

**Environmental
Protection Agency**

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

July 25, 2012

**VINTON COUNTY
GENERAL FILE
(ONE STOP AUTO & TIRE)
DMWM/SEDO**

Mr. Steve Maxwell
One Stop Auto & Tire
729 South Market Street
McArthur, Ohio 45651

Dear Mr. Maxwell:

On July 19, 2012, Melody Stewart and I inspected One Stop Auto & Tire in McArthur, Ohio, 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 3745-52-11, Hazardous Waste Determination:** Any person who generates a waste must evaluate the waste to determine if the waste is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51.

At the time of the inspection, One Stop Auto & Tire could not identify the contents of two 55-gallon drums and one yellow approximately 40-gallon drum that were located outside the garage. One Stop Auto & Tire indicated these drums of material were on-site when they began leasing the garage from Mr. Delbert Fulton in approximately September 2011, and that the drums of material belong to the site's owner or to a previous business at the location.

One Stop Auto & Tire and/or the site's owner, Mr. Delbert Fulton, must evaluate the material in the three drums to determine if they are a listed or characteristic hazardous waste as required by this rule and submit documentation of this evaluation to this office for review. You may use "generator knowledge" of the material and the process in which it was used to make a determination of whether the material in the drums is a hazardous waste, and submit that determination to me in writing. If such generator knowledge is not

available, you must have the material in the drums tested or analyzed to determine if it is a hazardous waste, and submit a copy of the analysis to me for review.

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

At the time of the inspection, several 55-gallon drums containing used oil, located both inside and outside the garage, were not labeled with the words "Used Oil". The indoor 200-gallon used oil tank and one used oil tank located outside the garage were also not labeled with the words "Used Oil".

To demonstrate a return to compliance with this rule, One Stop Auto & Tire must label all drums, containers, and tanks that contain used oil with the words "Used Oil", and submit photographs to me demonstrating that the drums and tanks have been correctly labeled.

General Comments:

- **Spent Fluorescent Lamp Management.** As we discussed during the inspection, I have enclosed information regarding management of spent fluorescent lamps under Ohio's Universal Waste Rule (UWR). Because all fluorescent lamps contain mercury, Ohio EPA recommends that you manage your spent lamps under the universal waste rule, if you are not already doing so. The universal waste rule eliminates many regulatory requirements such as waste evaluation, manifesting, and record keeping. If you manage your spent lamps as universal waste and they will be recycled, you do not have to determine if they are hazardous waste. If you do not have your spent fluorescent lamps recycled, it is your responsibility to evaluate the lamps to determine if they are hazardous prior to their disposal. Under no circumstances should unevaluated spent fluorescent lamps be disposed of in the trash, as this could result in violations for improper/illegal disposal of a hazardous waste.
- **Scrap Tire Storage.** During the inspection, I noted that you store used or "scrap" tires for re-sale (not on rims) outside your garage on a rack. As we discussed, all generators of scrap tires must store and handle tires in compliance with the general storage and handling rules found in OAC Rule 3745-27-60. If tires are stored outside, they must either be covered with a tarp or other cover, or must have mosquito controls applied to prevent mosquitoes from living and breeding in them. Tires must be kept clear of litter, debris and vegetative matter, and at least 50 feet from possible ignition sources. If dry tires are stored inside a building or in an enclosed container, no additional mosquito controls are necessary. I have enclosed Ohio EPA's factsheet on scrap tire regulations for your reference.

One Stop Auto & Tire needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. You are requested to provide documentation to this office, including the steps taken to abate the violations cited above, within 21 days of your receipt of this letter. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to vicky.german@epa.ohio.gov.

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734. of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, One Stop Auto & Tire is requested to submit written correspondence of the steps that will be taken to attain compliance.

Enclosed you will find a copy of the checklists that were completed as a result of the inspection. You can find copies of the hazardous waste rules and other information on our division's web page at <http://www.epa.ohio.gov/dhwm/lawsregs.aspx>. Pollution prevention and compliance assistance information can be found at <http://www.epa.ohio.gov/ocapp>.

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

Sincerely,



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

VDG/sb
Enclosure

cc: Mr. Delbert Fulton

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.

 <p>Environmental Protection Agency</p> <p>Send to Central Office <input checked="" type="checkbox"/></p>	<p>Ohio Environmental Protection Agency</p> <p>RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM</p>	<p>For Ohio EPA use only</p>
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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

<p>Site EPA ID No.</p> <p>Site Name</p> <p>Site Location Information</p> <p>Site Land Type (check only one)</p> <p>NAICS codes www.census.gov/epcd/www/naics.html</p>	<p>EPA ID Number:</p> <p>Name: One Stop Auto & Tire Website (Optional): Street Address: 729 South Market Street</p> <p>City, Town, or Village: McArthur State: OH County Name: Vinton Zip Code: 45651</p> <p>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"/></p>
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<p>Facility Representative</p> <p>Additional names can be recorded in comments section.</p> <p>Only provide address information if it is different than the site address.</p>	<p>First Name: Steve MI: Last Name: Maxwell</p> <p>Phone Number: 740-596-9976 Extension:</p> <p>E-Mail Address:</p> <p>Fax Number: Fax Number Extension:</p> <p>Street or P.O. Box: 729 South Market Street City, Town or Village: McArthur State: OH Zip Code: 45651</p>
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<p>Legal Owner And Operator</p> <p>List additional Owners and/or Operators in the Comments Section or on another copy of this page.</p>	<p>Name of Site's Legal Owner: Delbert Fulton (property owner) Date Became Owner (mm/dd/yyyy):</p> <p>Owner Private County District Federal Indian Municipal State Other Type: <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>Street or P.O. Box: P.O. Box 542</p> <p>City, Town or Village: McArthur Owner Phone #: 740-352-3459 State: OH Country: US Zip Code: 45651</p> <p>Name of Site's Operator: Steve Maxwell, One Stop Auto & Tire Date Became Operator: September 2011</p> <p>Owner Private County District Federal Indian Municipal State Other Type: <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>Street or P.O. Box: 729 South Market Street</p> <p>City, Town or Village: McArthur Operator Phone #: 740-596-9976 State: OH Country: US Zip Code: 45651</p>
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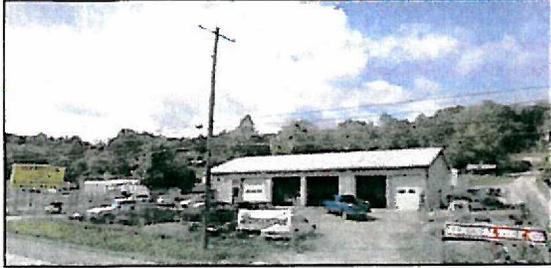
VIOLATIONS CITED?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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TYPE OF HANDLER (MARK AS APPROPRIATE)		
<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input type="checkbox"/> 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 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 type="checkbox"/> Lamps		
USED OIL ACTIVITIES (MARK ALL THAT APPLY)		
<input checked="" type="checkbox"/> Used Oil Generator		
<input type="checkbox"/> Used Oil Transporter		
<input type="checkbox"/> Used Oil Transfer Facility		
<input type="checkbox"/> Used Oil Processor		
<input type="checkbox"/> Used Oil Re-refiner		
<input type="checkbox"/> Off-Specification Used Oil Burner		
<input type="checkbox"/> Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil		
<input type="checkbox"/> Used Oil Fuel Marketer who first claims the Used Oil meets the specifications		
Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the boxes below to indicate the laboratory type.		
<input type="checkbox"/> College or University		
<input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university		
<input type="checkbox"/> Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university		
Waste Codes for Federally Regulated Hazardous Wastes: List the codes for the federally regulated hazardous waste handled at the site, in the order they are presented in the regulations (e.g., D001, D003, F007, U112). If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all; just indicate the date of the most recent source record.		
COMMENTS: Use this area to describe inspection conditions and additional information.		
Announced	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Containers	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
ADDITIONAL COMMENTS:		
Latitude/Longitude: 39.238694, -82.479763		
INSPECTOR(S)		INSPECTION DATE/TIME
Vicky German, DMWM-SEDO Melody Stewart, DMWM-SEDO		7/19/12

PROCESS INFORMATION AND WASTE ACTIVITIES SUMMARY

GENERAL FACILITY INFORMATION



One Stop Auto & Tire is an auto repair and maintenance shop. The facility also sells used tires.

WASTES GENERATED

Wastes are generated from auto repair and garage/building maintenance activities.

WASTE	ACCUMULATION/STORAGE	OFF-SITE MANAGEMENT
Used oil	55-gallon drums, 200-G indoor used oil storage tank, one outdoor used oil storage tank	N/A. Burned in on-site used oil furnace
Used oil filters	Drained and managed as solid waste	Solid waste - disposed
Spent antifreeze	55-gallon drum	Recycled
Spent lead-acid batteries	Inside garage	Recycled through core exchange
Spent fluorescent lamps	Original boxes awaiting recycling	Facility will begin managing as universal waste

REGULATORY HISTORY

One Stop Auto & Tire has not been previously inspected for compliance with Ohio's hazardous waste regulations.

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

One Stop Auto & Tire could not identify the contents of two 55-gallon drums and one approximately 40-gallon drum that were located outside the garage. One Stop Auto & Tire indicated these drums of material were on-site when they began leasing the garage from Mr. Delbert Fulton in September 2011, and they belong to the site's owner or a previous business at this location.

GENERATOR CLASSIFICATION

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

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

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

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

TREATMENT OF HAZARDOUS WASTE

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

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

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

USED OIL GENERATOR COLLECTION CENTER, AND AGGREGATION POINT REQUIREMENTS

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

PROHIBITIONS

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

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

GENERATOR STANDARDS

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| 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.

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| 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.

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| 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"/> |

Several 55-gallon drums containing used oil, located both inside and outside the garage, were not labeled with the words "Used Oil". The indoor 200-gallon used oil tank and one used oil tank located outside the garage were also not labeled with the words "Used Oil".

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

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 <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> |
| 2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-11(B)? [3745-273-11(B)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> |

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 <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> |
| <i>At the time of the inspection, spent fluorescent lamps were being accumulated in boxes awaiting recycling. The facility plans to begin handling their spent lamps as universal waste. A factsheet and list of recycling facilities will be sent with this inspection report.</i> | |
| 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"/> NA <input checked="" type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> |
| <i>When the facility begins accumulating spent lamps, the spent lamps must be accumulated in structurally adequate containers and be labeled with the words "Universal Waste-Lamps" or "Waste Lamps" or "Used Lamps".</i> | |
| <i>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.</i> | |

ACCUMULATION TIME

- NOTE:** Accumulation is defined as date generated or date received from another handler.
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|--|---|
| 11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> |
| a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> |
| b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> |
| c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] | Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> |
| d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] | Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> |
| e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] | Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> |