



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

March 10, 2008

RE: GREAT LAKES INDUSTRIAL KNIFE CO.
SUMMIT COUNTY
NON-NOTIFIER
NOTICE OF VIOLATION (NOV)
COMPLAINT NUMBER 7057

Ron Kara
Great Lakes Industrial Knife Co.
3261 Copley Road
P. O. Box 14509
Akron, OH 44321

Dear Mr. Kara:

On February 6, 2008, I, as a representative of the Ohio EPA Division of Hazardous Waste Management, conducted an inspection of Great Lakes Industrial Knife Co. (Great Lakes Knife), located at 3261 Copley Road, Copley, Ohio, for compliance with Ohio's hazardous waste and used oil regulations. Alan Angel represented Great Lakes Knife during the inspection. You subsequently provided additional information.

This inspection was in response to a complaint received by Ohio EPA alleging that Great Lakes Knife was managing used cooling lubricants in an underground tank that leaked, that lubricants had been dumped in the trash and that grass on the southeast side of the building had been killed by spilled lubricants.

The ground immediately adjacent to the east side of the building had been recently disturbed and seeded with grass seed and straw. Reportedly this was done as part of a project to improve drainage of storm water from the building roof. Similar work had been done on the north side of the building. No dead vegetation was observed, but the area in which the complainant had alleged the presence of dead vegetation had recently been disturbed. Similar reseeded and drainage work had been done on the north side of the building.

The facility has two major manufacturing activities:

- Resharpener of used industrial knives
- Manufacturing new and replacement industrial knives, which includes sharpening.

Usually metal degreasing is not required. If required, reportedly parts are wiped with rags soaked in grinding coolant to remove oil and grease.

Used oils and wastes generated by the facility include:

- Spent coolant from the grinding (sharpening) machines;
- Used filters with accumulated solids and residual coolant from the grinding (sharpening) machines;
- Used fluorescent bulbs; and
- Rags moistened with acetone used for clean up at various machines.

The acetone containing rags are recycled via laundering at Cintas.

Spent coolant from the grinding (sharpening) machines is the largest volume waste. Spent cutting oil is seldom generated as it is normally not dumped. Therefore fresh cutting oil need only be added to make up for losses and leaks.

Based on MSDS information provided, cutting oil used at the facility (e.g., Blasocut 4000 Strong which contains 45-65% mineral oil prior to use) meets the regulatory definition of used oil after use.

Based on MSDS information provided, some of the grinding coolants previously used at the facility were of the semi-synthetic type which contain a mineral oil (GLOC KUT EPX). The current grinding coolant (Seal Grind 1150) is a synthetic coolant. Information found on the internet describes synthetic metal working fluids and coolants as not containing petroleum or mineral oils and as generally consisting of chemical lubricants and rust inhibitors dissolved in water.

Grinding fluids as used by the facility are mixtures of water and the purchased concentrates with reported ratios of 5% concentrate and 95% water. Similarly cutting oil as used is reported to be diluted in the ratio of 5% purchased cutting oil and 95% water. Although such fluids may not at first inspection appear to meet the definition of used oil, they (including the synthetic fluids) are, after usage, usually regulated by Ohio EPA as used oil.

The facility's current practice is reportedly to collect spent grinding coolants, liquids from the floor cleaning machine, and possibly other used liquids and/or oils, in an on-site underground tank. Periodically these liquids are collected by Everclear. The Everclear invoices describe the mixture removed as "Used Oil/Water/Coolant".

The facility reported the capacity of the underground tank as 1,075 gallon. Facility was not able to provide any information on the construction of the tank. Apparently the tank has not been inspected.

The inspection included a review of the facility's operations, as well as the waste management practices and documentation.

This letter will explain the violations I found and steps you need to take to correct them.

I found the following violations of Ohio's used oil and universal waste laws:

1. OAC 3745-273-14(E) Small quantity handler must label unit holding universal waste lamps

The facility generates used fluorescent bulbs. Two used fluorescent bulbs without green endcaps were observed in the trash dumpster. Upon my request they were removed from the dumpster and placed in a closed and marked box for management as universal waste

This violation was abated during the inspection; no additional action on this issue is required to return to compliance.

2. OAC Rule 3745-273-16 Employee training for small quantity handlers of universal waste

Facility employees with universal waste duties did not appear to have been appropriately trained on universal waste requirements.

To return to compliance the facility must:

- Train appropriate personnel with universal waste management duties on applicable universal waste requirements.
- Submit copies of training documentation to this office within 45 days of the date of this letter.

3. OAC 3745-279-22 (C)(2) Inlet pipe to an underground tank storing used oil must be labeled or marked clearly with the words "Used Oil."

Spent grinding coolants, liquids from the floor cleaning machine, and possibly other used liquids and/or oils, are stored in an on-site underground tank. Materials reportedly are poured into the tank when the manhole cover is removed. Although such fluids may not at first inspection appear to meet the definition of used oil, they (including the synthetic fluids) are, after usage, usually regulated by Ohio EPA as used oil. The Everclear invoices describe the mixture removed from the tank as Used Oil/Water/Coolant. No "Used Oil" markings were on the manhole cover. My understanding is that the facility intends to cease using the underground tank for storage of these fluids.

To return to compliance the facility must either:

- Clearly mark or label the manhole cover to the underground tank with the words "Used Oil."; or,
- Cease using the underground tank for storage of these fluids.
- If the tank remains in use, submit documentation to this office in the form of photos of the words "Used Oil" on the manhole cover
- If tank is not to be used for storage of these fluids, submit documentation to this office in the form of photos of signs, markings, etc. indicating that no used oil or used coolants are to be placed in the tank
- If tank is replaced with containers as the facility indicated will occur, submit photos of containers labeled or marked clearly with the words "Used Oil."

Submit all documentation to this office within 45 days of the date of this letter.

Enclosed you will find a copy of the checklists completed during the inspection.

Concerns

Bureau of Underground Storage Tanks (BUSTR).

Per OAC 3745-279-22, generators of used oil that store used oil in underground tanks are subject to BUSTR standards for used oil stored in underground tanks. To learn more about BUSTR and the BUSTR rules see their website at: <http://com.state.oh.us/sfm/bust/>

Used Filters

Used filters from the grinder coolant systems were observed in the dumpster. It appeared that some residue was present, but because the inspection occurred during a period of rainfall and the trash dumpster lid was open, this could not be assessed accurately. Filters containing used oil can not be placed in a trash dumpster when free liquids are present. Filters should be drained and absorbent added if necessary to eliminate free liquids prior to placing in trash dumpster.

Staining

Some of the area around the trash dumpster had dark staining. Because the inspection occurred during a period of rainfall I could not determine if it was oil. However, no "rainbows" or oil sheens were observed. If you determine that the staining is used oil, it should be removed and disposed as trash.

Other Information

A list of Ohio EPA DHWM guidance documents can be found at the following Internet site: <http://www.epa.state.oh.us/dhwm/guidancedocuments.html>. You can find copies of Ohio's hazardous waste laws and regulations at our web page at: <http://www.epa.state.oh.us/dhwm/Law&Regs.html>.

GREAT LAKES INDUSTRIAL KNIFE
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The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign up for this free service. You can find more information at the following Web link <http://www.epa.state.oh.us/dhwm/listserv.html>.

The OEPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes and pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image through pollution prevention. More information about pollution prevention can be found on our website at <http://www.epa.state.oh.us/ocapp/ocapp.html>.

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

Sincerely,



Neil J. Wasilk
Environmental Specialist
Division of Hazardous Waste Management

NJW:ddw

Enclosure

cc: Natalie Oryshkewych, Ohio EPA, DHWM, NEDO
ec: Ed D'Amato, Ohio EPA, DHWM, NEDO

NOTICE:

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

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: NON-NOTIFIER								
3. Site Name	Name: Great Lakes Industrial Knife Co.				Website: (Optional)				
4. Site Location Information	Street Address: 3261 Copley Road								
	City, Town, or Village: Copley				State: OH				
	County Name: Summit				Zip Code:				
5. Site Land Type (check only one)	Private <input type="checkbox"/>	County <input checked="" type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input checked="" type="checkbox"/>	Other <input type="checkbox"/>	
6. NAICS code(s) www.census.gov/epcd/www/naics.html									
7. Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Ron			MI:	Last Name: Kara				
	Phone Number: 330-665-1200				Phone Number Extension: 104				
	E-Mail Address: ron@glknife.com								
	Fax Number: 330-665-1204				Fax Number Extension:				
	Street or P.O. Box: P.O. Box 14509								
	City, Town or Village: Akron				State: Oh		Country: USA		Zip Code: 44321
8. 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:				Date Became Owner (mm/dd/yyyy):				
	Owner Type:	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:								
	City, Town or Village:				Owner Phone #:				
	State:				Country:		Zip Code:		
	Name of Site's Operator:				Date Became Operator (mm/dd/yyyy):				
	Owner Type:	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:								
	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 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"/> Small Quantity Handler of Universal Waste		<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	
<input type="checkbox"/> Destination Facility for Universal Waste			
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))	
	Managed	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
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 RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.			
Same Annual report			
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.			
Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives: Alan Angel
Tanks	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Other Comments:
Containers	<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)
Neil Wasilk			2/6/2008 1:40 p.m.
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)

**PROCESS DISCRIPTION
and
Hazardous Waste Compliance Inspection Notes**

Facility:

Great Lakes Industrial Knife Co.
3261 Copley Road
P.O. Box 14509
Akron, OH 44321

Inspector: N. Wasilk

Arrived at 1:40 p.m. on 2-6-08.

Facility contact during the inspection was Alan Angel (Plant Manager).

Opening Meeting

Informed facility that OEPA had received a complaint and I was conducting a follow-up inspection.

Facility conducts two major activities:

- Resharpener of used industrial knives
- Manufacturing new and replacement industrial knives, which includes sharpening.

Usually used knives do not need to be degreased prior to sharpening. No degreasing tanks reported or observed at the facility. Occasionally some knives are wiped with rags moistened with same coolant as used on sharpeners. These rags are managed in a separate drum holding other used rags. No parts washer reported or observed at the facility.

Wastes generated include:

Spent coolant from the grinding (sharpening) machines. Each machine has its own coolant reservoir from which the coolant is recycled. Reportedly this coolant is changed when its color changes to purple. Facility reports that spent coolant is transferred to an underground tank for storage prior to pick-up by Everclear.

Spent filters from the grinding (sharpening) machines. Each machine has its own coolant filter. As the filter accumulates solids it is manually rolled up, then removed and placed in the trash dumpster.

Spent cutting oil from the milling machines. Each machine has its own oil reservoir from which the cutting oil is recycled. During the inspection my understanding was that this cutting oil is dumped and changed approximately once per year and that spent cutting oil is transferred to an underground tank for storage prior to pick-up by Everclear. Subsequent to the inspection, information was providing reporting that cutting oil does not require dumping of the reservoir, but only requires make-up for leaks and losses.

Wash water from floor cleaning. Facility reports that wash water is transferred to an underground tank for storage prior to pick-up by Everclear.

Rags moistened with acetone are used for clean up for various machines at the facility. These rags are managed in a separate drum holding other used rags. Rags are laundered by Cintas.

Rags moistened with same coolant as used on sharpeners are sometimes used to wipe down used knives. These rags are managed in a separate drum holding other used rags. Rags are laundered by Cintas.

Facility reports that it does not conduct vehicle oil changes.

Plant Walk Through

Underground storage tank (UST) is located in approximately the middle of the building. Facility believes its capacity is 1,075 gallons. Facility was not able to provide any information on the construction of the tank. Tank is reportedly used for storage of spent grinding coolant and liquids from floor clean-up. Conflicting comments provided by facility on whether used cutting oil is ever put in this tank. Materials are poured into the tank when the manhole cover is removed. No "Used Oil" markings on the manhole cover. No BUSTR documentation available on the UST. Tank contents are removed by Everclear. Everclear invoices describe materials removed as "used oil/water/coolant".

The ground immediately adjacent to the east side of the building had been recently disturbed and seeded with grass seed and straw. Reportedly this was done as part of project to improve drainage of storm water from the building roof. No dead vegetation was observed, but the area in which the complainant had alleged the presence of dead vegetation had recently been disturbed.

Similar reseeded and drainage work had been done on the north side of the building.

Two used fluorescent bulbs without green endcaps were observed in the trash dumpster. Upon my request these were removed and placed in a closed and marked box for management as universal waste.

Also present in the dumpster were used filters from the grinder coolant systems. It appeared that some oily residue was present, but because the inspection occurred a period of rainfall and the

PROCESS DISCRIPTION—Great Lakes Industrial Knife Page 3 of 3
trash dumpster lid was open, this could not be assessed accurately.

Some of the area around the trash dumpster had dark staining. Might be oil, but this could not be determined with certainty as the inspection occurred a period of rainfall which made it difficult to assess causes of color differences accurately. No "rainbows" or oil sheens were observed.

Records review.

Facility was not able to provide many of the MSDSs and other documents requested during the inspection and agreed to obtain and mail copies to NEDO. These were submitted by mail to NEDO.

Departed facility at about 3:40 p.m.

Subsequent to the inspection visit, Mr. Ron Kara mailed MSDSs and other documents requested. MSDSs provided included:

- GLOC KUT EPX (which a semi-synthetic micro emulsion coolant)
- GLOC GRIND-CG+ (which is a synthetic coolant)
- GLOC Clean SC #9 (which is a water-based cleaner)
- Seal Grind 1150 (MSDS is unclear, but appears to be a synthetic coolant)
- GLOC GRIND BP-A (which is a synthetic coolant)
- Blasocut 4000 Strong (water-miscible mineral oil metal working fluid)
- GLOC Premium Hydraulic Oil, AW-32 (which is a petroleum oil)



GRANT WALKS KNIFE

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 No N/A
- a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] Yes No N/A
2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes No N/A
3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? Yes No N/A

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil? If so, Yes No N/A
- a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] Yes No N/A

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes No N/A

NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6. Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] Yes No N/A
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] NOT STORING IN ABOVE GROUND TANKS Yes No N/A
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes No N/A

MANHOLE USED AS FILL PIPE FOR UNDERGROUND TANK NOT MARKED OR LABELED

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

b. Contained the release?

Yes No N/A

c. Cleaned up and properly managed the used oil and other materials?

Yes No N/A

*COULD NOT DETERMINE IF STAINS NEAR TRASH DUMPSTER WERE
REPAIRED OR REPLACED THE CONTAINERS OR TANKS PRIOR TO RETURNING THEM
TO SERVICE, IF NECESSARY? USED OIL.*

d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary?

Yes No N/A

ON-SITE BURNING IN SPACE HEATER

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:

Yes No N/A

a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?

Yes No N/A

b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?

Yes No N/A

c. Are the combustion gases from heater vented to the ambient air?

Yes No N/A

GENERATOR TRANSPORTATION

11. If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]

Yes No N/A

a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24]

Yes No N/A

b. Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24]

Yes No N/A

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

COLLECTION CENTERS AND AGGREGATION POINTS

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

13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]

Yes No N/A

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

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.

Keyword: UsedOilChecklistforGenerators.Oct.2007.doc

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

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

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

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No N/A 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:
 - 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) of 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

NO ACCUMULATION VRT. WILL APPLY TO FUTURE ACCUMULATION

11. Is the waste accumulated for less than one year? Yes ___ No ___ N/A ___ RMK# ___
[3745-273-15(A)] If not:
- 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# ___

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 NO RELEASES REPORTED

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 NO SHIPMENTS REPORTED, WILL

APPLY TO FUTURE 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# ___
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

