OhioEPA

State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: ProTec Coating Company
OHD 987043544
Hazardous Waste
Putnam County
NOV/PRTC

April 8, 2008

Mr. Rick Rupert
ProTec Coating Company
5000 County Road 5
Leipsic, Ohio 45856-9234

Dear Mr. Rupert:

On March 25, 2008, Melissa Boyers and I conducted a hazardous waste compliance evaluation inspection of ProTec Coating Company (hereafter Protec) located in Leipsic, Ohio, on behalf of the Ohio Environmental Protection Agency (Ohio EPA). This inspection was conducted in order to determine Protec's compliance with Ohio's hazardous waste laws as adopted under Chapter 3745 of the Ohio Administrative Code (OAC) and Chapter 3734 of the Ohio Revised Code (ORC). The Agency's inspection included a tour of your facility and a review of written documentation. This letter will explain the violations we found and what you need to do to correct the violations.

Protec provides coated steel products for the automotive, appliance, and construction industry. Protec operates continuous hot-dip galvanizing/galvannealing lines. Hazardous wastes generated from the process include contaminated debris and personal protective equipment (D002, D007), spent printer ink and solvent (F003), phosphoric/chromic acid waste (D002, D007). Other wastes generated include used oil, universal waste bulbs, universal waste batteries, universal waste mercury switches, aerosol can residues, etc.

The following violations of Ohio's hazardous waste laws were observed and noted during the inspection:

1) Universal Waste Batteries, Labeling, OAC Rule 3745-273-14(A):
All packages and containers holding spent batteries are to be labeled with the words "Universal Waste - Battery(ies)", "Waste Battery(ies)" or "Used Battery(ies)".

Protec did not have the satellite drum of spent batteries properly labeled.

During the inspection, the batteries were placed in a container and properly labeled "Universal Waste - Batteries". Therefore, this violation is considered abated.

2) Universal Waste Mercury Switches, Storage, OAC 3745-273-15(A):
A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated.

Protec is storing universal waste mercury switches that have an accumulation start date of July 21, 2005.

To abate this violation, Protec must immediately send the universal waste switches off-site to another handler or destination facility. You must send me documentation of this shipment(manifest, bill of lading, etc.). Additionally, you must submit a procedure to this office documenting how Protec will ensure universal waste does not exceed the one year requirement.

3) Weekly Container Inspections, OAC rule 3745-66-74:
Container storage areas shall be inspected on a weekly basis looking for leaks and for deterioration. Ohio EPA interprets weekly to mean once within the seven day period following the previous inspection.

Protec had one exceedance of the weekly requirement for inspections in 2006 (7/5/06-7/13/06) and also one exceedance in 2007 (9/26/07-10/4/07).

Protec has completed all weekly inspections in 2008. Therefore, this violation is considered abated.

4) Used Oil Labeling, OAC Rule 3745-279-22(C)(1):
Containers, aboveground tanks, and fill pipes used for underground storage tanks shall be labeled or marked clearly with the words "Used Oil".

Protec had one drum of used oil located in CGL 2 that was not properly labeled "Used Oil".

During the inspection, the drum was properly labeled "Used Oil". Therefore, this violation is considered abated.

Please respond, in writing, to this NOV letter within **thirty (30) days**. Your response must include all actions and timetables necessary to demonstrate compliance.

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

Enclosed you will find a copy of the checklists that Ohio EPA completed during the inspection. Should you have any questions, please feel free to call me at (419) 373-3114.

Sincerely,

Wendy Miller
Division of Hazardous Waste Management

/llr

Enclosures

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
DHWM-NWDO File (w/original enclosure)

Note:
Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: ProTec **Facility Type:** LQG **Date of Inspection:** 3/25/08 **EPA ID#:** OHD987043544

Waste Generated				*On- or Off-Site Management*		P2 Activities	
	Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	**Waste Description** (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and **EPA Waste Code, if applic.**	**QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area**	**Type of On-Site Treatment** (recycle, wwt, etc)	**Name, state, and type of activity occurring at the off-site facility.**	**Current P2 Activities**	**P2 Opportunities**
1	Production Areas	Debri, absorbent and PPE D002 D007	Cleaning section- sodium hydroxide • insulation " phosphoric acid based coating		Containers		
2		Broken fluorescent bulbs & Mercury switches D009	Chromic acid		Containers		
3	Surface Coating	Spent coating containing acid - D002 D007	Chromic acid/phosphoric		tanks		
4	One time- accidental mixed chlorinated solvent	Solvent Containing Oil D035 D039 F002 F003 F005			Container 1x		
5	Printers pure	Ink and solvent F003 ethyl acetate-			containers		
6	QA Lab	Lab waste D001 Solvent- acetone to remove coating	- QA/QC		container		
	parts washers - solvent, Heritage re-use program						

added row coater on line #2 runs phosphoric acid - hw → new tank

7	Aerosol cans	residues D039 D001, D005	Container				
8		Paint/Paint Related D001 F003 F005	[illegible]				
9	Obsolete Materials/Lab Packs	D001 D002 D035 U159 U239	lab pack				

Tank Cleanout D002 waste ferric sulfate solution

• used oil - Ashland dist. recycled through burning

• tanker

hydraulic, gear, etc.

• drums

REMARKS-GENERAL INFORMATION

General Process Information:

UW batteries, lead acid batteries
nicad, alkaline, etc

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.
Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other:

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: OHD987043544**							
3. Site Name	**Name: ProTec Coating Company**				**Website: (Optional)**			
4. Site Location Information	**Street Address: 5000 County Road 5**							
	City, Town, or Village: Leipsic				**State: OH**			
	County Name: Lucas				**Zip Code: 45856**			
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								
7. Facility Representative	**First Name: Rick**			**MI:**	**Last Name: Rupert**			
	Phone Number: 419-943-1287				**Phone Number Extension:**			
Additional names can be recorded in number 12	**E-Mail Address:**							
	Fax Number:				**Fax Number Extension:**			
	Street or P.O. Box:							
Only provide address information if it is different than the site address	**City, Town or Village:**							
	State:			**Country:**	**Zip Code:**			
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	**Name of Site's Legal Owner: USS Galvanizing Inc.**			**Date Became Owner (mm/dd/yyyy): 03/14/1990**				
	Owner Type:	**Private** ☒	**County** ☐	**District** ☐	**Federal** ☐	**Indian** ☐	**Municipal** ☐	**State** ☐	**Other** ☐
	Street or P.O. Box: 600 Grant Street							
	City, Town or Village: Pittsburgh			**Owner Phone #: 412-433-1121**				
	State: PA			**Country: USA**	**Zip Code: 15219**			
	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		10C. Used Oil Activities (Indicate Type(s) of Activity(ies)	
	Managed	☒ **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.

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:
Tanks	☒ **Yes**	☐ **No**	**Other Comments:**
Containers	☒ **Yes**	☐ **No**	

13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Wendy Miller, Melissa Boyers		**3/25/2008**

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)

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

Protec

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

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] — Yes ☑ No ☐ N/A ☐
2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] — Yes ☑ No ☐ N/A ☐
3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] — Yes ☑ No ☐ N/A ☐
4. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] — Yes ☑ No ☐ N/A ☐
5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] — Yes ☑ No ☐ N/A ☐
6. Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] — Yes ☐ No ☑ N/A ☐
7. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] — Yes ☐ No ☑ N/A ☐
8. Does the generator accumulate hazardous waste? — Yes ☑ No ☐ N/A ☐

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

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

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

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

NOTE: Complete appropriate checklist for each unit.

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

11. Does the generator export hazardous waste? If so: — 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.

Job Performed	Name of Employee	Date Trained
Security- Inspections	James Diemer	4-19-06 / 6-20-07
"	Mary Lambert	new hire Dec'07 1-30-08
"	Connie Niese	6-20-07 / 1-30-08

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

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

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

SATELLITE ACCUMULATION AREA REQUIREMENTS

42. Does the generator ensure that satellite accumulation area(s):
    a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes ☑ No ☐ N/A ☐
    b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes ☑ No ☐ N/A ☐
    c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes ☑ No ☐ N/A ☐

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

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

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

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

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

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

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less 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? [3745-66-71] Yes ☑ No ☐ N/A ☐

c. Compatible with wastes stored in them? [3745-66-72] Yes ☑ No ☐ N/A ☐

d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes ☑ No ☐ N/A ☐

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. 1 exceedance in 2006 and 1 exceedance in 2007 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 ☐

Protec

USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS

1. Does the generator manage used oil in a surface impoundment or waste pile? If yes: — Yes ☐ No ☒ N/A ☐

   a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] — Yes ☐ No ☐ N/A ☒

2. Is used oil used as a dust suppressant? [3745-279-12(B)] — Yes ☐ No ☒ N/A ☐

3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? — Yes ☐ No ☐ N/A ☒

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil? If so, — Yes ☐ No ☒ N/A ☐

   a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] — Yes ☐ No ☐ N/A ☒

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

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 ☒

NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6. Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] — Yes ☒ No ☐ N/A ☐

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 ☐

8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] — Yes ☐ No ☒ N/A ☐

   1 drum needed label

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 ☒

   b. Contained the release? Yes ☐ No ☐ N/A ☒

   c. Cleaned up and properly managed the used oil and other materials? Yes ☐ No ☐ N/A ☒

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

ON-SITE BURNING IN SPACE HEATER

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

   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 ☒

   b. Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour? Yes ☐ No ☐ N/A ☒

   c. Are the combustion gases from heater vented to the ambient air? Yes ☐ No ☐ N/A ☒

GENERATOR TRANSPORTATION

11. If the generator self-transports used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] Yes ☐ No ☐ N/A ☒

   a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24] Yes ☐ No ☐ N/A ☒

   b. Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24] Yes ☐ No ☐ N/A ☒

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

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 ☒

13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes ☐ No ☐ N/A ☒

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 ☒

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.

Keyword: UsedOilChecklistforGenerators.Oct.2007.doc

Protec

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 X 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 X No☐ N/A__ RMK# ___

   b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes X 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 X 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 X No☐ N/A__ RMK# ___

4. Does the generator generate a characteristic hazardous waste? If so: Y es X No__ N/A__ RMK# ___

   a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes X 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: Y es X 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 X 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 X 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_X_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_X_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_X_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_X_RMK# ___

    a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05] Yes__No_☐_N/A_X_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_X_RMK# ___

    a. The facility can land dispose of the waste. [3745-270-06] Yes__No_☐_N/A_X_RMK# ___

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? Y es__No__N/A_X_RMK# ___
If so:

a. Has the facility complied with 3745-270-04? Yes__No☐N/A_X_RMK# ___

NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)] Yes_X_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_X_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_X_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_X_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_X_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_X_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_X_No☐N/A__RMK# ___

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

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

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#___

   Only batteries that are leaking need to be containerized.

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#___ . abated during inspection

UNIVERSAL WASTE PESTICIDES

8. Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)] — Yes ___ No ☐ N/A ✓ RMK#___

9. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)] — Yes ___ No ☐ N/A ✓ RMK#___

10. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97; 3745-66-100 and -66-101 of the OAC met? (Use tank checklist) [3745-273-13(B)(3)] — Yes ___ No ☐ N/A ✓ RMK#___

11. If pesticides are stored in a transport vehicle, is it closed, structurally sound and compatible with the pesticide(s)? [3745-273-13(B)(4)] — Yes ___ No ☐ N/A ✓ RMK#___

12. Are containers, tanks, or transport vehicles that contain universal waste pesticides, labeled with either "Universal Waste Pesticides"or "Waste Pesticides?" [3745-273-14(B)] — Yes ___ No ☐ N/A ✓ RMK#___

UNIVERSAL WASTE THERMOSTATS

13. Are thermostats that show evidence of leaking, spilling, or damage that could cause leaks, properly contained? [3745-273-13(C)(1)] — Yes ✓ No ❑ N/A ___ RMK#___

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

• mercury switches are contained but were not leaking or spilling

15. If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]

    a. Remove the ampules in a manner to prevent breakage and are they removed over or in a containment device? [3745-273-13(C)(2)(a)(b)] — Yes ___ No ❑ N/A ✓ RMK#___

    b. Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)(d)] — Yes ___ No ❑ N/A ✓ RMK#___

    c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)] — Yes ___ No ❑ N/A ✓ RMK#___

    d. Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)] — Yes ___ No ❑ N/A ✓ RMK#___

    e. Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)] — Yes ___ No ❑ N/A ✓ RMK#___

    f. Pack removed ampules in containers with packing material to prevent breaking during storage, handling and transportation? [3745-273-13(C)(2)(h)] — Yes ___ No ❑ N/A ✓ RMK#___

16. If mercury, clean-up residues, or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-13(C)(3)(a) — Yes ___ No ❑ N/A ✓ RMK#___

a. If the waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to Chapter 3745-52.) [3745-273-13] — Yes ___ No ☐ N/A ✓ RMK#___

b. If the mercury, residues and/or other wastes are not hazardous, are they managed in compliance with applicable law? [3745-273-13(C)(3)(c) — Yes ___ No ☐ N/A ✓ RMK#___

17. Are thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)?" [3745-273-14[D]] — Yes ✓ No ☐ N/A ___ RMK#___

UNIVERSAL WASTE LAMPS

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

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

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

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

ACCUMULATION TIME

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

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

    Mercury switches dated July 21, 2005

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

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

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

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

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

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

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

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

EMPLOYEE TRAINING

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

RESPONSE TO RELEASES

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

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

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

OFF-SITE SHIPMENTS

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

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

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

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

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

30. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do <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#___

31. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following: — 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#___

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

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

EXPORTS

35. Is waste being sent to a foreign destination? If so: — 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

Protec

TANK SYSTEM REQUIREMENTS (OAC rule 3745-52-34(A) and OAC rules 3745-66-100)

(Please refer to the rules before or while completing this checklist.)

1. Is each tank clearly labeled/marked with the words "Hazardous Waste" [3745-52-34(A)(3)]? Yes ☑ No ☐ N/A ☐

TANK SYSTEM – GENERAL OPERATING REQUIREMENTS

2. Does the o/o follow the general operating requirements below:
   a. Does the o/o prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail?[3745-66-94(A)] Yes ☑ No ☐ N/A ☐
   b. Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)?[3745-66-94(B)] Yes ☑ No ☐ N/A ☐
   c. If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96?[3745-66-94(C)] Yes ☐ No ☐ N/A ☑

TANK SYSTEM – INSPECTION REQUIREMENTS

3. Has the o/o documented the inspections required in 3745-66-95, in the operating record, including inspection of the following:
   a. Spill control equipment each operating day? [3745-66-95(A)(1)] Yes ☑ No ☐ N/A ☐
   b. Above ground portion of tank each operating day?[3745-66-95(A)(2)] Yes ☑ No ☐ N/A ☐
   c. Data from leak detection equipment each operating day?[3745-66-95(A)(3)] Yes ☑ No ☐ N/A ☐
   d. Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste each operating day?[3745-66-95(A)(4)] Yes ☑ No ☐ N/A ☐

NOTE: "Each operating day" is each day that the tank system is being used to manage (store or treat) hazardous waste.

4. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter?[3745-66-95(B)(1)] Yes ☐ No ☐ N/A ☑
5. Where applicable, all sources of impressed current at least bi-monthly?[3745-66-95(B)(2)] Yes ☐ No ☐ N/A ☑

TANK SYSTEM CLOSURE REQUIREMENTS

6. 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). Yes ☐ No ☐ N/A ☑

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES

7. For tanks used or treat or store ignitable or reactive wastes, has the o/o complied with **one of the following**: [3745-66-98(A)] Yes ☐ No ☐ N/A ☑
   a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-66-17(B)?[3745-66-98(A); **OR** Yes ☐ No ☐ N/A ☑
   b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction?[3745-66-98(A)]; **OR** Yes ☐ No ☐ N/A ☑
   c. The tank is used solely for emergencies?[3745-66-98(A)] Yes ☐ No ☐ N/A ☑
8. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (1996)? [3745-66-98(B)] Yes ☐ No ☐ N/A ☑
9. Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material?[3745-66-99(A) and/or (B)] Yes ☐ No ☑ N/A ☐
   a. ***If so,*** have the requirements of 3745-65-17(B) been met?[3745-66-99(A) and/or (B)] Yes ☐ No ☐ N/A ☑

TANK SYSTEM – WASTE ANALYSIS REQUIREMENTS

10. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following:[3745-66-100] Yes ☐ No ☐ N/A ☑
    a. Conducted waste analysis and trial treatment or storage tests?[3745-66-100(A)]; **OR** Yes ☐ No ☐ N/A ☑
    b. Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-100(B)] Yes ☐ No ☐ N/A ☑

TANK SYSTEMS REQUIREMENTS

11. Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)?[3745-66-92(A)] Yes ☑ No ☐ N/A ☐

NOTE: You should review the file to see if the written assessment has been previously reviewed and what the results were.

12. Does the written assessment include the following:[3745-66-92(A)]

a. Certification by an independent registered, professional engineer?[3745-66-92(A)]	Yes ☑	No ☐	N/A ☐
b. Consideration of the design standards of the system?[3745-66-92(A)]	Yes ☑	No ☐	N/A ☐
c. Consideration of the hazardous characteristics of the waste(s)?[3745-66-92(A)]	Yes ☑	No ☐	N/A ☐
d. An evaluation by a corrosion expert *(if the external system/components are metal)*?[3745-66-92(A)]	Yes ☐	No ☐	N/A ☑
e. A determination of design and operational measures that will be needed to protect the tank system from potential damage (*for underground tank components*)?[3745-66-92(A)]	Yes ☐	No ☐	N/A ☑
f. Design considerations to ensure that the tank foundations will maintain the load of a full tank?[3745-66-92(A)]	Yes ☑	No ☐	N/A ☐
g. Design considerations for anchoring the unit to prevent floatation (*for tanks situated in a seismic fault zone or saturated zone*)?[3745-66-92(A)]	Yes ☐	No ☐	N/A ☑
h. Design considerations to ensure that the tank system will withstand the effects of frost heave(for underground tank systems)?[3745-66-92(A)]	Yes ☐	No ☐	N/A ☑

NOTE: CO-DHWM Engineering staff are available to assist you with evaluation of the written assessment.

13. Are there written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed?[3745-66-92(G)]	Yes ☑	No ☐	N/A ☐

Do the written statements address all of the following:

a. Inspection for damage and/or inadequate construction and installation was conducted?[3745-66-92(B)]	Yes ☑	No ☐	N/A ☐
b. Statement that deficiencies were corrected before the tank system was covered or put into use?[3745-66-92(B)]	Yes ☐	No ☐	N/A ☑
c. Proper backfilling?[3745-66-92(C)]	Yes ☐	No ☐	N/A ☑
d. Tightness test; if the tank was found not to be tight, does the statement indicate that proper repairs were made?[3745-66-92(D)]	Yes ☐	No ☐	N/A ☑
e. Proper support and protection of ancillary equipment?[3745-66-92(E)]	Yes ☑	No ☐	N/A ☐
f. Supervision of the installation of field fabricated corrosion protection?[3745-66-92(F)]	Yes ☐	No ☐	N/A ☑

SECONDARY CONTAINMENT

14. Has secondary containment been provided?	Yes ☑	No ☐	N/A ☐

NOTE: All tank systems must have secondary containment at this point, except for tank systems that store/treat materials that become hazardous waste after January 12, 1987, must have secondary containment required within the time intervals in [3745-66-92(A)(1)] to (A)(4). The date the material became a hazardous waste must be used in place of January 12, 1987.[3745-66-92(A)(5)]

15. Is secondary containment one of the following:

a. An **External Liner**? [3745-66-93(E)(1)] If so,	Yes ☑	No ☐	N/A ☐
i. Is liner designed or operated to contain 100% of the capacity of the largest tank?	Yes ☑	No ☐	N/A ☐
ii. Is liner designed and operated to prevent run-on and infiltration <u>or</u> the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	Yes ☐	No ☐	N/A ☑
iii. Is liner free of cracks and gaps?	Yes ☑	No ☐	N/A ☐
iv. Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release?	Yes ☑	No ☐	N/A ☐
v. Are chemically resistant water stops in place at all points? *(concrete liners only)*	Yes ☑	No ☐	N/A ☐
vi. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? *(concrete liners only)*	Yes ☑	No ☐	N/A ☐
b. **Vault System?** [3745-66-93(E)(2)] If so,	Yes ☐	No ☐	N/A ☑
i. Is vault system designed to contain 100% of the capacity in the largest tank?	Yes ☐	No ☐	N/A ☑
ii. Is liner designed and operated to prevent run-on and infiltration <u>or</u> the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	Yes ☐	No ☐	N/A ☑
iii. Are chemically resistant water stops in place at all points?	Yes ☐	No ☐	N/A ☑
iv. Is there a compatible interior coating to prevent migration into the concrete?	Yes ☐	No ☐	N/A ☑

v. For **ignitable or reactive waste**: Is the vault system provided with means to prevent against the formation or ignition of vapors? Yes ☐ No ☐ N/A ☑

vi. Is vault system provided with an exterior moisture barrier? Yes ☐ No ☐ N/A ☑

c. **Double-Walled Tank?** [3745-66-93(E)(3)] If so, Yes ☐ No ☐ N/A ☑

i. Is double-walled tank designed as an integral structure to contain any release from the inner tank? Yes ☐ No ☐ N/A ☑

ii. **If metal**, are the primary tank interior and outer shell exterior surfaces protected from corrosion? Yes ☐ No ☐ N/A ☑

iii. Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time? Yes ☐ No ☐ N/A ☑

d. **An Equivalent Device?** As described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D&E)] Yes ☐ No ☐ N/A ☑

SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION

16. Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, groundwater, or surface water and is it capable of detecting and collecting releases and accumulated liquids?[3745-66-93(B)(1) and (2)] Yes ☑ No ☐ N/A ☐

17. Does the secondary containment system meet the following minimum requirements of [3745-66-93(C)]:

a. Constructed or lined with compatible materials of sufficient strength to prevent failure?[3745-66-93(C)(2)] Yes ☑ No ☐ N/A ☐

b. Placed on a foundation or base capable of providing support?[3745-66-93(C)(2)] Yes ☑ No ☐ N/A ☐

c. Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time?[3745-66-93(C)(3)] Yes ☑ No ☐ N/A ☐

d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation?[3745-66-93(C)(4)] Yes ☑ No ☐ N/A ☐

e. Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner?[3745-66-93(C)(4)] Yes ☑ No ☐ N/A ☐

ANCILLARY EQUIPMENT REQUIREMENTS

18. Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)? Yes ☐ No ☑ N/A ☐

If not, is the ancillary equipment one of the following: [3745-66-93(F)]

a. Above ground piping (exclusive of flanges, joints, valves and connections) that is inspected daily? Yes ☑ No ☐ N/A ☐

b. Welded flanges, welded joints and/or welded connections that is inspected daily? Yes ☐ No ☐ N/A ☑

c. Sealless or magnetic coupling pumps and/or sealless valves? Yes ☐ No ☐ N/A ☑

d. Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown and/or loss of pressure-actuated shut-off devices) that is inspected daily? Yes ☑ No ☐ N/A ☐

TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE

19. Has there been a leak or spill from any tank system or has any tank system been found unfit for use? ***If so***, did the o/o: Yes ☐ No ☑ N/A ☐

NOTE: If the tank is found to be unfit for use, inspector should explain why.

a. Immediately cease flow of material into tank and investigate the cause of the release?[3745-66-96(A)] Yes ☐ No ☐ N/A ☑

b. Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time?[3745-66-96(B)(1)] Yes ☐ No ☐ N/A ☑

c. Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment?[3745-66-96(B)(2)] Yes ☐ No ☐ N/A ☑

d. Immediately conduct a visual inspection of the release?[3745-66-96(C)] Yes ☐ No ☐ N/A ☑

e. Prevent further migration of the leak or spill to soils or surface waters?[3745-66-96(C)] Yes ☐ No ☐ N/A ☑

f. Properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)] Yes ☐ No ☐ N/A ☑

g. Report the release to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)] Yes ☐ No ☐ N/A ☑

h. Submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)] Yes ☐ No ☐ N/A ☑

i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)(2)] Yes ☐ No ☐ N/A ☒

j. For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)] Yes ☐ No ☐ N/A ☒

NOTE: The requirements noted in 20.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.

20. In the event that the repairs to the tank system were major (replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from an independent, registered P.E. attesting that the repaired unit is capable of handing hazardous waste? [3745-66-96(F)] Yes ☐ No ☐ N/A ☒

21. Was a copy of the certification submitted to the director within seven days after returning the system to use? [3745-66-96(F)] Yes ☐ No ☐ N/A ☒

22. If the o/o was unable to repair and return the unit to service as described in 20.a through 20.e, was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)] Yes ☐ No ☐ N/A ☒

23. Does the o/o have a tank system **with a variance from secondary containment** from which a release has occurred but <u>has not</u> migrated beyond the zone of engineering control? Yes ☐ No ☒ N/A ☐
If so,

a. Has the o/o complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G)(3)] Yes ☐ No ☐ N/A ☒

b. If soils cannot be decontaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)] Yes ☐ No ☐ N/A ☒

24. Does the o/o have a tank system **with a variance from secondary containment** from which a release occurred and <u>has</u> migrated from the zone of engineering control? **If so,** Yes ☐ No ☒ N/A ☒

a. Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)] Yes ☐ No ☐ N/A ☒

b. If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(4)] Yes ☐ No ☐ N/A ☒

Certified by P.E. Leonard Michaels
8-7-06
meets OAC 3745-50-69