



May 23, 2013

ADAMS COUNTY
DP&L JM STUART STATION
DMWM/SEDO
OHD000721407

Mr. Troy Williams
Dayton Power & Light JM Stuart Station
745 U.S. Route 52, P.O. Box 468
Manchester, Ohio 45144-8449

Dear Mr. Williams:

On May 15, 2013, Melody Stewart and I inspected Dayton Power & Light (DP&L) JM Stuart Station in Manchester, Ohio to determine compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). This letter will explain the violations we found and what you need to do to correct the violations. The General Comments section of this letter will explain any other general concerns we have and what you can do to respond to those concerns.

We found the following violations of Ohio's hazardous waste laws. In order to correct these violations you must do the following and send me the required information **within 14 days** of your receipt of this letter:

- (1) **3745-52-42(B); Exception Report.** A small quantity generator of hazardous waste who does not receive a copy of the manifest with the signature of the designated treatment, storage, and/or disposal facility within 60 days of the date the waste was accepted by the initial transporter must submit to Ohio EPA a legible copy of the manifest and indicate in some manner that the generator has not received confirmation of delivery of the waste.

During the inspection we discovered one manifest (tracking number 005313353 transported by FeeCorp to Envirosafe Services of Ohio, Inc. dated 2/21/13) that did not have a signed copy returned by the designated TSDf (Envirosafe), indicating that the shipment had been received. The facility contacted Envirosafe and received the signed copy of the manifest. The signed copy was submitted to Ohio EPA via e-mail on 5/16/13.

DP&L JM Stuart Station has returned to compliance with this rule. No further action is necessary.

- (2) **3745-273-13(D); Waste Management Standards for Small Quantity Handlers of Universal Waste – Spent Lamps.** A small quantity handler of universal waste lamps must manage spent lamps in a way that prevents releases of universal waste or components of universal waste to the environment, by placing spent lamps in containers that are structurally sound, adequate to prevent breakage, and compatible with their

contents. Containers of spent lamps must be kept closed and lack evidence of leakage, spillage, or other damage that could cause a release to the environment. Each container of spent lamps must be labeled with the words "Universal Waste Lamps", "Waste Lamps" or "Used Lamps".

At the time of the inspection, containers of spent lamps in the Universal Waste Storage Room were not closed. Some spent lamps were stacked on the floor or on a table and were not containerized. Containers of spent lamps were not labeled with the words "Universal Waste Lamps", "Waste Lamps" or "Used Lamps".

DP&L JM Stuart Station must containerize all spent universal waste lamps, and keep containers securely closed unless adding lamps to the containers. All containers of spent lamps must be labeled with the words "Universal Waste Lamps", "Waste Lamps" or "Used Lamps".

On 5/16/13, DP&L JM Stuart Station sent photographic documentation to Ohio EPA via e-mail, demonstrating that spent lamps in the Universal Waste Storage Room have been containerized and the containers securely closed. To demonstrate complete abatement of this violation, DP&L JM Stuart Station must submit documentation demonstrating that the containers of spent lamps are labeled with the words "Universal Waste Lamps", "Waste Lamps" or "Used Lamps". I have enclosed Ohio EPA's guidances on management of spent universal wastes for your reference.

DP&L JM Stuart Station needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, DP&L JM Stuart Station is requested to provide documentation to this office including the steps taken to abate the violations cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to vicky.german@epa.ohio.gov.

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, DP&L JM Stuart Station is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

GENERAL COMMENTS:

- **Contingency Plan.** As we discussed, the facility's contingency plan does not address the actions to be taken if a spill occurs outside the plant buildings. DP&L JM Stuart Station agreed to revise their contingency plan to address this prior to becoming a Large Quantity Generator (LQG), when regulations require your facility to have an updated and accurate contingency plan to be in place. Enclosed is a Sample Contingency Plan that you can use in making revisions to your facility's plan.
- **Scrap Tire Storage.** During the inspection, we observed that tires were being collected in a roll-off box outside until they are recycled. Most of the tires appeared to be without rims, which presents an opportunity for water to collect in them. If tires are stored outside, they

must either be covered or must have mosquito controls applied to prevent mosquitoes from living and breeding in the pile. If dry tires are stored inside a building or in an enclosed container, no additional mosquito controls are necessary.

- **Used Oil Labeling.** All used oil containers and fill pipes leading to underground used oil storage tanks that we observed during the inspection were appropriately labeled as "Used Oil". As we discussed, the labels should be clearly legible at all times; most of the fill pipe labels could only be partially seen because they were coated with dirt and oil. DP&L JM Stuart Station cleaned off the labels during the inspection. Ohio EPA recommends the labels be wiped off periodically, such as when checking or inspecting the tanks, or adding used oil, etc. to the tanks, to ensure the labels are clearly legible.
- **General Housekeeping (Spent Lead-Acid Batteries).** We observed one lead-acid battery outside on the concrete. Ohio EPA recommended during the inspection that all spent lead-acid batteries be stored inside under roof to lessen the likelihood of the cases cracking during extreme weather temperatures and releasing lead/acid to the environment. DP&L JM Stuart Station submitted documentation on 5/16/13, demonstrating that the batteries are now stored inside until they are taken off-site for recycling.
- **Episodic Generation of Hazardous Waste.** As we discussed, DP&L JM Stuart Station normally operates as a Small Quantity Generator (SQG) of hazardous waste, and periodically becomes a Large Quantity Generator (LQG) during boiler cleanouts or other large waste generation events. I have enclosed Ohio EPA's guidance on the regulatory requirements that apply when you fluctuate between hazardous waste generation categories.

Enclosed you will find a copy of the checklists that were completed as a result of the inspection. You can find copies of the hazardous waste rules and other information on our division's web page at <http://www.epa.ohio.gov/dhwm/lawsregs.aspx>. Pollution prevention and compliance assistance information can be found at <http://www.epa.ohio.gov/ocapp>. If you have any questions or need assistance, please feel free to call me at 740-380-5237.

Sincerely,



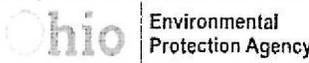
Vicky D. German
Division of Materials and Waste Management
Ohio EPA, Southeast District Office

VDG/mr

Enclosures

NOTICE:

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

 <p>Environmental Protection Agency</p> <p>Send to Central Office <input checked="" type="checkbox"/></p>	<p>Ohio Environmental Protection Agency</p> <p>RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM</p>	<p>For Ohio EPA use only</p>
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Completed forms that are required to be submitted to CO should be e-mailed to RCRAInfoData@epa.ohio.gov

<p>Site EPA ID No.</p> <p>Site Name</p> <p>Site Location Information</p> <p>Site Land Type (check only one)</p> <p>NAICS codes <small>www.census.gov/ipeds/www.naics.html</small></p>	<p>EPA ID Number: OHD000721407</p> <p>Name: Dayton Power & Light JM Stuart Station Website (Optional): Street Address: 745 U.S. Route 52 City, Town, or Village: Manchester State: OH County Name: Adams Zip Code: 45144-8449</p> <p>Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/></p> <p>22111</p>
<p>Facility Representative</p> <p><small>Additional names can be recorded in comments section.</small></p> <p><small>Only provide address information if it is different than the site address.</small></p>	<p>First Name: Harry MI: K. Last Name: McCann</p> <p>Phone Number: 937-549-2641 Extension: 5809</p> <p>E-Mail Address: harry.mccann@aes.com</p> <p>Fax Number: 937-549-4281 Fax Number Extension:</p> <p>Street or P.O. Box: 745 U.S. Route 52, P.O. Box 468 City, Town or Village: Manchester State: OH Zip Code: 45144-8449</p>
<p>Legal Owner And Operator</p> <p><small>List additional Owners and/or Operators in the Comments Section or on another copy of this page.</small></p>	<p>Name of Site's Legal Owner: Dayton Power & Light Company/AES Date Became Owner (mm/dd/yyyy): 1966</p> <p>Owner Type: Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/></p> <p>Street or P.O. Box: 1065 Woodman Drive City, Town or Village: Dayton Owner Phone #: 800-433-8500 State: OH Country: US Zip Code: 45432</p> <p>Name of Site's Operator: Dayton Power & Light Company/AES Date Became Operator: 1969</p> <p>Owner Type: Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/></p> <p>Street or P.O. Box: 1065 Woodman Drive City, Town or Village: Dayton Operator Phone #: 800-433-8500 State: OH Country: US Zip Code: 45432</p>

VIOLATIONS CITED?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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TYPE OF HANDLER (MARK AS APPROPRIATE)		
<p><input type="checkbox"/> Not a HW Generator</p> <p><input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11</p> <p><input type="checkbox"/> Short-Term/Temporary Generator (short-term or one-time event and not from on-going processes). <i>Check the box for the applicable generator status and provide a comment.</i></p>	<p><input type="checkbox"/> Large Quantity Generator (LQG)</p> <p><input checked="" type="checkbox"/> Small Quantity Generator (SQG)</p> <p><input type="checkbox"/> Conditionally Exempt Small Quantity Generator</p> <p><input type="checkbox"/> U.S. Importer of Hazardous Waste</p> <p><input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator</p>	

TYPE OF REGULATED WASTE ACTIVITY (MARK AS APPROPRIATE)	
<input type="checkbox"/> Hazardous Waste Transporter <input type="checkbox"/> Hazardous Waste Transfer Facility <input type="checkbox"/> Treater, Storer, or Disposer of Hazardous Waste <input type="checkbox"/> Recycler of Hazardous Waste <input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace <input type="checkbox"/> Small Quantity On-Site Burner Exemption <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption <input type="checkbox"/> Underground Injection Control Facility <input type="checkbox"/> Receives Hazardous Waste from Off-site
UNIVERSAL WASTE ACTIVITIES (MARK AS APPROPRIATE)	
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste <input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	<input type="checkbox"/> Destination Facility for Universal Waste
TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES (MARK ALL THAT APPLY)	
<input type="checkbox"/> Batteries <input type="checkbox"/> Pesticides <input checked="" type="checkbox"/> Mercury containing equipment <input checked="" type="checkbox"/> Lamps	
USED OIL ACTIVITIES (MARK ALL THAT APPLY)	
<input checked="" type="checkbox"/> Used Oil Generator <input type="checkbox"/> Used Oil Transporter <input type="checkbox"/> Used Oil Transfer Facility <input type="checkbox"/> Used Oil Processor <input type="checkbox"/> Used Oil Re-refiner <input type="checkbox"/> Off-Specification Used Oil Burner <input type="checkbox"/> Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil <input type="checkbox"/> Used Oil Fuel Marketer who first claims the Used Oil meets the specifications	
Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the boxes below to indicate the laboratory type.	
<input type="checkbox"/> College or University <input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university <input type="checkbox"/> Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university	
Waste Codes for Federally Regulated Hazardous Wastes: List the codes for the federally regulated hazardous waste handled at the site, in the order they are presented in the regulations (e.g., D001, D003, F007, U112). 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; just indicate the date of the most recent source record.	
Same waste codes as 2/9/2012 RCRA Site ID Form.	
COMMENTS: Use this area to describe inspection conditions and additional information.	
Announced	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Additional Facility Representatives: Troy Williams, DP&L JM Stuart Station <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Used Oil tanks only; no hazardous waste tanks at the time of the inspection. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Facility is an Episodic LQG.
ADDITIONAL COMMENTS:	
Latitude/Longitude: 38.642165, -83.691015	
INSPECTOR(S)	
INSPECTION DATE/TIME	
Vicky German, DMWM-SEDO	Melody Stewart, DMWM-SEDO
5/15/2013	

PROCESS INFORMATION AND WASTE ACTIVITIES SUMMARY

Dayton Power & Light Company – JM Stuart Station

SQG / EPISODIC LQG

OHD000721407

<i>Description of Waste</i>				<i>On-Site Management</i>			<i>Off-Site Management</i>
Process	Waste Generated	EPA Waste Code	Approx. Amount Generated per Month	Type of Accumulation or Storage	Type of On-Site Treatment	Waste Location	Name, state, and type of activity
Cleaning of process equipment	lead-contaminated debris, paint chips, etc.	D008	500 P	55-G containers Designated roll-off box	NA	Hazardous Waste Storage Cage	Clean Water Limited, Dayton OH Envirosafe Services of Ohio, Inc., Oregon OH
Cleaning of process equipment	Spent contaminated cleaning fluid containing tetrachloroethylene	D039	572 P	55-G containers	NA	Hazardous Waste Storage Cage	Safety-Kleen, Dolton IL
Cleaning of process equipment	Spent acidic cleaner (e.g. Scale Gone, etc.)	D002	1300 G at one time when generated	NA	NA	NA	Clean Harbors Environmental Services, Dayton OH
Laboratory	analytical lab wastes including waste corrosive liquids (acids) and mercuric chloride	D002 D009	Infrequent generation	55-G containers, lab packs	NA	Hazardous Waste Storage Cage	Clean Harbors Environmental Services, Dayton OH
Laboratory	analytical lab wastes waste liquid mercury	D009	Infrequent generation	55-G containers, lab packs	NA	Hazardous Waste Storage Cage	Clean Harbors Environmental Services, Dayton OH
Discarding off-spec and outdated products or chemicals	Ignitable spent solvents	D001 F003	220 P when generated	55-G containers	NA	Hazardous Waste Storage Cage	Clean Harbors Environmental Services, Dayton OH

PROCESS INFORMATION AND WASTE ACTIVITIES SUMMARY (CONT.)

Dayton Power & Light Company – JM Stuart Station				SQG/EPISODIC LQG		OHD000721407	
Description of Waste				On-Site Management			Off-Site Management
Process	Waste Generated	EPA Waste Code	QTY Generated per Month	Type of Accumulation or Storage	Type of On-Site Treatment	Waste Location	Name, state, and type of activity
Discarding off-spec and outdated products or chemicals	Spent solvents; corrosive, ignitable and/or reactive liquids including mercury or benzene	D001 D002 D003 D009 D018 F003 U002	70 P	55-G containers	NA	Hazardous Waste Storage Cage	Clean Harbors Environmental Services, Dayton OH
Stack repair/removal	Refractory material	D007 D010	84 T at once when generated (infrequent)	Designated roll-off box	NA	NA	Envirosafe Services of Ohio, Inc., Oregon OH
Plant and equipment maintenance and repair	Used oil	NA	700 to 2200 G	55-G containers 10,000-G UST	NA	Outside 10,000-G UST	Safety-Kleen, Dolton IL
Lighting changes and upgrades	Spent fluorescent lamps	NA- Univ. Waste	Varies	Containers Boxes	NA	Universal Waste Storage Room	USA Lamp & Ballast, Cincinnati OH
Plant and equipment maintenance and repair	Mercury switches from station processing equipment	D009 unless managed as Univ. Waste	Varies	Containers Boxes	NA	Universal Waste Storage Room	Spring Grove Resource Recovery, Cincinnati OH

FACILITY AND PROCESS INFORMATION



Dayton Power & Light Company, a principal subsidiary of Dayton Power & Light, Inc., operates the JM Stuart Station in Manchester, Ohio. The plant is a coal-fired power plant that operates four 600-megawatt boiler steam units. All four units are operated from one control room. DP&L Inc. was acquired by The AES Corporation in late 2011.

Coal is received by river barges and unloaded by a bucket off-loader and conveyor belt system to a staging pile. Coal is conveyed from the staging pile to silos, then pulverized to a fine powder and fed to the boilers. Forced draft fans supply the air for combustion. The boilers burn the coal to produce steam, which turns the turbines and generates electricity. Induced-draft fans exhaust combustion products from the boiler. The condenser cools the steam that exits the turbine, condensing it to water that is then re-used in the cycle. The cooling water tower cools the water exiting the condenser. The plant burns about 6 million tons of coal per year in the production of electricity.

The electricity is sold on contracts. Duke Energy owns 39 percent of each of the 4 units, Dayton Power & Light Company owns 35 percent, and American Electric Power owns 26 percent of each unit.

The plant uses a series of air emission control devices for coal combustion-related emissions, including an electrostatic precipitator to capture fly ash and a limestone reactor to remove sulfur oxides from plant emissions. Since a scrubber construction project in 2008, all four units now channel boiler emissions through the electrostatic precipitator and limestone reactor before traveling through the scrubber unit in a new fifth stack.

WASTE INFORMATION

Ash from coal combustion is removed from the bottom of the boiler (bottom ash) and from the exhaust gas (fly ash). Fly ash is finer and is collected through the electrostatic precipitators, while bottom ash is heavier and falls to the bottom of the boilers. Both fly ash and bottom ash are mixed with water and pumped to storage impoundments or ponds.

Fly Ash is conveyed to Ponds 3A, 7, or 10; these act as primary settling basins. While one pond is being used to accept fly ash, one pond is being de-watered, and the remaining one is idle. From the primary settling basin, the ash/water mixture is discharged to Pond 6 which is a secondary settling basin; then it goes to Pond 7A which is the polishing basin. The water in Pond 7A is monitored and discharged to the Ohio River per a NPDES permit. Fly ash removed from the ponds is disposed in an on-site landfill. The plant has two landfills (9 and 11); 9 is the currently active landfill. The landfills have ditch systems that convey water to a landfill collection pond that in turn flows into a mitigated wetland.

Bottom ash is conveyed to Pond 5A; which is divided into four units: North; West; North Fourbay; and South Fourbay. North and West act as primary settling basins. After primary settlement, the ash/water is conveyed to

Pond 5B, which acts as a secondary settling basin. Pond 5 B is then pumped into the wastewater treatment building for further treatment prior to discharge to Little 3-Mile Creek which leads to the Ohio River. Bottom ash removed from Pond 5A is sold as product or used as top cover for the on-site landfills.

The plant also has a surface impoundment, the Chemical Waste Pond that is lined with a synthetic liner. The pond manages wastes from cleaning out of boiler pipes on the water side of the boiler (not the fire side). Contractors conduct the boiler cleanout using an acidic solution that is piped through the boiler using a portable tank system. The system re-circulates the acidic cleaning solution until steady state is reached for iron and copper concentrations and pH. The solution is removed from the boiler and pumped to the Chemical Waste Pond. This waste is treated by raising the pH by adding a caustic solution for neutralization. Portable wastewater treatment trailers are used to drop solids out of the treated waste. The neutralized solution is discharged to Pond 5B after the solids are removed. The Chemical Waste Pond has not managed boiler clean out waste since 2004.

Runoff from the coal pile is collected in ditches which convey the water to Pond WW7, and then to Ponds 3A, 7, or 10 (whichever one is actively receiving ash/water). The limestone reactor generates a gypsum product; approximately half of this product is sold and half is disposed off-site. Other wastes are generated from boiler cleanouts, the on-site laboratory, painting and coating activities, and maintenance activities. Emission systems demolition and construction debris and waste refractory brick from air emissions stacks are also periodically generated.

The JM Stuart Station plant operates as a Small Quantity Generator (SQG) during normal operating conditions. During times of boiler cleanouts and other maintenance outages, the plant reaches Large Quantity Generator (LQG) status, and is therefore an "Episodic LQG". During periods of LQG status, the plant follows the LQG regulations, including filing a hazardous waste report if required, and maintaining and updating the site's contingency plan in case of emergency situations. The plant has a less-than 90-day hazardous waste storage area (the Hazardous Waste Cage) located in the warehouse area, two oil-water separator areas, a concrete outdoor used oil storage area for drums/containers, and a 10,000-gallon underground storage tank (UST) for used oil.

REGULATORY HISTORY

The facility was last inspected by Ohio EPA to determine compliance with Ohio's hazardous waste regulations on 1/8/2002. The facility abated the violation that was discovered during the inspection on 2/20/2002. In 2009, U.S.EPA inspected DP&L JM Stuart Plant as part of a multi-media inspection effort. U.S. EPA sent a follow-up information request to the facility on 8/30/2011 and the facility responded on 10/6/2011.

SMALL QUANTITY GENERATOR REQUIREMENTS

CESQG: <100Kg. (Approximately 25-30 gallons) of waste in a calendar month.

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.

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
2.	Has the generator obtained a U.S. EPA I.D. number? [3745-52-12]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
3.	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
4.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
5.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<i>NOTE: If the SQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements might still apply, e.g. manifest, marking, LDR, etc.</i>				
6.	Has the generator accumulated hazardous wastes <u>in excess of</u> (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
<i>NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]</i>				
7.	Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
<i>NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.</i>				
8.	Does the generator treat hazardous waste in a:			
	a. Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	c. Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	d. Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
<i>NOTE: Complete appropriate checklist for each unit. NOTE: If waste is treated to meet LDRs, use LDR checklist.</i>				

MANIFEST REQUIREMENTS

9.	Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
10.	Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	a. Does the contractual agreement specify the type of waste and frequency of shipment?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	b. Is the transport vehicle owned and operated by the reclaimer?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.

11.	Have items 1 through 20 of each manifest been completed?[3745-52-20(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
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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 complete. [3745-52-20 (A)]

12.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
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NOTE: The generator may designate on the manifest one alternative 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)]

13.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
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14.	Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
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NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.

15.	If the generator received a rejected load or residue, did the generator:			
a.	Sign item 20 of the new manifest or item 18c of the original manifest? [3745-52-23(F)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
b.	Provide the transporter a copy of the manifest? [3745-52-23(F)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
c.	Send a copy of the manifest to the designated facility that returned the shipment with 30 days after delivery of the rejected shipment? [3745-52-23(F)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

16.	If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? 3745-52-42(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
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During the inspection we discovered one manifest (tracking number 005313353 transported by FeeCorp to Envirosafe Services of Ohio, Inc. dated 2/21/13) that did not have a signed copy returned by the designated TSDF (Envirosafe), indicating that the shipment had been received. The facility contacted Envirosafe and received the signed copy. The signed copy of the manifest was submitted to Ohio EPA on 5/16/13.

17.	Are signed copies of all manifests being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
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NOTE: A generator who sends a shipment of hazardous waste to a TSD facility with the understanding that the TSD facility can accept and manage the waste and later receives that shipment back as a rejected load or residue may accumulate the waste on-site for <90 days or <180 days depending on the amount of hazardous waste on-site in that calendar month. [3745-52-34(M)]

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.

PREPAREDNESS AND PREVENTION

18.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
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19.	Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]				
	a.	Name and telephone number of emergency coordinator?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	b.	Location of fire and spill control equipment, and, if present, fire alarm(s)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	c.	Telephone number of local fire department?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
20.	Are employees familiar with waste handling and emergency procedures? [3745-52-34(D)(5)(c)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
21.	Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
22.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
23.	Does the generator have the following equipment at the facility (if it is required due to actual hazards associated with the waste):				
	a.	Internal alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	c.	Portable fire control, spill control and decontamination equipment? [3745-65-32(C)]?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
24.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency?[3745-65-33]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	a.	Are inspections recorded in a log or summary? [3745-65-33]?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
25.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (<i>unless the device is not required under OAC 3745-65-32</i>)? [3745-65-34(A)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
26.	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? (<i>unless not required under 3745-65-32</i>)? [3745-65-34(B)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
27.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
28.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
29.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
SATELLITE ACCUMULATION AREA REQUIREMENTS					
30.	Does the generator ensure that satellite accumulation area(s):				
	a.	Are at or near a point of generation? {3745-52-34(C)(1)}	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)].	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	f.	Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
31.		Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	b.	Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

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

USE AND MANAGEMENT OF CONTAINERS

32.		Has the generator marked containers with the words "Hazardous Waste"? [3745-52-34(D)(4)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
33.		Is the accumulation date on each container? [3745-52-34(D)(4)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
34.		Are hazardous wastes stored in containers which are:			
	a.	Closed except when adding/removing wastes? [3745-66-73(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	b.	In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	d.	Handled in a manner which prevents rupture or leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
35.		Is the container accumulation area(s) inspected at least once during the period from Sunday to Saturday? [3745-66-74]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
36.		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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
37.		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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
38.		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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

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.

PRE-TRANSPORT REQUIREMENTS

39.	Does each 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
40.	Does each container \leq 19 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
41.	Before off-site transportation, does the generator placard <u>or</u> offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

LAND DISPOSAL RESTRICTIONS (LDR) - GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

1.		If LDRs do not apply, does the generator have a statement that lists how the hazardous waste was generated, why LDRs don't apply, and where the hazardous waste went? [3745-270-07(A)(7)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
2.		Did the generator determine if the hazardous waste/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not,	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	a.	Did the generator send the waste to a permitted hazardous waste treatment facility ? [3745-270-07(A)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
<p>NOTE: This is done by determining if the hazardous waste/soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the hazardous waste, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).</p>					
3.		Does the generator have documentation of how he determined whether the hazardous waste/soil meets or does not meet the LDR treatment standard in #2 above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
4.		Does the generator keep the documentation required in #2 above, on-site for at least three years from the last date the hazardous waste/soil was sent for treatment/disposal? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
5.		Does the generator generate a listed hazardous waste that exhibits a characteristic? If yes,	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	a.	Did the generator determine if the listed hazardous waste exhibits a characteristic that is not treated under the LDR treatment standard for the listed hazardous waste? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
<p>FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed hazardous waste is treated for.</p>					
6.		Did the generator determine if its characteristic hazardous waste contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
<p>NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the hazardous waste at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed hazardous wastes.</p> <p>NOTE: Written documentation of this determination is not required.</p>					
7.		Did the generator treat their hazardous waste/soil on-site to meet the LDR treatment standard?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
<p>NOTE: If "Yes" see question #16.</p>					
8.		Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	a.	If the generator chose not to make the determination of whether their waste must be treated, did they send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	i	Applicable hazardous waste codes?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	ii	Manifest number of the first shipment to the TSD?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	iii	A statement that conveys that the hazardous waste may or may not be subject to the LDR treatment standards and the TSD must make	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

		that determination."?			
9.		Did the generator resubmit the LDR notification form to the TSD when the hazardous waste changed or the generator used a new TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
10.		Does the generator have a copy of the LDR notification form/notice on file? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	a.	Is the form/notice kept on file for three years after last hazardous waste shipped? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

NOTIFICATION FORM

11.		Does the LDR Notification form contain the following information:			
	a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	b.	Applicable waste codes (includes characteristic codes for a listed hazardous waste if applicable)? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	c.	A statement that conveys that the hazardous waste is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	d.	A designation whether the hazardous waste is a wastewater or non-wastewater? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
<p>NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the hazardous waste is a wastewater or non-wastewater, the hazardous waste can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.</p>					
	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
<p>NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all hazardous wastes have subcategories</p>					
	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
<p>NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.</p>					
	g.	If the hazardous waste is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
<p>NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.</p>					

PROHIBITED DILUTION

12.		Is the hazardous waste treated by burning? If "No" go to #15.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
13.		Is the hazardous waste a metal-bearing hazardous waste?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
<p>NOTE: Generally, metal-bearing hazardous wastes contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing hazardous wastes are given in the Appendix to 3745-270-03.</p>					
14.	a.	Metal-bearing hazardous wastes cannot be incinerated, combusted or, blended and burned for fuel unless <u>one</u> of the following conditions apply: [3745-270-03(c)]			
	i.	Contains > 1% TOC?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	ii.	Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

	iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	v.	Co-generated with a hazardous waste that must be combusted?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	b.	If all responses to 14 a.i. through 14 a.v. are "No", hazardous waste is being improperly treated by dilution, violation of 3745-270-03(C). Is hazardous waste being treated by dilution?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>

15.	Was the hazardous waste treated by wastewater treatment?		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

NOTE: If "Yes", hazardous waste is improperly being treated by dilution.

	b.	Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].

NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.

GENERATOR TREATMENT

16.	Does the generator treat to meet LDRs on-site?		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>



If "NO", stop here.

	a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the hazardous waste/soil to the LDR treatment standard? [3745-270-07(A)(5)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	b.	Did the generator use a detailed chemical and physical analysis of the hazardous waste/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

NOTE: This is a laboratory analysis but it does not have to be kept by the generator.

	c.	Does the WAP contain all information necessary to treat the hazardous waste/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	d.	Does the WAP include the testing frequency of the treated hazardous waste/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

NOTIFICATION FORM FOR GENERATOR TREATMENT

17.	a.	Does the LDR notification form contain all information in #11 a-g above, and	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
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	b. If the treated hazardous waste/soil is listed, does the notification contain the following certification statement? <i>"I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	c. If the treated hazardous waste/soil no longer exhibits a characteristic and is no longer a hazardous waste, did the generator:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	i. Prepare a one-time notification? [3745-270-09 (D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	ii. Maintain a copy of the notice onsite? [3745-270-09(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	iii. Include in the notification: [3745-270-09(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	1. Name & address of receiving landfill?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	2. Description of hazardous waste when generated?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	3. Hazardous waste code when generated?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	4. Treatability group when generated?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	5. Underlying hazardous constituents present when generated?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	iv. Contain the certification statement as required by 3745-270-07(B)(4)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

USED OIL GENERATOR COLLECTION CENTER, AND AGGREGATION POINT REQUIREMENTS

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 <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| 2. Is used oil used as a dust suppressant? [3745-279-12(B)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| 3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |

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).

GENERATOR STANDARDS

- | | | | |
|--|------------------------------|--|---|
| 4. Does the generator mix hazardous waste with used oil? If so, | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |

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

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 <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]
Containers and UST fill pipes have been labeled appropriately. The facility should have the labels wiped clean so they are clearly legible. | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] | | | |
| a. Stopped the release? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| b. Contained the release? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| c. Cleaned up and properly managed the used oil and other materials? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

ON-SITE BURNING IN SPACE HEATERS

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

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

GENERATOR TRANSPORTATION

11. Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24] Yes No N/A
12. If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]
- 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

13. 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
14. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes No N/A
15. 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.

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

*Small Quantity Universal Waste Handler (SQUWH) = Less than 5,000 Kg (11,023 lb)
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more*

PROHIBITIONS

1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <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"/>	NA <input type="checkbox"/>

WASTE MANAGEMENT, LABELING, AND MARKING

UNIVERSAL WASTE BATTERIES

1.	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"/>	NA <input checked="" type="checkbox"/>
2.	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"/>	NA <input checked="" type="checkbox"/>
3.	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"/>	NA <input checked="" type="checkbox"/>
4.	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"/>	NA <input checked="" type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
5.	Are the batteries or containers of batteries labeled with the words "Universal Waste Batteries" or "Waste Batteries" or "Used Batteries"? [3745-273-14(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

The facility manages spent lead acid batteries through a core exchange plan. NiCd and other batteries are collected and recycled.

UNIVERSAL WASTE PESTICIDES

1.	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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
2.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
3.	If the pesticide is stored in a tank, are the requirements of OAC rules 3745-66-90 through 3745-66-101 (with the exception of 3745-66-97 paragraph C) met? [3745-273-13(B)(3)] <i>(Use tank checklist)</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
4.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(B)(4)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
5.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed, and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides"? [3745-273-14(B)(1)&(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

6.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program, and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-14(C)(1)&(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
UNIVERSAL WASTE MERCURY-CONTAINING EQUIPMENT				
1.	Has mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage or damage that could cause leaks been placed in a container that is closed, structurally sound, compatible with contents of the device and lacks evidence of leakage, spillage or damage that could cause leakage and is designed to prevent escape of mercury into the environment by volatilization or any other means? [3745-273-13(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
2.	If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]			
a.	Remove and manage the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-13(C)(2)(a)&(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
b.	Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)&(d)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
d.	Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
e.	Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling, and transportation? [3745-273-13(C)(2)(h)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
3.	If the open original housing holding mercury is removed from a mercury-containing equipment that does not contain an ampule, does the SQUWH: [3745-273-13(C)(3)]			
a.	Immediately seal the original housing holding the mercury with an air-tight seal to prevent the release of any mercury to the environment? [3745-273-13(C)(3)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
b.	Follow all requirements for removing ampules and managing removed ampules in accordance with 3745-273-13(C)(2)? [3745-273-13(C)(3)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
4.	When removing mercury containing ampules from mercury-containing equipment or sealing mercury from its original housing if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining mercury-containing device), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-13(C)(4)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
a.	If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
NOTE: The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-13(C)(4)(b)]				

5.	Is mercury-containing equipment or containers of mercury-containing equipment labelled either "Universal Waste Mercury-Containing Equipment" or "Waste Mercury-Containing Equipment" or "Used Mercury-Containing Equipment"? [3745-237-14(D)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
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6.	Are mercury-containing thermostats or containers containing <i>only thermostats</i> labeled either "Universal Waste Mercury Thermostats" or "Waste Mercury Thermostats" or "Used Mercury Thermostats"? [3745-273-14(D)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
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UNIVERSAL WASTE LAMPS

1.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? [3745-273-13(D)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
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2.	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"/>	NA <input type="checkbox"/>
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Containers of spent lamps in the Universal Waste Storage Room were not closed. Some spent lamps were not containerized.

3.	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? [3745-273-13(D)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
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4.	Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
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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.

5.	Are the lamps or the containers or packages of lamps labeled with the words "Universal Waste Lamps" or "Waste Lamps" or "Used Lamps"? [3745-273-14(E)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
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Containers of spent lamps in the Universal Waste Storage Room were not labeled "Universal Waste Lamps" or "Waste Lamps" or "Used Lamps".

ACCUMULATION TIME

1.	Is the waste accumulated for one year or less ? [3745-273-15(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
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a.	If the waste is accumulated for over one year, can the facility demonstrate this accumulation time was necessary in order to facilitate proper recovery, treatment or disposal? [3745-273-15(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
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NOTE: Accumulation is defined as date generated or date received from another handler.

2.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
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3.	Describe how this is documented by the facility:			
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)]		<input checked="" type="checkbox"/>	
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)]		<input type="checkbox"/>	
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)]		<input type="checkbox"/>	
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)]		<input checked="" type="checkbox"/>	

e.	Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received [3745-273-15(C)(5)]	<input type="checkbox"/>
f.	Another 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)]	<input type="checkbox"/>

EMPLOYEE TRAINING

1.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
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RESPONSE TO RELEASES

1.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
2.	Is the released material characterized? [3745-273-17(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
3.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? [3745-273-17(B)] If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

OFF-SITE SHIPMENTS

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

1.	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"/>	NA <input type="checkbox"/>
2.	Is the handler aware of DOT requirements for packaging and shipping? <i>If no, make aware of 49 CFR 171-180.</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
3.	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"/>	NA <input type="checkbox"/>
4.	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"/>	NA <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)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
5.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and do one of the following:			
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)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
6.	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"/>	NA <input checked="" type="checkbox"/>

EXPORTS

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]

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.