



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

March 21, 2013

Carl Roxbury, Facilities Director
Akron-Summit County Library
60 South High St.
Akron, OH 44326

RE: AKRON-SUMMIT COUNTY LIBRARY, MAIN LIBRARY - COMPLAINT #7595, GOODYEAR BRANCH – COMPLAINT # 7596, NON-GENS/ NON-NOTIFIERS SUMMIT COUNTY, NOV/PRTC

Dear Mr. Roxbury:

Thank you for cooperating with our March 5, 2013, complaint investigation regarding management of your wastes at the main library at 60 South High St., Akron and at the Goodyear branch at 60 Goodyear Blvd., Akron. You and Andrew Hackett represented the library and Karen Nesbit and I represented the Ohio EPA Division of Materials and Waste Management.

We understand the wastes generated by your facilities include spent lamps, spent batteries, used oil, mop water, ballasts, and some electronic wastes. The floors are cleaned by contractors and the mop water goes into drains that go to the public sanitary sewer. The mop water has been determined to be non-hazardous. Spent lamps, ballasts, electronic equipment and spent batteries are accumulated in the recycle room of the main library and are sent off-site to a recycling facility. Used oil from vehicle maintenance is collected in the paint room and taken in less than 55 gallon quantities by an employee to an Auto Zone for recycling. We discussed how any toner cartridges or non-empty aerosol cans that are generated would need to be evaluated before disposal or alternatively recycled.

On March 14, 2013, I received an e-mail from you indicating the recycle room has been organized and all spent lamps were sent off-site. All of the used oil in the chemical storage room has been taken to a recycler. Some pictures were also submitted of the recycle room.

The following violations were noted at the main library.

1. Universal Waste Battery Labeling – OAC 3745-273-14(A)

Unlabeled spent batteries were being accumulated on a shelf in a closed metal cabinet in the chemical storage room. The spent batteries or the container of spent batteries are required to be labeled with the words “universal waste – batteries”, “waste batteries”, or “used batteries”. Appropriate wording was added to the shelf during the inspection, abating this violation. No further action is required at this time to address this violation.

2. Universal Waste Lamps in Closed Containers – OAC 3745-273-13(D)(1)

Some spent lamps were being accumulated in the recycle room in an open, unlabeled plastic garbage can. Some were in open, unlabeled cardboard boxes. And some were broken on the floor. Some spent lamps were being accumulated in open boxes in the maintenance storage room.

Spent lamps that are to be recycled are required to be accumulated in closed containers or packages that are adequate to prevent breakage. We understand that all spent lamps were sent off-site for recycling on March 14th. Please submit a copy of the shipping papers and confirm that the spent lamps in the maintenance storage area were included.

3. Immediate Clean Up of Broken Spent Lamps – OAC 3745-273-13(D)(2)

Some spent lamps were broken on the floor of the recycling room. If lamps are accidentally broken they should be immediately cleaned up and placed in appropriate closed containers. You should check with your recycler to see if they have any special packaging requirements for broken lamps. We understand you cleaned up the broken lamps since our inspection and photos of the cleaned up area were submitted. No further action is required at this time to address this violation.

4. Universal Waste Lamp Labeling – OAC 3745-273-14(E)

Spent lamps that were in containers in the recycle room and the maintenance storage area were not labeled. Spent lamps to be recycled are required to be labeled with the words "universal waste – lamps", or "waste lamps" or "used lamps" or the closed containers that they are accumulated in are required to have one of these labels. Photographs submitted and your e-mail indicates the lamp boxes were properly labeled before being sent off-site. No further action is required at this time to address this violation.

5. Employee Training – OAC 3745-273-16

You stated your employees have not received training on the proper management of universal wastes. Universal waste handlers are required to provide training regarding the proper handling and emergency procedures for such wastes, to all employees who handle or manage universal wastes. Please immediately provide this training for your employees and submit sign-in sheets or other documentation of such.

6. Release of Universal Waste – OAC 3745-273-17(A)

There were some broken fluorescent lamps on the floor of the recycling room and no one was cleaning them up. Universal waste handlers are required to immediately contain any releases of universal waste. We understand you cleaned up the broken lamps since our inspection and photos of the cleaned up area were submitted. Please submit written confirmation that any releases of universal waste in the future will be immediately contained.

7. Used Oil Labels – OAC 3745-279-22(C)

All containers accumulating used oil are required to be labeled with the words "used oil". The oil filter drain pan and some of the jugs of used oil in the chemical storage room were not labeled with the words "used oil". A used oil label was added to the drain pan during the inspection abating this violation for this container. We understand all of the used oil was taken to a recycler. Please confirm that current containers for used oil are labeled with the words "used oil".

The following violations were noted at the Goodyear Branch.

1. Universal Waste Lamps in Closed Containers – OAC 3745-273-13(D)(1)

Some spent lamps were being accumulated loose in a corner of a janitor's closet while others were in an open cardboard box in the same closet. Spent lamps that are to be recycled are required to be accumulated in closed containers or packages that are adequate to prevent breakage. Please immediately place all spent lamps in appropriate closed containers and submit a photo(s) documenting that this has been done or confirm that they were included in the shipment to a recycler from the main library on March 14th.

2. Immediate Clean Up Broken Spent Lamps – OAC 3745-273-13(D)(2)

A spent fluorescent lamp was broken on the sump lid in the basement. This needs to be immediately cleaned up and placed in an appropriate closed container. You should check with your recycler to see if they have any special packaging requirements for broken lamps. Please respond with a description of what action was taken to clean up the broken lamp and submit a photo(s) documenting that the broken lamp has been cleaned up.

3. Universal Waste Lamp Labeling – OAC 3745-273-14(E)

Spent lamps that were in the janitor's closet were not labeled. Spent lamps to be recycled are required to be labeled with the words "universal waste – lamps", or "waste lamps" or "used lamps" or the closed containers that they are accumulated in are required to have one of these labels. Please immediately label all spent lamps or the closed container that they are accumulated in and submit a photo(s) documenting such or confirm that they were included in the shipment to a recycler from the main library on March 14th.

4. Employee Training – OAC 3745-273-16

You stated your employees have not received training on the proper management of universal wastes. Universal waste handlers are required to provide training regarding the proper handling and emergency procedures for such wastes to all employees who handle or manage universal wastes. Please immediately provide this training for your employees and submit sign-in sheets or other documentation of such.

5. Release of Universal Waste – OAC 3745-273-17(A)

There was a broken fluorescent lamp on the sump lid in the basement and no one was cleaning it up. Universal waste handlers are required to immediately contain any release of universal waste. Please respond with a description of what action was taken to clean up the broken lamp and submit a photo(s) documenting that the broken lamp has been cleaned up.

Also submit written confirmation that any releases of universal waste will be immediately contained in the future.

Akron-Summit County Library needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, you are requested to provide documentation to this office including the steps taken to abate the violations cited above. Please be advised that the 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.

AKRON-SUMMIT COUNTY LIBRARY - MAIN LIBRARY AND GOODYEAR BRANCH
MARCH 21, 2013
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If circumstances delay the abatement of violations, Akron-Summit County Library is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

Several concerns were also noted during the inspection. One of the cabinets in the paint room of the main library contained a gallon jug of muriatic acid as well as several 5 gallon containers of corrosives. Also on shelves in this room were 3 tubs of aerosol wax stripper. It appears that there may be no useful purpose at the library for these chemicals anymore. We understand from your e-mail that you are working with an environmental contractor to recycle or dispose of these before the integrity of the containers is compromised.

Copies of the inspection checklists for each facility are enclosed. The hazardous waste rules cited above and on the checklists can be found on our division's web page at <http://www.epa.ohio.gov/dhwm/>. Ohio EPA is sponsoring a compliance workshop in May that you might be interested in. Please go to http://www.epa.state.oh.us/compliance_conference.aspx for more information and to register.

If you have any questions concerning this letter, please contact me by telephone at (330) 963-1226 or by e-mail at sherry.slone@epa.ohio.gov.

Sincerely,



Sherry Slone, P.E.
District Engineer
Division of Materials and Waste Management

SS:ddw

Enclosures

ec: Natalie Oryshkewych, DMWM, NEDO
Nyall McKenna, DMWM, NEDO
Jeff Mayhugh, DMWM, CO
cc: Marlene Kinney, DMWM, NEDO
David Jennings, Director, Akron-Summit County Library

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 Site Location Information Site Land Type (check only one) <i>TAX EXEMPT</i> NAICS code(s) www.census.gov/epcd/www/naics.html	EPA ID Number: <i>OH 000 176 081</i> Name: <i>AKRON SUMMIT Co. LIBRARY</i> <i>GOODYEAR BRANCH</i> Website: <i>akronlibrary.org</i> (Optional) Street Address: <i>60 GOODYEAR BLVD.</i> City, Town, or Village: <i>AKRON</i> State: <i>OH</i> County Name: <i>SUMMIT</i> Zip Code: <i>44305</i> 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"/> NAICS code(s): <i>—</i>
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Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: <i>CARL</i> MI: Last Name: <i>ROXBURY</i> Title: <i>FACILITIES DIRECTOR</i> Phone Number: <i>330.643.9175</i> Phone Number Extension: <i>—</i> E-Mail Address: <i>CROXBURY@AKRON.LIBRARY.ORG</i> Fax Number: <i>330.643.9178</i> Fax Number Extension: <i>—</i> Street or P.O. Box: <i>60 S. HIGH ST.</i> City, Town or Village: <i>AKRON</i> State: <i>OH</i> Zip Code: <i>44326</i>
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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 <i>TAX-EXEMPT NON-PROFIT ORGANIZATION</i>	Name of Site's Legal Owner: <i>AKRON SUMMIT Co. LIBRARY</i> Date Became Owner (mm/dd/yyyy): <i>ESTAB 1874</i> Owner Type: Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> Street or P.O. Box: <i>60 S. HIGH ST.</i> City, Town or Village: <i>AKRON</i> Owner Phone #: <i>330.643.9000</i> State: <i>OH</i> Country: <i>USA</i> Zip Code: <i>44326</i> Name of Site's Operator: <i>(SAME)</i> 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: Operator Phone #: Country Zip Code:
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VIOLATIONS CITED?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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TYPE OF HANDLER - MARK "X" AS APPROPRIATE	
<input checked="" type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment. <input type="checkbox"/> Large Quantity Generator (LQG) <input 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

- Batteries
 Pesticides
 Mercury containing equipment
 Lamps

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

- Used Oil Generator
 Used Oil Transporter
 Used Oil Transfer Facility
 Used Oil Processor
 Used Oil Re-refiner
 Off-Specification Used Oil Burner
 Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil
 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.

- College or University
 Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
 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.

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: **ANDREW WACKETT, H&S ASST.**
 Tanks Yes No
 Containers Yes No

Name of Inspector(s)

SHERRY SLOVE

Name of Inspector(s)

KAREN NESBIT

Date of Inspection/Time
(mm/dd/yyyy) (hh:mm)

03/05/2013 12:30

Comments:

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 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 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 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 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 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 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

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 checked="" type="checkbox"/> N/A <input type="checkbox"/> <i>LOOSE BULBS IN JANITORS CLOSET, BROKEN BULB ON SUMP LID IN BASEMENT</i> <i>OPEN BOX OF BULBS IN JAN. CLOS.</i>
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 checked="" type="checkbox"/> N/A <input type="checkbox"/> <i>BROKEN BULB ON SUMP LID IN BASEMENT</i>

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 checked="" type="checkbox"/> N/A <input type="checkbox"/> <i>OPEN BOX OF LAMPS IN JANITOR'S CLOSET UNLABELED</i>
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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"/> <i>AGGREGATED @ DOWNTOWN LIBRARY, SENT OUT 4-17-12</i>
a.	If not, is the waste accumulated over one year in order to facilitate	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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[ID number]

	proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	
<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: SHIPPING PAPERS	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 type="checkbox"/> No <input checked="" 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)] BROKEN LAMP ON SUMP LID IN BASEMENT	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input 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-transportes 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)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input 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 checked="" type="checkbox"/> N/A <input 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)]	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		
<i>NOTE: Small quantity handlers that export waste to the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262 subpart H. Small quantity handlers that export waste to a foreign destination other than the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262.53, 40 CFR 262.56(a)(1) to (a)(4), (a)(6), and (b), 40 CFR 262.57, and 40 CFR 262 subpart E. [3745-273-20]</i>		

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RCRA SMALL QUANTITY UNIVERSAL WASTE HANDLER – BATTERIES & LAMPS INSPECTION CHECKLIST

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NOTE: Violations regarding exporting universal waste to foreign destinations should be referred to U.S. EPA Region 5 because the federal counterpart provisions are not delegable to states.

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