



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Rd.  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468  
www.epa.ohio.gov

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

Re: Apollo Career Center  
OHD 981 955 032  
Allen County  
DHW, NWDO  
Notice of Violation

April 28, 2010

Mr. Roy Gillespie  
Apollo Career Center  
3325 Shawnee Road  
Lima, Ohio 45806-1497

Dear Mr. Gillespie:

Thank you for accompanying Ed Pulido and me during the Ohio Environmental Protection Agency's (Ohio EPA's) March 11, 2010, compliance evaluation inspection of the Apollo Career Center (ACC) located at 3325 Shawnee Road, Lima, Ohio. We inspected the facility to determine its 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). During the inspection we also helped you identify ways to prevent pollution by reducing waste.

This letter will explain the violations we found, what you need to do to correct the violations, other general concerns we have, what you need to do to respond to the general concerns, and the pollution prevention opportunities we identified.

The ACC is an educational facility that provides career technical training to high school students and adults. Classes include a wide range of subjects such as nursing, truck driving, auto maintenance and law enforcement. ACC Generates many waste streams including used oil, lead-acid batteries (core exchange), universal waste lamps and universal waste batteries. The main hazardous waste stream generated at the facility is waste paint related material (D001, F003, F005). ACC is currently a conditionally exempt small quantity generator of hazardous waste. However, ACC has not yet evaluated all waste streams from the facility, so the hazardous waste generator status may change in the future.

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 30 days of receipt of this letter.**

**Violations**

1. **OAC Rule 3745-52-11, Hazardous Waste Determination:** "Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste ..."

ACC failed to evaluate the following waste streams prior to sending them off site for disposal:

- a. filters from the smart washer bioremediation unit,
- b. antifreeze,
- c. paint booth filters from the auto body building,
- d. liquid/sludge from the paint booth channel in the auto body building,
- e. spent parts washer fluid, and
- f. spent sandblasting media.

In order for ACC to determine whether the wastes listed above exhibit any hazardous waste characteristics, ACC must obtain a chemical analysis of a representative sample of each of the wastes listed above. ACC will need to contract the services of an environmental laboratory to analyze these materials. A detailed description of what each material needs to be analyzed for is listed below. ACC has the option of analyzing the wastes for total volatile organic compounds (VOCs), total semi-volatile organic compounds (SVOCs) and total Resource Conservation and Recovery Act (RCRA) metals as a screening tool. However, based upon the results of these analyses ACC may be required to analyze the waste for toxicity characteristic leaching procedure (TCLP) VOCs, TCLP SVOCs and TCLP RCRA metals.

ACC must at least determine the concentrations of the following for each waste stream:

- a. filters from the smart washer bioremediation unit – VOCs, SVOCs and RCRA metals;
- b. antifreeze – RCRA metals;
- c. paint booth filters from the auto body building - VOCs and RCRA metals;
- d. liquid/sludge from the paint booth channel in the auto body building – VOCs and RCRA metals;
- e. spent parts washer fluid – RCRA metals and a flashpoint analysis; and
- f. spent sandblasting media – RCRA metals.

**Within 30 days of receipt of this letter**, ACC shall submit the analytical results indicating the proper evaluation of the wastes for Ohio EPA's review. The results must document if the waste is hazardous or not and, if hazardous, whether it is restricted from land disposal. If the waste is hazardous, ACC must also submit information as to what treatment, storage or disposal facility the waste will be sent to.

Once Ohio EPA acknowledges ACC's proper characterization of the wastes, ACC must dispose of the wastes at a proper disposal facility. ACC must then submit to the Ohio EPA the appropriate manifest documents or shipping papers indicating proper disposal of the wastes.

Please notify me at least five days prior to taking the samples so that I may be present.

If the waste is hazardous, I will determine the status of your compliance with other hazardous waste laws and notify you of my findings in a separate letter.

Ohio EPA understands that some of the waste streams listed above will not be generated again within the next three months (such as the spent parts washer fluid and the sandblasting media). In these cases, in order to abate the violations, ACC must describe that the wastes will be properly evaluated the next time they are generated. ACC should describe how a sample will be obtained, where it will be analyzed, and for what analyses.

For more information the following fact sheets have been enclosed: Identifying Your Hazardous Waste, dated November 2006; Use of Generator Knowledge in Complying with OAC Rule 3745-52-11 Hazardous Waste Evaluation, dated July 18, 2005; Commercial Environmental Laboratories, printed April 21, 2010; Violations Most Frequently Cited by Division of Hazardous Waste Management Inspectors, printed April 21, 2010; Environmental Compliance Guide for Auto Repair Shops, dated March 2007; Guidance for Owners/Operators of Automotive Collision Repair Shops, dated July 2006; Summary of Regulations Controlling Air Emissions from Paint Stripping and Miscellaneous Surface Coating Operations, dated April 2008; Frequently Asked Questions, Paint Stripping and Miscellaneous Surface Coating Operations Area Source Rule, dated January 28, 2010; and Information Needed for Initial Notification, Paint Stripping and Miscellaneous Surface Coating, dated November 2008.

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

ACC failed to mark two 55-gallon drums of used oil located in the used oil storage area near the auto mechanics building with the words "Used Oil."

In order to abate this violation, ACC must properly label all used oil containers with the words "Used Oil." **Within 30 days of receipt of this letter**, ACC must submit to Ohio EPA photographs of the used oil drums in the used oil storage area showing the proper labels. For more information Ohio EPA has enclosed the fact sheets titled The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil, dated April 2006, and Fact Sheets and Information Papers, Disposal of Terne-Plated and Non Terne-Plated Oil Filters, dated January 2001.

3. **OAC Rule 3745-273-13(D)(1), Waste Management – Standards for Small Quantity Handlers of Universal Waste:** "A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions."

ACC failed to store the universal waste lamps in a closed container that is adequate to prevent breakage.

During Ohio EPA's site visit on April 7, 2010, ACC showed Ohio EPA the universal waste lamps have been placed into an appropriate container that is closed.

***Therefore, this violation was abated on April 7, 2010.***

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

ACC failed to mark the container holding the spent lamps with the words " Universal Waste Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)."

During Ohio EPA's site visit on April 7, 2010, ACC showed Ohio EPA the container holding the spent lamps is properly labeled.

*Therefore, this violation was abated on April 7, 2010.*

For more information on universal waste, the following fact sheets have been enclosed: Universal Waste Rules for Handlers of Lamps, dated June 2005; Fluorescent Lamps: What You Should Know, dated January 2007; and Universal Waste, dated December 2004.

#### **General Concerns**

- A. **Drums near the used oil storage:** During the March 11, 2010, inspection, Ohio EPA observed two 55-gallon drums located beside the used oil storage area near the auto mechanics building. ACC stated that these drums are believed to be used oil. However, this was not confirmed during the March 11, 2010, inspection. When Ohio EPA returned to the site on April 7, 2010, the contents of the drums still had not been confirmed.

In order to address this general concern, ACC needs to determine the contents of the drums. **Within 30 days of receipt of this letter**, ACC should submit to Ohio EPA a description and photograph of the contents of each drum. If the contents of each drum are unknown (not used oil), then ACC must properly evaluate each drum to determine if it contains hazardous waste.

- B. **Acid Chips from the Neutralization Pit:** During the inspection, ACC showed Ohio EPA the area in one of the science labs where a neutralization pit had been installed. ACC explained that the pit contained chips that neutralized material poured into the pit. The neutralized liquid then flowed into the sanitary sewer system. ACC explained that the chips are good for three years and the pit was only two years old. Therefore, the chips would be changed next year.

Ohio EPA would like to remind ACC that the chips generated from the neutralization pit need to be properly evaluated prior to disposal. Depending on what chemicals are being disposed of through this neutralization pit, the waste chips may be considered characteristic or listed hazardous waste. Ohio EPA would recommend that a log be kept near the neutralization pit. This log should contain the type of waste and amount of waste that is placed into the pit. This will aid in the waste evaluation of the acid chips in the future.

In order to determine if this neutralization pit is regulated through the Division of Hazardous Waste Management and RCRA or the Division of Surface Water and the Clean Water Act, more information is needed. ACC must list all wastes or chemicals that are disposed of in this pit. Material Safety Data Sheets (MSDSs) must be provided to Ohio EPA for the materials that are disposed of in this fashion. ACC must describe what is used to clean the glassware in the lab and how the wastes generated from this are disposed. ACC must describe how the liquid from the pit flows into the sanitary sewer system (Does the liquid flow directly through the chips into the sewer or is the liquid held in the pit until ACC opens a valve and disposes of it through the sewer system?). If the pit has a valve, how often is the valve opened and the liquid allowed to

discharge into the sewer? This information must be submitted to Ohio EPA **within 30 days of receipt of this letter.**

- C. **Carpentry Class/Painting:** During the inspection, Ohio EPA was told that each year the carpentry class builds a house off site. The majority of painting occurs at the house while the students are off ACC property. However, some painting occurs in the ACC's carpentry classroom paint booth. Ohio EPA views the paint related waste from the painting that occurs at the house (and off of ACC property) as household hazardous waste. Therefore, this waste is not regulated by Ohio EPA. However, paint related waste from the painting that takes place on ACC property is still regulated by Ohio EPA.

Ohio EPA cannot tell from the MSDSs that were given to Ohio EPA which materials are utilized on site by the carpentry class. In order to determine compliance, Ohio needs this information. **Within 30 days of receipt of this letter,** ACC must send information to Ohio EPA that describes which materials are utilized on site, what wastes are generated from on site painting (including paint booth filters), and how these wastes are managed and disposed.

- D. **Glass Neutralization Tank:** During the inspection, Ohio EPA was told that one of the science labs contained a glass neutralization tank. In order to determine compliance, Ohio EPA needs more information pertaining to this tank. **Within 30 days of receipt of this letter,** ACC should submit information to answer the following questions: What wastes are disposed of in this tank? Please provide MSDSs if applicable. Are the glass chips contained in this tank ever changed? If so, how often are they changed and how are they disposed? Does the neutralized liquid flow directly to the sanitary sewer or is the tank pumped out? If the tank is pumped out, how frequently is the material removed from the tank? How much material is removed from the tank? What is done with the material that is removed from the tank?

- E. **Photography Wastes:** Some photograph developing processes utilize silver compounds which can be a hazardous waste. The MSDSs that were supplied to Ohio EPA for the #1 Network Universal Fixer Concentrate and the #1 Network Rapid Developer Concentrate do not list any silver compounds. In order to determine compliance, Ohio EPA needs more information. **Within 30 days of receipt of this letter,** ACC should submit information to answer the following questions: Is another silver containing material utilized in the developing/fixing process that has not been listed above? If so, please submit the MSDS for that material. If a substitute for the silver containing material is being utilized at ACC please describe what the substitute is and if the lack of silver affects the results.

### **Pollution Prevention**

During the inspection, Ohio EPA observed that ACC was not recycling scrap metal that is generated on site. This includes used oil filters, aerosol cans, and scrap metal from the machining shop. Ohio EPA recommends that ACC begin to recycle all scrap metal that is generated on site. It may prove to be an economic advantage and it decreases the amount of material that ends up in the landfill.

As we discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce, or altogether eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs as well as regulatory requirements. Ohio EPA has helpful information about pollution prevention at the following web address: <http://www.epa.ohio.gov/ocapp/>. If you would like to be considered for a free, non-regulatory on-site pollution prevention assessment, or if you would like more information about pollution prevention assessments, please contact me at the number listed below. The Ohio Department of Development's Office of Energy Efficiency may also be able to help with energy efficiency issues. Their website is at <http://www.development.ohio.gov/cdd/oeef/>.

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign up for this free service. You can find more information at the following web link:

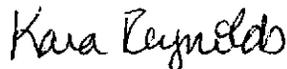
[http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc\\_serve.php?2=subscriptionpage](http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage).

Please feel free to share this with your colleagues.

Enclosed you will find a copy of the checklists that were completed during the inspection. Should you have any questions, please feel free to call me at (419) 373-3065. You can find copies of the rules and other information on the division's web page at <http://www.epa.ohio.gov/dhwm/>.

Please send all correspondence **within 30 days of receipt of this letter** to Ohio EPA, Northwest District Office, Attn: Kara Reynolds, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,



Kara Reynolds  
Environmental Specialist  
Division of Hazardous Waste Management

/cs

Enclosures

pc: Colleen Weaver, DHWM, NWDO  
Kara Reynolds, DHWM, NWDO  
Cindy Lohrbach, DHWM, NWDO  
~~DHWM, NWDO, Allen County, File: Apollo Career Center~~

**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.

Send to Central Office <input checked="" type="checkbox"/>	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE</b> <b>IDENTIFICATION/VERIFICATION FORM</b>	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to [kristina.durnell@epa.state.oh.us](mailto:kristina.durnell@epa.state.oh.us).

<b>Site EPA ID No.</b> <b>Site Name</b>	EPA ID Number: <b>OHD981955032</b>		Website: <b>www.apollocareercenter.com</b> (Optional)
<b>Site Location Information</b>	Name: <b>Apollo Career Center</b>		
<b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	Street Address: <b>3325 Shawnee Road</b>	City, Town, or Village: <b>Lima</b>	
	County Name: <b>Allen</b>	State: <b>OH</b>	
	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"/>	Zip Code: <b>45806-1497</b>

<b>Facility Representative</b>  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: <b>Roy</b>	MI:	Last Name: <b>Gillespie</b>
	Title: <b>Facility Manager</b>		
	Phone Number: <b>419-998-2907</b>		Phone Number Extension:
	E-Mail Address: <b>roy.gillespie@apollocc.org</b>		
	Fax Number: <b>567-904-2901</b>		Fax Number Extension:
	Street or P.O. Box:		
	City, Town or Village:		
	State:		Zip Code:

<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: <b>Apollo Career Center</b>	Date Became Owner (mm/dd/yyyy):
	Owner Type:	Federal <input type="checkbox"/>
	Private <input type="checkbox"/>	Indian <input type="checkbox"/>
	County <input type="checkbox"/>	Municipal <input type="checkbox"/>
	District <input type="checkbox"/>	State <input type="checkbox"/>
	Other <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: <b>3325 Shawnee Road</b>	
	City, Town or Village: <b>Lima</b>	
	State: <b>Ohio</b>	
	Owner Phone #: <b>419-998-2907</b>	
	Country: <b>USA</b>	
	Zip Code: <b>45806</b>	
	Name of Site's Operator: <b>Apollo Career Center</b>	
	Date Became Operator (mm/dd/yyyy):	
	Operator Type:	
	Private <input type="checkbox"/>	
	County <input type="checkbox"/>	
	District <input type="checkbox"/>	
	Federal <input type="checkbox"/>	
	Indian <input type="checkbox"/>	
	Municipal <input type="checkbox"/>	
	State <input type="checkbox"/>	
	Other <input type="checkbox"/>	
	Street or P.O. Box: <b>3325 Shawnee Road</b>	
	City, Town or Village: <b>Lima</b>	
	State: <b>Ohio</b>	
	Operator Phone #: <b>419-998-2907</b>	
	Country: <b>USA</b>	
	Zip Code: <b>45806</b>	

<b>VIOLATIONS CITED?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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<b>TYPE OF HANDLER - MARK "X" AS APPROPRIATE</b>		
<input type="checkbox"/> Not a HW Generator	<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
	<input type="checkbox"/> Short-Term Generator (generates from a 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"/> Small Quantity Generator (SQG)
		<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
		<input type="checkbox"/> U.S. Importer of Hazardous Waste
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

**TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)**

- |   |  |
|---|--|
| <input type="checkbox"/> 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"/> 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<br>(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. Oil  
 Used Oil Fuel Marketer to Off-Specification Used Oil Burner

**Waste Codes for Federally Regulated Hazardous Wastes.** Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

**D001                      F003                      F005**

**COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.**

Announced       Yes       No      Additional Facility Representatives:  
Tanks               Yes       No  
Containers         Yes       No

Name of Inspector(s)  
**Kara Reynolds**

Name of Inspector(s)  
**Ed Pulido**

Date of Inspection/Time  
(mm/dd/yyyy) (hh:mm)  
**03-11-2010 1:00 PM**

**Comments:**

## PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Apollo Career Center Facility Type: Unknown Date of Inspection: 03-11-2010 EPA ID#: OHD981955032

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1 Automotive Mechanic Building	Used Oil	Less than 20 Gallons Drum Used Oil Storage Area near Auto Building	Storage	Clean Water LTD, Ohio	Recycle	
2 Automotive Mechanic Building	Parts Washer Fluid	Less than 10 Gallons Drum No Storage Occurs		Heritage-Crystal Clean, Ohio	Recycle	
3 Automotive Mechanic Building	Smart Washer Filters	~12 filters per year		Local Landfill		
4 Automotive Mechanic Building	Antifreeze	~55 Gallons per Year Drum		Clean Water LTD, Ohio		

			Antifreeze Storage in Auto Building				
5	Automotive Mechanic Building	Only Non-Terne Plated Used Oil Filters			Local Landfill		Recycle as Scrap Metal
6	Automotive Mechanic Building	Lead Acid Batteries	~10 per Year		Interstate Batteries, Ohio, Core Exchange	Recycle	
7	Automotive Mechanic Building	Glass Sand Blast Media			Local Landfill		
8	Auto Body Building	Waste Paint Related Material D001, F003, F005	~5 Gallons Drum Paint Storage Room	Storage	Clean Water LTD, Ohio		
9	Auto Body Building	Paint Booth Filters	Disposed Once per Year		Local Landfill		
10	Auto Body Building	Sludge from Paint Booth Channel	Unknown, Disposed Once per Year		Clean Waters LTD		

11	Carpentry	Paint Booth Filters	Disposed Once per Year		Local Landfill		
12	Carpentry	Waste Paint Related Material?					
13	Precision Machining	Cutting Oil	No Waste Generated, Cutting Oil Only Added to Machines				
14	Precision Machining	Parts Washer Fluid	~ 30 Gallons per Year Drum No Storage Occurs		Heritage-Crystal Clean, Ohio	Recycle	
15	Maintenance Area	Parts Washer Fluid	~ 30 Gallons per Year Drum No Storage Occurs		Heritage-Crystal Clean, Ohio	Recycle	
16	Science Lab	Acid Chips	Will Generate in the Future				
17	Science Lab	Neutralized Waste Acid			Flows Directly to Sanitary Sewer		
18	Graphics Lab	Waste photo developer and fixer			Flows to sanitary sewer		

19	Science Lab	Glass Neutralization Tank					
20	Landscape & Turf Management	Pesticides	No Waste Generated; All Pesticides are Used on Grounds at Some Point				
21	Landscape & Turf Management	Used Oil	Minimal Drum Used Oil Storage Area near Auto Building	Storage	Clean Water LTD, Ohio	Recycle	
22	Construction & Trucking Building	Used Oil	~50 Gallons Tote Garage	Storage	Clean Water LTD, Ohio	Recycle	
23	Construction & Trucking Building	Antifreeze	~55 Gallons per Year Drum Antifreeze Storage in Auto Building	Storage	Clean Water LTD, Ohio		
24	Construction & Trucking Building	Lead-Acid Batteries	~12 per year		Interstate Batteries, Ohio, Core Exchange	Recycle	

25	Construction & Trucking Building	Only Non-Terne Plated Used Oil Filters			Local Landfill		Recycle as scrap metal
26	Maintenance & Central Receiving	Universal Waste Lamps	~200 per Year Boxes Maintenance Area	Storage	Wesco, Lima, Ohio	Recycle	
27	Maintenance & Central Receiving	Universal Waste Batteries	Minimal Box  Inside Caged Area	Storage	Key Janitorial Supply, Belle Center, Ohio	Recycle	

### REMARKS/GENERAL INFORMATION

**General Process Information:** See Attached Letter.

**Regulatory/Enforcement History** (if applicable): N/A

**Additional P2 remarks and information:** See Attached Letter.

Would this facility be interested in a P2 assessment? Yes\*      No      \*If yes, refer promptly to your district P2 coordinator.

Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or [p2mail@epa.state.oh.us](mailto:p2mail@epa.state.oh.us) or [www.epa.state.oh.us/ocapp/ocapp.html](http://www.epa.state.oh.us/ocapp/ocapp.html)

**Other:** N/A

**CONDITIONALLY EXEMPT 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:

**WASTE EVALUATION**

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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**GENERATOR CLASSIFICATION**

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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*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"). If so, complete the Small Quantity Generator Requirements checklist.*

**OFF-SITE SHIPMENT OF HAZARDOUS WASTE**

3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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**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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	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 the CESQG conducts treatment they are subject to the LQG requirements.*

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

**MIX HAZARDOUS WASTE WITH USED OIL**

5.	Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

**USED OIL INSPECTION CHECKLIST  
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

**NOTE:** 1. 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.

2. Inspectors can check BUSTR's web-site at [https://www.comapps.ohio.gov/sfm/fire\\_apps/bust/bustr/PublicInquiry.asp](https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp) to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at:

[https://www.comapps.ohio.gov/sfm/fire\\_apps/bust/bustr/SearchByCounty.asp](https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp).

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

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] 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 <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#? [3745-279-24]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]		
	a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <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.*

**SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS – BATTERIES AND LAMPS**

**Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more**

**Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less**

**PROHIBITIONS**

1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

**WASTE MANAGEMENT AND LABELING/MARKING**

**UNIVERSAL WASTE BATTERIES**

3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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 checked="" 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 checked="" type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**UNIVERSAL WASTE LAMPS**

8.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
9.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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 checked="" type="checkbox"/> N/A <input type="checkbox"/>
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ACCUMULATION TIME		
11.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Accumulation is defined as date generated or date received from another handler.</i>		
12.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)]  If yes, describe below:	Yes <input checked="" 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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RESPONSE TO RELEASES		
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
16.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
OFF-SITE SHIPMENTS		
<i>NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.</i>		
17.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Is the handler aware of DOT requirements for packaging and shipping?  If no, make aware of 49 CFR 171-180.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	a. If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
21.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of</u> the following:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	a. Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
22.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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"/>

