



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: University of Toledo
Health Science Campus
Lucas County
Hazardous Waste
OHD 087 047 353
Notice of Violation

July 23, 2007

Mr. Michael Valigosky
University of Toledo - Health Science
3000 Arlington Avenue
MS 1078
Toledo, Ohio 43614-2598

Dear Mr. Valigosky:

On June 13, 2007, the Ohio Environmental Protection Agency (Ohio EPA) conducted a compliance evaluation inspection of the University of Toledo - Health Science Campus (UT-HSC) located at 3000 Arlington Avenue in Toledo, Ohio. Colleen Weaver, Eric Schultz and I, representing Ohio EPA, inspected UT-HSC 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). We also discussed pollution prevention options during this inspection. This letter will explain the violations we found and what you need to do to correct these violations.

During our visit, we toured your facility operations, and reviewed written documentation with UT-HSC representatives, Michael Kovacs, Tim Niederkorn and yourself. The Health Science Campus is made up of 10-12 buildings. The buildings consist of two main research buildings, various other education buildings, and approximately 100 laboratories located throughout the campus. UT-HSC generates medical, prescription, and drug waste. The hazardous waste generated on campus primarily comes from three buildings: Block Health Science Building, the Health Education Building, and the hospital. All hazardous waste satellite accumulation areas are located inside the laboratories in the buildings. Two hazardous waste storage areas are located on UT-HSC: one area located inside the Health Sciences Building in Room 70 (Solvent Storage Room); and the other located in the Chemical Storage Area of the Facilities Support Building.

Used oil is generated in the Maintenance Area and stored in a poly drum. The used oil and filters are picked up and recycled by Safety Kleen. Safety Kleen also picks up the solvent (naphtha) from the parts washer which is managed as a hazardous waste. Universal Waste batteries and fluorescent bulbs are stored on a dock located in the Block Health Science Building until they are sent to Environmental Recycling located in Bowling Green, Ohio for recycling.

Mr. Michael Valigosky
July 23, 2007
Page 2

We found the following violations of Ohio's hazardous waste and used oil 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. OAC Rules 3745-65-52(D) and 3745-65-52(E): Contingency Plan:

A facility shall have a written contingency plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil or surface water.

UT-HSC does not have an adequate contingency plan. UT-HSC failed to have a current list of emergency coordinators and a list of emergency equipment in the contingency plan. UT-HSC is required to do the following to bring the contingency plan into compliance with the regulations:

- ▶ 3745-65-52(D) - The plan must include a current list of emergency coordinators including home addresses, home phone numbers and office numbers and have an emergency coordinator available on-site or on-call at all times. Where more than one person is listed, one shall be named as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates.
- ▶ 3745-65-52(E) - The plan must include a list of the emergency equipment, including its location, physical description and a brief outline of capabilities.

To abate this violation, UT-HSC must update the list of emergency coordinators to include office and home addresses and telephone numbers and submit the corrected page to the Ohio EPA, NWDO, for review. In addition, UT-HSC must add the list of emergency equipment and submit the page(s) with the required information to Ohio EPA, NWDO, for review. An adequate contingency plan must be written prior to conducting employee training as directed in violation number two. Additionally, UT-HSC must submit documentation (cover sheet, certified mail receipt, etc.) to Ohio EPA, NWDO, to verify that the updated contingency plan has been sent to the appropriate emergency authorities as required by OAC Rule 3745-65-53(B).

2. OAC Rule 3745-65-16(C): Annual Refresher Training for Personnel:

A generator shall provide annual refresher training for all personnel involved in the handling and management of hazardous waste at the facility. Ohio EPA defines annually as at least once every 365 days.

UT-HSC failed to provide annual refresher training for all employees involved in the handling or management of hazardous waste.

To abate this violation, UT-HSC must conduct the required training and shall submit signed class rosters to Ohio EPA, NWDO, to demonstrate that all employees have received the required training. In addition, UT-HSC shall immediately establish a written procedure to provide annual refresher training and shall submit a copy of this procedure to Ohio EPA, NWDO. Annual refresher training must be completed at least once every 365 days.

3. OAC Rule 3745-52-34(C)(1)(a): Satellite Container Management:

A container holding hazardous waste shall always be closed during storage except when it is necessary to add or remove waste, as required by OAC Rule 3745-66-73(A).

UT-HSC had one satellite container of waste Ethidium Bromide (EtBr) located in the Health Science Building, Ceders Lab, that was open and sitting in the fume hood.

The laboratory technician replaced the cap on the container of waste at the time of the inspection.

Therefore, this violation is considered abated.

4. OAC Rule 3745-52-34(C)(1)(b): Satellite Accumulation Areas:

A generator may accumulate as much as fifty-five gallons of hazardous waste or one quart of acutely hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit provided the containers are marked "Hazardous Waste" or other identifying words of the container's contents.

UT-HSC had two satellite containers located in the Health Science Building that were not labeled with the words "Hazardous Waste". Specifically, a container of EtBr located in the Ceders Lab and a container of Syber Green in lab #303. UT-HSC had three containers located in the hospital clinical lab that were not labeled with the words "Hazardous Waste". Specifically, two 1-gallon containers of xylene and one quart glass container of acetone were located in the Molecular Diagnostics laboratory hood.

Tim Niederkorn properly labeled each container with the words "Hazardous Waste" at the time of the inspection.

Therefore, this violation is considered abated.

5. OAC Rule 3745-66-74: Inspections:

Container storage areas shall be inspected on a weekly basis looking for leaks and for deterioration. These inspections shall be recorded in an inspection log which includes at a minimum the date and time of inspection, name of the inspector, a notation of observations made, and the date/nature of any repairs. Ohio EPA interprets weekly to mean once within the seven day period following the previous inspection.

On several occasions UT-HSC exceeded the weekly inspection requirement for the Chemical Storage Area located in the Facilities Support Building. Specifically, UT-HSC exceeded the weekly requirement for inspections from 4/4/05 to 4/15/05; 4/21/05 to 4/29/05; and 5/23/05 to 5/31/05. In addition, UT-HSC exceeded the weekly inspection requirement for Room 70 located in the basement of the Health Sciences Building. Specifically, UT-HSC exceeded the weekly requirement for inspections from 11/20/06 to 11/29/06; 12/6/06 to 12/15/06; and 12/18/06 to 12/27/06.

To abate this violation, UT-HSC must submit four (4) weeks of completed inspection logs for the Chemical Storage Area located in the Facilities Support Building and for Room 70 located in the basement of the Health Sciences Building.

6. OAC Rule 3745-52-42(A)(1): Exception Report:

A generator who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within thirty-five days of the date the waste was accepted by the initial transporter shall contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste.

UT-HSC had two shipments of hazardous waste, manifest #000244800 and manifest #000226987, where the signed copy of each manifest was not received within the thirty-five day time frame. UT-HSC did not have any documentation at the time of the inspection to indicate the initial transporter was contacted to determine the status of the hazardous waste shipments.

To abate this violation, UT-HSC must provide documentation from the transporter and/or the designated facility for the two shipments of hazardous waste where the signed copy of the manifest was not received within the required thirty-five days. Specifically, manifest #000244800 was signed by transporter #1 on 3/13/07, the shipment was then received by transporter #2 and delivered to the designated facility on 5/14/07, for a total of 61 days to reach transporter #2 and the designated facility. UT-HSC must provide documentation from transporter #1, ADCOM Express, Inc., regarding where the hazardous waste was stored until transporter #2, Pollution Control Industries, received the shipment and delivered it to the designated facility. Manifest #000244800 was for the shipment of six drums of waste flammable liquid (D001, F003, F005).

In addition, manifest #000226987 was signed by transporter #1 on 11/29/06, and the manifest was not signed by the designated facility until 1/10/07, for a total of 42 days to reach the designated facility. Manifest #000226987 was for the shipment of one fiber drum of waste sodium sulfide (D001, D002, D003); one container of waste acrolein (D001, P003); and one container of waste cyanogen bromide (U246).

7. OAC Rule 3745-52-42(A)(2): Exception Report:

A generator shall submit an exception report to the Ohio EPA if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within forty-five days of the date the waste was accepted by the initial transporter.

UT-HSC failed to submit an exception report to Ohio EPA for manifest #000244800. Specifically, manifest #000244800 was signed by transporter #1 on 3/13/07, the shipment was then received by transporter #2 and delivered to the designated facility on 5/14/07, for a total of 61 days to reach transporter #2 and the designated facility. Manifest #000244800 was for the shipment of six drums of waste flammable liquid (D001, F003, F005).

To abate this violation, UT-HSC must prepare an exception report for manifest #000244800. The exception report shall include: A legible copy of the manifest and a cover letter signed by the generator explaining the efforts that were taken to locate the hazardous waste and the results of those efforts. In addition, UT-HSC must submit a copy of an internal policy that outlines the procedures that will be implemented to ensure hazardous waste shipments are properly tracked.

8. OAC Rule 3745-279-22(C)(1): Labeling:

Containers, aboveground tanks and fill pipes used for underground storage tanks shall be labeled or marked clearly with the words "Used Oil."

UT-HSC had one container of used oil located in the Health Science Building, room 465, that was not properly labeled.

UT-HSC properly labeled the container with the words "Used Oil" at the time of our inspection.

Therefore, this violation has been abated.

9. OAC Rule 3745-273-13(D)(1): Universal Waste Management - Lamps:

Each lamp must be stored in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

UT-HSC had boxes of universal waste lamps that were not properly closed.

UT-HSC properly closed the boxes of universal waste lamps at the time of our inspection.

Therefore, this violation has been abated.

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

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".

UT-HSC did not properly label the boxes of spent lamps with one of the required phrases. UT-HSC was using a stamp that placed the date on the box and the words "universal waste". In order to correct this violation, UT-HSC must properly label each lamp, or container, or package and submit photographic documentation that this has been done.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. You may also contact the Office of Compliance Assistance and Pollution Prevention at 1-800-329-7518 if you wish to set up a pollution prevention assessment as we discussed during the inspection.

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) 373-3066. 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 compliance assistance and pollution prevention at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp.html>.

Sincerely,



Melissa L. Boyers
Division of Hazardous Waste Management
/cs/

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
DHWM, NWDO University of Toledo File (w/original enc.)
ec: Melissa Boyers, DHWM, NWDO

Notice:

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

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

For Ohio EPA use only

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

2. Site EPA ID No.	EPA ID Number: OHD 087 047 353								
3. Site Name	Name: University of Toledo - Health Science Campus				Website: (Optional)				
4. Site Location Information	Street Address: 3000 Arlington Ave.								
	City, Town, or Village: Toledo				State: OH				
	County Name: Lucas				Zip Code: 43614				
5. Site Land Type (check only one)	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 checked="" type="checkbox"/>	Other <input type="checkbox"/>	
6. NAICS code(s) www.census.gov/epcd/www/naics.html	61131								
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: Michael		MI: A.		Last Name: Valigosky				
	Phone Number: 419-383-5069				Phone Number Extension:				
	E-Mail Address: michael.valigosky@utoledo.edu								
	Fax Number:				Fax Number Extension:				
	Street or P.O. Box: 3000 Arlington Avenue, MS 1078								
	City, Town or Village: Toledo				State: Ohio				
	Country:			Zip Code: 43614					
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: University of Toledo				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:				Owner Phone #:				
	State:				Country:		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:				Operator Phone #:				
	State:				Country:		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 checked="" type="checkbox"/> Small Quantity Handler of Universal Waste			<input 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))			
	Managed	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner		
Batteries		<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil		
Pesticides		<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner		
Mercury containing equipment		<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor			
Lamps		<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner			
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	D003	D007	D008	D010	U007
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:		Heather Lorenz	
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)		
Melissa Boyers		Colleen Weaver		6/13/2007 9:30		
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: University of Toledo – Health Science Campus **Facility Type:** LQG/SQG/CESQG/TSD **EPA ID#:** OHD087047353

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.
1	Lighting	Spent Fluorescent Bulbs	UW			Dock located in the Block Health Science Building	Recycled at Environmental Recycling in Bowling Green
2	General vehicle maintenance and oil changes	Used Oil & Filters		containers		Maintenance Shop	Picked up for recycling by Safety Kleen
3	Laboratory Research	Medical, Prescription, and Drug waste	D001 D008 D002 D010 D003 U007 D005 U170 D007 U188	varies	Containers	Satellite containers located in each lab	Teris (Clean Harbors)
4	Machine Shop	Parts Washer Solution - Naphtha	D001	Drum		Maintenance Shop	Safety Kleen

5	Painting	Waste Paint & Spent Solvents	D001		Drum		Paint Shop	Teris (Clean Harbors)
6	Equipment Operation	Spent Batteries	UW				Dock located in the Block Health Science Building	Recycled at Environmental Recycling in Bowling Green
7								
8								
9								

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

CESQG: ≤ 100 Kg. (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: $\geq 1,000$ 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 University of Toledo - Health Science Campus

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
2/27/07
5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] Yes No N/A
6. Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] Yes No N/A
7. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] Yes No N/A

8. Does the generator accumulate hazardous waste? Yes No N/A

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

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

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

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

NOTE: Complete appropriate checklist for each unit.

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

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

MANIFEST REQUIREMENTS

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

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

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

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

15 If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes No N/A

16 Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] Yes No N/A

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

17 If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes No N/A

18 If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes No N/A

19 Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes No N/A

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

PERSONNEL TRAINING

20 Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes No N/A

21 Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes No N/A

22 Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A

23 Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes No N/A

24 Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A

25 Does the generator keep records and documentation of:

a. Job titles [3745-65-16D(1)]? Yes No N/A

b. Job descriptions [3745-65-16D(2)]? Yes No N/A

c. Type and amount of training given to each person [3745-65-16D(3)]? Yes No N/A

d. Completed training or job experience required [3745-65-16D(4)]? Yes No N/A

26 Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes No N/A

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

<u>Name of Employee</u>	<u>Job Performed</u>	<u>Date Trained</u>
David Weaver	Genomic Lab	4/26/06, None in 2007
Marjorie Gable	Lab #235	last trained on 2/8/02
Mike Valigosky	H&S Manager	2/27/06, 1/9/07

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: Yes No N/A

- a. Was the contingency plan implemented? [3745-65-51(B)] Yes No N/A
- b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes No N/A
- c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes No N/A

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

PREPAREDNESS AND PREVENTION

33 Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes No N/A

34 Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:

- a. Internal communications or alarm system? [3745-65-32(A)] Yes No N/A
- b. Emergency communication device? [3745-65-32(B)] Yes No N/A

- c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes No N/A
- d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes No N/A

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

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

SATELLITE ACCUMULATION AREA REQUIREMENTS

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

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# ___

1 - Health Science Bldg - Rm. 465 used oil containers not labeled.

- 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] *DISC* 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#

L:\Inspection Checklist\MegaSet Rule Updates\USED OIL.SHORT.11.2004.fin.megaset.wpd

REMARKS

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#

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: 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#

GENERATORS TREATING HAZARDOUS WASTE

1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? Yes No N/A RMK#
2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)] Yes No N/A RMK#
- a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] Yes No N/A RMK#

- b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes ___ No N/A RMK# ___
3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes ___ No N/A RMK# ___
4. Has the generator followed their WAP [3745-270-07(A)(5)? Yes ___ No N/A RMK# ___
5. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes ___ No N/A RMK# ___

NOTE: If the waste is a characteristic waste, which has been treated to render it non hazardous and subsequently sent to a solid waste landfill, proceed to question 7 & 8.

6. Has the generator sent a notification and certification with the initial shipment of waste? [3745-270-07(A)(5)(c)] Yes ___ No N/A RMK# ___
7. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] Yes ___ No N/A RMK# ___
8. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following:
- a. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes ___ No N/A RMK# ___
- b. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)] Yes ___ No N/A RMK# ___

NOTE: If the waste will be treated and monitored for all UHCs then they do not need to be listed on the notice.

9. Has the process/operation generating the waste or the solid waste landfill facility changed? If so: Yes ___ No ___ N/A RMK# ___
- a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] Yes ___ No N/A RMK# ___
- b. Has the director been notified of such changes? [3745-270-09(D)] Yes ___ No N/A RMK# ___

NOTE: The director need only be notified on an annual basis but no later than December 31.

10. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: Yes ___ No ___ N/A RMK# ___
- a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49 (C)] Yes ___ No N/A RMK# ___
11. Does each notification/certification form completed, contain the information found in Table 1? [3745-270-07(A)(3)] Yes ___ No N/A RMK# ___

NOTE: If the waste will be treated and monitored for all constituents, there is no need to put them all on the LDR notice.

REMARKS

HAZARDOUS DEBRIS No Debris On-Site

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)? Yes ___ No ___ N/A RMK# ___
2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.) Yes ___ No ___ N/A ___ RMK# ___
3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so: Yes ___ No ___ N/A ___ RMK# ___
- a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)] Yes ___ No N/A ___ RMK# ___

NOTE: If immobilization has been used in a treatment train, it must be the last treatment technology used.

4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so: Yes ___ No ___ N/A ___ RMK# ___
- a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] Yes ___ No N/A ___ RMK# ___
5. Is the waste a PCB waste under 40 CFR Part 761? If so: Yes ___ No ___ N/A RMK# ___
- a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)]

6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)]

Yes ___ No N/A RMK# ___

7. Does the owner/operator of a treatment facility that claims the debris is excluded from regulation as a hazardous waste under 3745-51-03(F)(1) maintain the following information?

Yes ___ No N/A ___ RMK# ___

a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)]

Yes ___ No ___ N/A ___ RMK# ___

b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)]

Yes ___ No N/A ___ RMK# ___

c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)]

Yes ___ No N/A ___ RMK# ___

8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F)(1) have the following information? [3745-270-07(D)(3)]

Yes ___ No N/A ___ RMK# ___

a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)]

Yes ___ No ___ N/A ___ RMK# ___

b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)]

Yes ___ No N/A ___ RMK# ___

c. Technology used from Table 1? [3745-270-07(D)(1)(c)]

Yes ___ No N/A ___ RMK# ___

9. Has the above notification been sent to the director? [3745-270-07(D)(1)]

Yes ___ No N/A ___ RMK# ___

Yes ___ No ___ N/A RMK# ___

TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS

No Treatment done on-site

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13? [3745-270-07(B)]

Yes ___ No N/A RMK# ___

2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)]

Yes ___ No N/A RMK# ___

Note: No further notification is necessary until such time that the waste changes or the receiving facility changes.

3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07? [3745-270-07(B)(3)]

Yes ___ No N/A RMK# ___

4. Are wastes or treatment residues being sent to another TSD to be further managed? If so:

a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)]

Yes ___ No N/A RMK# ___

5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? If so:

a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)), excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)]

Yes ___ No N/A RMK# ___

b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4)[3745-270-07(B)(6)]

Yes ___ No N/A RMK# ___

c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)]

Yes ___ No N/A RMK# ___

6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)]

Yes ___ No N/A RMK# ___

7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have:

a. Copies of all notices and certifications required in 3745-270?

Yes ___ No N/A RMK# ___

b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49?

Yes ___ No N/A RMK# ___

c. The testing frequency specified in the facility's WAP and have they followed the protocol?

Yes ___ No N/A RMK# ___

REMARKS

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg (11,023 lbs) or more
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg (11,023 lbs) or less

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No N/A RMK#
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes No N/A RMK#

UNIVERSAL WASTE BATTERIES

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes No N/A RMK#
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery, and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes No N/A RMK#
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes No N/A RMK#
 - b. Mix battery types in one container? Yes No N/A RMK#
 - c. Discharge batteries to remove the electric charge? Yes No N/A RMK#
 - d. Regenerated used batteries? Yes No N/A RMK#
 - e. Disassemble them into individual batteries or cells? Yes No N/A RMK#
 - f. Remove batteries from consumer products? Yes No N/A RMK#
 - g. Remove the electrolyte from the battery? Yes No N/A RMK#
- If yes, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] Yes No N/A RMK#
6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] Yes No N/A RMK#
- a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] Yes No N/A RMK#
 - b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] Yes No N/A RMK#
7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)] Yes No N/A RMK#

UNIVERSAL WASTE PESTICIDES

8. Does the SQUWH 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? [3745-273-13(B)(1)] Yes No N/A RMK#
9. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)] Yes No N/A RMK#
10. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97; 3745-66-100 and -66-101 of the OAC met? (Use tank checklist) [3745-273-13(B)(3)] Yes No N/A RMK#
11. If pesticides are stored in a transport vehicle, is it closed, structurally sound, and compatible with the pesticide(s)? [3745-273-13(B)(4)] Yes No N/A RMK#
12. Are containers, tanks, or transport vehicles that contain universal waste pesticides labeled with either "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-14(B)] Yes No N/A RMK#

UNIVERSAL WASTE THERMOSTATS

13. Are thermostats that show evidence of leaking, spilling, or damage that could cause leaks properly contained? [3745-273-13(C)(1)] Yes No N/A RMK#
14. 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? [3745-273-13(C)(1)] Yes No N/A RMK#
15. If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]
- a. Remove the ampules in a manner to prevent breakage and are they removed over or in a containment device? [3745-273-13(C)(2)(a)(b)] Yes No N/A RMK#
- b. Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC 3745-52-34, and is the spilled mercury transferred immediately? [3745-273-13(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? [3745-273-13(C)(2)(e)] Yes No N/A RMK#
- d. Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)] Yes No N/A RMK#

- e. Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(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? [3745-273-13(C)(2)(h)] Yes No N/A RMK#
16. If mercury, clean-up residues, or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-13(C)(3)(a)] Yes No N/A RMK#
- a. If the waste is characteristic, is it managed in compliance with OAC Chapters 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.) [3745-273-13] Yes No N/A RMK#
- b. If the mercury, residues and/or other wastes are not hazardous, are they managed in compliance with applicable law? [3745-273-13(C)(3)(c)] Yes No N/A RMK#
17. Are thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)"? [3745-273-14(D)] Yes No N/A RMK#

UNIVERSAL WASTE LAMPS

18. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(D)(1)] Yes No N/A RMK#
Containers not closed
19. Are lamps that show evidence of breakage, leakage, or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes No N/A RMK#
20. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)] Yes No N/A RMK#
Red labeled "universal waste"

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

21. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes No N/A RMK#

a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]

Yes No N/A RMK#

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

22. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)]

Yes No N/A RMK#

a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)]

Yes No N/A RMK#

b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)]

Yes No N/A RMK#

c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)]

Yes No N/A RMK#

d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)]

Yes No N/A RMK#

e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)]

Yes No N/A RMK#

f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)]

Yes No N/A RMK#

EMPLOYEE TRAINING

23. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/ emergency procedures, relative to their responsibilities? [3745-273-16]

Yes No N/A RMK#

RESPONSE TO RELEASES

24. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]

Yes No N/A RMK#

25. Is the material released characterized? [3745-273-17(B)]

Yes No N/A RMK#

26. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)]

Yes No N/A RMK#

OFF-SITE SHIPMENTS

NOTE: If a SQUWH self-transport waste, then they must comply with the Universal Waste transporter requirements.

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

Yes No N/A RMK#

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

28. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes No N/A RMK#
29. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No N/A RMK#
30. 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? [3745-273-18(E)(1)] Yes No N/A RMK#
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes No N/A RMK#
31. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes No N/A RMK#
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes No N/A RMK#
33. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes No N/A RMK#
34. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes No N/A RMK#

EXPORTS

35. Is waste being sent to a foreign destination? If so:
- a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes No N/A RMK#
- b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to 57? [3745-273-20(B)] Yes No N/A RMK#
- c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes No N/A RMK#

REMARKS