



Environmental  
Protection Agency

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

Eval. \$79

Inf. \$41

RTC'd 2 violations

May 7, 2012

Ms. Maria E. Cruset  
Assistant Compliance Manager  
Clean Waters Limited  
300 Cherokee Drive  
Dayton, Ohio 45427

**RE: Clean Waters Limited/Compliance Evaluation Inspection/OHD004274031  
Notice of Violation/Return to Compliance**

Dear Ms. Cruset:

Thank you for accompanying me and George Strobel during Ohio EPA's April 11, 2012, inspection of Clean Waters Limited in Dayton, Ohio. Our goal was to determine Clean Waters Limited's compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC) and Clean Waters Limited permit conditions.

During this visit we inspected the satellite, 90 day, universal waste and 1year hazardous waste storage areas. I also reviewed your paperwork and inspected your oil tank storage.

**Oil tank storage area:**

① While inspecting your oil tank storage area, I noticed that tanks B-2 and W-2 did not have a label stating "Used Oil". Therefore, Clean Waters Limited is in violation of Ohio Administrative Code 3745-279-54(F) which states you must label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil". Clean Waters Limited must label tanks B-2 and W-2 with the words "Used Oil".

On April 24, 2012, I returned to Clean Waters Limited to verify that the tanks were labeled. The violation was corrected.

**Universal waste storage area:**

② While inspecting your universal waste storage area, I noticed that one box containing spent lamps was open. Therefore, Clean Waters Limited is in violation of Ohio Administrative Code 3745-273-13(D)(1) which states all containers or packages containing lamps must be closed. This violation was corrected during the inspection.

Ms. Maria E. Cruset  
Clean Waters Limited  
May 7, 2012  
Page 2

Clean Waters Limited appears to be in compliance with Ohio's hazardous waste rules and regulations.

Enclosed you will find copies of the checklists associated with this inspection. Should you have any questions, please feel free to call me at (937) 285-6092. You can find the rules and other information on the division website at <http://www.epa.state.oh.us/dmwm/>. Ohio EPA also has helpful information about pollution prevention on our website at <http://www.epa.state.oh.us/ocapp>.

Sincerely,



Larry Dickerson  
Environmental Specialist  
Division of Materials and Waste Management

LD/tf

cc: Robyn Winstead, Ohio EPA, SWDO/DMWM

ec: George Strobel, Ohio EPA, SWDO/DMWM

**NOTICE:**

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

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

For Ohio EPA use only

E-mail this completed form to [kristina.durnell@epa.state.oh.us](mailto:kristina.durnell@epa.state.oh.us)  
or mail it to Kristina Durnell, Central Office

<b>Site EPA ID No.</b> <b>Site Name</b>  <b>Site Location Information</b>  <b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	EPA ID Number: <b>OHD004274031</b> Name: <b>Clean Water Limited</b>  Street Address: <b>300 Cherokee Dr.</b> City, Town, or Village: <b>Dayton</b> County Name: <b>Montgomery</b> 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"/>  	Website: (Optional)  State: OH Zip Code: <b>45427</b>
<b>Facility Representative</b>  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: <b>Maria</b> MI: <b>E.</b> Last Name: <b>Cruset</b> Phone Number: <b>(937) 268-6501</b> Phone Number Extension: <b>101</b> E-Mail Address: Fax Number: Fax Number Extension: Street or P.O. Box: City, Town or Village: State: Zip Code:	
<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Owner Type: Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> Street or P.O. Box: City, Town or Village: State: Name of Site's Operator: Operator Type: Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> Street or P.O. Box: City, Town or Village: State:	Date Became Owner (mm/dd/yyyy): Owner Phone #: Country: Zip Code: Date Became Operator (mm/dd/yyyy): 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 checked="" type="checkbox"/> Large Quantity Generator (LQG) <input 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 checked="" 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 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 checked="" 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.

**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:	<b>Bill Huston</b>
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)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
<b>Larry Dickerson</b>	<b>George Strobel</b>	<b>04/11/2012 10:25</b>

**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)

**OHIO PART B PERMITTED FACILITY  
RCRA INSPECTION CHECKLIST**

Facility: Clean Waters Inc.  
Address: 300 S. West End Avenue  
Dayton, Ohio 45427

Ohio Permit: 05-57-0555  
USEPA ID: OHD 004274031

County: Montgomery

Facility Phone: 937-268-6501

Inspection Date(s): 04/11/2012  
04/24/2012

Time: 10:20 - 10:30

Advance notice of inspection given? (yes)  (no)   
If so, how far in advance? \_\_\_\_\_

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspectors:	<u>LARRY DICKERSON</u>	<u>OHIO EPA</u>	<u>285-6092</u>
	<u>GEORGE STROBEL</u>	<u>OHIO EPA</u>	<u>285-6052</u>
Facility Representatives:	<u>BILL HUSTON</u>	<u>CWL</u>	<u>268-6501</u>
	<u>MARIA CURSET</u>	<u>CWL</u>	<u>268-6501</u>

Is facility operating as a generator? (yes)  (no)

If so, complete the applicable sections of the Generator Requirements checklist for wastes being managed under generator status.

**PERMIT STATUS**

Permit Issued:	December 29, 1995
Permit Effective Date:	December 29, 1995
Permit Expiration Date:	December 29, 2000
Permit Revision Date(s):	December 12, 1996 December 12, 1997 January 21, 1998. May 21, 1999
Permit Renewal:	December 31, 1997
Renewal Effective Date:	December 31, 1997
Renewal Expiration Date:	December 31, 2002

**AUTHORIZED ACTIVITIES**

**STORAGE**

Container  
 Tank  
 Waste Pile  
 Surface Impoundment

**TREATMENT**

Tank  
 Surface Impoundment  
 Incinerator  
 Thermal Treatment

**DISPOSAL**

Injection Well  
 Landfill  
 Land Application  
 Surface Impoundment

Revised 02/23/01  
(FINAL)

**GENERAL CONDITIONS OF PERMIT - 1**

**GENERAL PERMIT COMPLIANCE AND ACTIVITIES**

Y/N/NA

RMK#

1. Has the expiration date of the permit passed? If so,

N

\_\_\_\_\_

(a) Is the Permittee continuing any activity regulated by the permit after the expiration date of the permit?

N/A

\_\_\_\_\_

(b) Has the facility submitted an application for a permit renewal to the Director no later than (180) days prior to the expiration date of the permit? (or upon a later date if the Permittee can demonstrate good cause for late submittal) [Condition A.6.(a)]

N/A

\_\_\_\_\_

**NOTE:** The Permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:

i. The Permittee has submitted a timely and complete application for a renewal permit under O.A.C. Rule 3745-50-40, and;

ii. Through no fault of the Permittee, a new permit has not been issued pursuant to O.A.C. Rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]

2. Has the Permittee submitted the annual permit fee, payable to Treasurer of the State, to the Ohio EPA on or before the anniversary of the date of issuance during the term of the permit [Condition A.27.]?

Y

\_\_\_\_\_

3. Is the Permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit [Condition A.1.(b) and A.5]?

N

\_\_\_\_\_

4. Have any provisions of the permit been identified as invalid? [Condition A.4.]

N

\_\_\_\_\_

5. Has the facility identified any instances of noncompliance with the permit, R.C. Chapter 3734 or the Rules adopted thereunder, which may endanger human health or the environment? If so,

N

\_\_\_\_\_

(a) Did the facility immediately report the following to Ohio EPA Emergency Response Section: [Condition A.20.(b)]

i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and

NA

\_\_\_\_\_

ii. Information concerning a release of hazardous waste, fire or explosion at the facility which could threaten human health or the environment, including a description of:

a. Name, address and telephone number of the owner or operator?

NA

\_\_\_\_\_

b. Name, address and telephone number of the facility?

NA

\_\_\_\_\_

c. Date, time, type and source of release?

N/A

\_\_\_\_\_

d. Local weather conditions?

N/A

\_\_\_\_\_

**GENERAL CONDITIONS OF PERMIT**

e. Name and quantity of material(s) involved?

N/A

\_\_\_\_\_

f. The extent of injuries, if any?

N/A

\_\_\_\_\_

	Y/N/NA	RMK#
g. An assessment of the actual or potential hazard to the environment and human health inside and outside the facility where applicable?	<u>N/A</u>	_____
h. The response the facility took to contain and monitor the release?	<u>N/A</u>	_____
i. Who was notified?	<u>N/A</u>	_____
j. Any monitoring results?	<u>N/A</u>	_____
k. Estimated quantity and disposition of recovered material that resulted from the incident?	<u>N/A</u>	_____
6. Did the Permittee provide a written report to the Ohio EPA Emergency Response Section within (5) days of the time the Permittee became aware of the circumstances reported in Question 5? [Condition A.21.] If so, did the report contain:	<u>N/A</u>	_____
(a) A description of the noncompliance (including exact dates and times)?	<u>N/A</u>	_____
(b) Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? and;	<u>N/A</u>	_____
(c) Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance?	<u>N/A</u>	_____
7. Has the Permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8.]	<u>N/A</u>	_____
8. Has the Permittee identified any other instances of noncompliance not provided for in Question #5?	<u>N/A</u>	_____
(a) If so, did the Permittee report these instances to the Ohio EPA, DHWM within (15) days of becoming aware of the noncompliance? [Condition A.22.]	<u>N/A</u>	_____
(b) Do the reports provided contain the information set forth in Condition A.20? [Condition A.22.]	<u>N/A</u>	_____
(c) Has the Permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8.]	<u>N/A</u>	_____
9. Has the Permittee planned any changes in the permitted facility or activity which may result in noncompliance with the conditions of the permit?	<u>N/A</u>	_____
(a) If so, has the facility provided Ohio EPA with advance notice of such changes? [Condition A.15.]	<u>N/A</u>	_____

**NOTE:** Such notification does not waive the Permittee's duty to comply with the permit pursuant to Condition A.5.

**REMARKS**

**PERMIT MODIFICATION, REVISION, REVOCATION**

	Y/N/NA	RMK#
1. Has the Permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.]	<u>Y</u>	_____
2. Has the permit been transferred to a new owner or operator? [Condition A.18.]	<u>Y</u>	_____
(a) If so, has the transfer been conducted in accordance with R.C. Chapter 3734 and the Rules adopted thereunder? [Condition A.18.(a)] and;	<u>Y</u>	_____
(b) Before transferring ownership did the Permittee notify the new owner in writing of the requirements of R.C. Chapter 3734 and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.18.(a)]	<u>Y</u>	_____

**NOTE:**     *The Permittee's failure to notify the new owner or operator of the requirements of the applicable Ohio law of hazardous waste rules does not relieve the new owner or operator of its obligation to comply with all applicable requirements. [Condition A.17.(b)]*

3. Has the Permittee submitted reports of compliance or non-compliance with, or any progress reports on the requirements contained in any compliance schedule of the permit to the Ohio EPA no later than (14) days following each scheduled date, unless otherwise specified? [Condition A.19.]	<u>Y</u>	_____
4. Has the Permittee furnished relevant information which the Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10.]	<u>Y</u>	_____
5. Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10]	<u>Y</u>	_____
6. Has the Permittee become aware that it failed to submit any relevant facts in the permit or issuance proceedings or that it submitted incorrect or incomplete information in permit issuance proceedings or other submissions to Ohio EPA or the HWFB? If so,	<u>N</u>	_____
(a) Has the Permittee promptly submitted such facts or corrected information to the appropriate entity? [Condition A.24.]	<u>NA</u>	_____
7. Is the Permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application? [Condition A.14.(c)]	<u>Y</u>	_____
8. Is the Permittee retaining a complete copy of the approved application on-site? [Condition A.14.(c)]	<u>Y</u>	_____
9. Is the Permittee planning any physical alterations or		

additions to the permitted container storage facility?

N

\_\_\_\_\_

Y/N/NA

RMK#

(a) If so, has the Permittee given notice to the Director of such alterations/additions? [Condition A.15.]

N/A

\_\_\_\_\_

(b) Have such changes been made in accordance with O.A.C. Rule 3745-50-51? [Condition A.15.]

N/A

\_\_\_\_\_

**REMARKS**

1) Permit modification has been forwarded to Central Office, but is not yet approved.

**SITE ENTRY - AVAILABILITY OF RECORDS**

1. As specified in Condition A.11, has the Permittee allowed the Director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, to:

(a) Enter at reasonable times upon the premises where a regulated activity is located or where records are kept under the conditions of the permit?

Y

\_\_\_\_\_

(b) Have access to and copy any records required to be kept under the conditions of the permit?

Y

\_\_\_\_\_

(c) Inspect and photograph at reasonable times facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit?

Y

\_\_\_\_\_

(d) Sample or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by R.C. Chapter 3734 and the Rules adopted thereunder?

Y

\_\_\_\_\_

**RECORDKEEPING REQUIREMENTS**

**CONFIDENTIALITY**

1. Has the Permittee requested confidentiality of any information of the permit in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.26.]

N

\_\_\_\_\_

**OPERATING RECORD**

2. Is the Permittee maintaining a written operating record at the facility as set forth in O.A.C. Rules 3745-54-73 and 3745-54-74 which contains the following elements: [Condition B.21.]

(a) A description and the quantity of each hazardous waste received?

Y

\_\_\_\_\_

(b) Method(s) and date(s) of treatment, storage or disposal at the facility?

Y

\_\_\_\_\_

(c) The location of each hazardous waste within the facility and the quantity at each location?

Y

Y/N/NA

RMK#

3. Is the Permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents: [Condition A.29.]

(a) Waste analysis plan in accordance with O.A.C. Rule 3745-54-13 and the conditions of the permit?

Y

(b) Contingency plan in accordance with O.A.C. Rule 3745-54-53 and the conditions of the permit?

Y

(c) Closure plan in accordance with O.A.C. Rule 3745-55-12 and the conditions of the permit?

Y

(d) Cost estimate for facility closure in accordance with O.A.C. Rule 3745-55-42 and the conditions of the permit? (estimate only - adequacy of estimate will be evaluated by C.O. financial assurance personnel)

Y

(e) Personnel training plan and records required by O.A.C. Rule 3745-54-16 and the conditions of the permit?

Y

(f) Inspection schedules developed in accordance with O.A.C. Rules 3745-54-15 and O.A.C. Rule 3745-55-74 and the conditions of the permit?

Y

4. Have any of the documents identified in Question #3 been revised as required by the permit? If so,

N

(a) Has the Permittee submitted the revisions to the Ohio EPA? [Condition A.29.(b)]

N/A

(b) Has the Permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.29.(b)]

N/A

#### RECORDKEEPING

5. Is the Permittee maintaining copies of all inspection logs at the facility for a period of at least three years from date of inspection? [Condition A.29.(c)]

Y

#### ANNUAL REPORT REQUIREMENT

6. Is the Permittee complying with annual report requirements set forth in O.A.C. Rule 3745-54-75 and the additional report requirements set forth in O.A.C. Rule 3745-54-77 and the conditions of the permit? [Condition B.24.]

Y

#### SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

7. In compliance with Condition A.12.(b) of the permit, do the Permittee's records of monitoring information specify the:

(a) Date(s), exact place(s), time(s) and method(s) of sampling or measurement?

Y

- |   |                    |                   |
|---|--------------------|-------------------|
| (b) Individual(s) who performed the sampling or measurement?  | <u>Y</u>           | _____             |
| (c) Date(s) analyses were performed?  | <u>Y</u><br>Y/N/NA | _____ <u>RMK#</u> |
| (d) Individual(s) who performed the analyses?   | <u>Y</u>           | _____             |
| (e) Analytical technique(s) or method(s) used?  | <u>Y</u>           | _____             |
| (f) Results of such analyses?   | <u>Y</u>           | _____             |
| 8. Have the methods used to obtain a representative sample of the waste to be analyzed included the appropriate SW-846 method or an equivalent method specified in the approved waste analysis plan? [Condition A.12.(a)]             | <u>Y</u>           | _____             |
| 9. Is the Permittee maintaining records of all monitoring information, including calibration and maintenance records for a period of at least (3) years from the date of sample, measurement report, and record? [Condition A.14.(a)] | <u>Y</u>           | _____             |
| 10. Has Ohio EPA requested submittal of any reports or other information required by the conditions of the permit from the Permittee? If so,  | <u>N</u>           | _____             |
| (a) Have the submittals been signed and certified according to O.A.C. Rule 3745-50-42? [Condition A.13.]  | <u>N/A</u>         | _____             |

**WASTE MINIMIZATION REQUIREMENTS**

- |  |          |       |
|--|----------|-------|
| 11. Does the Permittee certify annually that a waste minimization program is in place at the facility as required by Condition A.30.(a) of the permit?   | <u>Y</u> | _____ |
| 12. Does the Permittee submit copies of the waste generator's current Waste Minimization Report and Waste Management Alternatives Report as required by the generator's certification on the uniform national manifest? [Condition A.30.(b)] | <u>Y</u> | _____ |
| 13. Does the Permittee submit a Waste Minimization Report describing the waste minimization program at least once each two years [Condition A.30]  | <u>Y</u> | _____ |

**OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS**

- |  |          |       |
|--|----------|-------|
| 1. Is all hazardous waste transported from the facility by a properly registered transporter of hazardous waste in accordance with all applicable laws, rules and standards? [Condition A.16.]   | <u>Y</u> | _____ |
| 2. Is the Permittee complying with the following manifest requirements set forth in O.A.C. Chapter 3745-52 and O.A.C. Rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76: [Condition B.23.] |          |       |
| (a) All hazardous wastes shipped off-site have been accompanied by a completed manifest, USEPA form 8700-22 and, if necessary, USEPA form 8700-22A   |          |       |

- |   |                    |                   |
|---|--------------------|-------------------|
| in compliance with O.A.C. Rule 3745-52-20(A)?   | <u>Y</u>           | _____             |
| (b) The manifest form used contains all information required by O.A.C. Rule 3745-52-20 and the minimum number of copies required by O.A.C. Rule 3745-52-22?   | <u>Y</u><br>Y/N/NA | _____ <u>RMK#</u> |
| (c) The facility has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with O.A.C. Rule 3745-52-20(C)(D)(E)? | <u>Y</u>           | _____             |
| (d) Prepared manifests have been signed by the facility and initial transporter in compliance with O.A.C. Rule 3745-52-23?  | <u>Y</u>           | _____             |
| 3. Has the Permittee received a return copy of each completed manifest within (35) days of the date the waste was accepted by the initial transporter?  | <u>Y</u>           | _____             |
| (a) If not, has the Permittee complied with the manifest exception reporting requirements of O.A.C. Rule 3745-52-42?  | <u>N/A</u>         | _____             |
| 4. Are signed copies of all hazardous waste manifests and any documentation required for exception reports retained for at least three years at the facility as required by O.A.C. Rule 3745-52-40?       | <u>Y</u>           | _____             |

**WASTE ANALYSIS/WASTE ANALYSIS PLAN**

- |  |           |       |
|--|-----------|-------|
| 1. Does the Permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with O.A.C. Chapters 3745-54 to 3745-57 and Condition B.3 of the permit? [3745-54-13(A)(1)] | <u>Y</u>  | _____ |
| 2. Since the last inspection, were any wastes generated by the facility which were unable to be characterized through process knowledge? If so,  | <u>N</u>  | _____ |
| (a) Were the waste analysis procedures described in Section C of the approved permit application followed?   | <u>NA</u> | _____ |
| 3. Is the Permittee following the procedures described in the approved waste analysis plan (Section C of approved permit application) and the requirements of O.A.C. Rule 3745-54-13? [Condition B.3.]   | <u>Y</u>  | _____ |

**REMARKS**

**GENERAL INSPECTION REQUIREMENTS**

	Y/N/NA	RMK#
1. Is the Permittee following the inspection procedures and schedules described in Section F of the approved permit application and the requirements of O.A.C. Rule 3745-54-15? [Condition B.5]	<u>Y</u>	_____
2. Does the Permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [O.A.C. Rule 3745-54-15(A)(1)(2)]	<u>Y</u>	_____
3. Is the Permittee following the approved inspection schedule for inspecting: monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment as specified in O.A.C. Rule 3745-54-15(1)?	<u>Y</u>	_____
(a) Is the schedule kept at the facility? [O.A.C. Rule 3745-54-15(B)(2)]	<u>Y</u>	_____
(b) Does the schedule identify the types of problems which are to be looked for during the inspection? [O.A.C. Rule 3745-54-15(B)(3)]	<u>Y</u>	_____
(c) Does the schedule include inspection of areas subject to spills daily when in use and according to other applicable regulations when not in use? [O.A.C. Rule 3745-54-15(B)(4)]	<u>Y</u>	_____
4. Does the Permittee remedy deterioration or any malfunctions discovered by an inspection as required by O.A.C. Rule 3745-54-15(C)? [Condition B.5.]	<u>Y</u>	_____
5. Is the Permittee maintaining records of inspections for a minimum of three years? [Condition B.5]	<u>Y</u>	_____
6. In accordance with O.A.C. Rule 3745-54-15(D) and Condition B.5 of the permit, do inspection records contain the following information:		
(a) Date and time of inspection?	<u>Y</u>	_____
(b) Signature of inspector?	<u>Y</u>	_____
(c) Notation of observations made?	<u>Y</u>	_____
(d) Date/nature of any repairs or other remedial actions?	<u>Y</u>	_____

**SECURITY PROVISIONS/FACILITY OPERATION**

	Y/N/NA	RMK#
1. Is the Permittee complying with the security provisions of O.A.C. Rule 3745-54-14 and Section F of the approved permit application, including the following: [Condition B.4]		
(a) Does the Permittee have a 24-hour surveillance system' which continuously monitors and controls entry onto the active portion of the facility, or;	<u>Y</u>	_____
(b) An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility, or;	<u>Y</u>	_____
(c) A means to control entry, at all times, through gates or other entrances, to the active portion of the facility?	<u>Y</u>	_____
2. In accordance with O.A.C. Rule 3745-54-14(C), does the Permittee have signs reading "Danger-Unauthorized Personnel Keep Out" posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? [Condition B.4.]	<u>Y</u>	_____
3. Is construction, maintenance and operation of the facility being conducted to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil ground or surface waters? [Condition B.1.]	<u>Y</u>	_____

**PERSONNEL TRAINING**

1. Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of O.A.C. Rule 3745-54-16: [Condition B.6.]	<u>Y</u>	_____
(a) The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [O.A.C. Rule 3745-54-16(A)(B)(C)]	<u>Y</u>	_____
(b) The facility provides personnel training to new employees within 6 months after their date of employment as required by O.A.C. Rule 3745-54-16(B)?	<u>Y</u>	_____
(c) The facility provides an annual refresher training course as required by O.A.C. Rule 3745-54-16(B)?	<u>Y</u>	_____
2. Is the Permittee maintaining personnel training records as required by O.A.C. Rule 3745-54-16(D) and of the approved application, including; written job titles, job descriptions		

and documented employee training records? [Condition B.6.]

Y

\_\_\_\_\_

**REMARKS**

**REQUIRED EQUIPMENT**

Y/N/NA

RMK#

1. Is the Permittee, at a minimum, maintaining the equipment set forth in the approved permit application (Section G) at the facility? [Condition B.8.]

Y

\_\_\_\_\_

2. Is the Permittee inspecting, testing and maintaining the equipment specified in Question #1 to assure its proper operation as specified in O.A.C. Rule 3745-54-33, the inspection plans and Section F of the approved permit application? [Condition B.9.]

Y

\_\_\_\_\_

3. Whenever hazardous waste is being managed at the facility, has the Permittee provided all personnel involved in the operation with immediate access to an internal alarm or emergency communication device as required by O.A.C. Rule 3745-54-34 and Section F of the approved permit application? [Condition B.10.]

Y

\_\_\_\_\_

**CONTINGENCY PLAN REQUIREMENTS**

**EMERGENCY PROCEDURES**

1. In compliance with Condition B.12.(a) of the permit, does the Permittee:

(c) Familiarize the emergency response agencies likely to respond to an emergency at the facility with:

i. The layout of the facility?

Y

\_\_\_\_\_

ii. Properties of hazardous waste managed at the facility and associated hazards?

Y

\_\_\_\_\_

iii. Places where facility personnel will normally be working?

Y

\_\_\_\_\_

iv. Entrances to and roads inside the facility?

Y

\_\_\_\_\_

v. Evacuation routes as depicted in Section G of the permit application?

Y

\_\_\_\_\_

(d) Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit? and;

Y

\_\_\_\_\_

(c) Familiarize local ambulance services, fire depts., hospitals and any other local emergency services with the properties of hazardous waste managed at the facility and the types of injuries or illness which could result from fires, explosions or a release of hazardous wastes at the facility?

Y

\_\_\_\_\_

**EMERGENCY AUTHORITIES**

- 2. Has a state or local agency declined to enter into the arrangements set forth in O.A.C. Rule 3745-54-37(A)? If so,   N   \_\_\_\_\_
  - (a) Has the Permittee documented the refusal in the operating record as required by O.A.C. Rule 3745-54-37(B)? [Condition B.12.(b)]   N/A   \_\_\_\_\_
- 3. Has the Permittee, in accordance with O.A.C. Rule 3745-54-53 submitted a copy of the approved contingency plan (including amendments, revisions or changes) to all local authorities, agencies and response contractors designated in the approved contingency plan? [Condition B.12.(c)]   Y   \_\_\_\_\_
- 4. Has the Permittee notified the agencies in Question #1, in writing, within (10) days of the effective date of any amendments or revisions to the plan? [Condition B.12.(c)]   N/A   \_\_\_\_\_
- 5. Has the Permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to the Ohio EPA, Division of Emergency and Remedial Response in accordance with O.A.C. Rule 3745-54-53? [Condition B.12.(d)]   Y   \_\_\_\_\_

Y/N/NA RMK#

**EMERGENCY COORDINATOR**

- 6. At all times is there an individual on-site or on call to act as an emergency coordinator as required by O.A.C. Rule 3745-54-55? [Condition B.18.]   Y   \_\_\_\_\_

**AMENDMENT OF PLAN**

- 7. Is the Permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with O.A.C. Rule 3745-54-54? [Condition B.16.]   Y   \_\_\_\_\_

**NOTE:** Also see Question #4 of Recordkeeping Requirements to verify that any changes to the contingency plan were submitted in accordance with O.A.C. Rule 3745-50-51.

**IMPLEMENTATION OF PLAN**

- 8. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility since date of last inspection as described by Condition B.13. of the permit? If so,   N   \_\_\_\_\_
  - (a) Did the Permittee immediately implement the approved contingency plan and follow the emergency procedures described in O.A.C. Rule 3745-54-56? [Condition B.13; B.18.]   N/A   \_\_\_\_\_
  - (b) Did the Permittee collect and manage released material, emergency response material and by-products as hazardous waste until making a demonstration to Ohio EPA that such materials are not subject to Ohio hazardous waste rules? [Condition B.15.]   N/A   \_\_\_\_\_

- (c) Within (15) days of the incident did the Permittee submit, to the Director, a written report of the incident? If so, N/A \_\_\_\_\_
- i. Did the report contain the elements set forth in O.A.C. Rule 3745-54-56(J)? [Condition B.20.] N/A \_\_\_\_\_
- (d) Did the Permittee note in the operating record the time, date and details of any incident that required the implementation of the approved contingency plan? [Condition B.22.] N/A \_\_\_\_\_

**CLOSURE REQUIREMENTS**

**GENERAL CLOSURE REQUIREMENTS**

Y/N/NA      RMK#

1. Is the Permittee maintaining at the facility, the approved closure plan which contains the elements set forth in O.A.C. Rule 3745-55-12? [Condition B.28.] Y \_\_\_\_\_

**AMENDMENT OF CLOSURE PLAN**

2. Has the Permittee amended the closure plan? N \_\_\_\_\_
- (a) If so, has the plan been amended in accordance with O.A.C. Rule 3745-55-12(C)? [Condition B.27.] N/A \_\_\_\_\_

*NOTE: Also see Recordkeeping Requirements (Question #4) in order to verify that any changes to the closure plan were submitted in accordance with O.A.C. Rule 3745-50-51.*

**CLOSURE PROCEDURES**

3. Has the Permittee closed the facility? If so, N \_\_\_\_\_
- (a) Was closure conducted in accordance with the closure performance standard of O.A.C. Rule 3745-55-11? [Condition B.25.] N/A \_\_\_\_\_
- (b) Did the Permittee carry out the approved closure plan as set forth in the permit application and the conditions of the permit? [Condition B.26.] N/A \_\_\_\_\_
- (c) After receiving the final volume of hazardous waste, did the Permittee remove from the facility all hazardous waste and complete closure activities in accordance with the schedule specified in the approved closure plan and as required by O.A.C. Rule 3745-55-13? [Condition B.30.] N/A \_\_\_\_\_
- (d) Has the Permittee decontaminated and/or disposed of all facility equipment, structures and soils as required by O.A.C. Rule 3745-55-14 and the approved closure plan? [Condition B.31.] N/A \_\_\_\_\_
- (e) Has the Permittee certified that the facility has been closed in accordance with the specifications in the approved closure plan as required by O.A.C. Rule 3745-55-15? [Condition B.32.] N/A \_\_\_\_\_

**REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES**

- |   |        |       |
|---|--------|-------|
| 1. Is the Permittee in compliance with the requirements of O.A.C. Rules 3745-54-17, 3745-55-77 (for incompatible wastes), the approved application and conditions of the permit? [Conditions B.7(a), C.11, C.12.]   | Y      | _____ |
| 2. As required by O.A.C. Rule 3745-55-76 does the Permittee store containers of ignitable or reactive wastes greater than 15 feet (50 feet) from the facility's property line? [Condition C.11.(a)]   | Y      | _____ |
| 3. Does the Permittee take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and follow the procedures as specified by O.A.C. Rule 3745-54-15 and in Section F of the permit application? [Condition C.11.(b)]  | Y/N/NA | RMK#  |
| 4. Does the Permittee provide electrical grounding for all containers and tanks, and transport vehicles during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(b)]  | Y      | _____ |
| 5. Does the Permittee require the use of spark proof tools during all operations involving the handling of ignitable wastes? [Condition B.7.(c)]  | Y      | _____ |
| 6. Does the Permittee prohibit smoking and open flames in areas where hazardous wastes are managed and post appropriate signs? [Condition B.7.(d)]  | Y      | _____ |
| 7. Where applicable, does all wiring and electrical equipment at the container storage building meet the National Fire Protection Association, "National Electric Code" National Fire Codes, 1985 Edition, Vol. 3, Chapter 5, Special Occupancies, Articles 500-503, pp. 176 through 189.)? [Condition B.7.(e)] | Y      | _____ |
| 8. Does the Permittee prevent hazardous waste from being placed in an unwashed container that previously held an incompatible waste or material? [Condition C.12.(b)]   | Y      | _____ |

**STORAGE OF HAZARDOUS WASTES IN CONTAINERS**

**NOTE:** *The requirements of Permit Condition C do not apply to the Permittee's activities as a generator accumulating hazardous waste for < 90 days per O.A.C. Rule 3745-52-34(A). Please complete the applicable sections of the Generator Requirements checklist to document compliance with activities associated with < 90-day accumulation of wastes.*

**GENERAL REQUIREMENTS**

- |  |   |       |
|--|---|-------|
| 1. Is the Permittee storing in containers, only those wastes identified in Attachment I to the permit? [Condition C.2]   | Y | _____ |
| 2. <u>Does the Permittee limit the total quantity of containerized waste in Building E to no more than 13,750 gallons of hazardous waste at any given time (maximum container storage inventory of 250 fifty-five gallon drums)? [Condition C.1.a]</u> | Y | _____ |

- |   |          |       |
|---|----------|-------|
| 3. Are hazardous wastes subject to regulation by the permit stored only at the designated container storage areas described in the approved permit application? [Condition C.1.a] | <u>Y</u> | _____ |
| 4. Does the Permittee limit storage of hazardous waste to no more than one year? [Condition C.4.]   | <u>Y</u> | _____ |

**CONTAINER REQUIREMENTS**

Y/N/NA      RMK#

- |   |            |       |
|---|------------|-------|
| 6. Is each container stored clearly marked to identify its contents and the date each period of accumulation/storage begins? [Condition C.4.]   | <u>Y</u>   | _____ |
| 7. Are containers holding hazardous wastes in good condition? [Condition C.5.]  | <u>Y</u>   | _____ |
| (a) If not, (e.g. severe rusting, structural defects) did the Permittee transfer the hazardous waste from such a container to a container that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit and O.A.C. Rule 3745-55-71? [Condition C.5.]? | <u>N/A</u> | _____ |
| 8. Does the Permittee ensure that all containers used at the facility are compatible with the hazardous waste to be stored in them as required by O.A.C. Rule 3745-55-72? [Condition C.6.]  | <u>Y</u>   | _____ |
| 9. Does the Permittee keep all containers closed during storage except when it is necessary to add or remove waste as required by O.A.C. Rule 3745-55-73? [Condition C.7.(b)]   | <u>Y</u>   | _____ |
| 10. Are lab-pack wastes handled in compliance with the applicable storage requirements? [Condition C.7.(c)]   | <u>Y</u>   | _____ |
| 11. Are lab pack wastes packaged in drums containing absorbent material that is compatible with the wastes? [Condition C.7.(d)]   | <u>Y</u>   | _____ |

**INSPECTIONS**

- |  |          |       |
|--|----------|-------|
| 12. Is the Permittee inspecting the container area weekly in accordance with O.A.C. Rule 3745-55-74 and the approved inspection schedule (Section F) to detect leaking containers and deterioration of containers and the containment system? [Condition C.9.]             | <u>Y</u> | _____ |
| (a) Does the Permittee note the results of these inspections in the inspection log along with any remedial action taken? [Condition C.9.]  | <u>Y</u> | _____ |
| (b) <b>On days when containerized waste are added and/or removed from any of the permitted areas for storage:</b> Does the Permittee conduct an inspection of the area as described in Section F of the approved permit application and maintain the inspection results in |          |       |

the operating record? [Condition C.9.]

Y \_\_\_\_\_

**CONTAINMENT SYSTEM**

13. Does the Permittee maintain the containment system as described in the plans and specifications contained in the approved permit application, including:  
[Condition C.8.(a)]

Y \_\_\_\_\_

(a) Sufficient design to contain ten percent of the total volume of the containers?

Y \_\_\_\_\_

(b) A system which is free of gaps and sufficiently impervious to contain leaks and spills?

Y \_\_\_\_\_

(c) Equipped with a coating which is compatible with each waste stored in the area?

Y \_\_\_\_\_

(d) **For those wastes which are deemed incompatible with liner material:** Has the Permittee installed a separate secondary containment structure within the existing structure which is equipped with a compatible liner?

N/A \_\_\_\_\_

14. Has the Permittee had a spill or leak of wastes or an accumulation of precipitation in the containment system?  
If so,

N \_\_\_\_\_

(a) Are spilled or leaked wastes and accumulated precipitation removed from the sump or collection area in a timely manner? [Condition C.8.(c)]

N/A \_\_\_\_\_

(b) Does removal of spilled/leaked wastes and accumulated precipitation occur within (24) hours from the time the spilled or leak waste is discovered? [Condition C.8.(c)]

N/A \_\_\_\_\_

**REQUIRED AISLE SPACE**

15. Is the Permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in the event of an emergency to any area of the facility as required by O.A.C. Rule 3745-54-35? [Condition B.11.]

Y \_\_\_\_\_

**USED OIL INSPECTION CHECKLIST  
PROCESSORS AND RE-REFINERS**

*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 used oil processor or re-refiner 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 checked="" type="checkbox"/>	N/A <input checked="" type="checkbox"/>

*NOTE: For example, scrap metal contaminated with used oil or used oil managed in a surface impoundment (i.e., pond).*

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 checked="" type="checkbox"/>	N/A <input 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).*

4.	Has the used oil processor and/or re-refiner notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-51(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
5.	Does the owner/operator of a used oil processing or re-refining facility comply with the following:			
a.	Is the facility maintained and operated to minimize the possibility of fire, explosion, or release of used oil? [3745-279-52(A)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Is the facility equipped with the equipment in 3745-279-52(A)(2), if necessary?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Are all communication systems, alarm systems, fire protection equipment, spill control equipment, and decontamination equipment tested and maintained as required? [3745-279-52(A)(3)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Is there access to communication or alarm system(s)? [3745-279-52(A)(4)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
e.	Is the required aisle space being maintained? [3745-279-52(A)(5)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
f.	Are arrangements maintained with local authorities? [3745-279-52(A)(6)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

**CONTINGENCY PLAN**

6.	Does the owner/operator of a used oil processing and re-refining facility have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-279-52(B)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
7.	Does the plan describe the following:			
a.	Actions to be taken to response to fires, explosions or any unplanned release of used oil? [3745-279-52(B)(2)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Arrangements with emergency authorities? [3745-279-52(B)(2)(c)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-279-52(B)(2)(d)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-279-52(B)(2)(e)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-279-52(B)(2)(f)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

*NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate used oil management provisions that are sufficient to comply with OAC requirements. [3745-279-52(B)(2)(b)]*

8.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-279-52(B)(3)(a) & (b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
9.	Has the owner or operator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-279-52(B)(4)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
10.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-279-52(B)(5)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<i>NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.</i>				
11.	Does the used oil processor/re-refiner determine whether the total halogen content of the used oil being managed at the facility is above or below 1000 ppm? [3745-279-53(A)] If yes, then;	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a. How did processor/re-refiner determine halogen level content:			
	i. Testing (approved SW-846 method)?; or	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	ii. Applying knowledge of the halogen content of the used oil in light of the materials or processes used?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<i>NOTE: If determination was not made by one of the two methods, then determination is not valid.</i>				
	b. If halogens are equal to/above 1000 ppm, did the processor/re-refiner successfully rebut the presumption the used oil was mixed with a listed hazardous waste?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	If yes, what method did processor/re-refiner use to rebut the presumption (e.g., testing, exclusion, generator process information, etc.) (describe below).	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	If no, did the processor/re-refiner manage the material as a hazardous waste? [ORC 3734.02(E)(F)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<i>NOTE: Once the facility has received the hazardous waste, they are in violation of ORC § 3734.02(E) and (F).</i>				
<i>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.</i>				
12.	Does/has the used oil processor/re-refiner:			
	a. Only store used oil in tanks, or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-54(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b. Only store used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-54(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c. Provide secondary containment for containers as required by 3745-279-54(C)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d. Provide secondary containment for existing aboveground tanks as required by 3745-279-54(D)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	e. Provide secondary containment for new aboveground tanks as required by 3745-279-54(E)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil"? [3745-279-54(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	g. Upon detection of a release of used oil, done the following in accordance with 3745-279-54(G):			
	i. Stopped the release?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	ii. Contained the release?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	iii. Cleaned up and managed the used oil and other materials?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	iv. 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"/>

	h.	Performed closure of aboveground tanks and containers in accordance with 3745-279-54(H)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
13.		Has the owner/operator of the used oil processing/re-refining facility developed, kept on-site, and followed a written waste analysis plan which meets the requirements in 3745-279-53 (how they will determine halogen content and rebut the presumption) and, if applicable 3745-279-72 (how they will determine if the used oil fuel is on-specification)? [3745-279-55(A) and/or (B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Does the rebuttable presumption plan include whether samples or knowledge of the halogen content will be used?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
		If sampling is to be used, does the plan detail			
	i.	the method to be used?			
	ii.	the frequency of sampling and location of analysis?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	iii.	methods for analyzing used oil parameters (e.g., halogen constituents)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
		If knowledge is to be used, the type(s) of information that will be used determine halogen content of the used oil?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Does the on-spec plan (if applicable) include whether samples or knowledge of the halogen content will be used?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
		If sampling is to be used, does the plan detail			
	i.	the sampling method used (must be either method in appendix I to rule 3745-51-20 or one equivalent under sections 40 CFR 260.20 and 260.21)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	ii.	if sampling will be done pre or post processing?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	iii.	the frequency of the sampling and the location of the analysis?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	iv.	methods for analyzing used oil parameters (e.g., arsenic, cadmium, chromium, lead)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
		If knowledge is to be used, does the plan contain the type(s) of information that will be used to make on specification determination?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
14.		Does the used oil processor/re-refiner keep a record of each shipment of used oil accepted for processing/re-refining? [3745-279-56(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Does each record include the name and address of the transporter who delivered the used oil to the processor? [3745-279-56(A)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Does each record include the name and address of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Does each record include the U.S. EPA ID # of the transporter who delivered the used oil to the processor/re-refiner? [3745-279-56(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	Does each record include the U.S. EPA ID # (if applicable) of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(4)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	e.	Does each record include the quantity of used oil accepted? [3745-279-56(A)(5)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	f.	Does each record include the date of acceptance? [3745-279-56(A)(6)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
15.		Does the used oil processor/re-refiner keep a record of each shipment of used oil that is shipped to a used oil burner, processor/re-refiner, or disposal facility? [3745-279-56(B)]			
	a.	Does each record include the name and address of the transporter who delivers the used oil to the burner, processor/re-refiner or disposal facility [3745-279-56(B)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

	b.	Does each record include the name and address of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner, processor/re-refiner or disposal facility? [3745-279-56(B)(3)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	Does each record include the U.S. EPA ID# of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(4)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	e.	Does each record include the quantity of used oil shipped? [3745-279-56-(B)(5)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	f.	Does each record include the date of shipment? [3745-279-56(B)(6)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
16.		Does the used oil processor/re-refiner retain all records required under 3745-279-56 for at least three years? [3745-279-56(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
(17)		Does the owner/operator keep an operating record at the facility? [3745-279-57(A)(1)]			
	a.	Does the operating record include records and results of used oil analysis performed as described in the analysis plan required under 3745-279-55? [3745-279-57(A)(2)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Are summary reports and details of all incidents that require implementation of the contingency plan as specified in 3745-279-52(B) maintained in the operating record? [3745-279-57(A)(2)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
18.		Does the used oil processor/re-refiner report to the director in the form of a letter, on a biennial basis by March 1, the following information:			
	a.	The U.S. EPA ID#, name and address of the processor/re-refiner? [3745-279-57(B)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	The calendar year covered by the report? [3745-279-57(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	The quantities of used oil accepted for processing/re-refining and the manner in which the used oil is processed/re-refined, including the specific processes employed? [3745-279-57(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
19.		Does the used oil processor/re-refiner, who initiates a shipment of used oil off-site, use a used oil transporter that has a U.S. EPA ID#? [3745-279-58]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
20.		Does the used oil processor/re-refiner generate residues from the storage, processing or re-refining of used oil? [3745-279-59]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
		If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-59]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

**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 checked="" 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 OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]  | Yes <input checked="" 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 checked="" 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 type="checkbox"/> No <input checked="" 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 checked="" type="checkbox"/> No <input 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 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"/> |
|-----|--|--|

<b>ACCUMULATION TIME</b>		
11.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input checked="" type="checkbox"/> No <input 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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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: <b>DATE ON BOXES</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>EMPLOYEE TRAINING</b>		
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"/>
<b>RESPONSE TO RELEASES</b>		
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input 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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>OFF-SITE SHIPMENTS</b>		
<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)]	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 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 and do <u>one of the following</u> :	Yes <input checked="" 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 checked="" 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"/>
<b>EXPORTS</b>		
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 checked="" 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 checked="" 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 checked="" type="checkbox"/>