



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

November 24, 2008

RE: JEWEL ACQUISITIONS  
OHR 000 121 202  
STARK COUNTY  
CESQG CEI/NOV/RTC

Ms. Deborah Calderazzo  
Jewel Acquisitions  
100 River Road  
Brackenridge, PA 15014

Dear Ms. Calderazzo:

On November 6, 2008, Ohio EPA conducted a compliance evaluation inspection of Jewel Acquisition's Louisville, Ohio facility to determine Jewel's compliance with Ohio's hazardous waste laws and regulations as found under the Ohio Revised Code and the Ohio Administrative Code ("ORC" and "OAC" respectively). Jewel was represented by Larry Gatts, Tom Corpora, Tony Denoi and Bryan Mikula. The Ohio EPA was represented by Shannon Ryan and me. The Ohio EPA's compliance inspection included an inspection of the facility operations and a review of written documentation.

At the time of the inspection, Jewel was a conditionally exempt small quantity generator (CESQG) of hazardous waste. In the event Jewel needs to do a process tank clean out, in that calendar month, the facility will be a large quantity generator of hazardous waste. Ohio EPA only evaluated the facility for the CESQG requirements.

Based on this inspection and a telephone conversation I had with you on November 13, 2008, Ohio EPA has determined that Jewel has violated at least the following state hazardous waste regulation:

**Violation:**

1. ***Used Oil Storage Requirements for Generators, OAC rule 3745-279-22(C):*** All containers and above ground tanks of used oil shall be clearly labeled or marked "Used Oil".

The used oil tank in the oil storage building was not labeled with the words "used oil". Jewel labeled the tank during the inspection.

No further action is required.

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Ohio EPA also noted several concerns:

1. Jewel did not have a plan for managing waste aerosol cans. While Ohio EPA did not see any aerosol cans in the trash, we believe that a protocol for managing aerosol cans would be prudent.

If an aerosol can is completely empty, it can be managed as an empty container. However, if material still remains in the can, the material in the can must be evaluated prior to the can being placed in the trash. Ohio EPA was told that a waste aerosol can management plan would be developed.

2. Jewel is currently managing their spent lamps as universal waste. Ohio EPA encourages Jewel to contact the facility that accepts their lamps to determine if that facility can accept lamps that have been accidentally broken. If they will accept broken lamps, then the lamps can continue to be managed as a universal waste. The facility may require for the broken lamps to be containerized separately from the other lamps to minimize accidents with their workers. If the facility cannot accept broken lamps, Jewel will have to determine if the broken lamps would be a hazardous waste and manage it accordingly.
3. There is a water production well within the facility that is no longer in use. Ohio EPA would recommend that Jewel evaluate the need for this well and if it is no longer necessary, it should be abandoned. If the well is not used and cannot be abandoned, Jewel should take every precaution to prevent hazardous constituents from reaching the well head. An unused well is a potential liability since it is a conduit straight to ground water.
4. Ohio EPA did note some oil on the floor in the basement under the Z-Mill. While the Jewel representatives explained that a Z-Mill has releases as part of its operations, best management practices should be used to keep the oil releases to a minimum.

Since Ohio EPA did not evaluate Jewel for all of the large quantity generator requirements Jewel would be subject to during months of tank clean-outs, Jewel may want to consider requesting assistance from the Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP). OCAPP is an independent, non-regulatory office that can assist you with environmental regulations, compliance concerns and pollution prevention. I have enclosed a brochure for you.

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 have not 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>. If you sign up for this service, it will send you updates regarding annual reports, which Jewel will need to submit for the years a tank

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clean out is conducted. If Jewel is a large quantity generator at least for one month during the year, then the report must be submitted.

The Ohio EPA 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 or 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 by implementing pollution prevention programs.

For more information about pollution prevention, including fact sheets or U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92/088), please contact the Ohio EPA Pollution Prevention Section at (614) 644-3469.

Failure to list specific deficiencies and or violations in this communication does not relieve Jewel from the responsibility of complying with all applicable laws, rules and regulations.

Be advised that the Ohio EPA reserves the right pursuant to ORC Chapters 3734 and 6111 and any other applicable state and federal laws or regulations, to require further site investigation and remediation to address any unpermitted releases of hazardous waste, hazardous substances, industrial wastes, pollutants, and or contaminants into the environment.

Further be advised that any instances of non-compliance can continue as subjects of pending or future enforcement actions..

Should you have any questions or require additional information, please contact Frank Popotnik, my supervisor, or me at (330) 963-1200.

Sincerely,



Karen L. Nesbit  
Division of Hazardous Waste Management

KLN:cl  
Enclosures

ec: Harry Sarvis, DHWM, CO  
Frank Popotnik, DHWM, NEDO

Shannon Ryan, DHWM, NEDO  
Adrienne LaFavre, OCAPP, NEDO

cc: Natalie Oryshkewych, DHWM, NEDO  
Tom Corpora, ATI



**Brief description of facility and processes:** Jewel finishes steel by annealing and pickling. Annealing is done as part of the hot and cold lines and also a bright anneal process. Pickling is done by use of sulfuric acid and also a nitric/hydrofluoric acid mixture.

**Process from beginning to end:** All coiled metal is from Allegheny Ludlum. The metal is in the form of stainless steel. Jewel no longer cuts the coils to length, only to width. The processes coiled metal may go through depending on the customer specifications include: Hood Anneal, coil prep, hotline, rolling mill (aka Z-Mill), cold line, bright anneal, temper mill and slitter.

In the past, there was a Cold Line #1 and #2 and a Hot Line #1 and #2. Both #1 Hot and Cold lines were removed, so all that remains are the #2 lines.

Processes:

Hood anneal – strictly a heating process – no waste generated

Coil prep/side trimmer – as the name suggests – machine trims the side of the coils. The waste generated from this process is scrap metal. There are two hydraulic parts of the trimmer that would generate used oil, but only during maintenance.

Hot Line starts with loading the coil, annealing, shot blasting, sulfuric acid pickling, rinse, nitric/HF acid pickling, rinse, then wrapping the coil. This is a continuous process. A pit is in the line to give the workers enough slack/time to weld the coils together.

No waste is generated in the annealing step. Mill scale is generated in the quench area on the hot line. It is non hazardous.

The shot blasting waste has been sampled and characterized as non-hazardous. The waste acid, when spent is pumped via in ground piping to a cistern where it is neutralized with lime slurry.

Waste water treatment system: Waste acids are pumped via in ground pipes to the cisterns. The pipes are in concrete trenches with metal plates covering the openings. The plates are removed periodically to check the pipes. One cistern is used for the sulfuric acid and the other is used for the nitric/hydrofluoric acid. The acid is pumped into another tank where it is neutralized with a lime slurry. From here it goes to a batch neutralization tank to bring the pH up to 8 or 9. Then it is pumped into the sludge thickener tank where the rest of the plant waste water ends up. From here the waste is pressed and the sludge goes off as a solid waste and the water goes to the rinse tanks where it is processed separately. The rinse waters are processed through another portion of the waste water treatment system. Treated water is then sent to the city.

Cold Line includes a coil scrubber tank (soap), annealing, kolene rinse bath, rinse, sulfuric acid bath, rinse, nitric/HF acid bath, rinse, nitric bath, rinse, drying then it is wrapped on coil.

Scrubber waste goes to the WWTS. The scrubber "soap" is slightly caustic.

Kolene rinse bath goes to the onsite WWTS. Once every couple years the kolene bath needs to be cleaned out – this waste is placed in containers and shipped off-site as



hazardous waste. Since production is down, the need to clean the tank may be less frequent. When waste is generated, it is accumulated in the hazardous waste accumulation area. All acid and rinse waters go to the on-site WWTS.

Rolling Mill (aka Z-Mill). The coils go through rolls to reduce the size to the proper thickness. The coil comes off the line when the desired thickness is achieved. No mill scale is generated. The mill does have rolling mill oil. The oil is part of a self contained system and is filtered through a diatomaceous earth filter bed. The capacity of the system is ~1300 gallons. Once the viscosity of the oil is too high, new oil is added to the system to achieve the appropriate viscosity. There is loss of oil to vaporization in the rolling process. No used oil is generated from this process.

#### Bright anneal line

The coils go through a scrubber with a caustic cleaner, rinse, a horizontal furnace, passivation system (tank with water and 3% nitric acid followed by rinse) then the steel is re-coiled. All of the material goes through the waste water treatment system.

Temper Mill is a reversing mill to reduce the size to gauge or finish. The system does not use oil. It is an elongation process vs a removal process. The rollers used in the mill are metal and need to be refinished periodically. This is done on site in the grind shop.

Grind shop generates swarf from refinishing the 2" rollers from the temper mill which is recycled back to Allegheny.

Slitter cuts the metal to the required widths. Wastes generated are scrap metal and spent ink. The coils are marked at the slitter and small amounts of waste are generated when the heads need to be cleaned. There are no color changes of the ink, so generally no line flushing is required.

In 2004 the metallurgical lab was moved to PA.

There is a machine shop where bearings are built up. It is located near the mills.

#### Other wastes

UW lamps and batteries – both managed as universal waste in the hazardous waste accumulation area

Used oil from Cracker tank – not used as a "cracker tank" but used as a waste water treatment unit in which waste water is allowed to sit and the used oil is taken off this tank and accumulated in a "used oil tank" and the water is put through the waste water treatment system

Parts washers located in the machine shop, the bright annealing area and the bearing area – the units are part of the Safety Kleen CUP program.

Interleaving plastic and paper is the paper and plastic that goes on the coils as packaging – it is managed as a solid waste – sometimes it can be recycled.



There are no PCBs on site. All of the PCB transformers have been removed.

There is a water well located in the plant; it was a production well. It has not been abandoned.

The facility crushes steel barrels and sends them to Allegheny as scrap metal.

Gloves and rags are laundered by Cintas.

Yale maintains the vehicles and tow motors – used oil is managed by Jewel – filters are returned to Yale in Monroeville, PA. Yale is co-generator so this is acceptable

**Hazardous waste generated:** Waste Ink at the slitter (D001, D035, F003, F005) – generate 1 quart per month. May generate Waste corrosive (D002) if the process tank needs to be cleaned.

Regulatory/Enforcement History (if applicable): None



**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](mailto:kristina.durnell@epa.state.oh.us)  
or mail it to Kristina Durnell, Central Office

Site EPA ID No.	EPA ID Number: OHR 000 121 202								
Site Name	Name: JEWEL ACQUISITION LLC					Website: (Optional)			
Site Location Information	Street Address: 1500 W MAIN ST								
	City, Town, or Village: LOUISVILLE					State: OH			
	County Name: STARK					Zip Code: 44641			
Site Land Type (check only one)	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
NAICS codes <a href="http://www.census.gov/epcd/www/whats.html">www.census.gov/epcd/www/whats.html</a>	331221								
Facility Representative  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: DEBORAH			MI: L	Last Name: CALDERAZZO				
	Phone Number: 7242265947				Phone Number Extension:				
	E-Mail Address: dcalderazzo@alleghenyludlum.com								
	Fax Number:				Fax Number Extension:				
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: ALLEGHY LUDLUM CORP					Date Became Owner (mm/dd/yyyy): 6/1/2004			
	Owner Type:	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"/>
	Street or P.O. Box: 100 RIVER ROAD					Owner Phone #:			
	City, Town or Village: BRACKENRIDGE					Zip Code: 15014			
Violations Cited?	State: PA					Country: USA		Zip Code: 15014	
	Name of Site's Operator: SAME AS OWNER					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:					Operator Phone #:			
City, Town or Village:					Country:		Zip Code:		
State:					Country:		Zip Code:		
Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
Type of Generator									
<input type="checkbox"/> Not Regulated				<input checked="" 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)									
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 generated and/or accumulated. Check all boxes that apply.)		
<input checked="" type="checkbox"/> <b>Small Quantity Handler of Universal Waste</b>		<input type="checkbox"/> <b>Large Quantity Handler of Universal Waste</b> (accumulates 5,000 kg. or more)
<input type="checkbox"/> <b>Destination Facility for Universal Waste</b>		
(Check all boxes below that apply for each of the three types of facilities above)		Used Oil Activities (Indicate Type(s) of Activity(ies))
	<input checked="" type="checkbox"/> <b>Managed</b>	<input checked="" type="checkbox"/> <b>Used Oil Generator</b>
Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Transporter</b>
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> <b>Off-Specification Used Oil Burner</b>
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil</b>
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Transfer Facility</b>
		<input type="checkbox"/> <b>Used Oil Fuel Marketer to Off-Specification Used Oil Burner</b>
		<input type="checkbox"/> <b>Used Oil Processor</b>
		<input type="checkbox"/> <b>Used Oil Re-refiner</b>
Waste Codes for Federally Regulated Hazardous Wastes: Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRA Info source record, you do not need to list them all. Instead, just indicate the date of the most recent source record.		
D001	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: Larry Gatts, Tom Corpora, Tony Denoi, and Bryan Mikula
Tanks	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Other Comments: Calderazzo not present during inspection. Facility is episodically an LQG due to process tank clean outs
Containers	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Name of Inspector(s)		Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Karen L Nesbit		Shannon Ryan
		11/6/2008 9:13 to 16:00
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)



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

CESQG: ≤ 100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.  
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.  
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used: *Steel toed shoes, safety glasses, hard hat + "sleeves" supplied by facility*

**WASTE EVALUATION**

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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**GENERATOR CLASSIFICATION**

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

**OFF-SITE SHIPMENT OF HAZARDOUS WASTE**

3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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**TREATMENT OF HAZARDOUS WASTE**

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

NOTE: Complete appropriate checklist for each unit.

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

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



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

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

**PROHIBITIONS**

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

*NOTE: For example, used oil contaminated scrap metal stored in a pile.*

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

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

**GENERATOR STANDARDS**

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

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

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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*NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.*

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

**ON-SITE BURNING IN SPACE HEATER**

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*Jewel Appliances*  
{Facility Name/Inspection Date}

[ID Number]



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 checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>

*NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).*

**GENERATOR TRANSPORTATION**

11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input 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 checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>

*NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.*



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

(LQUWH) = 5,000 Kg or more (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 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

**WASTE MANAGEMENT & LABELING/MARKING**

**UNIVERSAL WASTE BATTERIES** - *no batteries on site during inspection*

3.	Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Does the SQUWH conduct any of the following activities:	
	a. Sort batteries by type?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Mix battery types in one container?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Discharge batteries to remove the electric charge?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. Regenerated used batteries?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e. Disassemble them into individual batteries or cells?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	f. Remove batteries from consumer products?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	g. Remove the electrolyte from the battery?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. If the electrolyte or other waste is characteristic, is it managed in compliance with 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 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**UNIVERSAL WASTE LAMPS** - *no lamps on site during inspection*

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

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

**ACCUMULATION TIME**

11.	Is the waste accumulated for less than one year? [3745-273-15(A)] If not:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

**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 <b>one</b> of the following: [3745-273-15(C)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input 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"/>
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## RESPONSE TO RELEASES

14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

## OFF-SITE SHIPMENTS

**NOTE:** If a SQUWH self-transport waste, then they must comply with the Universal Waste transporter requirements. **NOTE:** SQUWHs are prohibited to send waste to any other facility.

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.	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
19.	Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
20.	If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do <u>one of the following</u> :			
a.	Receive the waste back? [3745-273-18(E)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Agree to where the shipment will be sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" 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 <u>one of the following</u> :	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input checked="" type="checkbox"/>
a.	Sending the waste back to the originating handler? [3745-273-18(F)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Sending 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 checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input checked="" type="checkbox"/>

## EXPORTS

24.	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 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

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