



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Crown Equipment Corporation
OHD 005053095
Augalize County
Hazardous Waste
Notice of Violation

August 28, 2007

Ms. Tonja Hardin
Environmental Administrator
Crown Equipment Corporation
44 S. Washington Street
New Bremen, Ohio 45869

Dear Ms. Hardin:

Thank you for accompanying me during Ohio EPA's August 15, 2007, inspection of Crown Equipment Corporation (Crown) at 424 W. Monroe Street in New Bremen, Ohio.

Mr. Brian Duffy of Crown also accompanied us. I inspected Crown 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 Crown. This letter will explain the violations I found and what you need to do to correct the violations.

Crown manufactures electrically powered lift equipment. Manufacturing processes include: fabrication, plating, welding, assembly and painting. The zero discharge plating process includes the following steps: Tank 1 Electroclean, for preparing the surface for plating → Tank 2 Rinse → Tank 3 (Shallow Tank 17') Two Cell Chromium Plating Tank → Tank 4 Three Stage Rinse → Tank 5 (Deep Tank 30') Two Cell Chromium Plating Tank → Tank 6 Two Stage Rinse → Tank 7 Strip Tank, for removing defective plating → Tank 8 Caustic Rinse, used for pieces that go through stripping. Prior to this zero discharge process, Crown had a pre-treatment system and generated F006 waste. Production painting is with water-based or powder paints. Two water-based colors are used: beige or gray.

Crown is a large quantity hazardous waste generator and a large quantity universal waste handler. Crown generates the following hazardous wastes, used oil and universal wastes:

1. Chrome Plating Solution - Deep Tank (D002 & D007). Crown plates mild steel (<1% lead). About 1-2 times a year the deep plating tank is cleaned out. The plating solution is pumped out of the tank and into a holding tank (it is reused). This solution is the same as the solution in the shallow plating tank. The only difference is the size of the tank and the pieces that can be plated. The sludge is pumped out and shipped off-site. Approximately 4,465 gallons was generated in 2006, and shipped to Envirite of Ohio in Canton, Ohio, Klor Kleen in Cincinnati, Ohio, and Petro Chem Processing in Detroit, Michigan.
2. Chrome Plating Solution - Shallow Tank (D002, D006 & D007). Approximately 554 gallons was generated in 2006, and shipped to Envirite of Ohio in Canton, Ohio. In 2005, approximately 275 gallons was generated and shipped to Perma-Fix of Dayton, Ohio. Perma-Fix analyzed the waste in 2005, and required Crown to add the waste code D004 for arsenic. Then in 2006, Envirite analyzed the waste and required Crown to add the waste code D006 for cadmium (but found no arsenic). It is not clear why these other metals would be present. Crown is checking into this.
3. Debris Generated from Chrome Plating Process (D006 & D007). This waste is generated when Crown must remove the plating tank bag liners. Approximately 760 pounds was generated in 2006, and shipped to Envirite of Ohio in Canton, Ohio.
4. Waste Chrome Plating and Mop Water (D007). Crown mops the floor of the plating department every shift to prevent employees from tracking chromium around the plant. Approximately 3,915 gallons was generated in 2006, and shipped to Vickery Environmental in Vickery, Ohio, and Klor Kleen in Cincinnati, Ohio.
5. Waste Debris from Chrome Plating (D007). This waste is accumulated in drums. It consists of contaminated PPE: sleeves, gloves, Tyvek, etc., and mats and pads. Approximately 8 drums of this waste was generated in 2006, and shipped to Petro Chem Processing in Detroit, Michigan, and Klor Kleen in Cincinnati, Ohio.
6. Waste Paint Related Material (D001 & F005). Paint guns are soaked in a 5-gallon safety can containing cleaning solvent. See the file for the solvent solution MSDS. This solution is about 29% toluene in addition to other organic compounds. The paint is water-based. Crown reports that the paint lines do not need to be flushed. They work with two different colors and, therefore, have dedicated lines so colors do not need to be changed. Approximately 165 gallons was generated in 2006, and shipped to Midwest Environmental Services in Louisville, Kentucky.
7. Waste Alcohol (D001). Isopropanol is used as a flux cleaner in Crown's circuit board operations. Approximately 110 gallons was generated in 2006, and shipped to Midwest Environmental Services in Louisville, Kentucky.

8. Waste Paint (D001, D007, D008, F003 & F005). This waste is generated from maintenance painting activities. Most of the paint is in aerosol cans. The cans are collected and emptied with a drum top device. The liquid portion is the hazardous waste. Empty cans are recycled. This waste stream may also include old paint in quart cans and old paints found in buildings that Crown has bought and refurbished. Approximately 440 gallons was generated in 2006, and sent to Midwest Environmental Services in Louisville, Kentucky.
9. Lead Contaminated Waste (D008 & D035). Circuit boards are manufactured in Plant 7. This waste is generated from cleaning the solder pot. MEK is used to clean the pot approximately once a quarter. Approximately 55 gallons was generated in 2006, and shipped to Midwest Environmental Services in Louisville, Kentucky.
10. Lead Flux Waste (D001 & D008). This waste is generated from cleaning the flux containers. Approximately 55 gallons was generated in 2006, and shipped to Petro Chem Processing in Detroit, Michigan.
11. Waste Floor Stripper (D001). When Crown needs to move manufacturing lines the floor in these areas is stripped. (These are areas other than the Plating Department.) Approximately 385 gallons was generated in 2006, and shipped to Petro Chem Processing in Detroit, Michigan.
12. Used Oil. Crown generates spent cutting fluid, tramp oil from machine sumps and an oily wastewater from its floor cleaning machine.
13. Fluorescent (4 and 8 foot) lamps and HID lamps. Spent lamps are generated from throughout the plants.
14. Batteries. Crown accumulates large lift equipment batteries and also vehicle batteries. These batteries are shipped to Midwest Guardian in Wapakoneta, Ohio.

Crown has an aggressive pollution prevention (P2) program. P2 activities at the facility include the following:

1. Fluorescent and HID lamps are recycled (4665 in the first half of 2007).
2. Batteries are recycled (small batteries 3,212 pounds and lift truck batteries 64 tons in the first half of 2007).
3. Computers are recycled (8.5 tons in the first half of 2007).
4. Shrink wrap plastic is bundled and recycled (2 tons in the first half of 2007).
5. Cardboard is baled and recycled (141 tons in the first half of 2007).
6. Metal shavings are recycled.
7. Empty aerosol cans are recycled.
8. Crown has invested in powder painting which has eliminated an ignitable hazardous waste stream.
9. Shop rags are laundered and reused.
10. Empty steel and plastic drums are recycled (2.5 tons in the first half of 2007).

11. Gloves, mops and absorbent pads are recycled (3.5 tons in the first half of 2007).
12. Styrofoam is recycled (1.75 tons in the first half of 2007).
13. Office paper and magazines are recycled (10 tons in the first half of 2007).
14. Plasma Cutter steel sludge is recycled (189 tons in the first half of 2007).
15. Wood pallets are reused (500 tons in the first half of 2007), repaired when possible (70 tons in the first half of 2007) and then eventually recycled (238 tons in the first half of 2007). The recycled pallets are ground into compost and animal bedding.
16. Non-hazardous shot blast dust is recycled (195 tons in the first half of 2007).
17. The following metals were recycled in the first half of 2007: iron (5407 tons), copper (31 tons) and aluminum (60 tons).
18. The following used oil was recycled in the first half of 2007: machine coolants (27 tons) and oil and oily wastewater (111,580 gallons).
19. Circuit boards are recycled (14 tons in the first half of 2007).

Crown has eliminated Styrofoam packaging in its electric motor manufacturing operations and replaced it with reusable trays. Crown also uses recycled paper for packaging instead of Styrofoam and uses recycled cardboard in all its boxes. Crown uses water-based paints now, which have no hazardous air pollutants. This has eliminated the compounds toluene, xylene and MEK from painting. Crown eliminated solvent cleaning and uses water-based cleaning agents, such as detergents. This has saved over 18,000 gallons of solvent and the resulting waste. The detergents are recycled. Crown implemented a powder coating painting operation, which eliminated the generation of over 300,000 pounds of hazardous waste.

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 Labeling - Lamps
OAC Rule 3745-273-34(E)**

Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with any one of the following phrases: "Universal Waste-Lamps", or "Waste Lamps" or "Used Lamps".

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

**2. Universal Waste Packaging - Lamps
OAC Rule 3745-273-33(D)(1)**

Containers of lamps must remain closed. Crown did not keep its spent lamps in closed containers. In order to correct this violation, Crown must close all containers of spent lamps and submit photographic documentation that this has been done.

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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: Fluorescent Lamps: What You Should Know and Computer, Fluorescent Lamp and Ballast Recyclers. I recommend that you review these documents carefully and contact me if you have any questions. The first document describes the rules you must follow in order to manage lamps as a universal waste.

As a used oil generator you are required to: store used oil in containers or aboveground tanks that are in good condition (no severe rusting, apparent structural defects or deterioration) and not leaking. Containers, aboveground tanks and fill pipes for underground tanks must be labeled with the words "Used Oil." If leaks are detected, the generator must: stop the release; contain the release; clean up and manage properly the released used oil and other materials related to the release; and, if necessary, repair or replace any leaking containers or tanks prior to returning them to service.

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. 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.

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You can find copies of the rules and other information about used oil, 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
District Representative
Division of Hazardous Waste Management

/llr

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
NWDO, DHWM, Auglaize County, Crown Equipment 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.

This document^{*} can be found
in the
NWDO DHWM Facility Document
Library

** Information from the facility
obtained at time of inspection.*

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: <u>OH0005053095</u>								
Site Name:	Name: <u>Crown Equipment Corp.</u>				Website: (Optional)				
Site Location Information	Street Address: <u>424 W. Monroe St.</u>								
	City, Town, or Village: <u>New Bremen</u>			State: <u>OH</u>					
	County Name: <u>Ashland</u>			Zip Code: <u>45869</u>					
Site Land Type (check only one)	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
NAICS code(s) www.census.gov/epcd/www/naics.html	<u>333924</u>								
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: <u>Brian</u>		MI: <u>J</u>	Last Name: <u>Duffy</u>					
	Phone Number: <u>419-629-2311</u>			Phone Number Extension: <u>2574</u>					
	E-Mail Address: <u>brian-duffy@Crown.com</u>								
	Fax Number: <u>419-629-3074</u>			Fax Number Extension:					
	Street or P.O. Box:								
	City, Town or Village:		State:		Country:		Zip Code:		
Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: <u>James F Dicke</u>			Date Became Owner (mm/dd/yyyy): <u>1-1-50</u>					
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: <u>44 S Washington St.</u>								
	City, Town or Village: <u>New Bremen</u>			Owner Phone #: <u>419-629-2311</u>					
	State: <u>OH</u>			Country: <u>US</u>		Zip Code: <u>45869</u>			
	Name of Site's Operator:			Date Became Operator (mm/dd/yyyy):					
	Owner 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:								
City, Town or Village:			Operator Phone #:		State:		Country:		Zip Code:
Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
Type of Generator	<input type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator				
	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste				
	<input checked="" type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator				
	<input type="checkbox"/> Small Quantity Generator (SQG)								
Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)	<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace				
	<input type="checkbox"/> Underground Injection Control Facility				<input type="checkbox"/> Small Quantity On-Site Burner Exemption				
	<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption				
	<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste								

Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply))

<input type="checkbox"/> Small Quantity Handler of Universal Waste	<input checked="" type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)
<input type="checkbox"/> Destination Facility for Universal Waste	

(Check all boxes below that apply for each of the three types of facilities above)

	Managed	Used Oil Activities (Indicate Type(s) of Activity(ies))	
Batteries	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
		<input type="checkbox"/> Used Oil Re-refiner	

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 if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:	
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments:	
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		

Name of Inspector(s) Don North	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm) 8-15-07
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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 (Print)	Date (mm/dd/yyyy)

**LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

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:
 - 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.

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date Trained</u>

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 thoroughly 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:
 - 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:
- 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 than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS 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)] 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

LDR CHECKLIST

GENERAL LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] If so:
- Yes No N/A RMK#
- a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)]
- Yes No N/A RMK#
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)]
- Yes No N/A RMK#
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1]
- Yes No N/A RMK#
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1]
- Yes No N/A RMK#
4. Does the generator generate a characteristic hazardous waste? If so:
- Yes No N/A RMK#
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)]
- Yes No N/A RMK#

NOTE: *If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so:
- Yes No N/A RMK#
- a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)]
- Yes No N/A RMK#

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*

6. Has the generator correctly determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)]
- Yes No N/A RMK#

NOTE: *Wastes with EPA hazardous waste numbers K174 and K175 (chlorinated aliphatic wastes) have specific requirements in rule 3745-270-33. Waste with EPA hazardous waste numbers K176, K177 and K178 (inorganic chemical wastes) have specific requirements in rule 3745-270-36.*

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03]

Yes No N/A RMK#

NOTE: *A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (§402 of CWA), that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater.[3745-270-03(B)]*

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)]

Yes No N/A RMK#

NOTE: *In other words, is combustion a legitimate treatment method.*

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)]

Yes No N/A RMK#

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] If so:

Yes No N/A RMK#

a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05]

Yes No N/A RMK#

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] If so:

Yes No N/A RMK#

a. The facility can land dispose of the waste. [3745-270-06]

Yes No N/A RMK#

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? If so:

Yes No N/A RMK#

a. Has the facility complied with 3745-270-04?

Yes No N/A RMK#

REMARKS

NOTIFICATION AND CERTIFICATION REQUIREMENTS

- 13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)]
Yes No N/A RMK#
- 14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)]
Yes No N/A RMK#
- 15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)]
Yes No N/A RMK#
- 16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)]
Yes No N/A RMK#
- 17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so:
 - a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)]
Yes No N/A RMK#

NOTE: *Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit.(See 270-07(A)(7))*

- 18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)]
Yes No N/A RMK#

REMARKS

USED OIL INSPECTION CHECKLIST (Short Version)

NOTE: This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes ___ No N/A ___ RMK# ___
Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes ___ No N/A RMK# ___
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No N/A ___ RMK# ___
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes ___ No N/A RMK# ___

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes ___ No N/A RMK# ___
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes ___ No N/A RMK# ___
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes No N/A ___ RMK# ___
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No N/A ___ RMK# ___
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes No N/A ___ RMK# ___
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes ___ No N/A RMK# ___
- b. Contained the release? Yes ___ No N/A RMK# ___

- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A RMK#
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A RMK#
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes No N/A RMK#
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes No N/A RMK#
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A RMK#
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A RMK#
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes No N/A RMK#

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

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

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes No N/A RMK#

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REMARKS

LARGE 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

GENERAL REQUIREMENTS

1. Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)] Yes No N/A RMK#

PROHIBITIONS

2. Did the LQUWH dispose of universal waste? [3845-273-31(A)] Yes No N/A RMK#
3. Did the LQUWH dilute or treat universal waste, except when responding to releases or by managing specific wastes as provided in OAC 3745-273-33? [3745-273-31(B)] Yes No N/A RMK#

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES:

4. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)] Yes No N/A RMK#
5. If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? Yes No N/A RMK#
6. Does the LQUWH 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. Regenerate 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)? [3745-273-33(A)(2)]

Yes No N/A ___ RMK# ___

7. If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)(3)]

Yes ___ No N/A RMK# ___

a. If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)]

Yes ___ No N/A ___ RMK# ___

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)]

Yes ___ No N/A ___ RMK# ___

8. Are the battery(ies) or container(s) of batteries located with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-34(A)]

Yes No N/A ___ RMK# ___

UNIVERSAL WASTE LAMPS

9. Does the LQUHW 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? [3745-273-33(D)(1)]

Yes ___ No N/A ___ RMK# ___

10. 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 constituents to the environment? [3745-273-33(D)(2)]

Yes ___ No N/A RMK# ___

11.

Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamps?" [3745-273-34(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.

12. **ACCUMULATION TIME**

Is the waste accumulated for less than one year? [3745-273-35(A)]

Yes No ___ N/A ___ RMK# ___

a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on handler to demonstrate) [3745-273-35(B)]

Yes ___ No N/A RMK# ___

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

13. Has the length of time the universal waste has been accumulated documented by one of the following: [3745-273-35(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? [3745-273-35(C)(1)]

Yes ___ No N/A ___ RMK# ___

b. Marking or labeling the individual item of universal waste with the date that it became a waste or was received? [3745-273-35(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? [3745-273-35(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? [3745-273-35(C)(4)]

Yes ___ No N/A ___ RMK# ___

- e. Placing the universal waste in a specific accumulation area and identifying the earliest that any universal waste in the area became a waste or was received? [3745-273-35(C)(5)]
- 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 is received? [3745-273-35(C)(6)]

Yes No N/A RMK#

Yes No N/A RMK#

EMPLOYEE TRAINING

14. Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36]

Yes No N/A RMK#

RESPONSE TO RELEASES

15. Were releases of universal waste and other residues immediately contained? [3745-273-37(A)]
16. Was the released material characterized? [3745-273-37(B)]
17. If the released material was a hazardous waste, was it managed as required in OAC 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) [3745-273-37(C)]

Yes No N/A RMK#

Yes No N/A RMK#

Yes No N/A RMK#

OFF-SITE SHIPMENTS

NOTE: *If a LQUWH self-transportes wastes, then the handler must comply with the Universal Waste transporter requirements.*

18. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)]

Yes No N/A RMK#

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

19. 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? [3745-273-38(C)]

Yes No N/A RMK#

20. Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)]

Yes No N/A RMK#

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

a. Receive the waste back? [3745-273-38(E)(1)]

b. Agree to where shipment will be sent? [3745-273-38(E)(2)]

Yes ___ No N/A RMK# ___

Yes ___ No ___ N/A RMK# ___

Yes ___ No ___ N/A RMK# ___

22. If a handler rejects a partial or full load from another handler, does the receiver handler contact the originating handler and discuss one of the following:

a. Sending the waste back to originating handler? [3745-273-38(F)(1)]

b. Sending the shipment to a destination facility? [3745-273-38(F)(2)]

Yes ___ No N/A RMK# ___

Yes ___ No ___ N/A RMK# ___

Yes ___ No ___ N/A RMK# ___

23. If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)]

Yes ___ No N/A RMK# ___

24. If the handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-38(H)]

Yes ___ No N/A RMK# ___

TRACKING UNIVERSAL WASTE SHIPMENTS

25. Are universal waste received from another handler? If so: Yes ___ No N/A ___ RMK# ___
- a. Is a record of each shipment kept? [3745-273-39(A)] Yes ___ No N/A RMK# ___

NOTE: *This record can be in the form of a log, invoice, manifest, bill of lading, or other shipping document. This also applies to question No. 35(a).*

26. Does the record include the following:
- a. Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)] Yes ___ No N/A RMK# ___
- b. Quantity of each type of universal waste? [3745-273-39(A)(2)] Yes ___ No N/A | RMK# ___
- c. Date received? [3745-273-39(A)(3)] Yes ___ No N/A | RMK# ___
27. Is universal waste shipped to another handler? If so: Yes ___ No ___ N/A ___ RMK# ___
- a. Is a record of each shipment kept? [3745-273-39(B)] Yes No N/A ___ RMK# ___
28. Does the record include the following?
- a. Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)] Yes No N/A ___ RMK# ___
- b. Quantity of each type of universal waste? [3745-273-39(B)(2)] Yes | No N/A ___ RMK# ___
- c. Date shipped? [3745-273-39(B)(3)] Yes | No N/A ___ RMK# ___
29. Are records kept for three years? [3745-273-39(C)(1)(2)] Yes No N/A ___ RMK# ___

EXPORTS

30. Is waste being sent to a foreign destination? If so: Yes ___ No ___ N/A RMK# ___
- a. Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56 and 3745-52-57? [3745-273-40(A)] Yes ___ No N/A | RMK# ___

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA "Acknowledgment of Consent" 3745-52-50 to -52-57? [3745-273-40(B)]

Yes ___ No N/A RMK# ___

c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)]

Yes ___ No N/A ___ RMK# ___

REMARKS