



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

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

February 2, 2010

RE: HYDROSOL SYSTEM, INC.  
OHD986966174  
PORTAGE COUNTY  
NOV

Mr. Gunner Puhl  
Hydrosol System, Inc  
4216 Karg Industrial Parkway  
Kent, OH 44240

Dear Mr. Puhl:

Thank you for assisting Todd Surrena and me with Ohio EPA's January 25, 2010 inspection of your Hydrosol facility in Kent, Ohio. We inspected Hydrosol 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). Our inspection included a review of company operations and related documentation.

The following violation of Ohio's hazardous waste rules was found during this inspection.

**Used Oil Labels - OAC 3745-279-22(C)**

One drum and one small tank outside as well as several totes inside the building of used oil, were not labeled as 'used oil' as required. Please label all containers and tanks of used oil with the words 'used oil' and submit pictures documenting that you are now in compliance with this rule.

Also one concern was noted that needs your attention. Although there were no spent lamps accumulating at the time of the inspection, you were uncertain how you would manage and dispose of spent lamps when they are eventually generated. When you do generate these wastes you will need to make a hazardous waste evaluation or manage them as universal wastes. We explained that often these wastes would be hazardous waste so it might be easier to manage them under the universal waste rules without analyzing them. We provided you with a guidance document on this topic. Additional information can be found at: <http://www.epa.ohio.gov/dhwm/fluorescent.aspx> and a list of recyclers can be found at: <http://epawebapps.epa.state.oh.us/Recyclers/jsp/results.jsp?category=33>.

Please respond in writing with what your plan will be for the management of these wastes when they are generated.

Enclosed is a copy of the checklists that we completed as a result of the inspection. Please submit the above requested documentation within 30 days of the date of this letter.

HYDROSOL SYSTEM, INC.  
FEBRUARY 2, 2010  
PAGE - 2 -

You can find Ohio's hazardous waste rules and other related information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>. The Division of Hazardous 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](http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage)

Should you have any questions related to this letter, please feel free to call me at (330) 963-1226 or write via e-mail.

Sincerely,



Sheryl K. Slone, P.E.  
Environmental Engineer  
Division of Hazardous Waste Management

SKS:ddw

Enclosures

ec: Natalie Oryshkewych, DHWM, NEDO  
Nyall McKenna, DHWM, NEDO  
Todd Surrena, DHWM, NEDO  
Harry Sarvis, DHWM, CO

**NOTICE:**

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

Completed verification forms required to be submitted to CO should be e-mailed to [kristina.durnell@epa.state.oh.us](mailto:kristina.durnell@epa.state.oh.us).

<b>Site EPA ID No.</b>	EPA ID Number: <u>OH 986 966 174</u>							
<b>Site Name</b>	Name: <u>HYDROSOL SYSTEM, INC.</u>			Website: <u>hydrosolssystem.com</u> (Optional)				
<b>Site Location Information</b>	Street Address: <u>4216 KARG IND. PKWY</u>							
	City, Town, or Village: <u>KENT</u>			State: <u>OH</u>				
	County Name: <u>PORTAGE</u> Zip Code: <u>44240</u>							
<b>Site Land Type</b> (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"/>
<b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>								

<b>Facility Representative</b>	First Name: <u>MATTHEW</u>		MI: <u>C</u>	Last Name: <u>PUHL</u>		
Additional names can be recorded in number 12  Only provide address information if it is different than the site address	Phone Number: <u>330-678-2181</u>			Phone Number Extension: <u>—</u>		
	E-Mail Address: <u>gunner@hydrosolssystem.com</u>					
	Fax Number: <u>330 678 0268</u>			Fax Number Extension: <u>—</u>		
	Street or P.O. Box: <u>4216 KARG IND. PKWY</u>					
	City, Town or Village: <u>KENT</u>			State: <u>OH</u>		
				Zip Code: <u>44240</u>		

<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: <u>RICHARD PUHL</u>			Date Became Owner (mm/dd/yyyy): <u>~ 1980-1982</u>					
	Owner Type: <input checked="" type="checkbox"/>	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: <u>4216 KARG IND. PKWY</u>						Owner Phone #: <u>800-535-8606</u>		
	City, Town or Village: <u>KENT</u>			State: <u>OH</u>		Country: <u>US</u> Zip Code: <u>44240</u>			
	Name of Site's Operator: <u>MATTHEW PUHL</u>			Date Became Operator (mm/dd/yyyy): <u>~ 2000</u>					
	Operator Type: <input checked="" type="checkbox"/>	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: <u>4216 KARG IND. PKWY</u>						Operator Phone #: <u>800 535 8606</u>		
	City, Town or Village: <u>KENT</u>			State: <u>OH</u>		Country <u>US</u> Zip Code: <u>44240</u>			

**VIOLATIONS CITED?**     Yes     No

<b>TYPE OF HANDLER - MARK "X" AS APPROPRIATE</b>		
<input checked="" type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)  <input type="checkbox"/> Small Quantity Generator (SQG) <input 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

<b>TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)</b>	
<input type="checkbox"/> Recycler of Hazardous Waste <input type="checkbox"/> Underground Injection Control Facility <input checked="" type="checkbox"/> Hazardous Waste Transporter <u>EPISODIC</u> <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace <input type="checkbox"/> Small Quantity On-Site Burner Exemption <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption

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

- Small Quantity Handler of Universal Waste
  Destination Facility for Universal Waste  
 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. 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 RCRA Info source record, you do not need to list them. Instead just indicate the date of the most recent source record.

**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: *NONE*  
 Tanks  Yes  No  
 Containers  Yes  No

Name of Inspector(s)      Name of Inspector(s)      Date of Inspection/Time (mm/dd/yyyy) (hh:mm)

*SHERBY SLOVE      TODD SURRENA      01/25/2010*

**Comments:**

*could be an episodic transporter. No hazardous waste generated or transported for at least 3 years. No universal wastes currently accumulated on-site. In future potentially will generate lamps.*

## PROCESS, WASTE, P2 SUMMARY SHEET

<b>Facility Name:</b> HYDROSOL		<b>Facility Type:</b> LQG/SGQ/CESQG/TSD Non-Hen		<b>Date of Inspection:</b> 1-25-2010		<b>EPA ID #:</b> OHD 986 366 179	
Waste Generated			On- or Off-Site Management		P2 Activities		
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation <small>(container, tank, etc) and location of waste accumulation area</small>	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities	
1	floor drains in garage	dirt, grime, oil varies	oil-water separator	Recycling & Treatment Technologies, Painesville (treatment & recycling)			
2	industrial cleaning of pipes	hydraulic oil varies	none	Everclean, Ohio (recycling)			
3	industrial cleaning of pipes	non-hazy water, sulfuric acid varies	none	Vickery, Ohio (deep well injection)			
4							
5							

6							
7							
8							
9							

**REMARKS-GENERAL INFORMATION**

**General Process Information:** Facility does industrial chemical cleaning at customer's site. Some acidic or oily wastes (non-haz) are brought back to their site on occasion. Haven't generated or transported haz waste for at least 3 years.

**Regulatory/Enforcement History (if applicable):** never been inspected before

**Additional P2 remarks and information:**

Same facility rep. Adrienne's number and info.

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](mailto:p2mail@epa.state.oh.us) or [www.epa.state.oh.us/ocapp/ocapp.html](http://www.epa.state.oh.us/ocapp/ocapp.html)

**Other:**

**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](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](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 <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 type="checkbox"/> No <input checked="" 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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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"/>
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*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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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 checked="" 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 checked="" type="checkbox"/>

[Facility Name/Inspection Date]

[ID Number]

Used Oil Checklist for Generators/August 2009

Page 1 of 2

ON-SITE BURNING IN SPACE HEATER		
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	No
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#? [3745-279-24] <u>EVER CURE</u>	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.

## HAZARDOUS WASTE TRANSPORTER REQUIREMENTS

**GENERAL INFORMATION** *No haz waste transported in at least 3 years.*

Please provide a brief description of site activity/waste handling procedures:

1.	Has the transporter registered with and obtained a permit (i.e., a credential) from the Public Utilities Commission of Ohio? [3745-53-11(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<p><i>Note: Credentials issued by PUCO are on its website at <a href="http://www.puco.ohio.gov/apps/HazmatSearch/">http://www.puco.ohio.gov/apps/HazmatSearch/</a>. PUCO's Transportation Division at 614-466-3392 also provides information on issued credentials or credential applications. Example of a credential ID number: UPW0028633OH</i></p>				
2.	Has the transporter received a U.S. EPA ID number? [3745-53-11(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
3.	Have all hazardous wastes accepted been accompanied by a manifest? [3745-53-20(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a. If no, was the waste generated by a CESQG or by a SQG shipped under a reclamation agreement? [3745-53-20(H)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
4.	Has the transporter signed and dated the manifest and left a copy with generator or prior transporter and carried the manifest with the waste shipment? [3745-53-20(B)&(C)] <i>Have not transported in over 3 yrs.</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
5.	Are manifests with all required signatures retained for at least three years? [3745-53-22(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
6.	Has the transporter delivered the entire quantity of waste accepted from the generator/transporter in accordance with OAC 3745-53-21(A)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	a. If the hazardous waste cannot be delivered in accordance with OAC 3745-53-21(A) other than rejection of the waste by the designated facility, did the transporter contact the generator for further instructions and revise the manifest accordingly? [3745-53-21(B)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	b. Was the transporter on the designated facility's premises when the facility rejected a partial load of the shipment or regulated quantities of container residues? If so:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	i. Did the transporter obtain a copy of the original manifest including the rejecting facility's date and signature, the manifest tracking number that will accompany the shipment, and a description of the partial rejection or container residue in the "Discrepancy" block? [3745-53-21(B)(2)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	ii. Has the transporter retained the original manifest for at least three years? [3745-53-21(B)(2)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	iii. Did the transporter obtain a new manifest if the transporter was forwarding the rejected part of the shipment or a regulated container residue to an alternate facility or returning it to the generator? [3745-53-21(B)(2)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	c. Was the transporter on the designated facility's premises when the facility rejected a full load of the shipment? If so:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	i. Did the transporter obtain the original manifest including the rejecting facility's signature and date attesting to the rejection, a description of the rejection in the "Discrepancy" block of the manifest, and the name, address, phone number, and U.S. EPA identification number for the alternate facility or the generator? [3745-53-21(B)(2)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	ii. Has the transporter retained the original manifest for at least three years? [3745-53-21(B)(2)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	iii. Did the transporter obtain a new manifest if the original manifest was not used? [3745-53-21(B)(2)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
7.	<b>For hazardous waste delivered by the original transporter to a rail or water transporter:</b> Did the original transporter comply with the manifest handling requirements of 3745-53-20(E)&(F)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

Facility Name/Inspection Date]

[ID Number]

Hazardous Waste Transporter Requirements Checklist/April 2009

Page 1 of 3

NOTE: OAC 3745-53-20(C) and (D) do not apply to water (bulk shipment) transports or shipments involving rail transportation.

8.	<b>For hazardous waste shipped out of the country:</b> Has the transporter retained signed copies of the manifest for at least three years indicating that the waste left the U.S.A.? [3745-53-22(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
9.	Has the transporter ever had a discharge of hazardous waste during the time that the waste was under the transporter's control? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Was immediate action taken? [3745-53-30(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. Was Ohio EPA's Office of Emergency Response immediately notified? [3745-53-30(C)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c. Did the transporter report in writing to Ohio EPA's Office of Emergency Response? [3745-53-30(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	d. Was the discharge cleaned up as required by Ohio EPA or a federal agency to remove hazard to protect human health or the environment? [3745-53-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
10.	Does the transporter store manifested containerized hazardous wastes at a specific location en route to the destination facility? If so:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	a. Are wastes stored for ten days or less at a transfer facility? [3745-53-12]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. Do containers used for waste storage meet DOT requirements? [3745-53-12]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Temporary storage in tanks is not permitted under transfer facility rules and tank storage requires a RCRA permit. Any storage by the transporter which is not authorized under OAC 3745-53-12 transfer facility requirements is subject to full RCRA regulations.

A "transfer facility" means any transportation-related facility, including loading docks, parking areas, storage areas and other similar areas where hazardous waste is held during the normal course of transportation. (This does not include storage at the designated facility.)

DOT regulations on packaging are contained in 40 CFR 176, 178 and 179.

11.	Does the transporter import hazardous waste into the United States? If so:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	a. Did the transporter comply with the generator standards of OAC Chapter 3745-52? [3745-53-10(C)(1)] (Complete generator checklist)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
12.	Does the transporter accept exports of hazardous waste NOT subject to 40 CFR 262.80 to 262.89? If so:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	a. Did the transporter accept only hazardous waste that conforms to the U.S. EPA "Acknowledgement of Consent"? [3745-53-20(A)(2)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
13.	Does the transporter accept exports of hazardous waste subject to 40 CFR 262.80 to 262.89? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Was the transporter provided with a U.S. EPA "Acknowledgment of Consent" which, except for shipments by rail, was attached to the manifest/shipping paper? [3745-53-20(A)(2)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. Was the transporter provided with a tracking document including all information required by 40 CFR 262.84? [3745-53-20(A)(2)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Hazardous wastes that are destined for recovery operations in the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262.80 to 262.89.

14.	Does the transporter mix hazardous wastes of different U.S. DOT descriptions by placing them into a single container? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Did the transporter comply with the generator standards of OAC Chapter 3745-52? [3745-53-10(C)(2)] (Complete generator checklist)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Does the transporter receive SQG wastes for transport pursuant to a reclamation agreement?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>

Facility Name/Inspection Date  
[ID Number]

Hazardous Waste Transporter Requirements Checklist/April 2009

Page 2 of 3

If so, was the following information recorded in a log or shipping paper carried with the shipment as required by 3745-53-20(H):		
a.	Name, address and U.S. EPA ID # of SQG?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Quantity of waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	DOT required shipping information?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Date waste was accepted?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	If the transporter receives SQG wastes for transport as described in Question No. 15:	
a.	Is the record carried when transporting these wastes to the reclamation facility? [3745-53-20(H)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Are records related to the shipments retained for at least three years following expiration of the reclamation agreement? [3745-53-20(H)(4)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
17.	Does the transporter transport waste military munitions? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Are the standards applicable to the transportation of waste military munitions in OAC 3745-266-203 met? [3745-53-10(F)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<p>Note: Complete the Transportation of Waste Military Munitions section in the Military Munition Checklist.</p>		