

Environmental
Protection Agency

Governor
Lt. Governor
Director

May 16, 2012

RE: BRT EXTRUSIONS INC.
TRUMBULL COUNTY
OHD 987 036 233
SQG, NOV/RTC

James Metheny
Safety & HR Manager
BRT Extrusions Inc.
P. O. Box 309
Niles, OH 44446

Dear Mr. Metheny:

On April 25, 2012, I as a representative of the Ohio EPA Division of Materials and Waste Management conducted a compliance inspection of the BRT Extrusions Inc. (BRT Extrusions) facility located at 1818 N. Main Street, Niles, for compliance with Ohio's hazardous waste and used oil regulations. James Byrd, Rick Russo and you represented BRT Extrusions during the inspection.

The BRT Extrusions facility receives aluminum billets which are extruded through dies to produce shaped pieces which are cut to size, heat treated and straightened. A small fraction of the extruded pieces are painted. The paint unit began operation in July 2011. No anodizing is done at this site.

Routine generation of hazardous waste occurs in the paint booth area. Wastes generated in the paint booth area are:

- Spent solvents (xylene) from the paint line (D001, F003) from flushing of paint lines and cleaning of paint mixers;
- Waste paint materials from the paint booth (paint overspray that runs down the booth walls) which the facility manages as D001, F003; and,
- Paint booth filters which the facility manages as D001, F003 wastes.

Non-routine hazardous waste generation has occurred from:

- Disposal of old paint left on the property at time of purchase (D001, F003).
- Sludge removed from the washer (on paint prep line). The washer had been purchased used. The sludge was hazardous for chromium (D007) because of use of the washer by prior owner.

The facility is also a generator of used oil and used lamps.

The inspection included a review of the facility's operations, as well as waste management practices and documentation. BRT Extrusions was inspected for the requirements of a small quantity generator (SQG) of hazardous waste because the facility typically generates between 220 pounds and 2,200 pounds of hazardous waste in a calendar month and did not have more than 6,000 kilograms of hazardous waste on site at one time.

Although BRT Extrusions is typically a Small Quantity Generator (SQG) of hazardous waste, BRT Extrusions generated more than 2,200 pounds of hazardous waste in April 2012 when unwanted paint left on the property by the prior owner was disposed and so was a large quantity generator (LQG) for that month. That waste was shipped off-site on April 25, 2012. Any facility that generates more than 2,200 pounds of hazardous waste in a calendar month is subject to the Large Quantity Generator (LQG) requirements until that waste is no longer on site. Facilities that vary in generator status are called episodic generators. A guidance document on generator status is enclosed for your information.

Based on observations made during the facility walk-through and inspection, Ohio EPA has determined that BRT Extrusions has violated the following state hazardous waste regulations and state used oil regulations:

1. **OAC 3745-279-22(C)(1) Used Oil Containers Must Be Labelled With The Words "Used Oil"**

Four totes holding used oil were observed near the maintenance shop. None were labelled or marked with the words "Used Oil". The totes were labelled with the words "Used Oil" during the inspection.

Labelling the containers during the inspection abated this violation. No further action regarding this violation is necessary at this time. In the future all containers holding used oil should be marked with the words "Used Oil".

2. **OAC Rule 3745-66-74 Weekly Inspections of Hazardous Waste Containers**

A small quantity generator of hazardous waste is required to inspect all containers of hazardous waste in the 180 day accumulation area at least weekly and to record the inspections in a log or summary. No inspection documentation was provided by the facility at the time of the inspection.

The facility submitted by email dated May 10, 2010 a copy of a completed inspection form for 2 weeks. This action abated this violation. No further action regarding this violation is necessary at this time. In the future inspections are to be documented at least weekly.

3. **OAC Rule 3745-65-33 Testing and maintenance of equipment.**

This rule states, "All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency. The owner or operator must record the inspections in a log or summary."

No records of the required inspections were provided by the facility at the time of the inspection. Inspection records are required for the emergency and spill response equipment for the 180 day hazardous waste accumulation area.

The facility submitted by email dated May 10, 2010 a copy of a completed inspection form for 2 weeks. This action abated this violation. No further action regarding this violation is necessary at this time. In the future inspections are to be documented as required by this rule.

4. **OAC Rule 3745-52-11 Waste Evaluation**

OAC Rule 3745-52-11 requires "Any person who generates a waste...[to] determine if that waste is a hazardous waste..."

The facility generates used fluorescent lamps. Based on comments during the inspection and lack of documentation of recycling, it appears that used lamps are disposed in the trash. The facility did not provide evidence during the inspection that it had evaluated its used lamps to determine if they are hazardous wastes.

The facility submitted by email dated May 10, 2010 a copy of a bill of lading for shipping used fluorescent lamps to Environmental Specialists. This action abated this violation. No further action regarding this violation is necessary at this time.

I previously emailed guidance documents to you on used lamps that might be useful in managing used lamps in accordance with the universal waste rules in the future.

5. **OAC Rule OAC 3745-52 34(D)(5)(b) Information must be posted next to the telephone.**

The facility did not post the following information next to the telephone as required by OAC 3745 52 34(D)(5)(b):

- (ii) Location of fire extinguishers and spill control material, and, if present, fire alarm(s) necessary for responding to incidents involving hazardous waste; and,
- (iii) The telephone number of the fire department, unless the facility has a direct alarm.

The facility submitted by email dated May 10, 2010 a copy of an emergency call list along with location of fire extinguishers and emergency spill locker and a picture showing that it was posted at an emergency phone near the 180 day accumulation area. This action abated this violation. No further action regarding this violation is necessary at this time.

6. **OAC Rule 3745-52-34(C)(1)(a) Satellite Accumulation Containers Must Be Closed Except When Adding Or Removing Waste**

In the paint mix room I observed a 55 gallon drum of spent solvent (D001, F003), being used as a satellite accumulation container. The drum was not closed (open funnel) as required by this rule.

This violation was abated by closing the container during the inspection. In addition, the facility submitted by email dated May 10, 2010 a copy of a picture of recently purchased funnel cover on this drum. These actions abated this violation. No further action regarding this violation is necessary at this time. In the future all satellite accumulation containers must be closed except when adding or removing waste.

CONCERNS

Annual Report

Because BRT Extrusions was an LQG for the month of April, 2012, BRT Extrusions must submit an annual report for the year 2012 by March 1, 2013. Contact Mary Ann Silagy at (614) 644-2891 with any questions on the annual report. Also see this webpage for more information on the annual report process: http://www.epa.ohio.gov/dhwm/ann_report.aspx

F003 Solvents

BRT Extrusions generates three waste streams from the paint line that are managed at F003, D001 wastes, namely:

- Spent solvents (xylene) from the paint line from flushing of paint lines and cleaning of paint mixers;
- Waste paint materials from the paint booths (paint overspray that runs down the booth walls); and,
- Paint booth filters.

Spent F003 solvents and wastes that contain spent F003 solvents are not classified as F003 unless they exhibit the characteristic of ignitability (D001). BRT Extrusions' spent solvents from the paint line from flushing of paint lines and cleaning of paint mixers would exhibit the characteristic of ignitability (D001) and so would also be listed for F003.

BRT EXTRUSIONS INC.

MAY 16, 2012

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I am not able to determine whether the other two paint line wastes exhibit the characteristic of ignitability (D001). These wastes could include xylene from flushing paint applicators and applicator tubing when changing paints. Managing those wastes as if they do exhibit the characteristic of ignitability is a conservative approach. However, the facility might wish to investigate whether those are actually F003, D001 wastes.

The MSDS provided by the facility for the xylene used as the paint line solvent states that both of the primary constituents are F003 solvents (xylene and ethylbenzene). The only other constituent listed on the MSDS is toluene at less than one per cent. The facility should be aware that if it were to use a xylene solvent with more than 10% of the solvents listed in F001, F002, F004 and/or F005, the paint filters and paint overspray would be listed hazardous wastes regardless of whether they exhibit any characteristic of a hazardous waste.

Enclosed you will find a copy of the checklists completed during the April 25, 2012 inspection.

OTHER INFORMATION

The Division of Materials and Waste Management has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link: http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage.

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

Sincerely,



Neil J. Wasilk
Environmental Specialist
Division of Materials and Waste Management

Enclosure

NJW:ddw

cc: Marlene Kinney, Ohio EPA, DMWM, NEDO
ec: Natalie Oryshkewych, Ohio EPA, DMWM, NEDO
Nyal McKenna, Ohio EPA, DMWM, NEDO
Jeff Mayhugh, Ohio EPA, DMWM, CO

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 verification forms required to be submitted to CO should be e-mailed to brad.hauser@epa.state.oh.us.

Site EPA ID No. Site Name Site Location Information Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html	EPA ID Number: OHD 987 036 233 Name: BRT Extrusions Inc. Website: (Optional) Street Address: 1818 N. Main Street City, Town, or Village: Niles State: OH County Name: TRUMBULL Zip Code: 44446 <table style="width:100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">Private <input checked="" type="checkbox"/></td> <td style="text-align: center;">County <input type="checkbox"/></td> <td style="text-align: center;">District <input type="checkbox"/></td> <td style="text-align: center;">Federal <input type="checkbox"/></td> <td style="text-align: center;">Indian <input type="checkbox"/></td> <td style="text-align: center;">Municipal <input type="checkbox"/></td> <td style="text-align: center;">State <input type="checkbox"/></td> <td style="text-align: center;">Other <input type="checkbox"/></td> </tr> </table>	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"/>
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Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: James MI: Last Name: Metheny Title: Safety & HR Manager Phone Number: 330-544-0244 Phone Number Extension: E-Mail Address: Fax Number: Fax Number Extension: Street or P.O. Box: P. O. Box 309 City, Town or Village: Niles State: OH Zip Code: 44446
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Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Date Became Owner (mm/dd/yyyy): <table style="width:100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">Owner Type:</td> <td style="text-align: center;">Private <input checked="" type="checkbox"/></td> <td style="text-align: center;">County <input type="checkbox"/></td> <td style="text-align: center;">District <input type="checkbox"/></td> <td style="text-align: center;">Federal <input type="checkbox"/></td> <td style="text-align: center;">Indian <input type="checkbox"/></td> <td style="text-align: center;">Municipal <input type="checkbox"/></td> <td style="text-align: center;">State <input type="checkbox"/></td> <td style="text-align: center;">Other <input type="checkbox"/></td> </tr> </table> Street or P.O. Box: City, Town or Village: Owner Phone #: State: Country: Zip Code: Name of Site's Operator: Date Became Operator (mm/dd/yyyy): <table style="width:100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">Operator Type:</td> <td style="text-align: center;">Private <input type="checkbox"/></td> <td style="text-align: center;">County <input type="checkbox"/></td> <td style="text-align: center;">District <input type="checkbox"/></td> <td style="text-align: center;">Federal <input type="checkbox"/></td> <td style="text-align: center;">Indian <input type="checkbox"/></td> <td style="text-align: center;">Municipal <input type="checkbox"/></td> <td style="text-align: center;">State <input type="checkbox"/></td> <td style="text-align: center;">Other <input type="checkbox"/></td> </tr> </table> Street or P.O. Box: City, Town or Village: Operator Phone #: State: Country Zip Code:	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"/>	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"/>
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VIOLATIONS CITED? Yes No

TYPE OF HANDLER - MARK "X" 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 (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.	<input type="checkbox"/> Large Quantity Generator (LQG) <input checked="" type="checkbox"/> Small Quantity Generator (SQG) <input type="checkbox"/> Conditionally Exempt Small Quantity Generator <input type="checkbox"/> U.S. Importer of Hazardous Waste <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator
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TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

- | | |
|-------------------------------------------------------------------------|------------------------------------------------------------------------|
| <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 (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

- Batteries
 Pesticides
 Mercury containing equipment
 Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))

- Used Oil Generator
 Used Oil Transporter
 Used Oil Transfer Facility
 Used Oil Processor
 Used Oil Re-refiner
 Off-Specification Used Oil Burner
 Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil
 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 box(es) below to indicate the laboratory type.

- College or University
 Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
 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. 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 or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRA Info source record, you do not need to list them. 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: |
| Tanks | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | |
| Containers | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | |

Name of Inspector(s)
N. Wasilk

Name of Inspector(s)

Date of Inspection/Time
(mm/dd/yyyy) (hh:mm)
4/25/2012 9:20 a.m.

Comments:

Process Flow

Facility:

OHD 987 036 233

BRT Extrusions Inc.
1818 N. Main Street
Niles, OH 44446

The BRT Extrusions facility receives aluminum billets which are extruded through dies to produced shaped pieces which are cut to size, heat treated and straightened.

Processes at the facility include:

- Heating billets to soften;
- Extruding billets through dies to create desired shape
- Cutting to size
- Stretching, straightening and heat treating
- Painting (if required)
- Shipping

Currently only a small portion of the extrusions are painted. Paint line processes include:

- Washer with several stages including caustic solution tank, acid solution tanks and several wash water rinse tanks
- Drying oven
- Paint booth
- Bake oven
- Shipping.

Routine generation of hazardous waste occurs in the paint booth area. Wastes generated are:

- Spent solvents (xylene) from the paint booth (D001, F003) from flushing of paint lines and cleaning of paint mixers with a current generation rate of about 1.5 drums (600 lbs.) per month;
- Waste paint materials from the paint booth (paint overspray that runs down the booth walls) which the facility manages as D001, F003 wastes with a current generation rate of about 0.3 drums (200 lbs.) per month; and,
- Paint booth filters which the facility manages as D001, F003 wastes with a current generation rate of about 120 pounds per month.

Xylene is used to flush paint supply lines and to flush the paint applicator and tubing during color changes. The MSDS provided by the facility for the xylene used as the paint line solvent states that both of the primary constituents are F003 solvents (xylene and ethylbenzene). The only other constituent listed in MSDS is toluene at less than one per cent.

Non-routine hazardous waste generation has occurred from:

- Disposal of 9 drums of old paint left on the property at time of purchase (D001, F003). Old paints left on the property were reported to be usable but BRT had no use for them and

decided to scrap them.

-Sludge removed from the washer (on paint prep line). Washer had been purchased used. Sludge was hazardous for chromium (D007) because of use of the washer by prior owner. Four drums (1,200 lbs.) of waste were generated when sludge was removed from the washer during Christmas week of 2011.

Hukill is TSDf for these wastes.

Non-hazardous waste generated includes solid material scraped from die shop sodium hydroxide dip tanks which probably contains a high proportion of sodium hydroxide. It does not contain any free liquids. This waste managed by shipment as a non-hazardous waste to a TSDf.

Spent caustic solution is generated from the dip tanks in which extrusion dies are cleaned by soaking in a caustic (NaOH) solution. This spent caustic solution is recycled without reclamation for use as a reagent and therefore is not regulated as a waste.

Solvent 100 is used at rate of about ½ drum per year to clean paint from tools. It is used on moistened rags without free liquids. Used rags are collected and sent to TSDf (Hukill) with paint filters.

Facility has an air permit (synthetic minor) for the paint booths. Wash water from paint booth operation goes to the City of Niles sewer system.

Facility was an LQG for at the month of April 2012 due to paint waste generated from disposal of old paint left on the property.

Facility generates used oil and used lamps. Facility has a parts washer in the maintenance shop that uses Simple Green as solvent.

The 180 accumulation area is in the Paint Storage/Solvent Storage Room. Three 55 gallon drums of spent solvent were in the accumulation area.

One 55 gallon satellite accumulation drum is located in the Mix Room. A drum for used rags from using Solvent 100 and a drum of solvent to clean the paint agitator by placing it in the drum were also in the Mix Room. The solvent in the drum used to clean the paint agitator was not spent; so drum contents were not waste.

The Paint Application Room contains 5-gallon pails for collecting excess paint (overspray) from paint booths (2 pails for each of 2 paint booths). Contents are removed along with the plastic bag lining the pail and placed in a 55 gallon satellite accumulation drum located in the room.

BRT EXTRUSIONS

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

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

Safety Equipment Used:

GENERAL REQUIREMENTS

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

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

6.	Has the generator accumulated hazardous wastes in excess of (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]

7.	Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.

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

NOTE: Complete appropriate checklist for each unit.

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

MANIFEST REQUIREMENTS

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

[Facility Name/Inspection Date]

[ID number]

SQG/March 2009

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

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

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32.	Is the accumulation date on each container? [3745-52-34(D)(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
33.	Are hazardous wastes stored in containers which are:	
	a. Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: Record location on process summary sheets and photograph the area.</i>		
34.	Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Are inspections recorded in a log or summary? [3745-66-74]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
35.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
36.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
37.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.</i>		
PRE-TRANSPORT REQUIREMENTS		
38.	Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
39.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
40.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

BRT Extrusions

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

GENERAL REQUIREMENTS

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| 1. | If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07 (A)(7)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 2. | Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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

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| 3. | Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 4. | Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 5. | Does the generator generate a listed HW that exhibits a characteristic? If yes, | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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

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| 6. | Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
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NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.

NOTE: Written documentation of this determination is not required.

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| 7. | Did the generator treat his HW /soil on-site to meet the LDR treatment standard? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
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NOTE If "Yes" see question #16.

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| 8. | Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility?[3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 9. | Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 10. | Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTIFICATION FORM

- | | | |
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| 11. | Does the LDR Notification form contain the following information: | |
| a. | Manifest number of the first waste shipment to the TSD?[3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d. | A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]. | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.

e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories

f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.

g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for?[3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.

PROHIBITED DILUTION

12.	Is the HW treated by burning? If "No", go to #15.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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13.	Is the HW a metal-bearing HW?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.

14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless one of the following conditions apply. [3745-270-03(c)]	
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	i.	Contains > 1% TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	ii.	Contains organic constituents or cyanide at levels greater than the UST levels?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	v.	Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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15.	Was the HW treated by wastewater treatment?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: If Yes, HW is improperly being treated by dilution.

	b.	Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B) and 3745-270-40(A)(3)].

NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.

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

BRT EXTRUSIONS

USED OIL INSPECTION CHECKLIST

GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

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

PROHIBITIONS

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

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

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

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

GENERATOR STANDARDS

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

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

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

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

ON-SITE BURNING IN SPACE HEATER

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

b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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

GENERATOR TRANSPORTATION

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

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

COLLECTION CENTERS AND AGGREGATION POINTS

13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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

BRT EXTRUSIONS

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 <i>No. U.W. BATTERIES OBSERVED</i>		
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	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 type="checkbox"/> N/A <input type="checkbox"/>
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
UNIVERSAL WASTE LAMPS <i>SEE COMMENT ON PAGE 3</i>		
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 type="checkbox"/> N/A <input type="checkbox"/>
9.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input 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 type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

ACCUMULATION TIME		
11.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input type="checkbox"/> No <input 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 type="checkbox"/>
NOTE: Accumulation is defined as date generated or date received from another handler.		
12.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
EMPLOYEE TRAINING		
13.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RESPONSE TO RELEASES <i>NO RELEASES OBSERVED</i>		
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input 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 type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
OFF-SITE SHIPMENTS <i>NOT SHIPPING OFF-SITE TO U.W. HANDLER</i>		
NOTE: If a SQUWH self-transport waste, then the handler 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 <input 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 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 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 type="checkbox"/> N/A <input type="checkbox"/>
a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
21.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one</u> of the following:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
EXPORTS		
23.	Is waste being sent to a foreign destination? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

a.	Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input 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"/>

Universal Waste Lamps.

Used lamps were collected but were not being managed as universal wastes. Facility reported that they were placed in trash.

Hazardous Waste Generator Categories And Episodic Generation

DHWM Guidance Document

Date: March 2007

What is the purpose and background of this guidance?

This guidance document is intended to help you determine your hazardous waste generator category and understand the requirements that apply when you fluctuate between categories. Your generator category determines which hazardous waste management requirements you must follow for hazardous waste generated during any calendar month. In general, the more hazardous waste you generate or accumulate on-site, the more requirements apply. Since your generator category and hence the requirements you must follow are based on the amount of hazardous waste you generate in a calendar month or the total amount you have on-site at any given time, you may fluctuate between categories depending upon production levels, seasonal changes, etc. This fluctuation between generator categories has been termed **episodic generation**.

What are Ohio's hazardous waste generator categories?

Ohio has three hazardous waste generator categories:

- conditionally exempt small quantity generator (CESQG);
- small quantity generator (SQG); and
- large quantity generator (LQG).

For monthly generation rates for each generator category, see the following table:

Monthly Generation Rate		
CESQG	SQG	LQG
≤ 1 kg of acute HW ≤ 100 kg of acute HW* ≤ 100 kg of HW	> 100 kg but $< 1,000$ kg of HW	> 1 kg of acute HW > 100 kg of acute HW* $\geq 1,000$ kg of HW
* 1 kg = ~ 1 qt 100 kg = ~ 27 gal (about 1/2 of a 55-gallon drum) or 220 lbs 1,000 kg = ~ 270 gal (about five 55-gallon drums) or 2,200 lbs 6,000 kg = ~ 1,620 gallons (about thirty 55-gallon drums) or 13,200 lbs residue, contaminated soil, waste or other debris from clean-up of a spill of acute HW		

Hazardous Waste Generator Categories

Note: Many hazardous wastes are liquids and are measured in gallons - not kilograms or pounds. In order to measure your liquid wastes, you will need to convert from gallons to kilograms (one gallon of water = 8.33 pounds). To more accurately calculate the number of pounds in a gallon, you must know the density of the liquid. A rough guide is that about half of a 55-gallon drum of waste with a density similar to water weighs about 220 pounds or 100 kilograms; 264 gallons (~ five 55-gallon drums) of a waste with a density similar to water weighs about 2,200 pounds or 1,000 kilograms.

How do I determine my hazardous waste generator category?

Most often, your hazardous waste generator category is determined by the total weight of hazardous waste that you generate (produce) in any given calendar month. Your category can also change due to the total amount of hazardous waste that you have on-site at any given time.

Note: A "calendar month" includes all the days in that particular month (i.e., February 1st to February 28th, March 1st to March 31st, April 1st to April 30th).

For instance, if you are a CESQG or an SQG based on monthly generation rate, your generator category can change if you generate acutely¹ hazardous wastes or the total amount of hazardous waste that you have on-site at any given time exceeds amounts listed below.

- If you otherwise are a CESQG and you accumulate more than 2,200 pounds of hazardous waste at any one time, you must comply with all applicable SQG requirements.
- If you otherwise are an SQG and you accumulate over 13,200 pounds of hazardous waste on-site, you are required to have a hazardous waste installation and operation permit.
- If you otherwise are an SQG or a CESQG and you generate or accumulate more than 2.2 pounds of acutely hazardous waste (other than clean-up debris or residues), you must comply with all applicable LQG requirements.

Note: Generator categories are NOT determined by the weight of waste shipped off-site.

¹A listed hazardous waste designated with an "H" hazard code - this includes most commercial chemical product listed wastes designated with hazardous waste number PXXX and F020, F021, F022, F023, F026 and F027.

Hazardous Waste Generator Categories

If you are an LQG, your hazardous waste management requirements are not affected by the total amount of hazardous waste you accumulate on-site at any one time. For more information on determining your hazardous waste generator category, see chapter 2 of our Hazardous Waste Generator Handbook.

Note: If your material was a product, but it is off-specification (meaning the product no longer meets applicable industry or manufacturing quality standards) and cannot be used, it is considered generated when you determine that it is no longer usable as a product.

What do I include in my monthly hazardous waste total?

OAC rules 3745-51-04 and 3745-51-05(C) and (D) state which hazardous wastes are counted towards your monthly quantity determination.

Examples of what to count

- All quantities of listed and characteristic hazardous wastes that are accumulated on your property for any period of time before treatment, disposal or recycling, except for wastes managed immediately upon generation only in on-site elementary neutralization units, wastewater treatment units or totally enclosed treatment facilities.
- All quantities of listed and characteristic hazardous wastes that are accumulated and transported off-site.
- All quantities of listed and characteristic hazardous waste that are placed directly in an on-site regulated treatment container or tank.
- All quantities of listed and characteristic hazardous wastes that are generated as still bottoms or sludges and removed from product storage tanks.

Are there any exceptions to which wastes I must count when determining my generator category?

Do NOT count

- Samples of waste and samples of water, soil or air which are collected to determine if hazardous, according to OAC rule 3745-51-04(D).
- Generated or collected treatability study samples, according to OAC rule 3745-51-04(E).
- Samples undergoing treatability studies at laboratories and testing facilities, according to OAC rule 3745-51-04(F).
- Specific recyclable materials that will be recycled, including scrap metal, according to OAC rule 3745-51-06(A)(3).
- Hazardous waste remaining in either an empty container or an inner liner removed from an empty container according to OAC rule 3745-51-07(A)(1).

Hazardous Waste Generator Categories

- PCB wastes regulated under the Toxic Substances Control Act, according to OAC rule 3745-51-08.
- Wastes that are recycled, without prior storage, only in an on-site recycling process subject to regulation under OAC rule 3745-51-06(C)(2).
- Waste residues that have not yet exited raw material storage or a production unit, unless the hazardous waste remains in the unit more than 90 days after the unit ceases to operate, according to OAC rule 3745-51-04(C).
- Wastes that are managed in an "elementary neutralization unit," a "totally enclosed treatment facility" or a "wastewater treatment unit," without being stored in a separate container/tank that is not a part of the wastewater treatment unit, totally enclosed treatment facility or elementary neutralization unit first (see OAC rule 3745-50-10 for definitions of these units).
- Wastes that are discharged directly to publicly owned treatment works (POTWs) without being stored or accumulated first. Discharges to a POTW must comply with the Clean Water Act. POTWs are public utilities, usually owned by the city, special districts or the county, that treat industrial and domestic sewage for disposal.
- Used oil managed under the requirements of OAC Chapter 3745-279.
- Spent lead-acid batteries that will be reclaimed and managed under the requirements of OAC rule 3745-266-80.
- Universal wastes managed under OAC Chapter 3745-273 (for example, batteries, pesticides, mercury thermostats and lamps).

To avoid double counting, the following types of wastes do not need to be counted when determining your hazardous waste generator classification. All of these hazardous wastes have already been counted when they were initially generated.

- Hazardous wastes that have already been counted once during the calendar month and are treated on-site to render them non-hazardous or reclaimed in some manner (for example, solvent that is distilled on-site).
- Hazardous waste previously counted when produced by on-site treatment (including reclamation).
- Hazardous waste removed from on-site storage.

Note: For more information on counting your hazardous waste that has been generated and reclaimed on-site, see the Fall 2004 Notifier article titled, "Reducing Solvent Purchase and Disposal Costs."

Hazardous Waste Generator Categories

What circumstances can make my generator category change month to month?

There are many instances where you may fall into another generator category unexpectedly or as the result of a one-time occurrence. Based on annual report filings, these situations may include: lab clean outs; off-specification product inventory clean outs; tank cleaning; underground storage tank removals; spills of hazardous waste or product that become hazardous waste when spilled; and those hazardous wastes (e.g., contaminated media and debris) generated from conducting remediation-related activities.

Am I an episodic generator?

If the weight/amount of hazardous waste you generate/accumulate causes your generator category to fluctuate month to month, you are an episodic generator. Episodic generators include those who only occasionally generate hazardous waste, those who occasionally fluctuate between the three hazardous waste generator categories and those who routinely change generator categories at least one month a year (for example, a generator who routinely generates and accumulates hazardous waste from a product storage tank clean out once a year).

Do I need to notify Ohio EPA if I change generator categories?

In some cases, you are required to notify Ohio EPA if you change generator categories. For example, if you change from a CESQG to either an SQG or LQG, you are required to notify Ohio EPA and obtain a U.S. EPA identification number as both SQG and LQGs are required to have a U.S. EPA identification number (see OAC rule 3745-52-12).

To notify, simply complete and submit the Notification of Regulated Activity Form to Ohio EPA's Division of Hazardous Waste Management (DHWM). The form and instructions are available on our Web page. When hazardous wastes are no longer generated at your location, the U.S. EPA identification number is no longer of use and it is suggested that you "deactivate" the assigned number.

To deactivate a U.S. EPA identification number you do not need to fill out the notification form. Simply send Ohio EPA a letter on company letterhead requesting us to deactivate your U.S. EPA identification number.

If I am normally an SQG but due to an episodic event become an LQG for one month, do I remain an LQG for the remainder of the year?

No. As stated earlier, you must comply with all applicable generator requirements for hazardous wastes generated that month for as long as that waste remains on-site. If you revert back to SQG status the following month, you must continue to manage the hazardous waste generated during the month you became an LQG according to all applicable LQG requirements. Hazardous waste generated during the month you were an SQG can be managed under SQG requirements.

Hazardous Waste Generator Categories

If I reach LQG status only once during the calendar year, do I have to file an annual report?

Yes. If you reached LQG status at any time during the calendar year, you must file an annual report by March 1st of the following year (see OAC rule 3745-52-41). This report should include information about all the hazardous waste that you generated during the previous reporting year; not just the hazardous waste generated during the month(s) you were an LQG.

If you are aware that you will become an LQG in the future, maybe once every other year, then Ohio EPA advises you to continue filing an annual report even if you did not meet the LQG threshold for that year. While you are only required to file an annual report if you reach LQG status at any time in a calendar year, filing an annual report in such circumstances keeps Ohio EPA informed of your current level of hazardous waste activity.

What if I accumulate large amounts of hazardous waste on-site due to an episodic event?

As an episodic generator, you can be generating and accumulating large quantities of hazardous waste several months a year. You can store (accumulate) or treat that hazardous waste on-site without an Ohio hazardous waste permit provided you comply with the hazardous waste generator requirements. The requirements that you must comply with are determined by the total amount of hazardous waste generated at the site in that calendar month, and for CESQGs and SQGs, the amount of hazardous waste you have on your property at any given time.

What if I do not accumulate hazardous waste on-site?

If you do not accumulate or treat any hazardous waste on-site, you are not subject to the hazardous waste accumulation/treatment requirements of OAC rule 3745-52-34 including tank/container management, personnel training, emergency preparedness/prevention and contingency plans/emergency response. This section of OAC Chapter 3745-52 applies if hazardous waste is accumulated and/or treated on-site. For example, if you are not a hazardous waste generator, yet you spilled a product onto the ground which would be considered hazardous waste when excavated, and the contaminated soil waste is loaded onto a truck and taken offsite at the time of excavation, no accumulation would have occurred.

All other applicable sections of OAC Chapter 3745-52 [annual reporting requirements (3745-52-41), recordkeeping (3745-52-40), using manifests (3745-52-20 to 3745-52-23), etc.] would apply to you in this situation. In addition, you must include the amount of hazardous waste in your total monthly generation rate even if the hazardous waste is not accumulated.

Hazardous Waste Generator Categories

How can I reduce the amount of waste I generate?

There are many opportunities for generators to reduce the amount and toxicity of hazardous waste they generate. Simple steps such as developing a pollution prevention program, improving housekeeping practices and implementing cost effective process changes can decrease hazardous waste generation. Reducing waste can save your company money and reduce environmental liability and regulatory requirements. To help reduce the amount of waste you generate, try the following practices:

- Do not mix non-hazardous waste with hazardous waste. Mixing non-hazardous waste with hazardous waste can increase the amount of hazardous waste created, as the entire mixture can become hazardous. Mixing waste can also make recycling very difficult, if not impossible. A common example of mixing wastes would be putting non-hazardous cleaning agents in a container of used hazardous solvents.
- Recycle and reuse manufacturing materials - Many companies routinely put useful components back into productive use rather than disposing of them. Items such as used oil, spent solvents, acids and metals are commonly recycled and used again. In addition, some companies have taken waste minimization actions such as using fewer solvents, using solvents that are less toxic or switching to a nontoxic detergent solution.
- Change material, process or both - Businesses can save money and increase efficiency by replacing a material or process with another that produces less waste. For example, you could possibly use plastic blast media for paint stripping of metal parts rather than conventional solvent stripping.
- Safely store hazardous products and containers - You can avoid creating more hazardous waste by preventing spills or leaks. Store hazardous product and waste containers in secure areas and inspect them frequently for leaks. When leaks or spills occur, cleanup materials may also become regulated hazardous waste, so preventing leaks and spills will avoid unnecessary generation of these wastes.

REFERENCES

OAC rule 3745-51-04
OAC rule 3745-51-05
OAC rule 3745-52-34
November 19, 1980 Federal Register (45 FR 76620)
March 24, 1986 Federal Register (51 FR 10153)
August 1, 1986, Fax-On-Demand: 12699
Ohio Hazardous Waste Generator Handbook