



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Sign Source USA
Allen County
Hazardous Waste
OHR000169524
NOV

February 1, 2013

Mr. Jeff Pisel
Sign Source USA
1700 South Dixie Highway
Lima, Ohio 45802

Dear Mr. Pisel:

On January 15, 2013, you accompanied Gary Deutschman and me during the Ohio Environmental Protection Agency's (Ohio EPA's) hazardous waste compliance evaluation inspection of your facility, Sign Source USA (hereafter referenced as SS) located in Lima, Ohio. Specifically, we inspected your facility 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. Pollution prevention options were also discussed during this inspection. This letter will explain the violations found and what you need to do to correct these violations.

SS manufactures various size electric signs for store fronts, etc. Aluminum and other materials are formed into letters using various equipment. Painting is done in one of two paint booths. Wastes generated include spent thinner from gun cleaning/painting operations which is put through a distillation unit. Distillation pucks, thinner and paint are collected and disposed of as one waste stream by Heritage-Crystal Clean. SS also generates paint booth filters, shop rags and spent fluorescent lamps. At the time of our inspection, you were operating as a small quantity generator of hazardous waste. This was not immediately determined as you sent me manifest copies on January 16th. Typically, a checklist is sent so that you can see what your company was evaluated for during the inspection. I have not provided a copy with this letter as there is additional information I need to complete the checklist. Once I receive the requested information, I will include a checklist in my next correspondence.

At this time, I found the following violations of Ohio's hazardous waste laws:

1. Container Management, Labeling, OAC Rule 3745-52-34(D)(4):

A small quantity generator may 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.

At the time of my inspection, SS had a drum of paint/solvent waste not labeled "Hazardous Waste". Additionally, SS had two drums of hazardous waste shop towels not properly labeled "Hazardous Waste".

To abate this violation, SS must submit photographic documentation to show that all three drums are properly labeled with the words "Hazardous Waste".

2. Accumulation Start Date, OAC Rule 3745-52-34(D)(4):

A small quantity generator may, for one hundred eighty 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.

SS had two drums of shop towels which were not labeled with the accumulation start date. Additionally, you had a drum of solvent and paint waste which was nearly full. Once this drum is full, it must also be labeled with the accumulation start date.

To abate this violation, SS must submit photographic documentation to show that these three drums of hazardous waste are properly marked with the accumulation start dates.

3. Weekly Inspections, OAC Rule 3745-66-74:

Container storage areas shall be inspected on a weekly basis looking for leaks or deterioration. These inspections shall be recorded in an inspection log or summary.

At the time of our inspection, SS was not conducting inspections of the hazardous waste storage area where the hazardous wastes are stored.

To abate this violation, SS must immediately begin conducting weekly inspections of the hazardous waste storage areas and submit four (4) weeks of completed inspection logs to this office. I have included an example log that you may use/modify, etc.

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Request For Information

- ⇒ SS must provide me with the Material Safety Data Sheets for your paints most frequently used as well as for commonly used hardener and/or reducer. I need to determine if there may be any constituents in them that would make the thinner/paint waste hazardous for lead, for methyl ethyl ketone or any other volatile organic chemical.
- ⇒ SS must submit copies of the last 2 years of hazardous waste manifests. I should be able to determine what your generator status will be if you no longer have shop towels managed as hazardous waste. These can be faxed, scanned/emailed, etc. (whatever is easiest)
- ⇒ 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.

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. If you have been keeping a log, SS must submit this information to document so.

- ⇒ A generator must post the following information next to the telephone: the name and telephone number of the emergency coordinator; location of fire extinguishers and spill control equipment, and if present, fire alarms; and the telephone number of the fire department, unless the facility has a direct alarm.

SS must submit photographic documentation to show that the list has been properly posted in this area.

- ⇒ A generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies. You had stated that you do training every three months, however, I did not review the training subjects/agendas.

SS must provide me with a copy of the training that you have given to the painters and those handling hazardous waste.

SS needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, SS is requested to provide documentation to this office including the steps taken to abate the violations cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to wendy.miller@epa.ohio.gov. If circumstances delay the abatement of violations, SS is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

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In regards to pollution prevention, a better option to manage your solvent/paint contaminated shop towels/rags is to send them off-site to a commercial laundry for cleaning. Under this scenario, shop towels/rags that will be cleaned and reused are not subject to the hazardous waste regulations because they are not being discarded. In the case of SS, this could allow for cost savings as well as potentially lowering your generator status and reducing the amount of regulations you are subject to.

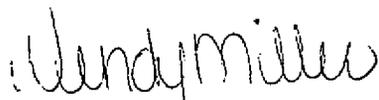
All shop rags/towels are eligible for this exclusion if the wipers contain no free liquids and are sent to a commercial laundry that is subject to regulation under the Clean Water Act or a dry cleaner. I can provide you with the names of a few companies that may provide this service if you'd like.

You can find copies of the rules and other information on the division's web page at <http://www.epa.ohio.gov/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.ohio.gov/opp>.

The Division of Materials and Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information at Web link <http://www.epa.ohio.gov/dhwm> (click on the link for DHWM Electronic Mailing List).

If you have any questions, please contact me by telephone at (419)373-3114 or by e-mail at wendy.miller@epa.ohio.gov.

Sincerely,



Wendy Miller
Division of Materials and Waste Management

/cg

Enclosures

pc: Lisa Gifford, DMWM, NWDO
Colleen Weaver, DMWM, NWDO(w/original checklist)

ec: Colleen Weaver, DMWM, NWDO(w/enclosures)
Wendy Miller, DMWM, NWDO

NOTE: Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance.

Send to Central Office <input type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to RCRAInfo.Data@epa.state.oh.us.

Site EPA ID No. Site Name	EPA ID Number: OHR000169524		Website: (Optional)
Site Location Information	Name: Sign Source USA		
Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/ww/naics.html	Street Address: 1700 South Dixie Hwy		State: OH
	City, Town, or Village: Lima		Zip Code: 45802
	County Name: Allen		
	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>
	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>
	State <input type="checkbox"/>	Other <input type="checkbox"/>	

Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Jeff		MI:	Last Name: Pisel
	Title: Owner			
	Phone Number: 419-224-1130		Phone Number Extension:	
	E-Mail Address: jeffpisel@bright.net			
	Fax Number: 419-224-1138		Fax Number Extension:	
	Street or P.O. Box:			
	City, Town or Village:			
	State:		Zip Code:	

Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Jeff Pisel		Date Became Owner (mm/dd/yyyy):		
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>
	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
	Street or P.O. Box:				
	City, Town or Village:				
	State:		Country:		Zip Code:
	Name of Site's Operator:				
	Date Became Operator (mm/dd/yyyy):				
	Operator Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>
	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
	Street or P.O. Box:				
	City, Town or Village:				
	State:		Country:		Zip Code:
	Operator Phone #:				

VIOLATIONS CITED?	<input type="checkbox"/> Yes <input type="checkbox"/> No
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TYPE OF HANDLER - MARK "X" AS APPROPRIATE

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
	<input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). <i>Check the box for the applicable generator status and provide a comment.</i>	<input checked="" type="checkbox"/> Small Quantity Generator (SQG)
		<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
		<input type="checkbox"/> U.S. Importer of Hazardous Waste
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Hazardous Waste Transfer Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility
<input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Receives Hazardous Waste from Off-site

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

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

<input type="checkbox"/> Batteries
<input type="checkbox"/> Pesticides
<input type="checkbox"/> Mercury containing equipment
<input checked="" type="checkbox"/> Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))

<input type="checkbox"/> Used Oil Generator
<input type="checkbox"/> Used Oil Transporter
<input type="checkbox"/> Used Oil Transfer Facility
<input type="checkbox"/> Used Oil Processor
<input type="checkbox"/> Used Oil Re-refiner
<input type="checkbox"/> Off-Specification Used Oil Burner
<input type="checkbox"/> Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil
<input type="checkbox"/> Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

<input type="checkbox"/> College or University
<input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
<input type="checkbox"/> Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

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

F003	F005	D007	D008	D035
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COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

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

Name of Inspector(s) Wendy Miller	Name of Inspector(s) Gary Deutschman	Date of Inspection/Time (mm/dd/yyyy) (hh:mm) 01/29/2012
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Comments:
May be CESQG in future.

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Sign Source USA Facility Type: SQG Date of Inspection: 1/15/13 EPA ID#: OHR000169524

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1 Painting	Waste thinner/distillation bottoms (F003, F005, D007, D008, D035)	1 drum/every 2-3 months Varies		Crystal Clean, Fuel Blend		
2 Painting	Paint booth filters (non-haz for metals)	Every 2-4 weeks as needed		Solid waste		
3 Lighting/Power Sources	lamps /batteries	Varies		All-Phase Electric	recycle	
4 Paint Room Clean Up	Shop Towels(D001)	1 drum/month, Varies		Crystal Clean – Disposal(?)		
5 Sign manufacture	Scrap Metal			Omni Source	recycle	

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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 2. | Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES

NO UW BATTERIES

- | | | |
|----|--|--|
| 3. | Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 5. | Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 6. | If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| a. | If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 7. | Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

UNIVERSAL WASTE LAMPS

NO LAMPS IN STORAGE

- | | | |
|----|---|--|
| 8. | Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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 rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.

- | | | |
|-----|--|--|
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|-----|--|--|

ACCUMULATION TIME		
11.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. If not, is 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)] (this change makes it like the LQUWH checklist)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Accumulation is defined as date generated or date received from another handler.</i>		
12.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RESPONSE TO RELEASES		
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	If the material released is a hazardous waste, was 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 OAC Chapter 3745-52) [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
OFF-SITE SHIPMENTS		
<i>NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.</i>		
17.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)] (this change makes it like the LQUWH checklist)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
20.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	a. If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
21.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u> :	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	a. Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)] (this change makes it like the LQUWH checklist)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
22.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
EXPORTS		
23.	Is waste being sent to a foreign destination? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

	a.	Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>



SQG Container Inspection Log – OAC Rule 3745-66-74

Inspection Item	Inspection Schedule (i.e., daily, weekly, monthly)	Date:	Date:	Date:	Date:	Date:
Are all containers closed?						
Are containers in good condition?	Weekly					
Are any containers leaking or is there evidence of a spill?	Weekly					
Are containers handled in a manner that would prevent leaks/spills?	Weekly					
Are containers compatible with the wastes stored in them?	Weekly					
Are containers labeled with the words "Hazardous Waste" and the accumulation date?						
Have any containers been stored for more than 180 or 270 days if the waste is shipped more than 200 miles?						
Is more than 6,000 kg (13,200 pounds) (approximately 27 55-gallon drums) of hazardous waste stored in the storage area(s)?						
Is aisle space adequate for passage of emergency equipment?						
Are incompatible wastes stored separately?						
Inspector's Name:						
Note: Information in the shaded area is not required under OAC rule 3745-66-74, but you are encouraged to record it.						
Comments/Problems/Corrective Action Required/Date Completed	Week 1					
	Week 2					
	Week 3					
	Week 4					
	Week 5					



SQG Container Inspection Log – OAC Rule 3745-66-74

Inspection Item	Inspection Schedule (i.e., daily, weekly, monthly)	Date:	Date:	Date:	Date:	Date:
Are all containers closed?						
Are containers in good condition?	Weekly					
Are any containers leaking or is there evidence of a spill?	Weekly					
Are containers handled in a manner that would prevent leaks/spills?	Weekly					
Are containers compatible with the wastes stored in them?	Weekly					
Are containers labeled with the words "Hazardous Waste" and the accumulation date?						
Have any containers been stored for more than 180 or 270 days if the waste is shipped more than 200 miles?						
Is more than 6,000 kg (13,200 pounds) (approximately 27 55-gallon drums) of hazardous waste stored in the storage area(s)?						
Is aisle space adequate for passage of emergency equipment?						
Are incompatible wastes stored separately?						
Inspector's Name:						
<p>Note: Information in the shaded area is not required under OAC rule 3745-66-74, but you are encouraged to record it.</p>						
<p>Comments/Problems/Corrective Action Required/Date Completed</p>	Week 1					
	Week 2					
	Week 3					
	Week 4					
	Week 5					

Generator Record Keeping Requirements Table

Record Keeping Requirements (and Ohio Administrative Code references)	Generator Category		
	Conditionally Exempt Small Quantity Generator	Small Quantity Generator	Large Quantity Generator
Hazardous Waste Determination <u>3745-52-40(C)</u>	Required through process knowledge or analysis. Documentation required for at least three years.	Required through process knowledge or analysis. Documentation required for at least three years.	Required through process knowledge or analysis. Documentation required for at least three years.
Inspection Log or Inspection Summary for areas where containers are stored. <u>3745-66-74(B)</u>	Records not required	Must inspect areas where containers are stored, at least weekly, and record inspections in an inspection log or summary.	Must inspect areas where containers are stored, at least weekly, and record inspections in an inspection log or summary.
Manifest <u>3745-52-23</u>	Records not required	Retain a signed copy for at least three years.	Retain a signed copy for at least three years.
Exception Report <u>3745-52-40(B)</u>	Records not required	Retain a copy for at least three years from due date.	Retain a copy for at least three years from due date.
Land Disposal Restriction Notifications, Certifications and Waste Analysis Data <u>3745-270-07</u>	Records not required	Retain on-site for at least three years all notices, certifications, waste analysis data and other documentation pursuant to this rule.	Retain on-site for at least three years all notices, certifications, waste analysis data and other documentation pursuant to this rule.
Emergency Equipment <u>3745-65-33</u>	Records not required	Record inspections of emergency in a log or summary.	Record inspections of emergency in a log or summary.
Annual Reports <u>3745-52-40(B)</u>	Records not required	Records not required	Retain a copy for at least three years from due date.
Personnel Training Documents <u>3745-65-16(E)</u>	Records not required	Though records are not specifically required, generators must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures. <u>3745-52-34(D)(5)(c)</u>	Training records on current personnel must be kept until <u>closure</u> of the facility. Training records on former employees must be kept for at least three years from the date the employee last worked at the facility.
Tank Inspection Logs <u>3745-66-95(C)</u>	Records not required	Must record tank inspections in an operating log.	Must record tank inspections in an operating log.

Note: The retention period is automatically extended during the source of any unresolved enforcement action regarding the regulated activity or as requested by the Director.