



**Environmental
Protection Agency**

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

June 12, 2012

**SCIOTO COUNTY
GENERAL FILE
(G&J PEPSI-COLA BOTTLING CO.)
DHW/SEDO
OHD004284238**

Mr. Rod Armstrong
G & J Pepsi-Cola Bottling Company
4587 Gallia Pike, P.O. Box 299
Franklin Furnace, Ohio 45629

Dear Mr. Armstrong:

On June 6, 2012, Melody Stewart and I inspected G & J Pepsi-Cola Bottling Company's Franklin Furnace, Ohio facility, to determine 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). This letter will explain the violations we found and what you need to do to correct the violations. The General Comments section of this letter will explain any other general concerns we have and what you can do to respond to those concerns.

We found the following violations of Ohio's hazardous waste laws. In order to correct these violations, you must do the following and send me the required information **within 21 days** of your receipt of this letter:

- (1) **OAC Rule 3745-279-22(C), Used Oil Storage Requirements for Generators-Labeling:** Containers and above-ground tanks used to store used oil must be labeled or marked clearly with the words "Used Oil."

The used oil tank located in the Fleet Maintenance Garage was not labeled with the words "Used Oil." G & J Pepsi-Cola Bottling Company appropriately labeled the tank during the inspection.

G & J Pepsi-Cola Bottling Company has returned to compliance with this rule. No further action is necessary to abate this violation.

- (2) **OAC Rule 3745-273-13(D)(1), Waste Management Standards for Small Quantity Handlers of Universal Waste:** Spent lamps must be stored in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps. The containers or packages of spent lamps must be kept closed and must lack evidence of leakage, spillage, or any damage that could cause leakage.

Spent fluorescent lamps of various sizes and lengths are stored inside a room in the Vending Department. Numerous spent lamps are being stored loose, standing upright inside two 55-gallon plastic drums. Spent lamps are not being stored appropriately in closed boxes or containers that are adequate to prevent breakage.

G & J Pepsi-Cola Bottling Company must immediately containerize the loose spent lamps that are being stored upright in plastic drums in the Vending Department. Containers must be structurally sound and give adequate protection against lamp breakage. The containers must be kept closed except when adding lamps to the containers, to minimize the chance of lamp breakage.

To demonstrate a return to compliance with this rule, G & J Pepsi-Cola Bottling Company must submit a photograph to me showing that the spent lamps have been appropriately containerized in structurally sound, closed containers.

- (3) ***OAC Rule 3745-273-14(E), Labeling/Marking Standards for Small Quantity Handlers of Universal Waste:*** Each spent lamp, or each container/package in which spent lamps are contained, must be labeled or clearly marked with one of the following phrases: "Universal Waste-Lamps" or "Waste Lamps" or "Used Lamps."

Spent lamps were not labeled with the words "Universal Waste-Lamps" or "Waste Lamps" or "Used Lamps."

G & J Pepsi-Cola Bottling Company must immediately label each spent lamp, or each container/package of spent lamps, with the words "Universal Waste-Lamps" or "Waste Lamps" or "Used Lamps."

To demonstrate a return to compliance with this rule, G & J Pepsi-Cola Bottling Company must submit a photograph to me showing that the spent lamps, or the containers of spent lamps, have been appropriately labeled with the words "Universal Waste-Lamps" or "Waste Lamps" or "Used Lamps."

- (4) ***OAC Rule 3745-273-15(C), Accumulation Time Limits-Standards for Small Quantity Handlers of Universal Waste:*** A small quantity handler of universal waste who accumulates universal waste lamps must be able to demonstrate the length of time that the universal waste spent lamps have been accumulated on-site from the time that they became a waste, by using one of the methods outlined in (C) (1) through (6) of this rule.

Spent lamps are not dated, and the facility does not track how long the spent lamps have been on-site.

G & J Pepsi-Cola Bottling Company must have a method of documenting the length of time that spent lamps have been accumulated on-site. This can be done by dating each spent lamp; by dating each container/package of spent lamps with the date the first spent lamp was put in the box; by maintaining an inventory system that identifies the earliest date that any spent lamp became universal waste; or by another method outlined in OAC Rule 3745-273-15(C) (1) through (6). *Please note that these methods are described in detail on the Small Quantity Handlers of Universal Waste Checklist, which is enclosed with this inspection report.*

To demonstrate a return to compliance with this rule, G & J Pepsi-Cola Bottling Company must submit a photograph to me showing that the each spent lamp, or each container of spent lamps, has been dated with the date they became a waste; or a written an explanation of how the company will employ one of the other methods in OAC Rule 3745-273-15(C) (1) through (6) to document the length of time that spent universal waste lamps have been accumulated on-site.

General Comments:

• **Recordkeeping**

As we discussed during the inspection, G & J Pepsi-Cola Bottling Company must maintain records (manifests or bills of lading) on-site documenting the off-site shipment of wastes for recycling or disposal.

Enclosed you will find a copy of the checklists that were completed during the inspection. I have also enclosed several fact sheets and lists of recyclers that you may find useful. You can find copies of Ohio's hazardous waste rules and other information on our division's web page at <http://www.epa.ohio.gov/dhwm/lawsregs.aspx>. Pollution prevention and compliance assistance information can be found at <http://www.epa.ohio.gov/ocapp>.

If you have any questions, please feel free to call me at (740) 380-5237.

Sincerely,



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

VDG/dh

Enclosure

NOTICE:

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

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

Site EPA ID No. Site Name Site Location Information Site Land Type (check only one) NAICS codes <small>www.census.gov/epcd/www/naics.html</small>	EPA ID Number: OHD004284238 Name: G & J Pepsi-Cola Bottling Company Website (Optional): http://www.gjpepsi.com Street Address: 4587 Gallia Pike, P.O. Box 299 City, Town, or Village: Franklin Furnace State: : OH County Name: Scioto Zip Code: 45629 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 comments section. Only provide address information if it is different than the site address.	First Name: Rod MI: Last Name: Armstrong Phone Number: 740-354-9798 Extension: E-Mail Address: rod.armstrong@gjpepsi.com Fax Number: 740-354-9439 Fax Number Extension: Street or P.O. Box: 4587 Gallia Pike, P.O. Box 299 City, Town or Village: Franklin Furnace State: OH Zip Code: : 45629
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Legal Owner And Operator List additional Owners and/or Operators in the Comments Section or on another copy of this page.	Name of Site's Legal Owner: G&J Pepsi-Cola Bottling Company, Inc. Date Became Owner (mm/dd/yyyy): Owner Private County District Federal Indian Municipal State Other Type: <input checked="" type="checkbox"/> <input type="checkbox"/> Street or P.O. 2580 Bobmeyer Road City, Town or Village: Hamilton Owner Phone #: State: OH Country: US Zip Code: 45015 Name of Site's Operator: Date Became Operator: Owner Private County District Federal Indian Municipal State Other Type: <input checked="" type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: 4587 Gallia Pike, P.O. Box 299 City, Town or Village: Franklin Furnace Operator Phone #: 740-354-9798 State: OH Country: US Zip Code: : 45629
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VIOLATIONS CITED?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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TYPE OF HANDLER (MARK AS APPROPRIATE)	
<input type="checkbox"/> Not a HW Generator <input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input type="checkbox"/> Short-Term/Temporary Generator (short-term or one-time event and not from on-going processes). <i>Check the box for the applicable generator status and provide a comment.</i>	<input type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator <input type="checkbox"/> U.S. Importer of Hazardous Waste <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK AS APPROPRIATE)			
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace		
<input type="checkbox"/> Hazardous Waste Transfer Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption		
<input type="checkbox"/> Treater, Storer, or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption		
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility		
<input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Receives Hazardous Waste from Off-site		
UNIVERSAL WASTE ACTIVITIES (MARK AS APPROPRIATE)			
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste		
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)			
TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES (MARK ALL THAT APPLY)			
<input type="checkbox"/> Batteries			
<input type="checkbox"/> Pesticides			
<input type="checkbox"/> Mercury containing equipment			
<input checked="" type="checkbox"/> Lamps			
USED OIL ACTIVITIES (MARK ALL THAT APPLY)			
<input checked="" type="checkbox"/> Used Oil Generator			
<input type="checkbox"/> Used Oil Transporter			
<input type="checkbox"/> Used Oil Transfer Facility			
<input type="checkbox"/> Used Oil Processor			
<input type="checkbox"/> Used Oil Re-refiner			
<input type="checkbox"/> Off-Specification Used Oil Burner			
<input type="checkbox"/> Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil			
<input type="checkbox"/> Used Oil Fuel Marketer who first claims the Used Oil meets the specifications			
Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the boxes below to indicate the laboratory type.			
<input type="checkbox"/> College or University			
<input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university			
<input type="checkbox"/> Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university			
Waste Codes for Federally Regulated Hazardous Wastes: List the codes for the federally regulated hazardous waste handled at the site, in the order they are presented in the regulations (e.g., D001, D003, F007, U112). If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all; just indicate the date of the most recent source record.			
D001	D018	D039	D040
COMMENTS: Use this area to describe inspection conditions and additional information.			
Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives: Keith Otworth, Quality Control Manager
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Bill Bowling, Hamilton Office
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
ADDITIONAL COMMENTS:			
Latitude/Longitude: 38.621628, -82.843702			
INSPECTOR(S)		INSPECTION DATE/TIME	
Vicky German, DMWM-SEDO		Melody Stewart, DMWM-SEDO	
		6/6/12	

PROCESS INFORMATION AND WASTE ACTIVITIES SUMMARY

G&J Pepsi-Cola Bottling Company

<i>Description of Waste</i>			<i>On-Site Management</i>			<i>Off-Site Management</i>
Waste Generated	EPA Waste Code	Amount Generated per Month	Accumulation and/or Storage	On-Site Treatment	Waste Location	Name, state, and activity
Used oil	NA	150 gallons	Tank inside Fleet Maintenance Garage	NA	Tank inside Fleet Maintenance Garage	Glockner Oil Piketon OH Recycled
Used oil filters	NA	Varies	Container inside Fleet Maintenance Garage	Drained, containerized	Container inside Fleet Maintenance Garage	Rumpke Disposed as solid waste
Spent antifreeze	NA	Varies	Drum inside Fleet Maintenance Garage	NA	Drum inside Fleet Maintenance Garage	Glockner Oil Piketon OH Recycled
Oil-water separator sludge	NA	Varies – removed as necessary by vacuum truck	NA	NA	NA	Little's Septic Service Wheelersburg OH Disposal
Spent parts cleaner solvent	D001 D018 D039 D040	NA – Continued use program	NA	NA	NA	Safety-Kleen Plano TX Continued use program
Spent fluorescent lamps	D009 unless recycled	Varies	Stored standing upright inside plastic drums	NA	Room inside Vending Department	USA Lamp and Ballast Cincinnati OH Recycled

FACILITY AND PROCESS INFORMATION



G&J Pepsi-Cola Bottling Company is one of seven franchises owned by G&J Pepsi Cola Bottlers, Inc. The company produces, sells, and distributes Pepsi-Cola products in 8 counties throughout south central Ohio and eastern Kentucky. This particular franchise is made up of a production facility and sales distribution warehouse located in Franklin Furnace, and a sales warehouse located in Chillicothe. In addition to producing and distributing Pepsi-Cola products such as Pepsi, Mountain Dew, Gatorade, Slice, SoBe, and Aquafina, the company packages and distributes products under the Lipton, Dole, and Starbucks labels.

SOURCE: <http://www.gipepsi.com>

WASTE GENERATION INFORMATION

Wastes are generated from building, equipment, and fleet maintenance. These wastes include used oil, spent antifreeze, spent parts cleaner solvent, and spent fluorescent lamps.

REGULATORY HISTORY

G&J Pepsi-Cola Bottling Company notified Ohio EPA of their hazardous waste generation activities as a Small Quantity Generator (SQG) on 8/16/1989. The company was last inspected for compliance with Ohio's hazardous waste regulations on 12/19/2001. Currently, G&J Pepsi-Cola Bottling Company is operating as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste.

CONDITIONALLY EXEMPT SMALL QUANTITY (CESQG) GENERATOR REQUIREMENTS

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

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or >1 Kg. of acutely hazardous waste in a calendar month.

WASTE EVALUATION

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

GENERATOR CLASSIFICATION

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

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator (SQG).

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

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

At the time of the inspection, the facility did not maintain documentation on-site; this was received from the Hamilton, Ohio office. In the future when spent parts cleaner, used oil, spent fluorescent lamps, or other wastes are shipped off-site, the facility must keep the manifest or bill of lading to document the appropriate recycling/disposal of these wastes.

TREATMENT OF HAZARDOUS WASTE

4. Does the generator treat hazardous waste in a:
- a. Container that meets 3745-66-70 to 3745-66-77? Yes No NA
 - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes No NA
 - c. Drip pad that meets 3745-69-40 to 3745-69-45? Yes No NA
 - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No NA

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

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

**USED OIL GENERATOR
COLLECTION CENTER, AND AGGREGATION POINT REQUIREMENTS**

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

PROHIBITIONS

1. Does the generator manage used oil in a surface impoundment or waste pile? Yes No N/A
 If yes:
 a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] Yes No N/A
2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes No N/A
3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? Yes No N/A

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

GENERATOR STANDARDS

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

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 No N/A

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 No N/A
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No N/A
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes No N/A

The used oil tank located in the Fleet Maintenance Garage was not labeled with the words "Used Oil". The company appropriately labeled the tank during the inspection.

9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes No N/A
- b. Contained the release? Yes No N/A
- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A

ON-SITE BURNING IN SPACE HEATERS

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

- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A

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

GENERATOR TRANSPORTATION

11. Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24] Yes No N/A
12. If the generator self-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 No N/A
- b. Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24] Yes No N/A

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

COLLECTION CENTERS AND AGGREGATION POINTS

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

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

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - LAMPS

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

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No NA
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-11(B)? [3745-273-11(B)] Yes No NA

CONTAINERS AND LABELING

8. Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] Yes No NA

Spent fluorescent lamps of various sizes and lengths are stored inside a room in the Vending Department. Numerous spent lamps are being stored loose, standing upright inside two 55-gallon plastic drums. Spent lamps are not stored appropriately in closed boxes or containers that are adequate to prevent breakage.

9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes No NA

10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamps" or "Waste Lamps" or "Used Lamps"? [3745-273-14(E)] Yes No NA

Spent lamps are not labeled with the words "Universal Waste-Lamps" or "Waste Lamps" or "Used Lamps".

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

ACCUMULATION TIME

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

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes No NA
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes No NA
12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)]
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes No NA
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes No NA
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes No NA
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes No NA
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes No NA
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes No NA

Spent lamps are not dated, and the facility does not track how long the spent lamps have been on-site.

EMPLOYEE TRAINING

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

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes No NA
15. Is the material released characterized? [3745-273-17(B)] Yes No NA
16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes No NA

OFF-SITE SHIPMENTS

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

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

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

Spent lamps are periodically containerized in original lamp boxes and sent to G & J Pepsi Bottling Company's Hamilton, Ohio office. They are then sent to USA Lamp and Ballast for recycling.

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes No NA
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No NA
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes No NA
 - b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes No NA
21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes No NA
 - b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes No NA
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes No NA
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes No NA

EXPORTS

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