be Generated in the Future		To be Determined		
17	Aerosol Can Puncturing Device	Waste Paint and Related Material D001	Minimal Satellite Accumulation Drum PC3 Annex Building		Has not been Disposed of yet, To be Determined		

REMARKS/GENERAL INFORMATION

General Process Information: See Attached Letter

Regulatory/Enforcement History (if applicable): N/A

Additional P2 remarks and information: N/A

Would this facility be interested in a P2 assessment? ☐ Yes* ☒ No *If yes, refer promptly to your district P2 coordinator.
Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other: N/A

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

1.		Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes ☒ No ☐ N/A ☐
2.		Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes ☒ No ☐ N/A ☐
3.		Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes ☒ No ☐ N/A ☐
4.		Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)]	Yes ☒ No ☐ N/A ☐
5.		Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes ☒ No ☐ N/A ☐
6.		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 ☐
7.		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 ☐
8.		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.			
9.		Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes ☐ No ☒ N/A ☐
NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).			
10.		Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]	
	a.	Container that meets 3745-66-70 to 3745-66-77?	Yes ☐ No ☐ N/A ☒
	b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	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.			
11.		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			
12.		Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes ☒ No ☐ N/A ☐
13.		Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(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)(1)]			
14.		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)].			
15.		If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes ☐ No ☐ N/A ☒
16.		Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes ☒ No ☐ N/A ☐
17.		If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	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 waste they generate.			
18.		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 ☒
19.		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 ☒
20.		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			
21.		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 ☐
22.		Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)]	Yes ☒ No ☐ N/A ☐
23.		Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes ☒ No ☐ N/A ☐
24.		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 ☐
25.		Does the generator provide annual refresher training to employees? [3745-65-16(C)]	Yes ☒ No ☐ N/A ☐
26.		Does the generator keep records and documentation of:	
	a.	Job titles? [3745-65-16D(1)]	Yes ☒ No ☐ N/A ☐

	b.	Job descriptions? [3745-65-16D(2)]	Yes ☒ No ☐ N/A ☐
	c.	Type and amount of training given to each person? [3745-65-16D(3)]	Yes ☒ No ☐ N/A ☐
	d.	Completed training or job experience required? [3745-65-16D(4)]	Yes ☒ No ☐ N/A ☐
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]		Yes ☒ No ☐ N/A ☐

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

Job Performed	Name of Employee	Date Trained
Shipper	Pearl Hullinger	11-20-07;11-19-08;11-03-09
Wastewater Operator	Dave Taulker	12-18-07;11-20-08;11-17-09

CONTINGENCY PLAN

28.	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 ☐
29.	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 Countermeasures 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)]

30.	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 ☐
31.	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 ☐
32.	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

33.	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			
34.	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 ☐
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:		
	a.	Internal communications or alarm system? [3745-65-32(A)]	Yes ☒ No ☐ N/A ☐
	b.	Emergency communication device? [3745-65-32(B)]	Yes ☒ No ☐ N/A ☐
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes ☒ No ☐ N/A ☐
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes ☒ No ☐ N/A ☐
NOTE: Verify that the equipment is listed in the contingency plan.			
36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]		Yes ☒ No ☐ N/A ☐
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]		Yes ☒ No ☐ N/A ☐
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]		Yes ☒ No ☐ N/A ☐
39.	If there is only one employee on the premises, is there immediate access to a device (eg., 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 ☐
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]		Yes ☒ No ☐ N/A ☐
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]		Yes ☒ No ☐ N/A ☐
42.	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			
43.	Does the generator ensure that satellite accumulation area(s):		
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes ☐ No ☒ N/A ☐
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes ☒ No ☐ N/A ☐
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:		Yes ☒ No ☐ N/A ☐

	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes ☒ No ☐ N/A ☐
	b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes ☒ No ☐ N/A ☐

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less then 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

45.		Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes ☒ No ☐ N/A ☐
46.		Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes ☒ No ☐ N/A ☐
47.		Are hazardous wastes stored in containers which are:	
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes ☒ No ☐ N/A ☐
	b.	In good condition? [3745-66-71]	Yes ☒ No ☐ N/A ☐
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes ☒ No ☐ N/A ☐
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes ☒ No ☐ N/A ☐

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

48.		Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days.	Yes ☐ No ☒ N/A ☐
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes ☒ No ☐ N/A ☐
49.		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 ☐
50.		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 ☐
51.		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 ☐
52.		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.

53.		If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745- 66-11? [3745-52-34(A)(1)]	Yes ☐ No ☐ N/A ☒

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

54.		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 ☒
55.		Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes ☐ No ☐ N/A ☒

56.	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 ☒

GENERATOR LDR CHECKLIST
DOES NOT APPLY TO CESQGS

GENERAL REQUIREMENTS			
1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07 (A)(7)]		Yes ☐ No ☐ N/A ☒
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)]		Yes ☒ No ☐ N/A ☐
NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07 (A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).			
3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]		Yes ☒ No ☐ N/A ☐
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]		Yes ☒ No ☐ N/A ☐
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,		Yes ☒ No ☐ N/A ☐
	a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)	Yes ☒ No ☐ N/A ☐
FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.			
6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]		Yes ☒ No ☐ N/A ☐
NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.			
NOTE: Written documentation of this determination is not required.			
7.	Did the generator treat his HW /soil on-site <u>to meet</u> the LDR treatment standard?		Yes ☐ No ☒ N/A ☐
NOTE If "Yes" see question #16.			
8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility?[3745-270-07(A)(2)]		Yes ☒ No ☐ N/A ☐
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]		Yes ☒ No ☐ N/A ☐
10.	Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)]		Yes ☒ No ☐ N/A ☐
	a.	Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes ☒ No ☐ N/A ☐
NOTIFICATION FORM			
11.	Does the LDR Notification form contain the following information:		
	a.	Manifest number of the first waste shipment to the TSD?[3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)].	Yes ☒ No ☐ N/A ☐

NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.				
	e.		Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories				
	f.		A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.				
	g.		If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for?[3745-270-07(A)(2)]	Yes ☐ No ☐ N/A ☒
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.				
PROHIBITED DILUTION				
12.			Is the HW treated by burning? If "No" go to #15.	Yes ☐ No ☒ N/A ☐
13.			Is the HW a metal-bearing HW?	Yes ☐ No ☐ N/A ☒
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.				
14.	a.		Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless **one** of the following conditions apply. [3745-270-03(c)]	
		i.	Contains > 1% TOC?	Yes ☐ No ☐ N/A ☒
		ii.	Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes ☐ No ☐ N/A ☒
		iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes ☐ No ☐ N/A ☒
		iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes ☐ No ☐ N/A ☒
		v.	Co-generated with a HW that must be combusted?	Yes ☐ No ☐ N/A ☒
	b.		If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes ☐ No ☐ N/A ☒
15.			Was the HW treated by wastewater treatment?	Yes ☐ No ☒ N/A ☐
	a.		Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes ☐ No ☐ N/A ☒
NOTE: If Yes, HW is improperly being treated by dilution.				
	b.		Does the waste carry the D001 code <u>and</u> contain ≥10% TOC?	Yes ☐ No ☐ N/A ☒
	c.		Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes ☐ No ☐ N/A ☒
NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B) and 3745-270-40(A)(3)].				
NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.				

GENERATOR TREATMENT					
16.	Does the generator treat to meet LDRs on-site [3745-270-40(A)]?				Yes ☐ No ☒ N/A ☐
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?				Yes ☐ No ☐ N/A ☒
	If "Yes•"..complete the rest of the checklist. If "No"...stop...you are done.				
	a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]			Yes ☐ No ☐ N/A ☒
	b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]			Yes ☐ No ☐ N/A ☒
NOTE: This is a laboratory analysis but it does not have to be kept by the generator.					
	c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]			Yes ☐ No ☐ N/A ☒
	d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]			Yes ☐ No ☐ N/A ☒
	e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]			Yes ☐ No ☐ N/A ☒
	f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]			Yes ☐ No ☐ N/A ☒
NOTIFICATION FORM FOR GENERATOR TREATMENT					
17.	a.	Contains all information in #11 a-g above and			Yes ☐ No ☐ N/A ☒
	b.	If the treated HW/soil is listed.....notification contains the following certification statement: "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."			Yes ☐ No ☐ N/A ☒
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:			
		i.	Send a one-time notification to the director?[3745-270- 09 (D)]		Yes ☐ No ☐ N/A ☒
		ii.	Maintain a copy of the notice onsite?[3745-270-09(D)]		Yes ☐ No ☐ N/A ☒
		iii.	Include in the notification: [3745-270-09(D)(1)(a)]		
			1.	Name & address of receiving landfill?	Yes ☐ No ☐ N/A ☒
			2.	Description of HW when generated?	Yes ☐ No ☐ N/A ☒
			3.	HW code when generated?	Yes ☐ No ☐ N/A ☒
			4.	Treatability group when generated?	Yes ☐ No ☐ N/A ☒
			5.	Underlying hazardous constituents present when generated?	Yes ☐ No ☐ N/A ☒
		iv.	Contain the certification statement as required by 3745-70-07(B)(4)?		Yes ☐ No ☐ N/A ☒

USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

NOTE: 1. A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

2. Inspectors can check BUSTR's web-site at https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at: https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp.

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:		Yes ☐ No ☒ N/A ☐
	a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes ☐ No ☐ N/A ☒
NOTE: For example, used oil contaminated scrap metal stored in a pile.			
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]		Yes ☐ No ☒ N/A ☐
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?		Yes ☐ No ☐ N/A ☒
NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).			

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,		Yes ☐ No ☒ N/A ☐
	a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes ☐ No ☐ N/A ☒
NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.			
5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]		Yes ☐ No ☐ N/A ☒
NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.			
6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]		Yes ☒ No ☐ N/A ☐
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]		Yes ☒ No ☐ N/A ☐
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]		Yes ☒ No ☐ N/A ☐
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]		Yes ☒ No ☐ N/A ☐
	a.	Stopped the release?	Yes ☒ No ☐ N/A ☐
	b.	Contained the release?	Yes ☒ No ☐ N/A ☐
	c.	Cleaned up and properly managed the used oil and other materials?	Yes ☒ No ☐ N/A ☐
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes ☒ No ☐ N/A ☐

ON-SITE BURNING IN SPACE HEATER			
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:		
	a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes ☐ No ☐ N/A ☒
	b.	Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour?	Yes ☐ No ☐ N/A ☒
	c.	Are the combustion gases from heater vented to the ambient air?	Yes ☐ No ☐ N/A ☒
NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).			
GENERATOR TRANSPORTATION			
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]		Yes ☒ No ☐ N/A ☐
12.	If the generator self-transports used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]		
	a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes ☐ No ☐ N/A ☒
	b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes ☐ No ☐ N/A ☒
NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).			
COLLECTION CENTERS AND AGGREGATION POINTS			
13.	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 ☒
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]		Yes ☐ No ☐ N/A ☒
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]		Yes ☐ No ☐ N/A ☒
NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.			

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 ☐
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes ☐ No ☒ N/A ☐
WASTE MANAGEMENT AND LABELING/MARKING		
UNIVERSAL WASTE BATTERIES		
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes ☒ No ☐ N/A ☐
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 ☐
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes ☐ No ☒ N/A ☐
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes ☐ No ☐ N/A ☒
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes ☐ No ☐ N/A ☒
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 ☒
7.	Are the batteries or containers 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 ☐
UNIVERSAL WASTE LAMPS		
8.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and 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 ☐
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 ☐
*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 rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.*		
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 ☐
ACCUMULATION TIME		
11.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes ☒ No ☐ N/A ☐

	a.	If not, is 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 ☒
NOTE: Accumulation is defined as date generated or date received from another handler.			
12.		Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below: Accumulation Start Date on Box	Yes ☒ No ☐ N/A ☐
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 ☐
RESPONSE TO RELEASES			
14.		Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes ☒ No ☐ N/A ☐
15.		Is the material released characterized? [3745-273-17(B)]	Yes ☒ No ☐ N/A ☐
16.		If the material released is a hazardous waste, was 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 OAC Chapter 3745-52) [3745-273-17(B)]	Yes ☒ No ☐ N/A ☐
OFF-SITE SHIPMENTS			
NOTE: If a SQUWH self-transports waste, then the handler 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 ☐
18.		Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes ☒ No ☐ N/A ☐
19.		Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	Yes ☒ No ☐ N/A ☐
20.		Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes ☐ No ☒ N/A ☐
	a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes ☐ No ☐ N/A ☒
21.		If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u>:	Yes ☐ No ☐ N/A ☒
	a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)]	Yes ☐ No ☐ N/A ☒
22.		If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes ☐ No ☐ N/A ☒
EXPORTS			
23.		Is waste being sent to a foreign destination? If so:	Yes ☐ No ☒ N/A ☐
	a.	Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes ☐ No ☐ N/A ☒
	b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	Yes ☐ No ☐ N/A ☒
	c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes ☐ No ☐ N/A ☒