



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

April 9, 2012

RE: YOUNG DIRECT SALES, INC.
DBA YOUNG VOLVO
STARK COUNTY
OHD 005 795 919
CESQG, NOV

Craig Young
Young Direct Sales, Inc. DBA Young Volvo
2230 Shepler Church Ave. SW
Canton, OH 44706

Dear Mr. Young:

On March 29, 2012, I as a representative of the Ohio EPA Division of Materials and Waste Management conducted a compliance inspection of the Young Direct Sales, Inc. DBA Young Volvo (Young Volvo) facility located at 2230 Shepler Church Ave. SW, Canton, for compliance with Ohio's hazardous waste and used oil regulations. Robert Smith, Homer Richards, Bob Young and Scott Baker represented Young Volvo during the inspection. Subsequent to the inspection, you submitted additional information via e-mail.

The Young Volvo facility was selected for a random inspection because our records indicate that ID Number OHD 005 795 919 is assigned to Lattavo Brothers Inc. at this location. During the inspection I was informed that Young Volvo has been at this location for about 10 years and is currently in the process of purchasing the property from Lattavo Brothers Inc.

Because an ID Number is assigned to a physical location, it is our practice to inspect the current occupant if the entity that requested the ID Number is no longer present or operating.

Young Volvo conducts maintenance work on heavy duty trucks at this location. Maintenance capabilities are quite extensive and range from oil changes to removal of major components, such as engines, transmissions rear axle, for major repairs. No vehicle painting is conducted at this location.

The only hazardous waste identified during the inspection as being generated at this facility at this time is spent low flash point mineral spirits solvent used in some parts washers. This spent solvent is managed by being placed in the used oil generated at this facility. The used oil is recycled in accordance with the used oil rules. The facility is also a generator of universal waste used lamps.

The inspection included a review of the facility's operations, as well as waste management practices and documentation. Young Volvo was inspected for the requirements of a conditionally exempt small quantity generator (CESQG) of hazardous waste because the facility typically generates less than 220 pounds of hazardous waste in a calendar month and did not have more than 2,200 pounds of hazardous waste on-site.

Based on observations made during the facility walk-through and inspection, Ohio EPA has determined that Young Volvo has violated the following state hazardous waste, used oil and universal waste regulations.

1. **OAC 3745-273-13(D)(1) Small quantity handler must contain lamps in proper containers or packaging and containers or packaging must be closed.**

2. **OAC 3745-273-14(E) Small quantity handler must label containers or packaging holding universal waste lamps.**
3. **OAC 3745-273-15(C) Small quantity handler must be able to demonstrate length of accumulation.**
4. **OAC 3745-273-273-15(A) Small quantity handler may only accumulate for one year unless additional accumulation time is necessary to facilitate proper recovery, treatment or disposal**

The facility generates used lamps and is classified as a small quantity handler of universal waste. In the loft area at the south end of maintenance building, I observed a box holding about ten 8 foot used fluorescent lamps and approximately eight additional used fluorescent lamps were leaning against the wall. Reportedly additional boxes of used lamps that I did not observe were present elsewhere in the building.

OAC 3745-273-13(D)(1) requires that all these lamps be in closed containers that are structurally sound, adequate to prevent breakage, and compatible with the contents. The facility was not in compliance with this.

OAC 3745-273-14(E) requires that the containers holding these lamps be labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)". The facility was not in compliance with this.

OAC 3745-273-15(C) requires that the facility have a system to demonstrate the length of time that the used lamps have been accumulated. The facility was not in compliance with this rule. No documentation of the time that these lamps had been accumulated was provided. It appeared that at least some of the lamps had been on-site for more than one year.

OAC 3745-273-273-15(A) requires that the facility not accumulate used lamps for more than one year unless the facility can demonstrate that additional accumulation time is necessary to facilitate proper recovery, treatment or disposal. The facility was not in compliance with this rule. No documentation of shipments of used lamps within the past year was provided by the facility. Apparently at least some of the lamps had been on-site for more than one year.

On April 6, 2012 you submitted photos of boxes of used lamps that were closed and properly marked. These actions abated the violations of OAC 3745-273-13(D)(1) and OAC 3745-273-14(E) . In the future all used lamps should be stored in containers that are closed and marked as required by these rules.

To return to compliance Young Volvo must also:

- Establish a system to demonstrate the length of time that the used lamps have been accumulated. One such system would be to mark on the container the date the first lamp was placed in the container;
- Submit information describing the time tracking system selected; ,
- Promptly ship the used lamps currently on-site to a recycler of used fluorescent lamps; and
- Provide a copy of the shipping paper for the recycled lamps to this office within 14 days of receipt of this letter.

5. **OAC 3745-279-22(C)(1) Fill pipes to underground storage tanks holding used oil must be labeled with the words "Used Oil"**

Young Volvo uses an underground tank for storage of used oil. The discharge line from a pump in the pit over which oil changes are conducted serves as the inlet to the underground tank. At the time of the inspection, the fill pipe to the underground tank was not labeled or marked with the words "Used Oil".

On April 6, 2012 you submitted a photo of the fill pipe to the underground tank marked with the words "Used Oil". This action abated this violation. No additional action is required at this time.

6. **OAC 3745-279-22(C)(1) Used oil containers must be labelled with the words "used oil"**

One 55 gallon drum located near the pit over which oil partially full of used oil from draining of oil filters changes are conducted was on-site at the time of the inspection. The drum was not labelled or marked with the words "Used Oil".

On April 6, 2012 you submitted a photo of this drum marked with the words "Used Oil". This action abated this violation. No additional action is required at this time.

In the future all containers holding used oil should be labeled with the words "Used Oil".

Submit the above requested response documentation to this office within 14 days of receipt of this letter. Response correspondence sent by the U. S. Postal Service should be sent to:

Neil Wasilk
Northeast District Office
Ohio Environmental Protection Agency
2110 East Aurora Road
Twinsburg, OH 44087

NECESSARY MEASURES

Young Volvo needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, Young Volvo is requested to provide documentation to this office including the steps taken to abate the violations cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to neil.wasilk@epa.ohio.gov.

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, Young Volvo is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

Enclosed you will find a copy of the checklists completed during the March 29, 2012 inspection. Also enclosed are guidance documents on management of used oil and used lamps.

Other Information

The Division of Materials and Waste Management has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link: http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage

Should you have any questions regarding this letter, please contact me at (330) 963-1165.

Sincerely,



Neil J. Wasilk
Environmental Specialist
Division of Materials and Waste Management

Enclosure

NJW:ddw

cc: Marlene Kinney, Ohio EPA, DMWM, NEDO
ec: Natalie Oryshkewych, Ohio EPA, DMWM, NEDO
Nyall McKenna, Ohio EPA, DMWM, NEDO
Jeff Mayhugh, Ohio EPA, DMWM, CO

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your facility from its obligation to comply with all applicable regulations.

Send to Central Office <input checked="" type="checkbox"/>	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 brad.hauser@epa.state.oh.us.

Site EPA ID No.	EPA ID Number: OHD 005 795 919	
Site Name	Name: Young Direct Sales, Inc. DBA Young Volvo	Website: (Optional)
Site Location Information	Street Address: 2230 Shepler Church Ave. SW	
	City, Town, or Village: Canton	State: OH
	County Name: STARK	Zip Code: 44706
Site Land Type (check only one)	Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	
NAICS code(s) www.census.gov/epcd/www/naics.html		

Facility Representative	First Name: Craig	MI:	Last Name: Young
Additional names can be recorded in number 12	Title:		
	Phone Number: 800-308-0838	Phone Number Extension:	
	E-Mail Address:		
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: Lattavo Brothers Inc.		Date Became Owner (mm/dd/yyyy):	
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District	Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>		
	Street or P.O. Box:			
	City, Town or Village:		Owner Phone #:	
	State:	Country:	Zip Code:	
	Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):	
	Operator Type: <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District	Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>		
	Street or P.O. Box:			
	City, Town or Village:		Operator Phone #:	
	State:	Country:	Zip Code:	

VIOLATIONS CITED?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
--------------------------	---

TYPE OF HANDLER - MARK "X" AS APPROPRIATE		
<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input type="checkbox"/> Short-Term/Temporary 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.	<input type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator <input type="checkbox"/> U.S. Importer of Hazardous Waste <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

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

- | | |
|---|--|
| <input type="checkbox"/> Hazardous Waste Transporter | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace |
| <input type="checkbox"/> Hazardous Waste Transfer Facility | <input type="checkbox"/> Small Quantity On-Site Burner Exemption |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Recycler of Hazardous Waste | <input type="checkbox"/> Underground Injection Control Facility |
| <input type="checkbox"/> 72-Hour Recycler | <input type="checkbox"/> Receives Hazardous Waste from Off-site |

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED

(CHECK ALL BOXES THAT APPLY)

- | | |
|---|---|
| <input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste | <input type="checkbox"/> Destination Facility for Universal Waste |
| <input type="checkbox"/> Large Quantity Handler of Universal Waste
(accumulates 5,000 kg. or more) | |

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 Used Oil
 Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

- College or University
 Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
 Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

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.

D001

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:
 Tanks Yes No
 Containers Yes No

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
N. Wasilk		3/29/2012 1:30 p.m.

Comments:

Hazardous Waste Process Flow

Facility:

OHD 005 795 919
Young Direct Sales, Inc. DBA Young Volvo
2230 Shepler Church Ave. SW
Canton, OH 44706

Young Volvo is one of two businesses at this location; the other is Big Rig Truck Driving School. The property is owned Lattavo Brothers; Young Volvo in the process of purchasing the property.

Young Volvo does maintenance of large trucks at this location. Maintenance capabilities are quite extensive and range from oil changes to removal of major components, such as engines, transmissions rear axle, for major repairs. No painting of vehicles done at this location.

Used oil is generated, primarily from vehicle oil changes, and is stored in an underground storage tank (UST). The UST reportedly has a capacity of about 3,000 gallons. Used oil is hauled by Capital City Oil. Oil changes are conducted in a trench/pit area. Carts are used to collect used oil during oil changes. Carts then are rolled to one end of the pit from which the used oil is pumped into a pipe that leads to the UST.

The facility has two types of parts washers, one uses a water based solvent and is maintained by Cintas; the other uses a mineral spirits solvent. Mineral spirits solvent currently used has a flash point of 105°F and reportedly is mixed with the used oil.

Used antifreeze is stored in a tank about 200 gallons capacity prior to being recycled.

Used fluorescent lamps are collected

Facility is a conditionally exempt small quantity generator (CESQG) of hazardous waste.

Young Volvo

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET

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:

WASTE EVALUATION

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

GENERATOR CLASSIFICATION

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

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

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes No N/A SAN # 5

TREATMENT OF HAZARDOUS WASTE

4. Does the generator treat hazardous waste in a: NOT TREATING

a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

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

MIX HAZARDOUS WASTE WITH USED OIL

5. Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so: Yes No N/A

a. Does the CESQG manage the mixture in accordance with 3745-279-21? Yes No N/A

Young VOLVO

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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
WASTE MANAGEMENT AND LABELING/MARKING		
UNIVERSAL WASTE BATTERIES <i>NO U.W. BATTERIES OBSERVED</i>		
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>NO RELEASES OBSERVED</i>
<p>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.</p>		
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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

ACCUMULATION TIME		
11.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: Accumulation is defined as date generated or date received from another handler.</i>		
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:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RESPONSE TO RELEASES <i>NO RELEASES OBSERVED</i>		
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
OFF-SITE SHIPMENTS <i>- NO SHIPMENTS DOCUMENTED</i>		
<i>NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.</i>		
17.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
EXPORTS		
23.	Is waste being sent to a foreign destination? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

Young Volvo

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

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

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
----	--	--

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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] <i>NO RELEASES OBSERVED</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

ON-SITE BURNING IN SPACE HEATER

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	<i>NO</i>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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#?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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.

The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil

DHWM Guidance Document

Date: April 2006

If your business generates used oil, it is important that you understand and comply with Ohio EPA's used oil regulations. This guidance document outlines the basic used oil generator requirements in Ohio Administrative Code (OAC) rules 3745-279-20 through 3745-279-24. If you need more information or have questions about Ohio's used oil regulations, please contact the Division of Hazardous Waste Management (DHWM) at (614) 644-2917 or visit our [Web site](#).

Why is Used Oil Regulated?

Used oil that is not managed safely can pose a threat to humans and the environment. Improperly disposing of used oil can also lead to contamination of drinking water, surface water, ground water and soils. The used oil regulations describe proper used oil management. Because used oil is a reusable resource, the regulations also promote used oil recycling.

What is Used Oil?

Petroleum-based or synthetic oils that are used and contaminated with physical and chemical impurities are defined as used oil. To determine whether your material meets the definition of used oil, you must determine if it meets the following three criteria:

Did you know that...

U.S. businesses produce about 1.2 billion gallons of used oil a year?

- 1) **Origin** - The material must come from either refined crude oil or from synthetic materials including materials derived from coal, shale or polymer-based starting material (e.g., Mobil 1, Castrol Syntec, and water based cutting and hydraulic oils).
- 2) **Use** - The material must be used as a lubricant, hydraulic fluid, heat transfer fluid (coolant), cutting fluid, buoyant or for some other similar purpose. Materials that have not been used, such as bottoms from a virgin oil tank clean-out or a virgin oil spill, are not considered used oil. Other materials that are not considered used oil include petroleum products used for cleaning (solvents) and other petroleum-derived products such as antifreeze and kerosene.

Used Oil Generators

- 3) **Contaminants** - the material must be contaminated with either physical or chemical impurities from its use. Examples of contaminants could include dirt, metal shavings, solvents or halogens.

What is a Used Oil Generator?

A used oil generator is a person whose action or process first causes used oil to become subject to regulation. Used oil is commonly generated through vehicle or equipment maintenance. Many different types of businesses generate used oil, including: manufacturing companies, machine shops, metal working industries, auto service stations, quick lube shops and others.

There are additional regulations for other used oil activities such as:

- transportation
- collection centers
- re-refining or reprocessing
- burning
- marketing

If your business is involved in any of these activities, you may have to comply with the applicable requirements. For information about the regulations that might apply to you, contact the Division of Hazardous Waste Management.

What Are My Responsibilities if I Generate Used Oil?

Ohio's regulations include some specific requirements for used oil generators. Most of these regulations relate to good housekeeping practices. See the checklist on the following page for used oil generator requirements.

What is Used Oil?

Used Oil Includes:

- engine oils from vehicles and equipment
- lubricating oil
- brake fluids
- transmission fluid
- hydraulic fluid
- insulating oils
- metal cutting fluids
- industrial process oils
- compressor/refrigerant oils

Used oil does not include:

- oil products
- cleanup materials from oil product spills
- animal or vegetable oils
- oil sludge from virgin oil storage tanks
- antifreeze
- kerosene (unless used as a lubricant)
- petroleum distillates used as solvents

Used Oil Generators

Besides Ohio's used oil regulations, you may be subject to regulation under other programs. For example, if your facility has the ability to store 660 or more gallons of used oil in a single above ground storage container or tank, you may need to develop a spill prevention plan (called an SPCC plan). Call Ohio EPA's Division of Emergency and Remedial Response at (614) 644-2924 for more information.

If you store used oil in an underground tank, you may be subject to regulation by the Bureau of Underground Storage Tank Regulation (BUSTR), Division of State Fire Marshal. Contact BUSTR for more information at (614) 752-7938.

How Can I Dispose of or Recycle My Used Oil?

As a used oil generator, you have several recycling and management options. Under no circumstances, however, can you dispose of used oil on your property.

Take your used oil to a collection center

You can transport small amounts of used oil generated at your site to a registered used oil collection center without being subject to the used oil transporter requirements. To do this, you must use your own vehicle or a vehicle owned by an employee and transport no more than fifty-five gallons at a time.

Take your used oil to an aggregation point(s)

You can transport small amounts of used oil that you generate to aggregation points that you own. A used oil aggregation point is a site or facility that you own in which you transport used oil to. You can transport your used oil to your aggregation point(s) without being subject to the used oil transporter requirements if you use your own vehicle or a vehicle owned by an employee and you transport no more than fifty-five gallons at a time.

Burn your used oil in a space heater

You can burn used oil generated at your business or used oil received from a household do-it-yourselfer in an on-site space heater.

Used Oil Generator ✓ List

- ✓ Label containers or tanks of used oil with the words, "Used Oil."
- ✓ Store used oil in containers or tanks that are in good condition (not rusting, leaking, etc.).
- ✓ If there is a leak of used oil: stop the leak, contain it, clean it up and properly manage the cleanup materials.
- ✓ Use a transporter with an EPA identification number when shipping used oil off site.
- ✓ Do not mix your used oil with other wastes such as mineral spirits, brake cleaner fluid or washer solvents, unless you are sure that you are complying with the appropriate regulations.

Used Oil Generators

To do this, your space heater cannot burn used oil at a rate exceeding 0.5 million Btu per hour and all combustion gases from your space heater must be vented to the outside. Please note, though, that besides complying with the used oil regulations, you may also be subject to regulation by Ohio EPA's Division of Air Pollution Control. If you want to burn used oil in a space heater, you should contact the air division at your local Ohio EPA District Office to discuss any applicable requirements.

Contact a used oil recycler

The best way to manage your used oil is to send it to a used oil recycler. Ohio EPA maintains a list of companies that recycle used oil. Used oil recyclers conduct various recycling methods such as:

Reconditioning

Involves removing impurities and reusing the oil.

Re-refining

Involves treating the used oil and removing impurities. Re-refining returns the oil to close to its original state so that it can be used to make new products.

Reusing

Used oil is returned to a petroleum refiner to be used as a feedstock for gasoline or coke production.

Burning for energy recovery

Used oil is treated to remove impurities such as water and solids. It is then burned as a fuel to generate heat.

Note: If you mix your used oil with other wastes (solvents, for example), this may cause the entire mixture to become a hazardous waste. This mixture may subject you to the hazardous waste rules, or to other rules which may result in higher recycling/disposal costs.

If you plan to send your used oil off-site to a used oil recycler, you must use a used oil transporter who has a U.S. EPA identification number.

Additional Tips on Handling Used Oil

Good housekeeping practices and training can help your company stay in compliance with the used oil regulations. In addition, there are other things you can do to reduce the amount of used oil generated at your company. These include:

- 1) Use high performance or long-lasting oils. They prolong the need for an oil change.

Used Oil Generators

- 2) Consider testing the oil periodically to determine the level of contamination or degradation. The testing may reveal problems in machinery or equipment.
- 3) Install by-pass on vehicle engines. These small devices are used to complement “full-flow” oil filters by removing contaminants smaller than 40 microns. These filters extend engine and oil life.

Handling Used Oil...

DO inspect equipment for oil leaks and take quick actions if repairs are needed.

DO train personnel on the correct methods for handling used oil.

DO look for ways to reduce the amount of used oil waste that your business generates.

Handling Used Oil...

DON'T throw your used oil on the ground, down the sewer, in a septic tank or down a floor drain.

DON'T put liquid used oil in the trash dumpster with your solid waste. Solid waste landfills cannot take liquids.

DON'T mix your used oil with other wastes that might cause the whole mixture to become a hazardous waste.

You can contact your vendor or supplier for additional information. Ohio EPA's [Office of Pollution Prevention](#) at (614) 644-3469 also can provide information about reducing the amount of waste you generate.

How Can I Dispose of Used Oil Filters?

According to OAC rule [3745-51-04\(B\)\(13\)](#), non-terne plated used oil filters that are hot-drained are not hazardous wastes. Non-terne plated filters do not contain lead in the metal portion of the filter. Hot-draining may be accomplished by either:

- puncturing the anti-drain back valve or the filter dome end and hot-draining;
- hot-draining and crushing;
- dismantling and hot-draining; or
- other equivalent method.

We consider a filter to be hot-drained when it is brought up to normal engine operating temperature just before you remove it for draining. The oil filter should be allowed to drain for 12 hours. After the oil has been drained, the filter may be disposed of in the municipal waste stream. However, we encourage you to recycle the filters as scrap metal. The oil collected must be managed as used oil.

Used Oil Generators

While most automobile oil filters are non-terne plated, industrial filters and other types may still be terne-plated. The Filter Manufacturers Council (FMC) maintains information on filters. For more specific data on the discontinuation of terne-plated oil filters and other types of filters, you should refer to [FMC's Web site](#).

Where Can I Go For More Help?

Please contact Ohio EPA's Division of Hazardous Waste Management's [Regulatory Services Unit](#) at 614-644-2917 if you have used oil management questions or wish to learn about ways you can reduce the amount of waste you generate.

Common Used Oil Management Standards (Ohio Administrative Code Chapter 3745-279)

Handler Type Mgmt. Standards	<u>Generator/ Collection Center</u>	<u>Transporter/ Transfer Facility</u>	<u>Off-Spec Burner</u>	<u>Processor/ Re-refiner</u>	<u>Marketer*</u>
Storage	Yes 3745-279-22(A)	Yes 3745-279-45(A)	Yes 3745-279-64(A)	Yes 3745-279-54(A)	N/A
Secondary Containment	No	Yes 3745-279-45(D)	Yes 3745-279-64(C)	Yes 3745-279-54(C)	N/A
Response to Releases	Yes 3745-279-22(D)	Yes 3745-279-45(H)	Yes 3745-279-64(G)	Yes 3745-279-54(G)	N/A
<u>Notification/ EPA ID Number</u>	No (Non-DIY collection centers must register with the state)	Yes 3745-279-42(A)	Yes 3745-279-62(A)	Yes 3745-279-51(A)	Yes 3745-279-73(A)
Tracking	No	Yes 3745-279-46	Yes 3745-279-65	Yes 3745-279-56	Yes 3745-279-74

* Storage, secondary containment and release response issues are not applicable to marketers, however, marketers must be one other type of handler.

Universal Waste Rules for Handlers of Lamps

DHWM Guidance Document

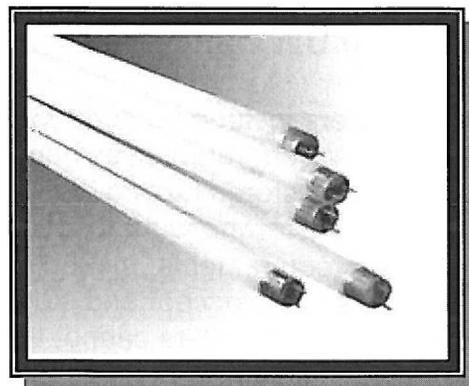
Date: June 2005

Purpose:

This guidance document is intended to provide handlers with an overview of the universal waste rules (UWR) as they pertain to hazardous waste lamps. Ohio's UWR are found in Ohio Administrative Code (OAC) Chapter 3745-273. This document is not intended to be a substitute for reading the universal waste rules.

Introduction:

Ohio EPA's use of the term "lamp" [see OAC rule 3745-50-10(A)] applies generically to hazardous waste lamps including: incandescent, fluorescent, metal halide, neon, high-intensity discharge, high-pressure sodium and mercury-vapor lamps. Fluorescent lamps may contain up to 40 milligrams (mg) of elemental mercury, depending on the brand and manufacturer date. Lamps may also contain lead and cadmium. Because most lamps exhibit the characteristic of toxicity for heavy metals when disposed, they could be a hazardous waste.



A waste must be a hazardous waste before it is defined as a universal waste. If a hazardous waste stream is not managed under the universal waste rules, then it must be managed as a hazardous waste under the applicable regulations if the waste exhibits any hazardous waste characteristic. Non-hazardous lamps also can be managed as universal wastes, although the universal waste compliance standards are not required.

Background:

Lamps have been added to Ohio's list of universal wastes (UW). The list of UW includes certain suspended and recalled pesticides, mercury-containing thermostats, and discarded batteries. When lamps were added to the list of universal wastes, Ohio revised the classification of hazardous lamps in the hazardous waste program.

Universal Waste Rules for Handlers of Lamps

Previously, **used** lamps that were being recycled were considered characteristic byproducts. This removed them from regulation as wastes and therefore hazardous wastes. Used lamps that were being discarded were to be evaluated to determine whether they were hazardous. Now hazardous lamps are considered “spent materials” and remain hazardous waste even when recycled, unless they are managed as universal wastes (see OAC rule [3745-51-02](#)). Hazardous waste lamp generators have the option of handling their lamps as hazardous waste or as UW. Managing hazardous waste lamps under the UWR eases certain regulations imposed on generators of spent lamps.



Non-hazardous Lamps: Ohio EPA recommends recycling lamps that do not exhibit hazardous waste characteristics. While these lamps are not hazardous waste, Ohio EPA encourages recycling rather than disposal. Non-hazardous lamps still contain low amounts of heavy metals such as mercury that could potentially harm the environment.

Who are UW handlers?

UW handlers include persons who generate, receive and store, but do not treat, dispose of or recycle UW generated elsewhere. Ohio’s hazardous waste rules state that a person who receives and stores hazardous waste is required to have a storage permit. Generators of universal waste who want to take advantage of the UWR instead of the hazardous waste generator requirements, must comply with all UW handler requirements. The UWR allows these persons to accept and store UW from off-site without having to obtain a storage permit. However, UW handlers cannot treat, dispose of or recycle UW.

What are the UW handler categories?

UW handlers are classified into two categories based on the quantity of UW waste they accumulate at any time:

- small quantity handlers [accumulate less than 5,000 kilograms (11,023 pounds) of UW (not by type) at any time], or
- large quantity handlers [accumulate more than 5,000 kilograms (11,023 pounds) of UW (not by type) at any time].

If a small quantity UW handler accumulates more than 5,000 kilograms of UW on-site at any time, they must comply with the large quantity UW handler requirements for the remainder of the calendar year. All generators have the option of handling their UW under the UWR or under Ohio’s hazardous waste generator requirements found in OAC Chapter [3745-52](#).

Note: UW should not be counted when making quantity determinations for hazardous waste generator categories (i.e., conditionally exempt small quantity generators (CESQGs), small quantity generators (SQGs) and large quantity generators (LQGs)). Universal waste handlers' status levels should not be confused with hazardous waste generator status levels.

May I use a lamp crusher to crush the lamps I generate?

The UWR prohibits handlers from crushing lamps. If you are the lamp generator and you want to continue crushing them, you have the option of managing those lamps under the hazardous waste generator requirements in OAC Chapter [3745-52](#). You cannot send crushed hazardous lamps to an unpermitted handler. They must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility accompanied by a hazardous waste manifest. While some commercially available lamp crushers are designed to control mercury emissions when properly maintained, please beware that due to the unique properties of mercury, there is a high potential for exposure to harmful mercury vapors when lamps are crushed.

What are the packaging requirements for UW lamps?

Lamps must be packaged to minimize breakage and must be designed to contain potential releases due to breakage. Some examples of acceptable packaging include double- or triple-ply cardboard containers with closed lids or packaging in which new lamps are shipped from the manufacturer. Broken, damaged or leaking lamps can be sent to permitted recycling facilities. Acceptable storage for broken lamps includes a closed 55-gallon steel drum or a closed wax fiberboard drum.

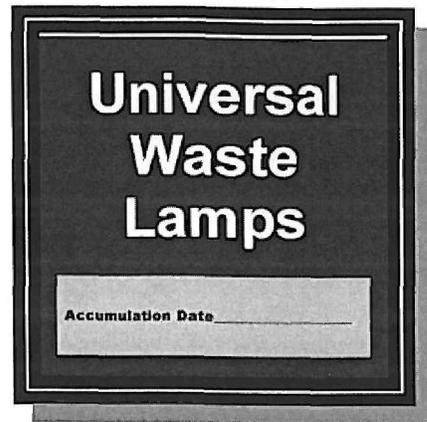
Warning: Because of its unique properties, mercury from broken or crushed lamps can become airborne at room temperature and can seep into cracks and porous materials such as cloth, carpet or wood, slowly emitting vapors over a long period. Immediate and proper containment of a mercury release is very important. For information on mercury containment and clean up, contact your local fire department or call Ohio EPA's spill hotline at (800) 282-9378.

What are the labeling requirements for UW lamps?

Universal waste lamps or their containers must be clearly marked "Universal Waste Lamp(s)," "Waste Lamp(s)" or "Used Lamp(s)." The containers should never be labeled "Hazardous Waste" unless being managed as such.

UW handlers must be able to demonstrate the accumulation time for all universal wastes. Accumulation begins with the date the lamps became a waste or were received. The handler may make this determination by:

- placing the lamps in a container and marking or labeling the container with the earliest date that any UW in the container became a waste or was received;
- marking or labeling the individual item of UW (i.e., each lamp) with the date it became a waste or was received;
- maintaining an inventory system on-site that identifies the date the lamp(s) being accumulated became a waste or was received;
- maintaining an inventory system on-site that identifies the earliest date that any UW in a group of UW items or a group of containers of UW became a waste or was received;
- placing the UW in a specific accumulation area and identifying the earliest date that any UW in the area became a waste or was received; or
- any other method which clearly demonstrates the length of time that the UW has been accumulated from the date it became a waste or was received.



Am I required to notify Ohio EPA of my UW activities?

Small quantity UW handlers and transporters are not required to notify Ohio EPA of their activities and are not required to obtain an EPA hazardous waste ID number. Large quantity UW handlers must notify Ohio EPA in writing and must obtain an EPA hazardous waste ID number prior to exceeding the 5,000 kg storage limit. Large quantity UW handlers that have previously notified Ohio EPA of their hazardous waste activities and who have received an EPA identification number are not required to renotify. For specifics on the notification requirements, see OAC rule 3745-273-32.

How long may I accumulate UW lamps?

If you are a UW handler, you may accumulate UW fluorescent lamps on-site for up to one year regardless of your status. If greater than a year accumulation is required, you must be able to prove that the accumulation is necessary in order to facilitate proper recovery, treatment or disposal.

Who can I send or take my UW lamps to?

As a universal waste handler, you can send or take lamps only to another UW handler or to a permitted (if in Ohio) destination facility. If you are sending your UW lamps to a facility outside Ohio, the out-of-state destination facility must be authorized by that state to accept lamps.

Am I required to manifest my UW lamps?

No. UW handlers are not required to manifest their off-site shipments. However, all UW handlers must ensure delivery of their universal waste to another UW handler or to a permitted destination facility as defined in OAC rule 3745-273-09(B).

Do I need to use a special transporter like I do for my other hazardous waste?

No. UW handlers are not required to use a certain transporter. Universal waste transporters, however, must comply with DOT packaging/labeling requirements, transfer facility storage requirements and must immediately contain all releases of universal waste in the event of a spill.

May I transport my own universal waste lamps?

Yes. Both small and large quantity universal waste handlers can transport their universal waste lamps to either another universal waste handler or to a universal waste destination facility if they comply with the universal waste transporter requirements in OAC rules 3745-273-50 through 3745-273-56.

What are my record-keeping requirements?

If you are a small quantity UW handler, you are not required to keep off-site shipment records of UW. If you are a large quantity UW handler, you are required to retain shipment records received on-site and shipments sent off-site for at least three years. For specifics, see OAC rule 3745-273-39.

For more information on Ohio's UWR, please see our guidance document entitled, "Universal Waste Rule" and our universal waste handler requirements summary table available on our Web page. If you have questions regarding information contained in this guidance document, please contact Ohio EPA's Division of Hazardous Waste Management's Regulatory Services Unit at 614-644-2917 or visit our Web site.

Fluorescent Lamps: What You Should Know

DHWM Guidance Document

DATE: January 2007

Do you use lamps?

EVERYONE uses lamps! Many people don't realize they can be hazardous because of the mercury, lead and cadmium they contain. When Ohio EPA uses the term "lamp" it includes:

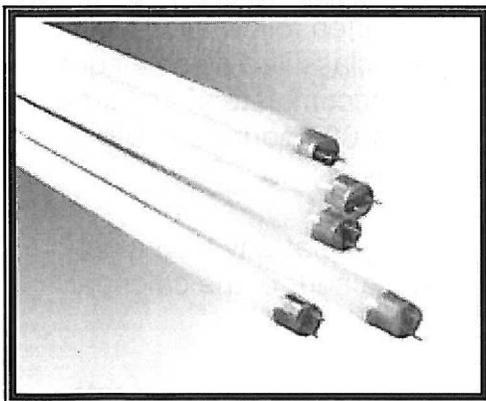
- incandescent;
- fluorescent;
- metal halide;
- neon;
- high-intensity discharge (HID);
- high-pressure sodium;
- mercury-vapor;
- and LED lamps.

Why are waste lamps harmful?

Lamps can contain mercury, lead, cadmium and barium, which are toxic chemicals that can accumulate in living tissue and cause health problems. A small amount of mercury is needed in all fluorescent and HID lamps to make the lamp work. When a lamp breaks or is thrown away in a solid waste landfill or incinerator, the mercury can contaminate air, soil, surface water and ground water.

Be Aware!

Some fluorescent lamps contain up to 40 mg of mercury!



Are fluorescent lamps a good environmental and economic choice?

Yes. The use of energy-efficient lighting reduces electricity needed from power plants. This reduces harmful power plant emissions of mercury, carbon dioxide and nitrogen oxide. Using less energy reduces demands on electric utilities and results in cost savings for customers.

What is the best way to manage the hazardous lamps I generate?

We recommend that you manage your waste lamps under the Universal Waste Rule (UWR). The UWR eliminates many regulatory requirements such as waste evaluation, manifesting and record keeping. This rule ensures waste lamps will be properly recycled. By following the UWR, you will reduce the financial and regulatory burden on your company and help protect the environment.

What is the UWR?

The UWR streamlines collection requirements for certain hazardous wastes in the following categories: batteries, pesticides, mercury-containing equipment (such as thermostats) and lamps (such as fluorescent bulbs). The rule is designed to make it easier for universal waste (UW) handlers to collect these items and send them for recycling or proper disposal.

Advantages of managing waste lamps under the UWR:

- UW is not counted toward hazardous waste generator status.
- No manifesting required unless the waste lamps are transported through states, or treated or disposed in states that do not recognize mercury-containing lamps as a universal waste.
- Increased storage time available.
- Reduced administrative requirements for record-keeping, training, and emergency preparedness.

Managing your lamps as UW

If you choose to manage your waste lamps as UW, you are not required to evaluate them. You are, however, required to determine your handler category and then follow all requirements associated with that category. Most UW handlers are classified as small quantity handlers based on the total quantity of **all types** of UW waste they accumulate at any time. Small quantity handlers accumulate less than 5,000 kilograms, or 11,023 pounds of UW at any time. For example, 5,000 kg is approximately 17,000 four-foot lamps.

UW handlers who accumulate more than 5,000 kilograms of UW on-site at any time must comply with the large quantity UW handler requirements for the remainder of the calendar year.

The main advantages to managing waste under the UWR instead of the hazardous waste rules are that, the UWR requires less paperwork, less man-hours and saves you money.

May I use a lamp crusher to crush the lamps I generate?

Yes. However, if you choose to crush your lamps, you must manage them under the hazardous waste rules. You may not manage crushed lamps under the UWR.

What if I decide not to manage my lamps as UW?

If you choose not to manage your lamps as UW, then you must evaluate them to determine if they are hazardous. To evaluate your waste lamps, you can either:

- send a representative sample to a laboratory for testing; or
- obtain complete up-to-date analysis of the lamps from the manufacturer.

Managing your lamps as hazardous waste

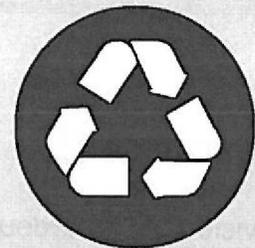
If your lamps are hazardous, you must manage them according to Ohio's hazardous waste rules. To know what rules to follow, you must know your generator category. Generator category is determined by how much hazardous waste you generate in a calendar month. For more details, please see our Hazardous Waste Generator Categories guidance document.

What if my lamps have green tips?

Some fluorescent lamp manufacturers have created "green tipped" lamps that they claim are not hazardous. Although it's true that green tipped lamps contain less mercury than other lamps, this may not be enough for the green tipped lamps to avoid being regulated as hazardous waste. For the lamps to be non-hazardous, and therefore not subject to the hazardous waste rules, the laboratory test results must be less than all the regulatory limits found in Ohio Administrative Code (OAC) rule 3745-51-24. Some examples are:

- mercury - 0.2 mg/L;
- cadmium - 1.0 mg/L;
- lead - 5.0 mg/L;
- and barium - 100.0mg/L.

When you are done using any lamps at your facility, and are disposing or recycling them, they are a waste stream. According to OAC rule 3745-52-11, all wastes, except universal wastes, must be evaluated to determine if they are hazardous.



Non-hazardous

Lamps: While these lamps are not hazardous waste, they still contain low amounts of heavy metals such as mercury, lead and cadmium that can potentially harm the environment! Ohio EPA encourages recycling rather than disposing of non-hazardous lamps.

What if I have non-hazardous lamps?

If you determine your lamps are not hazardous, you have the option to manage them as solid waste. However, we recommend you manage them as UW even though the UW compliance standards are not required.

Lamp Recyclers in Ohio:

Environmental Recycling

527 E. Woodland Circle
P.O. Box 167
Bowling Green, OH 43402
wgrabowski@envrecycle.com
www.envrecycle.com
phone: (800) 284-9107
fax: (419) 354-5110

U.S.A. Lamp & Ballast Recycling

7806 Anthony Wayne Ave.
Cincinnati, OH 45216
www.usalamp.com
phone: (800) 778-6645
fax: (513) 641-4156

Resources:

Division of Hazardous Waste Management Web site: www.epa.state.oh.us/dhwm

If you have more questions about hazardous waste please check the Answer Place, call the DHWM Regulatory Services Unit at (614) 644-2917, or contact your local district inspector.