



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468  
www.epa.state.oh.us

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

Re: Goodyear  
OHD 005039722  
Auglaize County  
Hazardous Waste  
**Notice of Violation**

June 13, 2007

Ms. Shelly Liette  
Environmental Coordinator  
Goodyear Tire & Rubber Company  
1115 South Wayne Street  
St. Marys, Ohio 45885

Dear Ms. Liette:

On June 4, 2007, I conducted an inspection of Goodyear Tire & Rubber Company (Goodyear) at 1115 South Wayne Street in St. Marys, Ohio. I was accompanied by Mr. Ron Seibert and Ms. Marcy Fischer of Goodyear. I inspected Goodyear 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. This letter will explain the violation I found and what you need to do to correct the violation.

Goodyear produces molded and extruded rubber products, involving rubber to metal bonding. Goodyear produces these products for military, farm, automotive and miscellaneous uses. However, the automotive and miscellaneous products will be moved from the plant by the end of the year. Rubber is formed in 400-500 pound batches in Banbury mixers. As many as 12-15 ingredients are used in each batch, including: rubber, carbon black, pigments and specialty ingredients. Goodyear reported that no pigments contain TCLP metals. The most common metal compound in the pigments is zinc oxide. A rubber slab is made that can be formed into smaller slabs that can be press molded (most common) or injection molded. Metal parts (cold roll 1040 steel and cold roll allots) are cleaned (to remove oil and rust), primed, coated with adhesive (in spray booths), matched with rubber slab in press, cured and finished. See the file for process flow charts.

Hazardous wastes are moved to the Waste Department where they are managed by authorized personnel. From the Waste department the authorized personnel transport the hazardous waste and used oil to the Hazardous Waste Storage Building. Goodyear generates the following hazardous wastes, used oil and universal waste:

1. Uncured Rubber with Lead (D008): Lead is added to the mix for agricultural products. This waste is generated when a batch is off-spec. Goodyear has not been able to find a user for this waste because of the lead content. This is a large waste stream. In 2006, Goodyear shipped 33,545 pounds, 15,229 kg or about 1,269 kg/month. It is shipped to EQ Michigan Disposal in Belleville, Michigan.
2. Waste Adhesive Spray Booth Filters (D008): The adhesives contain lead. It assists with the bonding of the rubber to the metal. The filters are accumulated in large hoppers. This is a large waste stream. In 2006, Goodyear shipped 25,853 pounds, 11,737 kg or about 978 kg/month. It is shipped to Pollution Control Industries in East Chicago, Indiana.
3. Adhesive Spray Booth Scrapings (D001, D008): According to Goodyear, when the booths are scrapped out some of the material may be thick and contain some liquid. That is why it has the D001 waste number. In 2006, Goodyear shipped 10,578 pounds, 4,802 kg or about 400 kg/month. It is shipped to Pollution Control Industries in East Chicago, Indiana.
4. Waste Bonding Adhesive and Gun Cleaning Solvent (D001, D008, D035, F003 & F005): The unused bonding adhesive may become waste when it is off-spec, such as when the viscosity cannot be properly adjusted or it is not properly in solution. Gun cleaning solvent is also mixed with this waste. In 2006, Goodyear shipped 7,409 pounds, 3,364 kg or about 280 kg/month. It is shipped to Pollution Control Industries in East Chicago, Indiana.
5. Waste Corrosive Liquid (D002): Alkali and acid cleaners are pumped from their tanks on a regular basis (approximately every two months) in order to assure their cleaning performance. The liquids are pumped into vac trucks and are not accumulated on-site. Each load is tested. This is a large waste stream. In 2006, Goodyear shipped 37,962 pounds, 17,235 kg or about 1,436 kg/month. It is shipped to Perma Fix of Dayton.
6. Hazardous Waste Liquid (D008): Alkali and acid cleaners are pumped from their tanks on a regular basis (approximately every two months) in order to assure their cleaning performance. The liquids are pumped into vac trucks and are not accumulated on-site. Each load is tested. This is a large waste stream. In 2006, Goodyear shipped 45,000 pounds, 20,430 kg or about 1,703 kg/month. It is shipped to EQ of Detroit, Michigan.
7. Hazardous Waste Liquid (D007 & D008): Alkali and acid cleaners are pumped from their tanks on a regular basis (approximately every two months) in order to assure their cleaning performance. The liquids are pumped into vac trucks and are not accumulated on-site. Each load is tested. This waste is from the phosphoric acid tank. This is a large waste stream. In 2006, Goodyear shipped 27,000 pounds, 12,258 kg or about 1,022 kg/month. It is shipped to EQ of Detroit, Michigan.

8. Acid Cleanup (D002): This is from the cleanup of residue from the acid pump containment. In 2006, Goodyear shipped 61 pounds to Pollution Control Industries in East Chicago, Indiana.
9. Waste Alkali Liquid/Sludge from Metal Cleaning (D002, D008): The lead in this waste comes from adhesive cleaned from the conveyor racks. Periodically the liquid is removed from the tank by vac truck and the sludge on the bottom is shoveled out. In 2006, Goodyear shipped 11,850 pounds, 5,380 kg or about 448 kg/month. It is shipped to Pollution Control Industries in East Chicago, Indiana.
10. Ash/Water Mix from Pyrolytic Oven (D008): The oven is used to clean off (bake off) adhesive from the conveyor racks. The ash is then washed off the racks. Adhesives contain lead. In 2005, Goodyear shipped 4,168 pounds, 1,892 kg or about 158 kg/month. It was shipped to Michigan Disposal Waste Treatment Plant in Belleville, Michigan.
11. Water and Booth Scrapings (D008): This waste was generated from the cleanup of a fire in a spray booth. The adhesive that builds up on the walls of the spray booths is sensitive to friction and occasionally can smolder when it is scrapped off. In 2006, Goodyear shipped 946 pounds to Pollution Control Industries in East Chicago, Indiana.
12. Waste Paint and Solvent (D001, D035, F003 & F005): Automotive products are color coded to identify them. This waste includes the cleanup of paint guns and unused, old or off-spec paints. In 2006, Goodyear shipped 5,084 pounds, 2,308 kg or about 192 kg/month. It is shipped to Pollution Control Industries in East Chicago, Indiana.
13. Dip Tank Waste (D001): The military products are dipped in a solvent based rust preventive material. In 2006, Goodyear shipped 2,756 pounds, 1,251 kg or about 104 kg/month. It is shipped to Pollution Control Industries in East Chicago, Indiana.
14. Hazardous Skimmer Oil from Metal Cleaning (D002, D008): This is oil skimmed from the metal cleaning tanks. The oil comes from the incoming metal parts. It is oil such as metal working coolant. Lead comes from the adhesive coated conveyor racks that are also cleaned in the tanks. In 2006, Goodyear shipped 986 pounds to Pollution Control Industries in East Chicago, Indiana.
15. Chromic Acid Lab Pack (D002, D007): Occasionally lad chemicals are discarded. In 2006, Goodyear shipped 227 pounds to Pollution Control Industries in East Chicago, Indiana.
16. Universal Waste Lamps: Fluorescent lamps and other bulbs are generated throughout the facility.
17. Universal Waste Batteries: Fork lift batteries and other batteries are generated throughout the facility.

18. Used Oil: Used oil is collected in 55-gallon drums, totes and tanks throughout the facility. Some of the oil is chlorinated (Shamric Oil and Flamite Oil) and is segregated from the other non-chlorinated oils.

P2 activities at the facility include the following:

1. Rubber scrap (uncleared and non-leaded) is sold to Lotridge Rubber from use in truck bed liners and mud flaps
2. Metal banding is collected and recycled.
3. Shrink wrap plastic is bundled and recycled.
4. Cardboard is bundled and recycled.
5. Aluminum cans are collected and recycled.
6. Paper is collected and recycled.
7. Wood and wood pallets are recycled through Langston pallets.
8. Spent welding rods are recycled through OmniSource.
9. Scrap stainless steel, copper, brass and lead are recycled through OmniSource.
10. Scrap carbon black can be used by PCI (Philips) as a fuel.

Waste rubber flash and trims from the buffing operation is landfilled since it contains metal particles and grit from the buffers. Goodyear may want to investigate its use in paving materials.

I found the following violation of Ohio's hazardous waste laws. In order to correct this violation, you must do the following and send me the required information, **within 30 days** of your receipt of this letter:

**1. Container Accumulation Date  
OAC Rule 3745-52-34(A)(2)**

The date upon which each period of accumulation and/or treatment begins must be clearly marked and visible for inspection on each container.

Goodyear does not mark the two large hoppers for waste adhesive spray booth filters and two 1-cubic yard boxes for uncured rubber with lead with the date in which their period of accumulation begins. In order to correct this violation, Goodyear must properly mark these containers and submit photographic documentation that they have been properly marked.

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 a copy of the following documents to assist you in properly managing your spent lamps: Universal Waste Rules for Handlers of Lamps 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. During the inspection I gave you copies of the following used oil fact sheets: The Regulation of Used Oil: Used Oil Generators and Used Oil Recyclers. Please review these carefully and contact me immediately if you have any questions.

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, a worksheet that can help you recognize opportunities for reducing waste and conserving energy at your business, Pollution Prevention Opportunities: Easy to Implement P2, Battery Recyclers/Brokers & Disposal Facilities and Management of Electronic Waste From 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. I have mentioned your interest in an assessment to Mr. Ron Nabors in our Northwest District Office. You can reach him at (419) 373-3147. 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.

Ms. Shelly Liette  
June 13, 2007  
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You can find copies of the rules and other information about used oil 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  
Ron Nabors, OCAPP, NWDO

ec: ~~NWDO, DHWM, Auglaize County, Goodyear File~~  
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](mailto:tammy.mcconnell@epa.state.oh.us) or mail it to Tammy  
McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: <u>OH0005039722</u>									
3. Site Name	Name: <u>Goodyear Tire &amp; Rubber Company</u>					Website: (Optional)				
4. Site Location Information	Street Address: <u>1115 South Wayne Street</u>									
	City, Town, or Village: <u>St. Marys</u>					State: <u>OH</u>				
	County Name: <u>Auglaize</u>					Zip Code: <u>45885</u>				
5. 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"/>		
6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	326291									
7. 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>Marcy</u>			MI:	Last Name: <u>Fischer</u>					
	Phone Number: <u>(419) 394-3311</u>				Phone Number Extension: <u>277</u>					
	E-Mail Address: <u>marcy_fischer@goodyear.com</u>									
	Fax Number: <u>(419) 394-0479</u>				Fax Number Extension:					
	Street or P.O. Box:									
	City, Town or Village:			State:			Country:		Zip Code:	
	8. 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:					Date Became Owner (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:			State:			Owner Phone #:		Zip Code:		
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:			State:			Operator Phone #:		Zip Code:		
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No									
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)										
<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)										
<input type="checkbox"/> Hazardous Waste Transporter					<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste					<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Recycler of Hazardous Waste					<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Underground Injection Control Facility										

10B. Universal Waste Activities (Indicate types of universal waste managed (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	10C. Used Oil Activities (Indicate Type(s) of Activity(ies))
<b>Managed</b>	<input checked="" type="checkbox"/> Used Oil Generator
Batteries <input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter
Pesticides <input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility
Mercury containing equipment <input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Processor
Lamps <input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner
	<input type="checkbox"/> Off-Specification Used Oil Burner
	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner

11. 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.

D001	D002	D008	F003	F005	D035	D007
------	------	------	------	------	------	------

12. 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	

13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Don North		6-4-07

14. 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)

## PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Greystone Tire & Rubber Co

Facility Type: LQG/SQG/CESQG/TSD

EPA ID#: OH000000122

### Description of Waste

### On-Site Management

### Off-Site Management

Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	Waste Generated (e.g. sludge, 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 (Include map if possible)	Name, state, and type of activity occurring at the facility.	P2 Activities
1. Machine oil & grease	oil & grease	D008	1,061 kg/mo.	drums			Pollution Control Industries East Chicago, IN IND 000646943	
2. Machine oil & grease	oil & grease brake fluids	D008	978 kg/mo.	drums			Pollution Control Industries East Chicago, IN IND 000646943	
3. Machine oil & grease	Adhesive solvent solvents	D001	450 kg/mo.	drums			Pollution Control Industries East Chicago, IN IND 000646943	
4. Machine oil & grease equipment cleaning	Machine oil & grease solvent	D001 F003 F005	280 kg/mo.	drums			Pollution Control Industries East Chicago, IN IND 000646943	
5. Metal cleaning solution (see file)	Machine oil & grease	D002	1,436 kg/mo.	vac truck			Thomas Fix of Dayton Dayton, OH OH 0004274031	

## PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Green Tree Rubber Co.

Facility Type: LQG/SQG/CESQG/TSD

EPA ID#: OH 000000

### Description of Waste

### On-Site Management

### Off-Site Management

Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	Waste Generated (e.g. sludge, 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 (Include map if possible)	Name, state, and type of activity occurring at the facility.	P2 Activities
1 6 Machining waste (oil, coolant)	oil sludge	D001	1,000 gallons	IBC truck			Waste Management Co. Inc. 1000 1000	
2 7 Machining waste (oil, coolant)	oil sludge	D001	1,000 gallons	IBC truck			Waste Management Co. Inc. 1000 1000	
3 8 Machining waste (oil, coolant)	oil sludge	D001	1,000 gallons	drum			Pollution Control Industries East Chicago, IN IND 0006 46943	
4 9 Machining waste (oil, coolant)	Waste oil sludge (oil, coolant)	D001	448 gallons	drums			Pollution Control Industries East Chicago, IN IND 0006 46943	
5 10 Machining waste (oil, coolant)	oil sludge	D001	1,000 gallons	drums			Waste Management Co. Inc. 1000 1000	



Goodyear 6-4-07

### USED OIL INSPECTION CHECKLIST (Long Version)

#### 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# W/101
- 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-oil 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 a 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# \_\_\_

### REMARKS

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

*Goodyear  
6-4-00*

CE SQG: ≤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 1<sup>st</sup>? [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.

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 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] *Containment used for many containers* 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 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

6. Has the generator **correctly** determined if restricted wastes meet or exceed treatment standards? [3745-270-07(A)(1)]

Yes  No  N/A \_\_\_ RMK# \_\_\_

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]

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]

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? [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? [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? [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? [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: Yes  No  N/A  RMK#
- 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**

**GENERATORS TREATING HAZARDOUS WASTE**

Brodyear 6-4-07

**LARGE QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS**

**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:**

*Speckman automotive  
Craig Speckman 394-2345*

- 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? ~~Dark in case~~ 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 PESTICIDES**

9. Does the LQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-33(B)(1)]

Yes  No  N/A  RMK#           

10. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-33(B)(2)]

Yes  No  N/A  RMK#           

11. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 66-101, except for paragraph (C) of 3745-66-97; rule 3745-66-100 and 3745-66-101 of the OAC met? [3745-273-33(B)(3)]

Yes  No  N/A  RMK#           

12. If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-33(B)(4)]

Yes  No  N/A  RMK#           

13. Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)]

Yes  No  N/A  RMK#

14. Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)]

Yes \_\_\_ No  N/A  RMK# \_\_\_

**UNIVERSAL WASTE THERMOSTATS**

15. Are thermostats that show evidence of leakage, spillage or damage that could cause leaks, properly contained? [3745-273-33(C)(1)]

Yes \_\_\_ No  N/A  RMK# \_\_\_

16. If the thermostats are contained, are the containers closed, structurally sound, compatible with contents of the thermostats and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(C)(1)]

Yes \_\_\_ No  N/A  RMK# \_\_\_

17. If the mercury-containing ampules are removed, does the LQUWH: [3745-273-33(C)(2)]

- a. Remove the ampules in a manner to prevent breakage and is the removal done over a containment device? [3745-273-33(C)(2)(a)(b)]

Yes  No  N/A \_\_\_ RMK# \_\_\_

- b. Have a clean-up system readily available to transfer spilled material to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-33(C)(2)(c)(d)]

Yes  No  N/A \_\_\_ RMK# \_\_\_

- c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-33(C)(2)(e)]

Yes  No  N/A \_\_\_ RMK# \_\_\_

- d. Ensure employees are thoroughly familiar with proper waste handling and emergency procedures? [3745-273-33(C)(2)(f)]

Yes  No  N/A \_\_\_ RMK# \_\_\_

- e. Ensure removed ampules are stored in closed, non-leaking containers that are in good condition? [3734-273-33(C)(2)(g)]

Yes  No  N/A \_\_\_ RMK# \_\_\_

- f. Pack removed ampules in containers with packing material to prevent breaking during storage, handling and transportation? [3745-273-33(C)(2)(h)]

Yes  No  N/A \_\_\_ RMK# \_\_\_

18. If mercury or clean-up residues resulting from spills or leaks or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-33(C)(3)(a)]

Yes \_\_\_ No  N/A  RMK# \_\_\_

a. If the waste is characteristic, was it managed in compliance with 3745-50 through 3745-69? (*The handler is considered the generator of the mercury, residues, and/or other waste and is subject to Chapter 3745-52*) [3745-273-33(C)(3)(b)]

Yes \_\_\_ No  N/A  RMK# \_\_\_

b. If the mercury, residues and/or other waste are not hazardous, are they managed in compliance with applicable law? [3745-273-33(C)(3)(c)]

Yes \_\_\_ No  N/A  RMK# \_\_\_

19. Are the thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)" [3745-273-34(D)]

Yes  No  N/A \_\_\_ RMK# \_\_\_

**UNIVERSAL WASTE LAMPS**

20. 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# \_\_\_

21. 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# \_\_\_

22. 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.

**ACCUMULATION TIME**

23. 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#

*Ship once / qtr.*

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

24. 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)]

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 is received? [3745-273-35(C)(6)]

Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# \_\_\_

**EMPLOYEE TRAINING**

25. 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**

26. Were releases of universal waste and other residues immediately contained? [3745-273-37(A)]

Yes \_\_\_ No  N/A  RMK# \_\_\_

27. Was the released material characterized? [3745-273-37(B)]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

28. 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# \_\_\_

**OFF-SITE SHIPMENTS**

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

29. 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.

30. 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# \_\_\_

31. 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# \_\_\_

32. 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# \_\_\_

33. 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# \_\_\_

34. 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# \_\_\_

35. 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# \_\_\_