



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

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www.epa.state.oh.us

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

August 7, 2007

**RE: HARBISON-WALKER  
REFRATORIES  
OHD 046 626 628  
COMPLAINT # 7004  
NOTICE OF VIOLATION**

Rhonda Vete  
Harbison-Walker Refractories Co.  
400 Fairway Dr.  
Moon Township, PA 15108

Dear Ms. Vete:

The Ohio EPA Division of Hazardous Waste Management conducted an inspection of Harbison-Walker Refractories Co. (Harbison) located at 9686 East Center St., Windam, OH 44288 on July 27, 2007. The purpose was to investigate a complaint and determine if Harbison had violations of Ohio's hazardous waste and used oil laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC).

This letter will document any violations and concerns found and outline what you need to do to correct them. A written response to these issues is required within 30 days.

The complaint alleged that a load of waste was leaking when it left the site, was rejected by Countywide Landfill, and was then returned to Harbison. Joseph Berger explained that waste resin is mixed with waste refractory in plastic lined rolloff boxes that are stored outside and then shipped to Countywide Landfill, a solid waste landfill. He said one load was rejected by Countywide and then brought back to Harbison. We saw that this load had been put onto the concrete next to other waste rolloff boxes. It appears that this problem resulted from one or more of the following: resin not being thoroughly mixed with refractory, rainwater entering the uncovered rolloff boxes, and/or problems with the plastic liner such as holes or the sides of the liner falling down.

Based on the MSDS you provided for the resin and on a description of your process, it appears that this is not hazardous waste and, therefore, not regulated by the Division of Hazardous Waste Management. I will, however, offer some suggestions. You may want to talk with Ohio EPA's Division of Solid and Infectious Waste and/or Division of Surface Water regarding this. The sides of the rolloff liner can be taped so that they do not fall down into the rolloff. You could put covers on the rolloffs to minimize rainwater getting in. A better mixing procedure could be started. Care should be taken not to rip the liner if mixing is done once the waste is in the rolloff.

A large amount of this waste was seen on the ground between the concrete barriers and the fence. It is suggested that this waste be disposed. Some of this waste was also seen off the other edge of this concrete area. This appeared to be from dust caused by loading the rolloffs and/or rainwater washing this waste off the concrete. You may want to consider

Rhonda Vete  
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installing a berm on this edge of the concrete to contain this waste and then cleaning the waste that is on the ground beyond the concrete.

Another purpose of the inspection was to look for ways Harbison may be able to reduce its waste generation, conserve energy, and save money. An attachment to this letter covers these issues.

The following violations were found:

1. OAC rule 3745-279-22(C) - Used oil labels.  
This rule requires containers and aboveground tanks used to store used oil at generator facilities to be labeled or marked clearly with the words "Used Oil."

Harbison violated this rule by having a drum of used oil in the automotive area that was not labeled as used oil. You must now properly label this container and contact me when that has been done.

2. OAC rule 3745-273-14(A) - Labeling/markings- standards for small quantity handlers of universal waste.  
This rule requires that universal waste batteries, or a container of these batteries, be labeled as "Universal Waste Batteries," "Waste Batteries", or "Used Batteries."

Harbison violated this rule by having a pallet of waste batteries that was not labeled as required. You must now properly label these waste batteries and contact me when that has been done.

3. OAC rule 3745-273-13 (D) - Universal waste lamp containers.  
This rule requires universal waste lamps to be in closed containers or packages that are structurally sound and adequate to prevent breakage.

Harbison violated this rule by having waste fluorescent lamps that were not in a closed container or package. You must correct this violation and provide documentation of that to me.

4. OAC rule 3745-273-16 - Employee training for handlers of universal waste.  
This rule requires that employees who manage universal waste be informed of proper handling and emergency procedures for that universal waste.

Harbison violated this rule by not informing its employees as required as shown by violation 3 above. Please send me documentation that employees have been informed as required.

Rhonda Vete  
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The following concern was found:

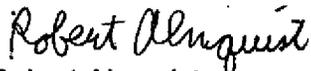
1. OAC rule 3745-273-15(A) - Universal waste accumulation time limits.  
This rule allows the accumulation of universal waste for no longer than one year unless it is solely for the purpose of accumulation of such quantities to facilitate proper recovery or treatment. The most recent manifest you provided for the shipment of universal waste lamps was dated December 21, 2005. You stated you will check to see if this was the last time they were shipped. In addition, it appeared that there were full boxes of waste lamps in storage. You must either provide documentation that waste lamps have been shipped within a year, ship waste lamps at this time, or provide a description of why they need to be accumulated longer for the purpose of facilitating proper recovery or treatment.

**Please send a written response to this letter within 30 days including the documentation required above.**

You can find copies of the regulations and other information on the Division of Hazardous Waste Management web page at <http://www.epa.state.oh.us/dhwm/>.

If you have any questions, please contact me at (330) 963-1217, or [robert.almquist@epa.state.oh.us](mailto:robert.almquist@epa.state.oh.us)

Sincerely,



Robert Almquist  
Division of Hazardous Waste Management

RA:cl  
Enclosures

- cc. Natalie Oryshkewych, DHWM, NEDO  
Joe Batman, Harbison-Walker Refractories Co.
- ec. Frank Popotnik, DHWM, NEDO  
Harry Sarvis, DHWM, CO  
Joseph Berger, Harbison-Walker Refractories Co.  
Jack Palmermo, Countywide Landfill

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.



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

For Ohio EPA use only

E-mail this completed form to  
tammy.mcconnell@epa.state.oh.us or mail it to Tammy  
McConnell, Central Office

|  |  |  |                                      |                                      |  |                                       |                                       |                                   |                                   |
|--|--|--|--------------------------------------|--------------------------------------|--|---------------------------------------|---------------------------------------|-----------------------------------|-----------------------------------|
| 2. Site EPA ID No.   | EPA ID Number: OHD046626628  |  |                                      |                                      |  |                                       |                                       |                                   |                                   |
| 3. Site Name   | Name: Harbison-Walker Refractories Co  |  |                                      |                                      |  | Website:<br>(Optional)                |                                       |                                   |                                   |
| 4. Site Location Information   | Street Address: 9686 E Center St.  |  |                                      |                                      |  |                                       |                                       |                                   |                                   |
|  | City, Town, or Village: Windam   |  |                                      |                                      |  | State: OH                             |                                       |                                   |                                   |
|  | County Name: Portage   |  |                                      |                                      |  | Zip Code: 44288                       |                                       |                                   |                                   |
| 5. Site Land Type<br>(check only one)  | Private<br><input checked="" type="checkbox"/>   | County<br><input type="checkbox"/>                             | District<br><input type="checkbox"/> | Federal<br><input type="checkbox"/>  | Indian<br><input type="checkbox"/>   | Municipal<br><input type="checkbox"/> | State<br><input type="checkbox"/>     | Other<br><input type="checkbox"/> |                                   |
| 6. NAICS code(s)<br><a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>   |  |  |                                      |                                      |  |                                       |                                       |                                   |                                   |
| 7. Facility Representative<br><br>Additional names can be recorded in number 12<br><br>Only provide address information if it is different than the site address | First Name: Rhonda   |  |                                      | MI:                                  | Last Name: Vete  |                                       |                                       |                                   |                                   |
|  | Phone Number: 412-375-6848   |  |                                      |                                      |  | Phone Number Extension:               |                                       |                                   |                                   |
|  | E-Mail Address: rvete@anhrefractories.com  |  |                                      |                                      |  |                                       |                                       |                                   |                                   |
|  | Fax Number:  |  |                                      |                                      |  | Fax Number Extension:                 |                                       |                                   |                                   |
|  | Street or P.O. Box: 400 Fairway Dr.  |  |                                      |                                      |  |                                       |                                       |                                   |                                   |
|  | City, Town or Village: Moon Township   |  |                                      |                                      |  |                                       |                                       |                                   |                                   |
|  | State: PA  |  |                                      |                                      | Country:   |                                       | Zip Code: 15108                       |                                   |                                   |
|  | 8. Legal Owner and Operator of the Site List<br>Additional Owners and/or Operators in the Comment Section or on another copy of this form page | Name of Site's Legal Owner:<br>Harbison-Walker Refractories Co |                                      |                                      |  | Date Became Owner (mm/dd/yyyy): 1953  |                                       |                                   |                                   |
| Owner Type:  |  | Private<br><input checked="" type="checkbox"/>                 | County<br><input type="checkbox"/>   | District<br><input type="checkbox"/> | Federal<br><input type="checkbox"/>  | Indian<br><input type="checkbox"/>    | Municipal<br><input type="checkbox"/> | State<br><input type="checkbox"/> | Other<br><input type="checkbox"/> |
| Street or P.O. Box: 400 Fairway Dr.  |  |  |                                      |                                      |  |                                       |                                       |                                   |                                   |
| City, Town or Village: Moon Township   |  |  |                                      |                                      | Owner Phone #:   |                                       |                                       |                                   |                                   |
| State: PA  |  |  |                                      |                                      | Country:   |                                       | Zip Code: 15108                       |                                   |                                   |
| Name of Site's Operator:<br>same   |  |  |                                      |                                      | Date Became Operator (mm/dd/yyyy):   |                                       |                                       |                                   |                                   |
| Owner Type:  |  | Private<br><input type="checkbox"/>                            | County<br><input type="checkbox"/>   | District<br><input type="checkbox"/> | Federal<br><input type="checkbox"/>  | Indian<br><input type="checkbox"/>    | Municipal<br><input type="checkbox"/> | State<br><input type="checkbox"/> | Other<br><input type="checkbox"/> |
| Street or P.O. Box:  |  |  |                                      |                                      |  |                                       |                                       |                                   |                                   |
| City, Town or Village:   |  |  |                                      |                                      | Operator Phone #:  |                                       |                                       |                                   |                                   |
| State:   |  |  |                                      |                                      | Country:   |                                       | Zip Code:                             |                                   |                                   |
| 9. Violations Cited?   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  |  |                                      |                                      |  |                                       |                                       |                                   |                                   |
| 10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)   |  |  |                                      |                                      |  |                                       |                                       |                                   |                                   |
| <input checked="" type="checkbox"/> Not Regulated  |  |  |                                      |                                      | <input type="checkbox"/> Conditionally Exempt Small Quantity Generator     |                                       |                                       |                                   |                                   |
| <input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11  |  |  |                                      |                                      | <input type="checkbox"/> United States Importer of Hazardous Waste         |                                       |                                       |                                   |                                   |
| <input type="checkbox"/> Large Quantity Generator (LQG)  |  |  |                                      |                                      | <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator |                                       |                                       |                                   |                                   |
| <input type="checkbox"/> Small Quantity Generator (SQG)  |  |  |                                      |                                      |  |                                       |                                       |                                   |                                   |
| <input type="checkbox"/> Hazardous Waste Transporter   |  |  |                                      |                                      | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace           |                                       |                                       |                                   |                                   |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste  |  |  |                                      |                                      | <input type="checkbox"/> Small Quantity On-Site Burner Exemption           |                                       |                                       |                                   |                                   |
| <input type="checkbox"/> Recycler of Hazardous Waste   |  |  |                                      |                                      | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption     |                                       |                                       |                                   |                                   |
| <input type="checkbox"/> Underground Injection Control Facility  |  |  |                                      |                                      |  |                                       |                                       |                                   |                                   |



|   |   |  |  |
|---|---|--|--|
| 10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))  |   |  |  |
| <input checked="" type="checkbox"/> <b>Small Quantity Handler of Universal Waste</b>  |   | <input type="checkbox"/> <b>Large Quantity Handler of Universal Waste</b><br>(accumulates 5,000 kg. or more) |  |
| <input type="checkbox"/> <b>Destination Facility for Universal Waste</b>  |   |  |  |
| Check all boxes below that apply for each of the three types of facilities above  |   | 10C. Used Oil Activities (Indicate Type(s) of Activity(ies))   |  |
|   | <b>Managed</b>                          | <input checked="" type="checkbox"/> <b>Used Oil Generator</b>  | <input type="checkbox"/> <b>Off-Specification Used Oil Burner</b>                            |
| Batteries   | <input checked="" type="checkbox"/>     | <input type="checkbox"/> <b>Used Oil Transporter</b>   | <input type="checkbox"/> <b>Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil</b> |
| Pesticides  | <input type="checkbox"/>                | <input type="checkbox"/> <b>Used Oil Transfer Facility</b>   | <input type="checkbox"/> <b>Used Oil Fuel Marketer to Off-Specification Used Oil Burner</b>  |
| Mercury containing equipment  | <input type="checkbox"/>                | <input type="checkbox"/> <b>Used Oil Processor</b>   |  |
| Lamps   | <input checked="" type="checkbox"/>     | <input type="checkbox"/> <b>Used Oil Re-refiner</b>  |  |
| 11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRA info source record, you do not need to list them all. Instead just indicate the date of the most recent source record.   |   |  |  |
| 12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.  |   |  |  |
| <b>Announced</b>  | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No   | <b>Additional Facility Representatives:</b> Joe Berger                                       |
| <b>Tanks</b>  | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No   | <b>Other Comments:</b> complaint 7004  |
| <b>Containers</b>   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No  |  |
| 13. Name of Inspector(s)  |   | Name of Inspector(s)   | Date of Inspection/Time (mm/dd/yyyy) (hh:mm)   |
| Robert Almquist   |   |  | 7/27/2007  |
| 14. OPTIONAL CERTIFICATION: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. |   |  |  |
| Signature of Owner, Operator, or an Authorized Representative   |   | Name and Title (Print)   | Date (mm/dd/yyyy)  |
|   |   |  |  |



# USED OIL INSPECTION CHECKLIST (Short Version)

Harbison Walker, OHD 046 626 628, 7-27-07 inspection

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

## PROHIBITIONS

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

## USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes \_\_\_ No  N/A  RMK#
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes \_\_\_ No  N/A  RMK#  
4-2-07 test data found <200 ppm total halogen
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes  No  N/A \_\_\_ RMK#
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes  No  N/A \_\_\_ RMK#
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes \_\_\_ No  N/A \_\_\_ RMK#
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes  No  N/A \_\_\_ RMK#



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

#### USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes  No  N/A  RMK#
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes  No  N/A  RMK#
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes  No  N/A  RMK#

#### WASTE EVALUATION

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

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#### REMARKS



**UNIVERSAL WASTE HANDLER REQUIREMENTS - SMALL QUANTITY - BATTERIES AND LAMPS**

Facility Name: Harbison-Walker ID #: OHD 046 626 628 Inspection Date: 7-27-07

*Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more*

*Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less*

**PROHIBITIONS**

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

**WASTE MANAGEMENT & LABELING/MARKING**

**UNIVERSAL WASTE BATTERIES**

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes \_\_\_ No  N/A  RMK#
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes \_\_\_ No  N/A  RMK#
5. Does the SQUWH conduct any of the following activities:
- no
- a. Sort batteries by type? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK#
- b. Mix battery types in one container? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK#
- c. Discharge batteries to remove the electric charge? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK#
- d. Regenerated used batteries? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK#
- e. Disassemble them into individual batteries or cells? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK#
- f. Remove batteries from consumer products? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK#
- g. Remove the electrolyte from the battery? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK#



If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)]

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

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)]

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

a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]

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

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]

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

7. Are the battery(ies) or container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]

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

#### UNIVERSAL WASTE LAMPS

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]

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

9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]

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

10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)]

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



**NOTE:** Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

**ACCUMULATION TIME**

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

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



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

**EMPLOYEE TRAINING**

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

**RESPONSE TO RELEASES**



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

**OFF-SITE SHIPMENTS**

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

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

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

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



b. Agree to where the shipment will be sent? [3745-273-18(E)(2)]

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

21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:

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

a. Sending the waste back to the originating handler? [3745-273-18(F)(1)]

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

b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)]

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

22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]

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

23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)]

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

### EXPORTS

24. Is waste being sent to a foreign destination? If so:

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

a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]

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

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)]

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

c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]

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

### REMARKS

