OhioEPA

State of Ohio Environmental Protection Agency

Northwest District Office

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Bowling Green, OH 43402-9398

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

Re: University of Toledo
Main Campus
Lucas County
Hazardous Waste
OHD 051 623 734
Notice of Violation

July 20, 2007

Mr. Michael Kovacs
University of Toledo
2801 W. Bancroft Street
MS 405
Toledo, Ohio 43606-3390

Dear Mr. Kovacs:

On May 23 and May 24, 2007, the Ohio Environmental Protection Agency (Ohio EPA) and United States Environmental Protection Agency (U.S. EPA) conducted a compliance evaluation inspection of the University of Toledo - Main Campus (UT-Main) located at 2801 West Bancroft Street in Toledo, Ohio. Wendy Miller and I, representing Ohio EPA, inspected UT-Main 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). Bryan Gangwisch represented U.S. EPA during the inspection. 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-Main representatives, Michael Valigosky and Heather Lorenz. The hazardous waste generated on Main Campus primarily comes from three buildings: Bowman-Oddy, Wolfe Hall, and McMaster Hall. There are three hazardous waste storage areas located on UT-Main: one area located inside the Bowman-Oddy building (Chemical Storage Area); another area located outside adjacent to the Fleet Maintenance Shop; and the third area located inside the Student Classroom Annex building (Sociology Annex). Each laboratory has a satellite accumulation area for any hazardous waste generated by research students/employees. Satellite containers from each laboratory are taken to the Chemical Storage Area by the research lab technicians and placed on the appropriate shelf. Used oil is generated in the Fleet maintenance Shop and stored in a 35-gallon poly drum and multiple containers. The used oil is picked up and recycled by DISC Environmental. One parts washer, located in the machine shop, uses a citrus based cleaner and is serviced by Crystal Clean Parts Washer Services. Fluorescent bulbs are taken to the Student Classroom Annex building, crushed and managed as hazardous waste.

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. **ORC Section 3734.02(E)&(F): Unpermitted Hazardous Waste Treatment, Storage or Disposal:**

No person shall store, treat, or dispose of hazardous waste identified or listed under this chapter and rules adopted under it, regardless of whether generated on or off the premises where the waste is stored, treated, or disposed of, or transport or cause to be transported any hazardous waste identified or listed under this chapter and rules adopted under it to any other premises, except at or to any of the following: (1) A hazardous waste facility operating under a permit issued in accordance with this chapter; (2) A facility in another state operating under a license or permit issued in accordance with the "Resource Conservation and Recovery Act of 1976" 90 Stat. 2806, 42 U.S.C.A. 6921, as amended.

a. UT-Main has established an unpermitted hazardous waste storage facility by: storing hazardous waste in its Student Classroom Annex building from facilities that are not contiguous. UT-Main has been receiving spent fluorescent bulbs from the UT-Westwood Campus and managing them as hazardous waste. **UT-Main must immediately cease the storage of hazardous waste from non-contiguous facilities.** UT-Main must provide documentation that describes the procedures that will be taken, immediately, to ensure that unpermitted storage does not happen again.

b. UT-Main stored hazardous waste for greater than 90-days. Specifically, UT-Main had three containers, approximately one liter each, of hazardous waste currently on-site in the chemical storage area with the following dates: 12/2/06, 1/7/07, and 2/1/07. UT-Main also had one drum of spent fluorescent lamps labeled hazardous waste, located in the Student Classroom Annex building, that were crushed via the use of an on-site bulb crusher. The drum was labeled "Hazardous Waste" but did not have an accumulation start date on it. The maintenance log for the bulb crusher located next to the drum indicated that the new drum was started on July 8, 2004. In addition, UT-Main had at least one box (duct taped end) that contained spent hazardous waste fluorescent bulbs waiting to be crushed. UT-Main also had one drum of crushed lamps labeled hazardous waste located in the center bay of the outside hazardous waste storage area that did not have an accumulation start date.

UT-Main must immediately properly dispose of the drums and containers of hazardous waste that have been on-site for more than 90 days. UT-Main must properly label and date each drum of hazardous waste and submit photographic documentation to Ohio EPA. In addition, a copy of the manifests, complete with land disposal restriction (LDR) forms, for these materials must be submitted to Ohio EPA once the waste is transported off-site for disposal.

c. UT-Main, Wolfe Hall, laboratory #2223 was allowing a container of hazardous waste to evaporate while sitting in the laboratory hood. The student in this laboratory stated that they leave the lids off of the containers of hazardous waste and allow the contents to volatilize. Ohio EPA considers this treatment and disposal of hazardous waste to the air. According to ORC Section 3734.02 (E) & (F) this practice is not legal as a permit is required to treat and/or dispose of hazardous waste.

UT-Main has become an unpermitted hazardous waste disposal/treatment facility. UT-Main must immediately cease treating and disposing of the laboratory waste by allowing it to evaporate. UT-Main must properly collect, store and dispose of the spent laboratory waste. The lid was placed on the container of hazardous waste at the time of our inspection. UT-Main must create and submit an internal policy to address the proper storage of hazardous waste containers located in the satellite accumulation areas within each laboratory.

Since UT-Main has violated ORC Section 3734.02(E) & (F) by becoming an unpermitted storage facility (TSD), it is subject to OAC Rules 3745-55-10 through 3745-55-48 and 3745-55-97. Therefore, you may be required to close the storage areas. A closure plan describes the steps necessary to investigate the extent of contamination and to clean up all contamination found.

UT-Main also is subject to all applicable general facility standards found in OAC Chapters 3745-54 and 55 until such time as UT-Main has demonstrated that it has ceased operations as an unpermitted storage facility. Additionally, at any time, Ohio EPA may assert its right to have UT-Main begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

2. OAC Rule 3745-52-11: Waste Evaluation:

Any person who generates a waste must determine if that waste is a hazardous waste by using generator knowledge or by testing the waste.

a. UT-Main had several containers, approximately 1 liter each, located in the outside hazardous waste storage area that were not labeled and facility personnel were unsure of the contents. Containers located in the west end bay were rusted and sitting in a cardboard box. A container, approximately 16 ounces, labeled hazardous waste was laying on its side on the top shelf and the lid was missing. Containers located in the middle bay were in a cardboard box that was labeled "dark room chemicals". Additional containers in the middle bay were sitting on the floor or in cardboard boxes. The east end bay was full and we were unable to completely enter it at the time of the inspection. The east end bay was full of asbestos supplies, a spill kit, buckets, and miscellaneous boxes. It is unclear if any hazardous waste was stored in the east end bay area. However, if a spill occurred in this area, employees would have a difficult time getting to the spill kit.

UT-Main must provide proper waste evaluation documentation for all the containers located in the outside hazardous waste storage area. This documentation can include Material Safety Data Sheets, laboratory analytical results, or generator knowledge that is based upon adequate information of the waste generated. If samples are collected to evaluate the waste, UT-Main must notify me at least seven days prior to the sampling event date so that a representative from Ohio EPA can be present to observe the sampling and to split samples if necessary. UT-Main must submit a copy of the analytical results or other documentation to Ohio EPA for review.

b. UT-Main failed to have waste evaluation documentation for the metal shavings that are generated in the machine shop, room 106, located in McMasters Hall. UT-Main has historically disposed of this waste stream in the solid waste dumpster.

UT-Main must immediately cease disposing of the metal shavings until a proper waste evaluation has been completed. UT-Main must obtain a representative sample of the waste and have it analyzed for Toxicity Characteristic Leaching Procedure (TCLP) Resource Conservation and Recovery Act (RCRA) metals (SW-846 Method 1311/6010). In lieu of waste evaluation, UT-Main should consider recycling the metal shavings.

To abate this violation, UT-Main must submit either waste evaluation documentation or a written policy that outlines how the metal shavings will be collected and recycled.

Ohio EPA may use the data you collect, in part, to make regulatory decisions concerning the waste(s) tested. A data review process, referred to as data validation, may be utilized to confirm the validity of the data. This data validation can include a review of the following components: sampling techniques, sample containers, representativeness of sample, laboratory test methods, laboratory data completeness, documentation of holding time(s), chain(s) of custody and quality assurance/quality control (QA/QC) data. Please include data sufficient for Ohio EPA to perform the data validation review. Information on conducting a data validation can be obtained from Ohio EPA's web page:
http://www.epa.state.oh.us/dhwm/tier_i_data_validation_manual.html.

3. 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-Main does not have an adequate contingency plan. UT-Main failed to have a current list of emergency coordinators and a list of emergency equipment in the contingency plan. UT-Main 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-Main 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-Main 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 four. Additionally, UT-Main 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).

4. OAC Rules 3745-65-54: Amendment of Contingency Plan:

The contingency plan must be reviewed, and immediately amended, in response to rule changes, facility, equipment and personnel changes, or failure of the plan.

UT-Main failed to amend the contingency plan when the facility merged with the Medical College of Ohio and personnel changes occurred. UT-Main was not reviewing the contingency plan on a regular basis to update it as needed in response to the ongoing changes at the university.

To demonstrate a return to compliance, UT-Main shall submit to Ohio EPA, NWDO, a copy of a written internal policy that ensures the contingency plan will be reviewed and amended, as necessary, on a regular basis.

5. OAC Rule 3745-65-16(A)(1-3), (B), (C), (D)(1-4) and (E): Personnel Training:

Facility personnel must complete training on hazardous waste management procedures.

UT-Main violated all the applicable requirements of this rule as follows:

(a) 3745-65-16(A)(1) through (3) - UT-Main did not conduct personnel training for all employees involved in the handling or management of hazardous waste at the facility. The training shall include, but is not limited to, instruction in safe equipment operation, emergency procedures and the generator's contingency plan. It must also familiarize employees with procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment. The personnel training must be directed by a person trained in hazardous waste management procedures.

UT-Main must develop a personnel training plan that includes procedures for using, inspecting, repairing, and replacing emergency & monitoring equipment, what to do in case of fire in a hazardous waste area, what wastes are considered hazardous, how to label hazardous wastes, what to do in case of waste spills, how to inspect waste storage areas, contingency plan evacuation routes, and communication/alarm systems. UT-Main must also identify the students and/or employees who will be responsible for managing the hazardous waste and therefore will receive training.

Prior to conducting training, a copy of the training program or plan shall be submitted to Ohio EPA for review. UT-Main must also submit a copy of the instructor's name and credentials, resume, work experience or OSHA 40-hour certificate which shows they have been trained in hazardous waste management procedures.

This violation will be abated once the personnel training has been completed and class sign-in sheets from those attending have been received by Ohio EPA.

(b) 3745-65-16(B) - UT-Main does not have in place hazardous waste management training for new employees.

UT-Main must immediately begin to train new employees within six months of their initial date of employment or switching to a new position involving hazardous waste management. To demonstrate a return to compliance, UT-Main shall submit to Ohio EPA, NWDO, a copy of a written internal policy that ensures new employees are properly trained.

(c) 3745-65-16(C) - UT-Main failed to provide annual refresher training for all employees involved in the handling or management of hazardous waste.

To abate this violation, UT-Main 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-Main 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.

(d) 3745-65-16(D)(1) through(4) - UT-Main does not maintain personnel training records which include employee name, job title, job descriptions, type and amount of introductory and continuous training for employees responsible for waste handling and spill response duties.

To abate this violation, UT-Main must submit to Ohio EPA, NWDO, written job titles, job descriptions, name of each employee filling that position and documentation that all applicable training has been completed for all employees involved in the handling and management of hazardous waste.

(e) 3745-65-16(E) - UT-Main did not maintain training records on current and former employees.

UT-Main must submit to Ohio EPA, NWDO, a copy of a written internal policy that ensures all personnel training records will be maintained. Specifically, current employees until facility closure and former employees for three years.

6. **OAC Rule 3745-65-33: Testing and maintenance of equipment:**

All facility communications or alarm systems, spill control equipment and decontamination equipment must be tested and maintained as necessary to assure its proper operation in time of emergency. The owner or operator must record the inspections in a log or summary.

UT-Main does not test or maintain the emergency equipment to assure its proper operation in the event of an emergency. These tests must be recorded in a log. It is recommended that the log include the following information: date and time of test, name of person conducting the test, observations made and date/nature of any repairs.

To abate this violation, UT-Main must submit a copy of an internal policy regarding the testing and maintenance of all emergency equipment and the frequency of the inspections. UT-Main must also submit a copy of a completed inspection log to verify compliance with this rule. An example log was given at the time of the inspection.

7. **OAC Rule 3745-65-34(A): Access to communication or alarm system:**

Whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation shall have immediate assess to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee.

Laboratory technicians do not have immediate access to an alarm or communication device when placing hazardous waste in the chemical storage area located in the Bowman-Oddy building. In addition, no alarm or communication device is located near the outside hazardous waste storage area and it is unclear which employee(s) would have access to this area.

To abate this violation, UT-Main must provide employees immediate access to an alarm or communication device in the hazardous waste storage areas. UT-Main must submit written and/or photographic documentation of the alarm or communication device employees will have access to when handling hazardous waste.

8. **OAC Rule 3745-65-35: Required Aisle Space:**

The owner/operator shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.

UT-Main failed to maintain adequate aisle space in the three bays of the outside hazardous waste storage area. Spill control equipment was located inside the east bay, however it was unaccessible due to other items stacked in front of it. In addition, UT-Main failed to maintain adequate aisle space in the Student Classroom Annex building (Sociology Annex) where the drum of crushed hazardous waste fluorescent bulbs and boxes of stored bulbs waiting to be crushed were stored.

UT-Main must clean-up the three bays of the outside hazardous waste storage area and the Student Classroom Annex building to allow unobstructed movement in the event of an emergency. UT-Main must submit photographic documentation showing that adequate aisle space has been established in these areas.

9. **OAC Rule 3745-52-34(C)(1)(a): Container Management:**

A container holding hazardous waste shall always be closed during storage except when it is necessary to add or remove waste.

UT-Main had one satellite container of waste phenol chloroform located in Wolfe Hall, lab# 2223, 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.

10. **OAC Rule 3745-52-34(A)(2): Accumulation time of hazardous waste:**

A generator may, for ninety days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit provided that the waste is placed in containers that have the date upon which each period of accumulation begins clearly marked and visible for inspection on each container.

UT-Main had multiple containers of waste located in the outside hazardous waste storage area that did not have accumulation start dates. Specifically, in the middle bay there were several one liter bottles and paint cans that contained waste acids, solvents, and paint that did not have an accumulation start date. Also, in the middle bay there was a drum of crushed fluorescent lamps that was labeled hazardous waste but did not have an accumulation start date listed on the label. UT-Main also had one drum of spent fluorescent lamps labeled hazardous waste, located in the Student Classroom Annex building, that did not have an accumulation start date listed on the label. In addition, UT-Main had at least one box (duct taped end) that contained spent hazardous waste fluorescent bulbs waiting to be crushed.

UT-Main must properly label the containers of waste acids, solvents, paints, and spent bulbs with the accumulation start date. To abate this violation, UT-Main must submit photographic documentation to show that all the containers in the hazardous waste storage areas are properly labeled.

11. OAC Rule 3745-52-34(A)(3): Accumulation time of hazardous waste:

A generator may , for ninety days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit provided that the waste is placed in containers that are labeled or marked clearly with the words "Hazardous Waste" while being accumulated and/or treated on-site.

UT-Main had multiple containers of waste located in the outside hazardous waste storage area that were not marked with the words "Hazardous Waste." Specifically, in the middle bay there were several one liter bottles and paint cans that contained hazardous waste acids, solvents, and paint that were not marked with the words "Hazardous Waste."

UT-Main must properly label the containers of waste acids, solvents, and paints with the words "Hazardous Waste." To abate this violation, UT-Main must submit photographic documentation to show that the containers in the outside hazardous waste storage area are properly labeled.

12. 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.

UT-Main failed to document the weekly inspections of the outside hazardous waste container storage area in an inspection log. On several occasions UT-Main exceeded the weekly inspection requirement for the chemical storage area located in Bowman-Oddy. Specifically, UT-Main exceeded the weekly requirement for inspections from 6/19/06 to 6/27/06; 12/18/06 to 12/27/06; and 4/23/07 to 5/7/07.

To abate this violation, UT-Main must submit four (4) weeks of completed inspection logs for the outside hazardous waste container storage area and the chemical storage area located inside Bowman-Oddy to this office. An example log was given at the time of the inspection.

13. 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-Main had approximately four containers of used oil located in the maintenance shop that were not properly labeled.

UT-Main must properly label the containers located in the maintenance shop with the words "Used Oil" and submit photographic documentation to demonstrate compliance.

14. OAC Rule 3745-273-34(A): Universal Waste Labeling - Batteries:

Universal waste batteries (i.e., each battery), or a container or tank in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste - Batteries", or "Waste Batteries", or "Used Batteries".

UT-Main did not properly label at least one drum and several individual Universal Waste Batteries, in the west bay of the outside hazardous waste storage area, with one of the required phrases.

In order to correct this violation, UT-Main must properly label each Universal Waste Battery or the container they are placed in and submit photographic documentation that this has been done.

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

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

UT-Main was not able to demonstrate the length of time the universal waste batteries were accumulated. There were no dates on the batteries located in the outside hazardous waste storage area.

In order to correct this violation, UT-Main must place a date on each battery, or on the container they are placed on or in, with the earliest date that a battery is placed on or in the container. UT-Main must submit photographic documentation that this has been done.

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

A small quantity handler of universal waste shall ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relative to their responsibilities during normal facility operations and emergencies.

UT-Main has not ensured that all employees are thoroughly familiar with proper waste handling and emergency procedures.

In order to correct this violation, UT-Main must describe, through a training outline, how it will thoroughly familiarize (train) its universal waste battery handlers in proper handling and emergency procedures. UT-Main must submit some form of documentation demonstrating that this training has been accomplished. The training must also include compliance with all rules for the handling of universal waste batteries and the corrective actions for all violations of universal waste rules, cited above.

Suggestion:

UT-Main is currently managing the spent fluorescent bulbs as a hazardous waste. UT-Main may want to consider managing them as Universal Waste.

Hazardous bulbs are considered "spent materials" and remain hazardous waste even when recycled. Hazardous waste lamp generators have the option of handling their lamps as hazardous waste or as universal waste. 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.

Managing hazardous waste lamps under the universal waste rules eases certain regulations imposed on generators of spent lamps. Enclosed is a Fact Sheet outlining the universal waste rules for handlers of lamps and a list of fluorescent bulb recyclers. Please review this information and contact me if you have any questions.

If UT-Main plans to begin managing the spent fluorescent bulbs as universal waste, please submit photographic documentation showing the storage containers properly closed, labeled and dated. UT-Main must also submit the name of the facility where you plan to recycle the bulbs. In addition, UT-Main would need to add information about proper waste handling and emergency procedures for universal waste lamps to the training outline as required by OAC 3745-273-16.

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.

Ohio EPA considers these violations to be serious violations, ones for which further enforcement action may be taken. 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

Melissa L. Boyers
Division of Hazardous Waste Management

/csl

Enclosures

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.

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

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

GENERAL REQUIREMENTS **University of Toledo - Main Campus OHD 051 623 734**

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.

Name of Employee	Job Performed	Date Trained

CONTINGENCY PLAN

27 Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes ☒ No ☐ N/A ☐

28 Does the plan describe the following:

a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes ☒ No ☐ N/A ☐

b. Arrangements with emergency authorities [3745-65-52(C)]. Yes ☒ No ☐ N/A ☐

c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes ☐ No ☒ N/A ☐

d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes ☐ No ☒ N/A ☐

e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes ☒ No ☐ N/A ☐

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

29 Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes ☒ No ☐ N/A ☐

30 Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] Yes ☐ No ☒ N/A ☐

31 Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes ☒ No ☐ N/A ☐

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

EMERGENCY PROCEDURES

32 Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes ☐ No ☒ N/A ☐

a. Was the contingency plan implemented? [3745-65-51(B)] Yes ☐ No ☐ N/A ☒

b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes ☐ No ☐ N/A ☒

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

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

PREPAREDNESS AND PREVENTION

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

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

a. Internal communications or alarm system? [3745-65-32(A)] Yes ☒ No ☐ N/A ☐

b. Emergency communication device? [3745-65-32(B)] Yes ☒ No ☐ N/A ☐

c. Portable fire control, spill con[redacted] and decon equipment? [3745-65-32([redacted]] Yes ☒ No ☐ N/A ☐

d. Water of adequate volume/pr[redacted]ure per documentation or facility rep? [3745-65-32(D)] Yes ☒ No ☐ N/A ☐

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

35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes ☐ No ☒ N/A ☐

36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes ☐ No ☒ N/A ☐

37. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] Yes ☐ No ☒ N/A ☐

38. If there is only one employee on the premises, is there immediate access to a device (ex.phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] Yes ☐ No ☐ N/A ☒

39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes ☐ No ☒ N/A ☐

40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes ☒ No ☐ N/A ☐

41. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)? Yes ☐ No ☐ N/A ☒

SATELLITE ACCUMULATION AREA REQUIREMENTS

42. Does the generator ensure that satellite accumulation area(s):

a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes ☒ No ☐ N/A ☐

b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes ☒ No ☐ N/A ☐

c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes ☒ No ☐ N/A ☐

d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes ☒ No ☐ N/A ☐

e. Containers are closed, in good condition and compatible with wastes stored in them?[3745-52-34(C)(1)(a)] Yes ☐ No ☒ N/A ☐

f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes ☒ No ☐ N/A ☐

43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes ☐ No ☒ N/A ☐

a. Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes ☐ No ☐ N/A ☒

b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded?[3745-52-34(C)(2)] Yes ☐ No ☐ N/A ☒

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

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

44. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes ☐ No ☒ N/A ☐

45. Is the accumulation date on each container? [3745-52-34(A)(2)] 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- 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 ☐

REMARKS:

Manifest #000134702 and #000530744 were missing the signed copy at the time of the inspection. The signed copies were located on Mr. Kovacs' desk and he was on vacation at the time of the inspection. The copies were faxed to this office on 6/6/07.

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 051 623 734**							
3. Site Name	**Name: University of Toledo - Main Campus**					**Website: (Optional)**		
4. Site Location Information	**Street Address: 2801 W. Bancroft**							
	City, Town, or Village: Toledo					**State: OH**		
	County Name: Lucas					**Zip Code: 43606**		
5. Site Land Type (check only one)	**Private** ☐	**County** ☐	**District** ☐	**Federal** ☐	**Indian** ☐	**Municipal** ☐	**State** ☒	**Other** ☐
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: J.**		**Last Name: Kovacs**		
	Phone Number: 419-530-3605					**Phone Number Extension:**		
	E-Mail Address: michael.kovacs@utoledo.edu							
	Fax Number:					**Fax Number Extension:**		
	Street or P.O. Box: 2801 W. Bancroft Street, MS 405							
	City, Town or Village: Toledo							
	State: Ohio			**Country:**		**Zip Code: 43606**		
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** ☐	**County** ☐	**District** ☐	**Federal** ☐	**Indian** ☐	**Municipal** ☐	**State** ☐	**Other** ☐
	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** ☐	**County** ☐	**District** ☐	**Federal** ☐	**Indian** ☐	**Municipal** ☐	**State** ☐	**Other** ☐
	Street or P.O. Box:							
	City, Town or Village:				**Operator Phone #:**			
	State:				**Country:**		**Zip Code:**	
9. Violations Cited?	☒ **Yes** ☐ **No**							

10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)

☐ **Not Regulated**	☐ **Conditionally Exempt Small Quantity Generator**
☐ **UNKNOWN**: Cited for violation of 3745-52-11	☐ **United States Importer of Hazardous Waste**
☒ **Large Quantity Generator (LQG)**	☐ **Mixed Waste (Hazardous and Radioactive) Generator**
☐ **Small Quantity Generator (SQG)**	
☐ **Hazardous Waste Transporter**	☐ **Exempt Boiler and/or Industrial Furnace**
☐ **Treater, Storer or Disposer of Hazardous Waste**	☐ **Small Quantity On-Site Burner Exemption**
☐ **Recycler of Hazardous Waste**	☐ **Smelting, Melting, Refining Furnace Exemption**
☐ **Underground Injection Control Facility**	

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply)

☒ **Small Quantity Handler of Universal Waste**	☐ **Large Quantity Handler of Universal Waste** (accumulates 5,000 kg. or more)
☐ **Destination Facility for Universal Waste**	

Check all boxes below that apply for each of the three types of facilities above	Managed	10C. Used Oil Activities (Indicate Type(s) of Activity(ies)	
		☒ **Used Oil Generator**	☐ **Off-Specification Used Oil Burner**
Batteries	☒	☐ **Used Oil Transporter**	☐ **Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil**
Pesticides	☐	☐ **Used Oil Transfer Facility**	☐ **Used Oil Fuel Marketer to Off-Specification Used Oil Burner**
Mercury containing equipment	☐	☐ **Used Oil Processor**	
Lamps	☐	☐ **Used Oil Re-refiner**	

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	**D005**	**D006**	**D007**	**D008**	**D009**	**D011**

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

Announced	☐ **Yes**	☒ **No**	**Additional Facility Representatives:**	**Heather Lorenz**
Tanks	☐ **Yes**	☒ **No**	**Other Comments: Bryan Gangwisch - US EPA participated in the inspection. Inspection was a state lead. Facility only managing batteries as UW. May begin to manage bulbs as UW too.**	
Containers	☒ **Yes**	☐ **No**		

13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Melissa Boyers	**Wendy Miller**	**5/23/2007 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 – Main Campus **Facility Type: LQG**/SQG/CESQG/TSD **EPA ID#: OHD051623734**

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	D009				Student Classroom Annex Building on Main Campus	Currently managed as hazardous waste
2	General vehicle maintenance and oil changes	Used Oil			Tote and small containers		Fleet Maintenance Shop	Picked up for recycling by DISC Environmental
3	Laboratory Analysis	Spent Laboratory Acids	D002 D008 D004 D009 D005 D010 D006 D011 D007	varies	Containers		Satellite containers located in each lab	Chemical Analytics, Inc.
4	Machine Shop	Parts Washer Solution	Citrus Based					Serviced by Crystal Clean Parts Washer Services
5	Machine Shop	Metal Shavings						Solid Waste dumpster

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:

Y es __ 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:

Y es __ 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:

Y es __ No ✓ N/A __ RMK# ___

---

a. Has the facility complied with 3745-270-04? Yes__ No☐ N/A ✓ RMK# ___

REMARKS

NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)] Yes ✓ No☐ N/A ✓ RMK# ___

14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)] Yes ✓ No☐ N/A__ RMK# ___

15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)] Yes__ No☐ N/A ✓ RMK# ___

16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)] Yes ✓ No☐ N/A__ RMK# ___

17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so: Y es__ 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? Y es__ 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: Yes__ No☐ N/A ✓ RMK# ___

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: Y es__ 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: Y es__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 Table1? [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)? Y es__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.) Y es__No__N/A__RMK# ___

3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so: Y es__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: Y es__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: Y es__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)] — Yes__ No☐ N/A__ RMK# ___

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? — Y es__ 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)] — Y es__ 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)] — Y es__ No__ N/A✓ RMK# ___

REMARKS

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)]

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

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)] Fleet Maint. Shop – small containers need labeled. — Yes ___ No ☑ N/A ___ RMK#

9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]

   a. Stopped the release? — Yes ✓ No ☐ N/A ___ RMK#

b. Contained the release? Yes ✓ No ☐ N/A ___ RMK#

c. Cleaned up and properly managed the used oil and other materials? Yes ✓ No ☐ N/A ___ RMK#

d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ✓ No ☐ N/A ___ RMK#

10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes ___ No ✓ N/A ___ RMK#

a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes ___ No ☐ N/A ✓ RMK#

b. Is the heater designed to have a maximum capacity of not more that 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] Outside 90-day storage area contents, metal shavings, Yes ___ No ☑ N/A ___ RMK#

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REMARKS

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

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

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] — Yes ☐ No ✓ N/A ___ RMK#___

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

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

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

4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] — Yes ✓ No ☐ N/A ___ RMK#___

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

   a. Sort batteries by type? — Yes___ No ✓ N/A ___ RMK#___

   b. Mix battery types in one container? — Yes___ No ✓ N/A ___ RMK#___

   c. Discharge batteries to remove the electric charge? — Yes___ No ✓ N/A ___ RMK#___

   d. Regenerated used batteries? — Yes___ No ✓ N/A ___ RMK#___

   e. Disassemble them into individual batteries or cells? — Yes___ No ✓ N/A ___ RMK#___

   f. Remove batteries from consumer products? — Yes___ No ✓ N/A ___ RMK#___

   g. Remove the electrolyte from the battery? — Yes___ No ✓ N/A ___ RMK#___

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

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

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

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] — Yes ___ No ☐ N/A ✓ RMK#___

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

UNIVERSAL WASTE LAMPS Currently managing as hazardous waste.

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] — Yes ___ No ☐ N/A ✓ RMK#___

9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] — Yes ___ No ☐ N/A ___ RMK#___

10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)] — Yes ___ No ☐ N/A ✓ RMK#___

NOTE: **Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]**. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

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

a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] — Yes ___ No ☐ N/A ✓ RMK#___

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

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

a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] — Yes___ No___ N/A ✓ RMK#___

b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] — Yes___ No___ N/A ___ RMK#___

c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] — Yes___ No___ N/A ___ RMK#___

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

e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] — Yes___ No___ N/A ___ RMK#___

f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] — Yes___ No___ N/A ✓ RMK#___

EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] — Yes ___ No ☑ N/A ___ RMK#___

RESPONSE TO RELEASES no known releases

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

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

16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] — Yes ___ No ☐ N/A ✓ RMK#___

OFF-SITE SHIPMENTS

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

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] — Yes ✓ No ☐ N/A ___ RMK#___

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

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] — Yes ✓ No ☐ N/A ___ RMK#___

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

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

    a. Receive the waste back? [3745-273-18(E)(1)] — Yes ___ No ✓ N/A ___ RMK#___

    b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] — Yes ✓ No ___ N/A ___ RMK#___

21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss <u>one of the following</u>: — Yes ___ No ☐ N/A ___ RMK#___

    a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] — Yes ___ No ✓ N/A ___ RMK#___

    b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] — Yes ✓ No ___ N/A ___ RMK#___

22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] — Yes ___ No ☐ N/A ✓ RMK#___

23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] — Yes ___ No ☐ N/A ✓ RMK#___

EXPORTS

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

a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes ___ No ❑ N/A ✓RMK#___

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)] Yes ___ No ❑ N/A ✓RMK#___

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

REMARKS