



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

June 9, 2009

RE: **FORD MOTOR COMPANY**
OHD 000 817 270
SQG NOV

Lynn Beamer
Ford Motor Company
18300 Snow Road
Cleveland, OH 44142-1415

Dear Ms. Beamer:

On May 29, 2009, Ed D'Amato and I of the Ohio EPA Division of Hazardous Waste Management conducted an inspection of Ford Motor Company located at 5600 Henry Ford Blvd., Brook Park, Ohio. The purpose was to determine if Ford was in compliance with 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). Please see the enclosed Process and Waste Summary chart for my understanding of this facility's operations.

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

The following violation was found:

OAC rule 3745-279-22(C) - Used oil labels.

This rule requires containers and above ground tanks for used oil to be labeled or marked clearly with the words Used Oil.

Ford violated this rule by having one drum at engine Plant 1 that was collecting used oil from oil filters that was not labeled as used oil. This was corrected during the inspection.

The following concern was found:

This facility has a sluiceway system for wastewater which directs wastewater into two millponds. As I understand it, these wastewaters include non-contact cooling water, wet waste from dust collectors, and dry waste from dust collectors. You sent me analysis of the waste that has been dredged out of the millponds. The total analysis of this dredged waste found arsenic, cadmium, chromium, and lead. The TCLP analysis of this dredged waste showed it is not hazardous waste for these metals. I have a concern that one or more of the wastes going into this sluiceway system may be hazardous waste. Please send me a listing of the

Lynn Beamer
Ford Motor Company
June 9, 2009
Page 2

wastes that go into this system and the details of how you have determined whether or not each is a hazardous waste. As an alternative to this you may want to determine (and send me documentation) whether the wastewater treatment unit exemption in the hazardous waste rules applies to this system. A guidance document regarding this exemption can be found at: http://www.epa.state.oh.us/dhwm/pdf/MWTU_Guidance.pdf.

Other information and suggestions:

- You gave me test data from a sample taken in 1994 of the petroleum naphtha parts washer waste. This showed that the waste was over the TCLP limit for tetrachloroethylene and, therefore, the waste has the D039 hazardous waste code. If you do not have more recent data, you may want to resample this waste as it may be a nonhazardous waste if the level of tetrachloroethylene is now below the TCLP limit.
- A 7-page guidance document regarding generator categories can be found at: http://www.epa.state.oh.us/dhwm/pdf/Episodic_Generation.pdf.
- Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides compliance and pollution prevention assistance on environmental issues related to air, land, and water. They can be contacted at (800) 329-7518 or <http://www.epa.state.oh.us/ocapp/ocapp.html>.
- Entrepreneurs for Sustainability is a group that seeks to "build a sustainable regional economy in Northeast Ohio that will create prosperity and total community health." They offer workshops, conferences, a business to business directory and more. Their website is at: <http://www.e4s.org/content/index.asp>.
- ENERGY STAR is a government-backed program helping businesses and individuals protect the environment through superior energy efficiency. Their website is at: <http://www.energystar.gov/>.
- There are various grants, loans, and tax incentives available for environmental projects in Ohio. A good place to start looking for these is at: <http://www.epa.state.oh.us/ocapp/funding.html>.
- The Clean Air Resource Center offers help in understanding EPA air quality requirements. In addition, if your business is required to purchase new equipment, they can offer better-cost financing with special tax incentives. Their phone number is (800) 225-5051, and website is <http://www.ohioairquality.org/>.

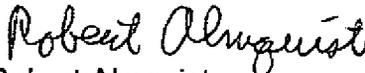
Lynn Beamer
Ford Motor Company
June 9, 2009
Page 3

- 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 at: http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage.

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.

Sincerely,


Robert Almquist
Division of Hazardous Waste Management

RA:cl
Enclosures

cc: Natalie Oryshkewych, DHWM, NEDO

ec: Frank Popotnik, DHWM, NEDO
Ed D'Amato, DHWM, NEDO
Harry Sarvis, DHWM, CO
Mike Stevens, DSW, NEDO
Dan Lyons, MPS Group

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.



| Process and Waste Summary for: | | | | | | | |
|--|---|---|--|------------------|--|--|--|
| Ford Motor Company, OHD 000 817 270, SQG, 5-29-09 inspection | | | | | | | |
| # | Process generating the waste | Waste description and haz. codes | Date of last analysis | Date of last LDR | Amount generated (2008 annual report unless specified) | On-site management | Off-site management |
| 1 | Filtering onto paper of wastewater from machining at Engine Plant 2 | Lead bearing sludge, D008, Jim Hostacky said this waste is about 90% filter paper | Received copy of analysis from a 9-26-08 sample. Result was 8.5 mg/l (TCLP). I was told that more recent tests show it is still over the 5 TCLP limit for lead. They stopped using lead in this process and cleaned out the system in the summer of 2008. They plan to retest until residual lead in the system goes to a level where the waste would be nonhazardous. | 4-29-09 | 11000 P | Collected in satellite drum in Engine Plant 2, When full it is moved to the main accumulation area which is shown on the site diagram. | Safety Kleen, Smithfield, KY Fuel blending |
| 2 | | rags | | | | Some get put into lead sludge drum | |
| 3 | Maintenance painting using aerosol cans | Paint related material, D001, F003, F005 this is | | 5-6-09 | 950 P | The puncture unit and liquid waste collection | Safety Kleen, Smithfield, KY Fuel blending |

| | | | | | | | |
|---|--|--|------|---------|---------------------------|---|---|
| | | drained out of the can when it is punctured. The punctured cans are remelted in the casting plant. | | | | drum are at the main accumulation area. | |
| 4 | Parts washers | Petroleum naphtha, D039 | 1994 | 4-15-09 | 885 G | Collected directly from parts washers | Safety Kleen, Dolton, IL Solvents recovery |
| 5 | Parts washers using Safety-Kleen Premium Gold Solvent | Used solvent, non hazardous | | NA | 211 G shipped on 5-6-09 | Collected directly from parts washers | Safety Kleen, Brunswick, OH for continued use program |
| 6 | Cleaning out of wastewater filtration system (see waste 1 above) | Lead sludge cleanup PPE, D008 | | | 2100 P | | Safety Kleen, Dolton, IL Storage, bulking, and/or transfer off-site |
| 7 | Air pollution control at the Casting Plant | Spent scrubber solution, non hazardous | | NA | 5000 G shipped on 5-21-09 | | Usher Oil, Detroit, MI |
| 8 | Testing of engines, maintenance of machines, and other sources | Used oil | | NA | | Collected in drums. Drums pumped into tank at main accumulation area. | Safety Kleen |

| | | | | | | | |
|----|-------------------------------|---|--------------------------------------|----|---|---|--|
| 9 | | lamps | | NA | Shipped 800 P on 2- 25-09 | Collected in a large metal box – one at main accumulation area and one at Engine Plant 1 | Environmental Recycling, Bowling Green, OH for recycling |
| 10 | | Alkaline batteries | | NA | | | Disposed as solid waste |
| 11 | | Other batteries | | NA | Shipped 400 P on 12-14-07 | | Environmental Recycling, Bowling Green, OH for recycling |
| 12 | | Adsorbants and grease, non hazardous special waste | | NA | 78 drums shipped on 3-18-09 | Main accumulation area | Carbon Limestone Landfill, Lowellville, OH |
| 13 | | Off-spec products, for example fluorescent dye | | NA | 13 drums shipped on 3-18-09 | Main accumulation area | Carbon Limestone Landfill, Lowellville, OH |
| 14 | | Shot blast dust | | | Have not removed waste from this system in the recent past | | |
| 15 | Core making, melting, etc. | Wastewater from these processes and both wet and | 4-8-09 (test of dredged material) | NA | | Every 6 months or longer a mill pool is dredged. | Dredged waste is disposed as solid waste. |

| | | | | | | | |
|----|---------------|---|--------|----|-------------------------|--|-------------------------------------|
| | | dry dust collection systems go into a sluiceway system which goes to two mill pools (outside lagoons) | | | | | |
| 16 | Casting Plant | Mold line sand. This is about 90% of the total sand waste. | | NA | | Recycled on site | |
| 17 | Casting Plant | Core sand, nonhazardous | 4-8-09 | NA | 400 to 500 tons per day | | Kurtz Brothers for beneficial reuse |
| 18 | Casting Plant | Resin waste | | | | | |
| 19 | | Cardboard | | NA | | Most is bailed and shipped for recycling | |
| 20 | | pallets | | | | | Sent out for recycling |
| 21 | | Scrap metal | | | | Remelted in casting plant | |
| 22 | | Empty plastic drums | | | | | Disposed as solid waste |

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

For Ohio EPA use only

E-mail this completed form to kristina.durnell@epa.state.oh.us
 or mail it to Kristina Durnell, Central Office

| | |
|---|--|
| Site EPA ID No. Site Name Site Location Information Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html | EPA ID Number: OHD 000 817 270 Name: Ford Motor Company Website: (Optional) Street Address: 5600 Henry Ford Blvd City, Town, or Village: Brook Park County Name: Cuyahoga State: OH Zip Code: 44142 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"/> 331511 |
| Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address | First Name: Lynn MI: Last Name: Beamer Phone Number: 216-676-7782 Phone Number Extension: E-Mail Address: lbeamer@ford.com Fax Number: 216-676-3411 Fax Number Extension: Street or P.O. Box: City, Town or Village: State: Zip Code: |
| Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page | Name of Site's Legal Owner: Ford Motor Company Date Became Owner (mm/dd/yyyy): 06/01/1952 Owner Private County District Federal Indian Municipal State Other Type: <input checked="" type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: On American Rd. City, Town or Village: Dearborn State: MI Owner Phone #: 313-323-1276 Country: US Zip Code: 48126 Date Became Operator (mm/dd/yyyy): same Operator Private County District Federal Indian Municipal State Other Type: <input type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: City, Town or Village: State: Operator Phone #: United States Zip Code: |

VIOLATIONS CITED? Yes No

| | |
|--|--|
| TYPE OF HANDLER- A MINIMUM OF ONE BOX MUST BE CHECKED | |
| <input 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 checked="" 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 |

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

| UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY)) | |
|---|---|
| <input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste | <input type="checkbox"/> Destination Facility for Universal Waste |
| <input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more) | |

| CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES | |
|--|--|
| <input checked="" type="checkbox"/> Batteries | |
| <input type="checkbox"/> Pesticides | |
| <input checked="" type="checkbox"/> Mercury containing equipment | |
| <input checked="" type="checkbox"/> Lamps | |

| USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S)) | |
|---|--|
| <input checked="" type="checkbox"/> Used Oil Generator | |
| <input type="checkbox"/> Used Oil Transporter | |
| <input type="checkbox"/> Used Oil Transfer Facility | |
| <input type="checkbox"/> Used Oil Processor | |
| <input type="checkbox"/> Used Oil Re-refiner | |
| <input type="checkbox"/> Off-Specification Used Oil Burner | |
| <input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil | |
| <input type="checkbox"/> 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 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.

D001 D008 D039 F003 F005

| 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: Dave Knapp, Russ Moenich, Dan Lyons, Pam Turner, Jim Hostacky |
| Tanks <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Other Comments: |
| Containers <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |

| | | |
|---|--|---|
| Name of Inspector(s) Robert Almquist | Name of Inspector(s) Ed D'Amato | Date of Inspection/Time (mm/dd/yyyy) (hh:mm) 5/29/2009 |
|---|--|---|

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
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

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

PROHIBITIONS

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

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

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

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

| | | | | |
|----|--|---|--|---|
| 6. | Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 7. | Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 8. | Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| 9. | Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] | 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 type="checkbox"/> |
| b. | Contained the release? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| c. | Cleaned up and properly managed the used oil and other materials? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| d. | Repaired or replaced the containers or tanks prior to returning them to service, if necessary? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

ON-SITE BURNING IN SPACE HEATER

| | | | | |
|-----|--|------------------------------|-----------------------------|------------------------------|
| 10. | Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: | 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 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 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 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] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 12. | If the generator self-transported 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 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 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 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.

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS – BATTERIES AND LAMPS

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

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

PROHIBITIONS

| | | |
|----|---|--|
| 1. | Did the SQUWH dispose of universal waste? [3745-273-11(A)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 2. | Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES

| | | |
|----|--|--|
| 3. | Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 4. | If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 5. | Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 6. | If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| a. | If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 7. | Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

UNIVERSAL WASTE LAMPS

| | | |
|----|---|--|
| 8. | Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 9. | Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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

| | | |
|-----|--|--|
| 10. | Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|-----|--|--|

| ACCUMULATION TIME | | |
|---|---|--|
| 11. | Is the waste accumulated for less than one year? [3745-273-15(A)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <i>NOTE: Accumulation is defined as date generated or date received from another handler.</i> | | |
| 12. | Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below: | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| EMPLOYEE TRAINING | | |
| 13. | Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| RESPONSE TO RELEASES | | |
| 14. | Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 15. | Is the material released characterized? [3745-273-17(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 16. | If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| OFF-SITE SHIPMENTS | | |
| <i>NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.</i> | | |
| 17. | Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 18. | Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180. | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 19. | Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)] (this change makes it like the LQUWH checklist) | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 20. | Has the originating handler ever had an off-site shipment rejected by another handler or destination facility? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | a. If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 21. | If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u> : | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | a. Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 22. | If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| EXPORTS | | |

| | | |
|-----|--|--|
| 23. | Is waste being sent to a foreign destination? If so: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |



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

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

Safety Equipment Used:

GENERAL REQUIREMENTS

| | | | | |
|----|---|---|--|------------------------------|
| 1. | Have all wastes generated at the facility been adequately evaluated? [3745-52-11] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| 2. | Has the generator obtained a U.S. EPA I.D. number? [3745-52-12] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 3. | Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| 4. | Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| 5. | Does the generator accumulate hazardous waste? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

NOTE: If the SQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements might still apply, e.g. manifest, marking, LDR, etc.

| | | | | |
|----|---|------------------------------|--|------------------------------|
| 6. | Has the generator accumulated hazardous wastes <u>in excess of (180/270)</u> days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
|----|---|------------------------------|--|------------------------------|

NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]

| | | | | |
|----|---|------------------------------|--|------------------------------|
| 7. | Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
|----|---|------------------------------|--|------------------------------|

NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.

| | | | | |
|----|---|------------------------------|--|------------------------------|
| 8. | Does the generator treat hazardous waste in a: | | | |
| a. | Container that meets 3745-66-70 to 3745-66-77? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| b. | Tank that meets 3745-66-101? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| c. | Drip pads that meet 3745-69-40 to 3745-69-45? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| d. | Containment building that meets 3745-256-100 to 3745-256-102? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |

NOTE: Complete appropriate checklist for each unit.

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

MANIFEST REQUIREMENTS

| | | | | |
|-----|---|---|--|------------------------------|
| 9. | Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)(1)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 10. | Are wastes reclaimed under a contractual agreement? If so: [3745-52-0(E)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| a. | Does the contractual agreement specify the type of waste and frequency of shipment? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| b. | Is the transport vehicle owned and operated by the reclaimer? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

| | | |
|--|---|--|
| c. | Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist. | | |
| 11. | Have items 1 through 20 of each manifest been completed? [3745-52-20(A)(1)] & [3745-52-27(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be complete. [3745-52-20(A)(1)] | | |
| 12. | Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| NOTE: The generator may designate on the manifest one alternative facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)] | | |
| 13. | If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 14. | Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation. | | |
| 15. | If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? [3745-52-42(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 16. | Are signed copies of all manifests being retained for at least three years? [3745-52-40] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10. | | |
| PREPAREDNESS AND PREVENTION | | |
| 17. | Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 18. | Has the following been posted by the telephone: [3745-52-34(D)(5)(b)] | |
| a. | Name and telephone number of emergency coordinator? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Location of fire and spill control equipment, and, if present, fire alarm(s)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Telephone number of local fire department? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 19. | Are employees familiar with waste handling and emergency procedures? [3745-52-34(D)(5)(c)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 20. | Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 21. | Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 22. | Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste: | |
| a. | Internal Alarm system? [3745-65-32(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Emergency communication device? [3745-65-32(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

| | | | | | | | | |
|---|----|---|-----|-------------------------------------|----|-------------------------------------|-----|-------------------------------------|
| | c. | Portable fire control, spill control and decon equipment? [3745-65-32(C)]? | Yes | <input checked="" type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| | d. | Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] | Yes | <input checked="" type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 23. | | Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] | Yes | <input checked="" type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| | a. | Are inspections recorded in a log or summary? [3745-65-33] | Yes | <input checked="" type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 24. | | Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)] | Yes | <input checked="" type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 25. | | If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance (unless not required under OAC 3745-65-32)? [3745-65-34(B)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 26. | | Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] | Yes | <input checked="" type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 27. | | Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] | Yes | <input checked="" type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 28. | | Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| SATELLITE ACCUMULATION AREA REQUIREMENTS | | | | | | | | |
| 29. | | Does the generator ensure that satellite accumulation area(s): | | | | | | |
| | a. | Are at or near a point of generation? [3745-52-34(C)(1)] | Yes | <input checked="" type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| | b. | Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] | Yes | <input checked="" type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| | c. | Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] | Yes | <input checked="" type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| | d. | Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| | e. | Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] | Yes | <input checked="" type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| | f. | Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] | Yes | <input checked="" type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 30. | | Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| | a. | Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| | b. | Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| <p><i>NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.</i></p> | | | | | | | | |
| USE AND MANAGEMENT OF CONTAINERS | | | | | | | | |
| 31. | | Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(D)(4)] | Yes | <input checked="" type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 32. | | Is the accumulation date on each container? [3745-52-34(D)(4)] | Yes | <input checked="" type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 33. | | Are hazardous wastes stored in containers which are: | | | | | | |

| | | | | | | | | |
|--|----|---|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| | a. | Closed (except when adding/removing wastes)? [3745-66-73(A)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| | b. | In good condition? [3745-66-71] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| | c. | Compatible with wastes stored in them? [3745-66-72] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| | d. | Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

NOTE: Record location on process summary sheets and photograph the area.

| | | | | | | | | |
|-----|----|---|-----|-------------------------------------|----|--------------------------|-----|-------------------------------------|
| 34. | | Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days. | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| | a. | Are inspections recorded in a log or summary? [3745-66-74] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 35. | | Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 36. | | If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 37. | | If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

PRE-TRANSPORT REQUIREMENTS

| | | | | | | | | |
|-----|--|---|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| 38. | | Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 39. | | Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 40. | | Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

**GENERATOR LDR CHECKLIST
DOES NOT APPLY TO CESQGS**

GENERAL REQUIREMENTS

| | | |
|----|---|---|
| 1. | If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07 (A)(7)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|----|---|---|

| | | |
|----|--|---|
| 2. | Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] | Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|----|--|---|

NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07 (A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).

| | | |
|----|--|---|
| 3. | Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)] | Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|----|--|---|

| | | |
|----|--|---|
| 4. | Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)] | Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|----|--|---|

| | | |
|----|---|--|
| 5. | Does the generator generate a listed HW that exhibits a characteristic? If yes, | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|--|

| | | |
|----|---|---|
| a. | Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)] | Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|---|

FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.

| | | |
|----|---|---|
| 6. | Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)] | Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|---|

NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.

NOTE: Written documentation of this determination is not required.

| | | |
|----|--|--|
| 7. | Did the generator treat his HW /soil on-site to meet the LDR treatment standard? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|----|--|--|

NOTE If "Yes" see question #16.

| | | |
|----|---|---|
| 8. | Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility?[3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|---|

| | | |
|----|--|---|
| 9. | Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|----|--|---|

| | | |
|-----|---|---|
| 10. | Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|-----|---|---|

| | | |
|----|---|--|
| a. | Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|--|

NOTIFICATION FORM

| | | |
|-----|---|--|
| 11. | Does the LDR Notification form contain the following information: | |
|-----|---|--|

| | | |
|----|--|--|
| a. | Manifest number of the first waste shipment to the TSD?[3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|----|--|--|

| | | |
|----|---|--|
| b. | Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
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| | | |
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| c. | A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
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| d. | A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]. | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|----|--|--|

NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is

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

GENERATOR TREATMENT

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

