

**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

April 3, 2012

**SCIOTO COUNTY
GENERAL FILE
(PISTOLE'S AUTO TRUCK &
EQUIPMENT)
DMWM/SEDO**

Mr. Michael Pistole, Jr.
Pistole's Auto Truck & Equipment
16127 U.S. Route 52
West Portsmouth, Ohio 45663

Dear Mr. Pistole:

On March 22, 2012, Melody Stewart and I inspected Pistole's Auto Truck & Equipment, located at 16127 U.S. Route 52, West Portsmouth, Ohio, to determine compliance with Ohio's hazardous waste laws found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). This letter will explain any violations found during the inspection and what you need to do to correct the violations, as well as other general concerns noted and what you can do to respond to those concerns.

We found the following violation of Ohio's hazardous waste laws:

- (1) OAC Rule 3745-279-22(C) Used Oil Storage Requirements for Generators – Labeling.** Containers and aboveground tanks that store used oil must be labeled with the words "Used Oil".

At the time of the inspection, two 55-gallon drums containing used oil located inside the garage were not labeled "Used Oil".

Pistole's Auto labeled the drums during the inspection, and has returned to compliance with this rule. No further action is necessary.

GENERAL COMMENTS:

- **Fluorescent Lamp Management.** I have enclosed information regarding management of spent fluorescent lamps under Ohio's Universal Waste Rule (UWR). Because all fluorescent lamps contain mercury, Ohio EPA recommends that you manage your spent lamps under the universal waste rule, if you are not already doing so. The universal waste rule eliminates many regulatory requirements such as waste evaluation, manifesting and record keeping. If you manage your spent lamps as universal waste and they will be recycled, you do not have to determine if

they are hazardous waste. If you do not have your spent fluorescent lamps recycled, it is your responsibility to evaluate the lamps to determine if they are hazardous prior to their disposal. Under no circumstances should unevaluated spent fluorescent lamps be disposed of in the trash, as this could result in violations for improper/illegal disposal of a hazardous waste. I have included a list of fluorescent lamp recycling facilities.

- **Paint Spray Booth.** You mentioned that you may be moving all painting activities to your West Portsmouth location. Once you begin painting, you will likely need air permits for your paint spray booths. There are two permits required for an air pollution source: the permit-to-install (PTI) and the permit-to-operate (PTO). The permit-to-install is required before installing the equipment, and the permit-to-operate is needed to operate the equipment after installation. For more information regarding the air permit requirements that may apply to your business, please contact Cindy Charles of the Portsmouth Local Air Agency, at 740-353-5156.
- **Truck Wash Bay.** During the inspection you also mentioned constructing a truck wash bay. If you want to discharge wastewater to your local wastewater treatment plant, you should discuss it with the treatment plant directly; permission to discharge to their plant may be necessary. As we discussed, the treatment plant may require you to conduct "pretreatment" by using an oil-water separator to remove oil, grease, dirt, etc. before discharging your wastewater to them. If you must construct wastewater treatment or storage units, a PTI from Ohio EPA is required. For more information regarding requirements for wash bays and industrial wastewater discharges that may apply to your business, please contact Scott Foster in Ohio EPA's Division of Surface Water, at 740-380-5227.
- **Spill Prevention, Control and Countermeasure (SPCC) Requirements for Oil Storage.** The SPCC regulations were put into place to prevent and contain leaks of oil or petroleum products into waterways by using certain methods and procedures such as secondary containment and emergency action plans. If your business has a total aboveground oil storage capacity of 1,320 gallons or more, or has a total underground oil storage capacity of more than 42,000 gallons, you are subject to the SPCC regulations. Please note that these amounts refer to the total capacity of your tanks and/or containers, not the actual amount of oil stored in them. I have enclosed Ohio EPA's information on the SPCC requirements.
- **Other Factsheets and Guidances.** As we discussed, I have enclosed a list of Used Oil Recyclers, and a list of Treatment, Storage, and Disposal Facilities that Accept Hazardous Waste. I have also enclosed the Environmental Compliance Guide for Auto Repair Shops, which discusses proper management of many common wastes from businesses such as yours.

Mr. Michael Pistole, Jr.
Pistole's Auto Truck & Equipment
April 3, 2012
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Enclosed you will find a copy of the checklists that were completed during the inspection. You can find copies of the hazardous waste rules and other information on our division's web page at:

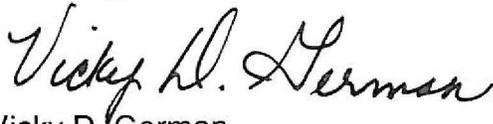
<http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/dhwm>.

Compliance assistance and pollution prevention information is available at:

<http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/ocapp>.

If you have any questions or need assistance, please feel free to contact me at 740-380-5237 or at vicky.german@epa.ohio.gov.

Sincerely,



Vicky D. German
Division of Materials and Waste Management
Ohio EPA, Southeast District Office

VDG/sb

Enclosure

cc: Scott Foster, Ohio EPA, DSW-SEDO
Cindy Charles, Portsmouth Local Air Agency

NOTICE:

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

Environmental Protection Agency Send to Central Office <input checked="" type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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Completed forms that are required to be submitted to CO should be e-mailed to brad.hauser@epa.state.oh.us

Site EPA ID No.	EPA ID Number:
Site Name	Name: Pistole's Auto Truck & Equipment Website (Optional):
Site Location Information	Street Address: 16127 U.S. Route 52 City, Town, or Village: West Portsmouth State: OH County Name: SCIOTO Zip Code: 45663
Site Land Type (check only one) NAICS codes www.census.gov/epcd/www/naics.html	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"/>

Facility Representative Additional names can be recorded in comments section. Only provide address information if it is different than the site address.	First Name: Michael MI: Last Name: Pistole, Jr. Phone Number: 740-858-2886 Extension: E-Mail Address: michael.pistole@yahoo.com Fax Number: 740-858-3329 Fax Number Extension: Street or P.O. Box: 16127 U.S. Route 52 City, Town or Village: West Portsmouth State: OH Zip Code: 45663
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Legal Owner And Operator List additional Owners and/or Operators in the Comments Section or on another copy of this page.	Name of Site's Legal Owner: Michael Pistole, Sr. / Michael Pistole, Jr. Date Became Owner (mm/dd/yyyy): 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: same as above City, Town or Village: Owner Phone #: State: Country: Zip Code: Name of Site's Operator: same as above Date Became Operator: 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: Operator Phone #: City, Town or Village: Country: Zip Code: State:
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VIOLATIONS CITED?	<input checked="" type="checkbox"/> Yes No <input type="checkbox"/> <i>(Returned to compliance during inspection)</i>
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TYPE OF HANDLER (MARK AS APPROPRIATE)	
<input type="checkbox"/> Not a HW Generator <input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input type="checkbox"/> Short-Term/Temporary Generator (short-term or one-time event and not from on-going processes). <i>Check the box for the applicable generator status and provide a comment.</i>	<input type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator (CESQG) <input type="checkbox"/> U.S. Importer of Hazardous Waste <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK AS APPROPRIATE)		
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace	
<input type="checkbox"/> Hazardous Waste Transfer Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption	
<input type="checkbox"/> Treater, Storer, or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption	
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility	
<input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Receives Hazardous Waste from Off-site	
UNIVERSAL WASTE ACTIVITIES (MARK AS APPROPRIATE)		
<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)		
TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES (MARK ALL THAT APPLY)		
<input type="checkbox"/> Batteries		
<input type="checkbox"/> Pesticides		
<input type="checkbox"/> Mercury containing equipment		
<input checked="" type="checkbox"/> Lamps		
USED OIL ACTIVITIES (MARK ALL THAT APPLY)		
<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 Used Oil		
<input type="checkbox"/> Used Oil Fuel Marketer who first claims the Used Oil meets the specifications		
Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the boxes below to indicate the laboratory type.		
<input type="checkbox"/> College or University		
<input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university		
<input type="checkbox"/> Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university		
Waste Codes for Federally Regulated Hazardous Wastes: List the codes for the federally regulated hazardous waste handled at the site, in the order they are presented in the regulations (e.g., D001, D003, F007, U112). 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; just indicate the date of the most recent source record.		
COMMENTS: Use this area to describe inspection conditions and additional information.		
Announced	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Containers	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
ADDITIONAL COMMENTS:		
Latitude/Longitude: 38.700347,-83.094613		
INSPECTOR(S)		INSPECTION DATE/TIME
Vicky German, DMWM-SEDO Melody Stewart, DMWM-SEDO		3/22/12

PROCESS INFORMATION AND WASTE ACTIVITIES SUMMARY

Pistole's Auto Truck & Equipment

<i>Description of Waste</i>			<i>On-Site Management</i>		<i>Off-Site Management</i>
Waste Generated	EPA Waste Code	Amount Generated per Month	Accumulation	On-site Treatment	Name, state, and activity
Used oil	NA	Varies	55-G drum inside shop	NA	Collected for recycling
Used oil filters	NA	Varies	Filters drained, crushed		Filters managed as scrap metal
Spent antifreeze	NA if recycled	Varies	55-G drum inside shop	NA	Collected for recycling; none shipped off-site yet
Spent fluorescent lamps	D009 unless recycled	Varies	NA	NA	Collected for recycling; none shipped off-site yet
Spent parts cleaner solvent	To be determined	Not yet generated	NA	NA	None shipped off-site yet
Paint-related wastes	To be determined	Not yet generated	Not yet generated	NA	None shipped off-site yet
Spent lead-acid batteries	D008 unless recycled	Varies	Inside shop	NA	AutoZone Advanced Auto Parts Barbour's Auto Parts (core exchange/recycled)

CONDITIONALLY EXEMPT SMALL QUANTITY (CESQG) GENERATOR REQUIREMENTS

CESQG: <100Kg. (Approximately 25-30 gallons) of waste in a calendar month.

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.

WASTE EVALUATION

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No NA

GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg. of hazardous waste per month? (CESQG - Conditionally Exempt Small Quantity Generator) Yes No NA

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).

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [ORC §3734.02(F)] Yes No NA

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 No NA
 - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes No NA
 - c. Drip pad that meets 3745-69-40 to 3745-69-45? Yes No NA
 - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No NA

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

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

USED OIL GENERATOR COLLECTION CENTER, AND AGGREGATION POINT REQUIREMENTS

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"/> |
| 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).

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"/> |
|---|------------------------------|-----------------------------|---|

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"/> |
|---|------------------------------|--|------------------------------|

Two 55-gallon drums containing used oil located inside the garage were not labeled "Used Oil". The drums were labeled during the inspection.

- | | | | |
|---|---|-----------------------------|------------------------------|
| 9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] | | | |
| a. Stopped the release? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| b. Contained the release? | Yes <input checked="" 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 checked="" 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 checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

ON-SITE BURNING IN SPACE HEATERS

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] Yes No N/A
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 No N/A
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A

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 No N/A
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 No N/A
- b. Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24] Yes No N/A

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

COLLECTION CENTERS AND AGGREGATION POINTS

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 No N/A
14. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes No N/A
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 No N/A

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

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - LAMPS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more
Small Quantity Universal Waste Handler (SQUWH) = Less than 5,000 Kg (11,023 lb)

PROHIBITIONS

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

LABELING

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 No NA
9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes No NA
10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste – Lamps" or "Waste Lamps" or "Used Lamps"? [3745-273-14(E)] Yes No NA
At the time of the inspection, no lamps were being accumulated on-site for recycling. Any lamps that are generated must be accumulated in containers or boxes that are closed and labeled as required above.

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

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

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes No NA
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes No NA
12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)]
In addition to the accumulation requirements noted above, Pistole's Auto must document how long spent lamps are accumulated on-site in one of the following manners, and maintain documentation of their disposal.
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes No NA
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes No NA
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes No NA
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes No NA
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes No NA

f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes No NA

EMPLOYEE TRAINING

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

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes No NA

15. Is the material released characterized? [3745-273-17(B)] Yes No NA

16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes No NA

OFF-SITE SHIPMENTS

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

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes No NA

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

Pistole's Auto must maintain documentation of the disposal of spent lamps.

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes No NA

19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No NA

20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:

a. Receive the waste back? [3745-273-18(E)(1)] Yes No NA

b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes No NA

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

a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes No NA

b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes No NA

22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes No NA

23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes No NA

EXPORTS

24. Is waste being sent to a foreign destination? If so: Yes No NA
- a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes No NA
- 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 3745-52-57? [3745-273-20(B)] Yes No NA
- c. Is a copy of U.S. EPA' s "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes No NA