OhioEPA

State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Ohio Decorative Products
OHD 005036264
Allen County
Hazardous Waste
Notice of Violation

September 24, 2007

Mr. Mike Sawmiller, Plating Supervisor
Ohio Decorative Products, Inc.
220 S. Elizabeth Street
Spencerville, Ohio 45887

Dear Mr. Sawmiller:

Thank you for accompanying me during Ohio EPA's September 12, 2007, inspection of Ohio Decorative Products, Inc. (ODP) at 220 S. Elizabeth Street in Spencerville, Ohio. I inspected ODP 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). My inspection included a tour of your facility and a review of written documentation. We also discussed pollution prevention at ODP. This letter will explain the violations I found and what you need to do to correct the violations.

ODP manufactures zinc die-cast parts for the appliance industry. Processes at the facility include: 1. Zinc melting and casting, 2. Machining, 3. Polishing and 4. Plating. The surface prep and plating process involves the following steps: 1. #1 Washer, emersion cleaner, utilizing an alkaline soap → 2. Spray water rinse → 3. Spray wash with alkaline phosphate → 4. Spray rinse → 5. Cleaner tank, alkaline electrocleaner → 6. Emersion rinse → 7. Surface activation (prior to copper plating) with acid salts (sodium bisulfate) → 8. Rinse → 9. Copper strike → 10. Copper plating → 11 - 14. Rinses (4 tanks) → 15. 1% Sulfuric acid → 16. Nickel plating → 17 - 19. Rinses (3 tanks) → 20. Chrome (hexavalent) plating → 21 - 24. Rinses (4 tanks). The copper strike contains cyanide.

ODP is a large quantity hazardous waste generator and a small quantity universal waste handler. ODP generates the following hazardous and universal wastes:

1. Concentrated Liquid From Electroplating Wastewater Treatment (F006). Once the plating wastewaters are treated in the on-site system, they are pumped by hose into WST-1, a 2,000 gallon, indoor, above ground storage tank. This may occur once or twice per quarter. Approximately 9,055 gallons was generated in 2006, and shipped to Envirite of Ohio in Canton, Ohio.

2. Acid Waste (D002, D008 & F006). This waste consists of nickel and chrome plating solutions and some concentrated liquid from electroplating wastewater treatment (F006). The lead comes from the anodes in the plating tanks. This waste is pumped by hose into containers. The containers are moved to the indoor tank area and the waste is pumped by hose into WST-2, a 2,000 gallon, indoor, above ground storage tank. Approximately 150 gallons is generated each month, when it is necessary to adjust the chemistry of the plating tanks. Approximately 1,927 gallons was generated in 2006, and shipped to Vickery Environmental in Vickery, Ohio.

3. Waste Cleaner (D007). Once or twice per quarter the 4,000 gallon #1 Washer Tank is emptied. It contains chromium, presumably caused by drag out from the chrome plating tank. It is pumped through overhead piping to SC -1, a 5,000 gallon, indoor, above ground storage tank. Approximately 14,836 gallons was generated in 2006, and shipped to Envirite of Ohio in Canton, Ohio.

4. Waste Copper Cyanide Solution (D002 & F007). One to two times per year the copper plating tank is emptied, when it is necessary to adjust its chemistry. Approximately 20 drums are generated in the process. The drums are moved to an indoor drum accumulation area in the back of the facility. The liquid is pumped by hose into a hazardous waste tanker truck for off-site shipment.

5. Fluorescent Lamps. Spent lamps are generated from throughout the facility.

ODP has not painted parts for about one year. ODP no longer de-waters its wastewater treatment sludge, so they do not generate a "dry" sludge. Instead, treated wastewaters are pumped out of tanks and shipped to a hazardous waste facility.

I 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 your receipt of this letter:

1. **Universal Waste Packaging - Lamps**
   OAC Rule 3745-273-13(D)(1)

   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.

   ODP did not keep its spent lamps in closed containers. Lamps were found laying against an office wall. In order to correct this violation, ODP must place all lamps in closed containers and submit photographic documentation that this has been done.

2. Universal Waste Labeling - Lamps
OAC Rule 3745-273-14(E)

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-Lamps", or "Waste Lamps" or "Used Lamps".

ODP did not properly label any of its spent lamps with one of the required phrases. In order to correct this violation, ODP must properly label each lamp, or container, or package and submit photographic documentation that this has been done.

3. Accumulation Time for Universal Waste Lamps
OAC Rule 3745-273-15(C)

A small quantity handler of universal waste shall be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

ODP was not able to demonstrate the length of time the universal waste lamps were accumulated. In order to correct this violation, ODP must place a date on each lamp, or on the container they are placed in, with the earliest date that a lamp is placed in the container. ODP must submit photographic documentation that this has been done.

4. Universal Waste Employee Training
OAC Rule 3745-273-16

A small quantity handler of universal waste shall inform all employees who handle or have responsibility for managing universal waste. The information shall describe proper handling and emergency procedures appropriate to the type of universal waste handled at the facility.

ODP has not demonstrated that it has properly informed its employees who handle spent lamps of proper waste handling and emergency procedures. In order to correct this violation, ODP must describe, through a training outline, how it will inform its universal waste lamp handlers in proper handling and emergency procedures. ODP must submit some form of documentation demonstrating that this training has been accomplished. The training must also include compliance with all rules for the handling of universal waste lamps and the corrective actions for all violations of universal waste rules, cited above.

5. Tank System Inspection Record
OAC Rule 3745-66-95(C)

The owner or operator must document an inspection of the aboveground portions of the tank system.

ODP has not recorded an inspection of the piping for Tank SC - 1. In order to correct this violation, ODP must record an inspection of the piping for Tank SC -1 each day that waste is in Tank SC -1. ODP must revise the tank inspection record and document that it has performed the appropriate inspection and submit copies of two weeks of inspection records demonstrating that the inspections have been recorded.

Please be aware that incandescent, fluorescent, metal halide, neon, high-intensity discharge, high-pressure sodium and mercury-vapor lamps could be hazardous waste when discarded. Fluorescent lamps may contain up to 40 milligrams (mg) of mercury, depending on the brand and manufacturer. Lamps may also contain lead and cadmium. Many lamps exhibit a characteristic of toxicity for heavy metals when disposed. During the inspection, I gave you copies of the following documents to assist you in properly managing your spent lamps: Universal Waste Rules for Handlers of Lamps and Fluorescent Lamps: What You Should Know. I have also enclosed a copy of Computer, Fluorescent Lamp and Ballast Recyclers. I recommend that you review these documents carefully and contact me if you have any questions. The first two documents describe the rules you must follow in order to manage lamps as a universal waste.

You may be able to reduce the waste your business generates. If you find ways to recycle, reduce or altogether eliminate the amount of waste that your business generates, you may be able to reduce your treatment and disposal costs and you may possibly reduce your regulatory requirements. During the inspection I gave you copies of the following fact sheets: Pollution Prevention Opportunities and Easy to Implement P2, two worksheets that can help you recognize opportunities for reducing waste and conserving energy at your business. I also provided a copy of Management of Electronic Waste from Businesses. Please review this information and contact me if you have any questions.

You may want to consider the opportunity to have a pollution prevention assessment at your facility. I encourage you to schedule an assessment because there are often many opportunities for facilities to reduce waste and save money. Please feel free to contact Ohio EPA's Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 about your interest in an assessment.

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 and used oil 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://www.epa.state.oh.us/dhwm/listserv.html. Please feel free to share this information with your colleagues.

Enclosed you will find a copy of the inspection checklists that I completed during the inspection. If you have any questions about my inspection, or this letter, please feel free to call me at (419) 373-3074.

You can find copies of the rules and other information about universal waste and hazardous waste management on the division's web page at http://www.epa.state.oh.us/dhwm. Ohio EPA also has helpful information about pollution prevention at the following web address: http://www.epa.state.oh.us/ocapp/ocapp.html.

Sincerely,

Don North

Don North
District Representative
Division of Hazardous Waste Management

/llr

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
DHWM-NWDO File- Allen County, Ohio Decorative Products File
ec: Don North, DHWM, NWDO

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

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

For Ohio EPA use only

E-mail this completed form to tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office

Site EPA ID No	**EPA ID Number:** OHD 005 036 264
Site Name	**Name:** Ohio Decorative Products, Inc. **Website: (Optional)**
Site Location Information	**Street Address:** 220 S. Elizabeth St.
	City, Town, or Village: Spencerville **State:** OH
	County Name: Allen **Zip Code:** 45887
Site Land Ty (check only o	Private ☑ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other ☐
NAICS code www.census.gov/ w/naics.html	331522 332813
Facility Representative	**First Name:** Mike **MI:** D **Last Name:** Sawmiller
Phone Numbers can be number 12	**Phone Number:** 419-647-4191 **Phone Number Extension:** 212
	E-Mail Address:
	Fax Number: 419-647-4941 **Fax Number Extension:**
Only pr	**Street or P.O. Box:**
information	**City, Town or Village:**
than the site	**State:** **Country:** **Zip Code:**
Legal Owner and the Site List Addit	**Name of Site's Legal Owner:** Ohio Decorative Products, Inc. **Date Became Owner (mm/dd/yyyy):** 8-15-1950
	Owner Type: Private ☒ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other ☐
	Street or P.O. Box: 220 S. Elizabeth St.
	City, Town or Village: Spencerville **Owner Phone #:** 419-647-4191
	State: Ohio **Country:** US **Zip Code:** 45887
	Name of Site's Operator: Same **Date Became Operator (mm/dd/yyyy):**
	Owner Type: Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other ☐
	Street or P.O. Box:
	City, Town or Village: **Operator Phone #:**
	State: **Country:** **Zip Code:**
Viol is Cited?	☒ Yes ☐ No

Type of Generator

☐ Not Regulated	☐ Conditionally Exempt Small Quantity Generator
☐ UNKNOWN: Cited for violation of 3745-52-11	☐ United States Importer of Hazardous Waste
☒ Large Quantity Generator (LQG)	☐ Mixed Waste (Hazardous and Radioactive) Generator
☐ Small Quantity Generator (SQG)	

Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)

☐ Recycler of Hazardous Waste	☐ Exempt Boiler and/or Industrial Furnace
☐ Underground Injection Control Facility	☐ Small Quantity On-Site Burner Exemption
☐ Hazardous Waste Transporter	☐ Smelting, Melting, Refining Furnace Exemption
☐ Treater, Storer or Disposer of Hazardous Waste	

Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply)	
☒ Small Quantity Handler of Universal Waste	☐ Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)
☐ Destination Facility for Universal Waste	

(Check all boxes below that apply for each of the universal waste types at facilities above.) Used Oil Activities (Indicate ...)

	Managed		
		☐ Used Oil Generator	☐ Off-Specification Used Oil Burner
Batteries	☐	☐ Used Oil Transporter	☐ Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	☐	☐ Used Oil Transfer Facility	☐ Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	☐	☐ Used Oil Processor	
Lamps	☒	☐ Used Oil Re-refiner	

Waste codes of Federally Regulated Hazardous Wastes (Please list the codes of federally regulated hazardous waste handled at the site. List them in the order they are presented in the [illegible] (07-01-12). Use additional [illegible] if there are more than 7 waste codes and the [illegible] listed in the most recent [illegible] source record [illegible] need to list them all. Instead just [illegible] the most recent source record.

Comments: Use this area to describe whether the inspection was announced, [illegible] tanks or containers, etc.

Announced	☐ Yes	☒ No	Additional Facility Representatives:
Tanks	☒ Yes	☐ No	Other Comments:
Containers	☒ Yes	☐ No	

Name of Inspector(s):	Name of Inspector(s):
Don North	

OPTIONAL CERTIFICATION: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Owner, Operator or an Authorized Representative	Name and Title (Pri[illegible])	Date (mm/dd/yyyy)

Revised May 2007

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

Ohio Decorative Products 9-12-07

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

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] — Yes ☑ No ☐ N/A ☐
2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] — Yes ☑ No ☐ N/A ☐
3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] — Yes ☑ No ☐ N/A ☐
4. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] — Yes ☑ No ☐ N/A ☐
5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] — Yes ☑ No ☐ N/A ☐
6. Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] — Yes ☐ No ☑ N/A ☐
7. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] — Yes ☐ No ☑ N/A ☐
8. Does the generator accumulate hazardous waste? — Yes ☑ No ☐ N/A ☐

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

9. Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)? — Yes ☐ No ☑ N/A ☐

NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G) & (H).

10. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]
    a. Container that meets 3745-66-70 to 3745-66-77? — Yes ☐ No ☐ N/A ☑
    b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? — Yes ☐ No ☐ N/A ☑
    c. Drip pads that meet 3745-69-40 to 3745-69-45? — Yes ☐ No ☐ N/A ☑
    d. Containment building that meets 3745-256-100 to 3745-256-102? — Yes ☐ No ☐ N/A ☑

NOTE: Complete appropriate checklist for each unit.
NOTE: If waste is treated to meet LDRs, use LDR checklist.

11. Does the generator export hazardous waste? If so: — Yes ☐ No ☑ N/A ☐
    a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] — Yes ☐ No ☐ N/A ☑
    b. Has the generator complied with special manifest requirements? [3745-52-54] — Yes ☐ No ☐ N/A ☑
    c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] — Yes ☐ No ☐ N/A ☑
    d. Has an annual report been submitted to U.S. EPA? [3745-52-56] — Yes ☐ No ☐ N/A ☑
    e. Are export related documents being maintained on-site? [3745-52-57(A)] — Yes ☐ No ☐ N/A ☑

MANIFEST REQUIREMENTS

12. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] — Yes ☑ No ☐ N/A ☐
13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] — Yes ☑ No ☐ N/A ☐

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]

14. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] — Yes ☑ No ☐ N/A ☐

NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].

15. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] — Yes ☐ No ☐ N/A ☑
16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] — Yes ☑ No ☐ N/A ☐

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.

17. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] — Yes ☐ No ☐ N/A ☑
18. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] — Yes ☐ No ☐ N/A ☑
19. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] — Yes ☐ No ☐ N/A ☑

NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.

PERSONNEL TRAINING

20. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] — Yes ☑ No ☐ N/A ☐
21. Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] — Yes ☑ No ☐ N/A ☐
22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] — Yes ☑ No ☐ N/A ☐
23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] — Yes ☐ No ☐ N/A ☑
24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] — Yes ☑ No ☐ N/A ☐
25. Does the generator keep records and documentation of:
    a. Job titles [3745-65-16D(1)]? — Yes ☑ No ☐ N/A ☐
    b. Job descriptions [3745-65-16D(2)]? — Yes ☑ No ☐ N/A ☐
    c. Type and amount of training given to each person[3745-65-16D(3)]? — Yes ☑ No ☐ N/A ☐
    d. Completed training or job experience required [3745-65-16D(4)]? — Yes ☑ No ☐ N/A ☐
26. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] — Yes ☑ No ☐ N/A ☐

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the -job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained

CONTINGENCY PLAN

27. Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] — Yes ☑ No ☐ N/A ☐
28. Does the plan describe the following:
    a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? — Yes ☑ No ☐ N/A ☐
    b. Arrangements with emergency authorities [3745-65-52(C)]. — Yes ☑ No ☐ N/A ☐
    c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] — Yes ☑ No ☐ N/A ☐
    d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] — Yes ☑ No ☐ N/A ☐
    e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] — Yes ☑ No ☐ N/A ☐

NOTE: If the facility already has a "Spill Prevention, Control and Counter measures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to Incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]

29. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] — Yes ☑ No ☐ N/A ☐
30. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] — Yes ☑ No ☐ N/A ☐
31. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] — Yes ☑ No ☐ N/A ☐

NOTE: The emergency coordinator shall be throughly familiar with: (a) all aspects of the facility's contingency plan: (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES

32. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: — Yes ☐ No ☑ N/A ☐
    a. Was the contingency plan implemented? [3745-65-51(B)] — Yes ☐ No ☐ N/A ☑
    b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? — Yes ☐ No ☐ N/A ☑

c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes ☐ No ☐ N/A ☑

NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

PREPAREDNESS AND PREVENTION

33. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes ☑ No ☐ N/A ☐
34. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:
    a. Internal communications or alarm system? [3745-65-32(A)] Yes ☑ No ☐ N/A ☐
    b. Emergency communication device? [3745-65-32(B)] Yes ☐ No ☐ N/A ☑
    c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes ☑ No ☐ N/A ☐
    d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes ☐ No ☐ N/A ☑

NOTE: Verify that the equipment is listed in the contingency plan.

35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes ☑ No ☐ N/A ☐
36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes ☑ No ☐ N/A ☐
37. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] Yes ☑ No ☐ N/A ☐
38. If there is only one employee on the premises, is there immediate access to a device (ex.phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] Yes ☐ No ☐ N/A ☑
39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes ☑ No ☐ N/A ☐
40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes ☑ No ☐ N/A ☐
41. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)? Yes ☐ No ☐ N/A ☑

SATELLITE ACCUMULATION AREA REQUIREMENTS

42. Does the generator ensure that satellite accumulation area(s):
    a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes ☐ No ☐ N/A ☑
    b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes ☐ No ☐ N/A ☐
    c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes ☐ No ☐ N/A ☐
    d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes ☐ No ☐ N/A ☐
    e. Containers are closed, in good condition and compatible with wastes stored in them?[3745-52-34(C)(1)(a)] Yes ☐ No ☐ N/A ☐
    f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes ☐ No ☐ N/A ☐
43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes ☐ No ☐ N/A ☐
    a. Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes ☐ No ☐ N/A ☐
    b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded?[3745-52-34(C)(2)] Yes ☐ No ☐ N/A ☐

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less then 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

44. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes ☑ No ☐ N/A ☐
45. Is the accumulation date on each container? [3745-52-34(A)(2)] No containers in accumulation at time of CEI Yes ☐ No ☐ N/A ☑
46. Are hazardous wastes stored in containers which are:
    a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes ☐ No ☐ N/A ☑
    b. In good condition? [3745-66-71] Yes ☑ No ☐ N/A ☐
    c. Compatible with wastes stored in them? [3745-66-72] Yes ☑ No ☐ N/A ☐
    d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes ☐ No ☐ N/A ☑

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. Yes ☑ No ☐ N/A ☐
    a. Are inspections recorded in a log or summary? [3745-66-74] Yes ☑ No ☐ N/A ☐
48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes ☐ No ☐ N/A ☑
49. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes ☐ No ☐ N/A ☑

50. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] Yes ☐ No ☐ N/A ☑

51. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] Yes ☐ No ☐ N/A ☑

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

52. If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745- 66-11? [3745-52-34(A)(1)] Yes ☐ No ☐ N/A ☑

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

53. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes ☑ No ☐ N/A ☐

54. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes ☐ No ☐ N/A ☐

55. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes ☐ No ☐ N/A ☐

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Ohio Decorative Products **Facility Type:** LQG/SQG/CESQG/TSD EPA ID#:

Description of Waste				On-Site Management			Off-Site Management	
Process/Activity Generating Waste (e.g. plating bath, painting, hammer peening, etc.)	Waste Generated (e.g. stripper, spent solvent, ash, etc.)	EPA Waste Code	QTY Generated per Month	Type of Accumulation/ Storage (e.g. container, tank, etc.)	Type of On-Site Treatment (recycle, WWT, etc.)	Waste Location (building and room)	Name, state, and type of activity occurring at the facility	P2 Activities
Waste water treatment of plating wade + rinses.	Concentrated liquid	F006	700 gallons	Tank WST-1	none	Tank Room (see diagram)	Envirite of Ohio Canton, Ohio OHD980568992	
Plating bath change	Acid wade	D002 D008 F006	150 gallons	Containers → Tank WST-2	none	Tank Room (see diagram)	Vickery Environmental Vickery, Ohio OHD020273819	
Surface prep/parts cleaning	Waste Cleaner	D007	1500 gallons	Tank SC-1	none	Tank Room (see diagram)	Envirite of Ohio Canton, Ohio OHD980568992	
Plating bath change	Wade Copper Cyanide Solution	D002 F007	20 Drums 1-2x/year	Containers	none	Drum accumulation area of WWT room		

Ohio Decorative Products 9-12-07

TANK SYSTEM REQUIREMENTS (OAC rule 3745-52-34(A) and Ohio rules 3745-66-100)

(Please refer to the rules before or while completing this checklist.)

1. Is each tank clearly labeled/marked with the words "Hazardous Waste" [3745-52-34(A)(3)]? ✓Yes No N/A

TANK SYSTEM – GENERAL OPERATING REQUIREMENTS

2. Does the o/o follow the general operating requirements below:
   a. Does the o/o prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail?[3745-66-94(A)] ✓Yes No N/A
   b. Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)?[3745-66-94(B)] ✓Yes No N/A
   c. If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96?[3745-66-94(C)] Yes No ✓N/A

TANK SYSTEM – INSPECTION REQUIREMENTS

3. Has the o/o documented the inspections required in 3745-66-95, in the operating record, including inspection of the following:
   a. Spill control equipment each operating day? [3745-66-95(A)(1)] ✓Yes No N/A
   b. Above ground portion of tank each operating day?[3745-66-95(A)(2)] ✓Yes (No) N/A
   c. Data from leak detection equipment each operating day?[3745-66-95(A)(3)] Yes No ✓N/A
   d. Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste each operating day?[3745-66-95(A)(4)] ✓Yes No N/A

NOTE: "Each operating day" is each day that the tank system is being used to manage (store or treat) hazardous waste.

4. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter?[3745-66-95(B)(1)] Yes No ✓N/A
5. Where applicable, all sources of impressed current at least bi-monthly?[3745-66-95(B)(2)] Yes No ✓N/A

TANK SYSTEM CLOSURE REQUIREMENTS

6. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). Yes No ✓N/A

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES

7. For tanks used or treat or store ignitable or reactive wastes, has the o/o complied with **one of the following**: [3745-66-98(A)] Yes No ✓N/A
   a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-66-17(B)?[3745-66-98(A); **OR** Yes No ✓N/A
   b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction?[3745-66-98(A)]; **OR** Yes No ✓N/A
   c. The tank is used solely for emergencies?[3745-66-98(A)] Yes No ✓N/A
8. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (1996)? [3745-66-98(B)] Yes No ✓N/A
9. Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material?[3745-66-99(A) and/or (B)] Yes No ✓N/A
   a. ***If so,*** have the requirements of 3745-65-17(B) been met?[3745-66-99(A) and/or (B)] Yes No ✓N/A

TANK SYSTEM – WASTE ANALYSIS REQUIREMENTS

10. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following:[3745-66-100] Yes No ✓N/A
    a. Conducted waste analysis and trial treatment or storage tests?[3745-66-100(A)]; **OR** Yes No ✓N/A
    b. Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-100(B)] Yes No ✓N/A

TANK SYSTEMS REQUIREMENTS

11. Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)?[3745-66-92(A)] ✓Yes No N/A

NOTE: You should review the file to see if the written assessment has been previously reviewed and what the results were.

12. Does the written assessment include the following:[3745-66-92(A)]
    a. Certification by an independent registered, professional engineer?[3745-66-92(A)] ✓Yes No N/A
    b. Consideration of the design standards of the system?[3745-66-92(A)] ✓Yes No N/A

c. Consideration of the hazardous characteristics of the waste(s)?[3745-66-92(A)]	✓Yes	No	N/A
d. An evaluation by a corrosion expert (*if the external system/components are metal*)?[3745-66-92(A)]	✓Yes	No	N/A
e. A determination of design and operational measures that will be needed to protect the tank system from potential damage (*for underground tank components*)?[3745-66-92(A)]	Yes	No	N/A✓
f. Design considerations to ensure that the tank foundations will maintain the load of a full tank?[3745-66-92(A)]	✓Yes	No	N/A
g. Design considerations for anchoring the unit to prevent floatation (*for tanks situated in a seismic fault zone or saturated zone*)?[3745-66-92(A)]	Yes	No	N/A✓
h. Design considerations to ensure that the tank system will withstand the effects of frost heave(for underground tank systems)?[3745-66-92(A)]	Yes	No	N/A✓

NOTE: CO-DHWM Engineering staff are available to assist you with evaluation of the written assessment.

13. Are there written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed?[3745-66-92(G)]	✓Yes	No	N/A
Do the written statements address all of the following:			
a. Inspection for damage and/or inadequate construction and installation was conducted?[3745-66-92(B)]	✓Yes	No	N/A
b. Statement that deficiencies were corrected before the tank system was covered or put into use?[3745-66-92(B)]	Yes	No	N/A✓
c. Proper backfilling?[3745-66-92(C)]	Yes	No	N/A✓
d. Tightness test; if the tank was found not to be tight, does the statement indicate that proper repairs were made?[3745-66-92(D)]	✓Yes	No	N/A
e. Proper support and protection of ancillary equipment?[3745-66-92(E)]	✓Yes	No	N/A
f. Supervision of the installation of field fabricated corrosion protection?[3745-66-92(F)]	Yes	No	N/A✓

SECONDARY CONTAINMENT

14. Has secondary containment been provided?	✓Yes	No	N/A

NOTE: All tank systems must have secondary containment at this point, except for tank systems that store/treat materials that become hazardous waste after January 12, 1987, must have secondary containment required within the time intervals in [3745-66-92(A)(1)] to (A)(4). The date the material became a hazardous waste must be used in place of January 12, 1987.[3745-66-92(A)(5)]

15. Is secondary containment one of the following:	✓Yes	No	N/A
a. An **External Liner**? [3745-66-93(E)(1)] If so,	✓Yes	No	N/A
i. Is liner designed or operated to contain 100% of the capacity of the largest tank?	✓Yes	No	N/A
ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? Inside facility	Yes	No	N/A ✓
iii. Is liner free of cracks and gaps?	✓Yes	No	N/A
iv. Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release?	✓Yes	No	N/A
v. Are chemically resistant water stops in place at all points? *(concrete liners only)*	Yes	No	N/A✓
vi. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? *(concrete liners only)*	✓Yes	No	N/A
b. **Vault System?** [3745-66-93(E)(2)] If so,	Yes	No	N/A
i. Is vault system designed to contain 100% of the capacity in the largest tank?	Yes	No	N/A
ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	Yes	No	N/A
iii. Are chemically resistant water stops in place at all points?	Yes	No	N/A
iv. Is there a compatible interior coating to prevent migration into the concrete?	Yes	No	N/A
v. For **ignitable or reactive waste**: Is the vault system provided with means to prevent against the formation or ignition of vapors?	Yes	No	N/A
vi. Is vault system provided with an exterior moisture barrier?	Yes	No	N/A
c. **Double-Walled Tank?** [3745-66-93(E)(3)] If so,	Yes	No	N/A
i. Is double-walled tank designed as an integral structure to contain any release from the inner tank?	Yes	No	N/A
ii. **If metal**, are the primary tank interior and outer shell exterior surfaces protected from corrosion?	Yes	No	N/A

iii. Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time? Yes No N/A

d. **An Equivalent Device?** As described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D&E)] Yes No N/A

SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION

16. Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, groundwater, or surface water and is it capable of detecting and collecting releases and accumulated liquids?[3745-66-93(B)(1) and (2)] ✓Yes No N/A

17. Does the secondary containment system meet the following minimum requirements of [3745-66-93(C)]:

a. Constructed or lined with compatible materials of sufficient strength to prevent failure?[3745-66-93(C)(2)] ✓Yes No N/A

b. Placed on a foundation or base capable of providing support?[3745-66-93(C)(2)] ✓Yes No N/A

c. Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time?[3745-66-93(C)(3)] ✓Yes No N/A

d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation?[3745-66-93(C)(4)] ✓Yes No N/A

e. Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner?[3745-66-93(C)(4)] Yes No N/A✓

ANCILLARY EQUIPMENT REQUIREMENTS

18. Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)? Yes ✓No N/A

If not, is the ancillary equipment one of the following: [3745-66-93(F)]

a. Above ground piping (exclusive of flanges, joints, valves and connections) that is inspected daily? Yes ✓No N/A

b. Welded flanges, welded joints and/or welded connections that is inspected daily? Yes No N/A ✓

c. Sealless or magnetic coupling pumps and/or sealless valves? Yes No N/A ✓

d. Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown and/or loss of pressure-actuated shut-off devices) that is inspected daily? Yes No N/A✓

TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE

19. Has there been a leak or spill from any tank system or has any tank system been found unfit for use? ***If so***, did the o/o: Yes (No) N/A

NOTE: If the tank is found to be unfit for use, inspector should explain why.

a. Immediately cease flow of material into tank and investigate the cause of the release?[3745-66-96(A)] Yes No (N/A)

b. Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time?[3745-66-96(B)(1)] Yes No N/A

c. Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment?[3745-66-96(B)(2)] Yes No N/A

d. Immediately conduct a visual inspection of the release?[3745-66-96(C)] Yes No N/A

e. Prevent further migration of the leak or spill to soils or surface waters?[3745-66-96(C)] Yes No N/A

f. Properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)] Yes No N/A

g. Report the release to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)] Yes No N/A

h. Submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)] Yes No N/A

i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)(2)] Yes No N/A

j. For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)] Yes No N/A

NOTE: The requirements noted in 20.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.

20. In the event that the repairs to the tank system were major (replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from an independent, registered P.E. attesting that the repaired unit is capable of handing hazardous waste? [3745-66-96(F)] Yes No N/A ✓

21. Was a copy of the certification submitted to the director within seven days after returning the system to use? [3745-66-96(F)] Yes No N/A✓

22. If the o/o was unable to repair and return the unit to service as described in 20.a through 20.e, was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)]	Yes	No	N/A
23. Does the o/o have a tank system **with a variance from secondary containment** from which a release has occurred but <u>has not</u> migrated beyond the zone of engineering control? **If so,**	Yes	No	N/A
a. Has the o/o complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G)(3)]	Yes		N/A
b. If soils cannot be decontaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)]	Yes		N/A
24. Does the o/o have a tank system **with a variance from secondary containment** from which a release occurred and <u>has</u> migrated from the zone of engineering control? **If so,**	Yes	No	N/A
a. Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)]	Yes	No	N/A
b. If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(4)]	Yes	No	N/A

Ohio Decorative Products
9-12-07

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 ☐ No ✓ N/A ___ RMK#___

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 3745-273-13? [3745-273-11(B)] — Yes ☐ No ✓ N/A ___ RMK#___

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] — Yes ___ No ☐ N/A ✓ RMK#___

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 ___ No ☐ N/A ___ RMK#___

5. Does the SQUWH conduct any of the following activities:

   a. Sort batteries by type? — Yes___ No___ N/A ___ RMK#___

   b. Mix battery types in one container? — Yes___ No___ N/A ___ RMK#___

   c. Discharge batteries to remove the electric charge? — Yes___ No___ N/A ___ RMK#___

   d. Regenerated used batteries? — Yes___ No___ N/A ___ RMK#___

   e. Disassemble them into individual batteries or cells? — Yes___ No___ N/A ___ RMK#___

   f. Remove batteries from consumer products? — Yes___ No___ N/A ___ RMK#___

   g. Remove the electrolyte from the battery? — Yes___ No___ N/A ___ RMK#___

   If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] — Yes ☐ No___ N/A ___ RMK#___

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] — Yes ___ No ☐ N/A ✓ RMK#___

   a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] — Yes ___ No ☐ N/A ___ RMK#___

   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 ___ No ☐ N/A ___ RMK#___

7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)] — Yes ___ No ☐ N/A ___ RMK#___

UNIVERSAL WASTE LAMPS

8. Does the SQGUHW 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 ☑ N/A ___ RMK#___

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 ☐ N/A ✓ RMK#___

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 ___ No ☑ N/A ___ RMK#___

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

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: — Yes ✓ No___ N/A ___RMK#___

    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 ☐ N/A ✓ RMK#___

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

12. Is the length of time the universal waste is stored documented by **one** of the following: [3745-273-15(C)] — Yes ___ No ☑ N/A ___RMK#___

    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___ N/A ___RMK#___

    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___ N/A ___RMK#___

    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___ N/A ___RMK#___

    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___ N/A ___RMK#___

    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___ N/A ___RMK#___

    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___ N/A ___RMK#___

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 ☑ N/A ___ RMK#___

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] — Yes ___ No ☐ N/A ✓ RMK#___

15. Is the material released characterized? [3745-273-17(B)] — Yes ___ No ☐ N/A ___ RMK#___

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 ☐ N/A ___ RMK#___

OFF-SITE SHIPMENTS

NOTE: ***If a SQUWH self-transports 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 ☐ N/A ___ RMK#___

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

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 ☐ N/A ✓ RMK#___

19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] — Yes ✓ No ☐ N/A ___ RMK#___

20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do <u>one of the following</u>:

    a. Receive the waste back? [3745-273-18(E)(1)] — Yes___ No___ N/A ✓ RMK#___

    b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] — Yes___ No___ N/A ___ RMK#___

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: Yes ___ No ❑ N/A ✓ RMK#___

a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes___ No___ N/A ___ RMK#___

b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes___ No___ N/A ___ RMK#___

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 ❑ N/A ___ RMK#___

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 ❑ N/A ___ RMK#___

EXPORTS

24. Is waste being sent to a foreign destination? If so: Yes___ No ✓ N/A ___ RMK#___

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 ❑ N/A ✓ RMK#___

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 -52-57? [3745-273-20(B)] Yes ___ No ❑ N/A ___ RMK#___

c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes ___ No ❑ N/A ___ RMK#___

REMARKS