



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

Re: Brost Foundry Company
OHR000002295
Richland County
NOV/RTC

June 7, 2013

Mr. Chuck Horvath
Brost Foundry Company
198 Wayne Street
Mansfield, Ohio 44902

Dear Mr. Horvath:

On May 20 & May 31, 2013, the Ohio EPA conducted a hazardous waste compliance evaluation inspection (CEI) of Brost Foundry Company (Brost) located at 198 Wayne Street, Mansfield, Ohio. This inspection was conducted to determine Brost's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC), and Ohio's hazardous waste regulations as adopted under Chapter 3745. of the Ohio Administrative Code (OAC). On May 20, 2013, Brost was represented by Mac Flinn. Ohio EPA was represented by Kara Reynolds and me. On May 31, 2013, Brost was represented by Kevin Harris and yourself and Ohio EPA was represented by me. The inspection included a tour of the facility and a review of facility paperwork. This letter will explain the violations I found.

Brost is a foundry that manufactures brass and aluminum castings for various industries (pumps, machinery, manufacturing). Hazardous waste sand (D008) is generated by dust collectors from two wheelabrators, furnace dust/fumes and general foundry sand. Other wastes include core sand, used oil, clay crucibles and universal waste lamps.

During the inspection, I gave Mr. Flinn the following information: the Ohio EPA fact sheets Universal Waste Rules for Handlers of Lamps; The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil; Satellite Accumulation Under Ohio Hazardous Waste Rules; a copy of the Ohio EPA's Annual Report page indicating the change to biennial reporting and a copy of the rule for personnel training and the rule for container storage inspections outlining the rule changes which occurred on 3-17-12.

I found the following violation of Ohio's hazardous waste laws:

**1. Satellite Accumulation – must mark date excess accumulation began.
OAC Rule 3745-52-34(C) (2)**

A generator of hazardous waste must mark a satellite container holding the excess accumulation of hazardous waste (over 55 gallons) with the date the excess began accumulating.

Brost failed to mark the date on a satellite drum in the blue dust collector area with the date the drum was full and thus began accumulating over the 55-gallon limit. Brost did not move the drum within three days as it had been raining and the ground was soft and muddy. Mr. George Murphy knew he was required to move the drum but had not because he did not want to tear up the ground with the truck.

The drum was dated 5-16-13 and moved to the container storage area (the contents of the drum were emptied in the roll-off box in the container storage area) during the CEI thus this violation is abated.

Please note that exceedance of the three day accumulation area (Brost had the drum there for four days) would result in the area the drum was stored becoming a less than 90-day storage area which would include weekly inspections and closure of the less than 90-day area upon facility closure. Coincidentally, Brost is already conducting weekly container storage inspections in this area. Please note to not exceed the three day time limit in this area in the future as all applicable less than 90-day requirements could apply.

**2. Personnel Training.
OAC Rule 3745-65-16 (C)**

Facility personnel must partake in annual hazardous waste training.

George Murphy received hazardous waste training on 1-26-11 and 1-23-13. However, Mr. Murphy did not receive annual hazardous waste training in 2012 as he was out on medical leave. Likewise, Mr. Flinn (who is in sales) was trained on 1-26-11, but not trained since.

During the CEI, we discussed in depth how employees who handle or are responsible for emergency response to hazardous waste (Mr. Murphy and Mr. Flinn) must be trained annually.

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Mr. Harris submitted to me on May 31, 2013, via email, a sign-in sheet dated May 31, 2013, that Mr. Flinn had received annual hazardous waste training. In addition, since Mr. Murphy received annual hazardous waste training in 2013, this violation is abated.

**3. Waste management - standards for small quantity handlers of universal waste (lamps).
OAC Rule 3745-273-13 (D) (1)**

A small quantity handler of universal waste must manage lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment by containing lamps in containers or packages and such containers must remain closed.

Brost was storing one box of lamps that were not closed.

This box was closed during the CEI, thus this violation is abated.

General Comment:

Mr. Harris submitted to me documentation that MedCentral Health System had received a copy of their contingency plan on 5-31-13. MedCentral Health System has conducted the lead abatement program for Brost for years so understands the hazardous waste (D008) associated with the facility. Please ensure to include this information in your contingency plan as well as the facility evacuation route we discussed during the CEI.

Pollution Prevention:

Brost recycles their scrap metal with Total Metals Recycling Inc. in Illinois and their lamps with Safety-Kleen. If you find additional ways to recycle, reduce, or altogether eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs. Furthermore, you may possibly reduce your regulatory requirements. Or if you would like a free, non-regulatory on-site pollution prevention assessment or more information about pollution prevention, please contact me at (419) 373-3082. Ohio EPA has helpful information about this at the following web address: <http://epa.ohio.gov/ocapp/ComplianceAssistanceandPollutionPrevention.aspx>.

The Division of Materials and Waste Management (DMWM) has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio.

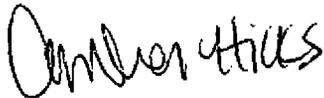
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If you haven't already, we encourage you to sign-up for this free service. You can find more information at the following Web link <http://ohioepa.custhelp.com/ci/documents/detail/2/subscriptionpage>. Please feel free to share this information with your colleagues.

Enclosed you will find a copy of the checklists that I completed during the inspection. No response to this letter is necessary. Should you have any questions, please feel free to call me at (419) 373-3082 or email me at amber.hicks@epa.ohio.gov.

You can find copies of the rules and other information on the division's web page at <http://epa.ohio.gov/dmwm/dmwmrules.aspx>.

Sincerely,



Amber M. Hicks
Division of Materials and Waste Management

/llr

Enclosures

pc: Lisa Gifford, DMWM, NWDO
([Colleen Weaver](mailto:Colleen.Weaver@epa.state.oh.us), DMWM, NWDO (w/ checklist))

ec: Amber Hicks, DMWM, NWDO
Colleen Weaver, DMWM, NWDO
EPA RCRAInfo Data (RCRAInfoData@epa.state.oh.us) (w/ checklist)

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.

| | | |
|---|---|-----------------------|
| Send to Central Office <input checked="" type="checkbox"/> | Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM | For Ohio EPA use only |
|---|---|-----------------------|

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) NAICS code(s) www.census.gov/epcd/www/naics.html | EPA ID Number: OHR000002295 | | Website: www.brostfoundry.com (Optional) | | | | | | |
| | Name: CSM Horvath - Brost Foundry | | | | | | | | |
| | Street Address: 198 Wayne Street | | State: OH | | | | | | |
| | City, Town, or Village: Mansfield | | Zip Code: 44902 | | | | | | |
| County Name: Richland | | 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"/> |
| | | 33152 | | | | | | | |

| | | | | | |
|--|---|--|-------------------------|---------------------------|--|
| Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address | First Name: Chuck | | MI: | Last Name: Horvath | |
| | Title: President | | | | |
| | Phone Number: 419-522-1133 | | Phone Number Extension: | | |
| | E-Mail Address: brostfoundry@yahoo.com | | | | |
| | Fax Number: 419-522-6030 | | Fax Number Extension: | | |
| | Street or P.O. Box: | | | | |
| | City, Town or Village: | | | | |
| | State: | | | Zip Code: | |

| | | | | | | | | | | | |
|---|--|---|--|-----------------------------------|----------------------------------|-----------------------------------|------------------------------------|---------------------------------|------------------------------------|--------------------------------|--------------------------------|
| Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page | Name of Site's Legal Owner: CSM Horvath Ledgebrook | | Date Became Owner (mm/dd/yyyy): 6/1/07 | | | | | | | | |
| | Owner Type: | Private <input checked="" type="checkbox"/> | County <input type="checkbox"/> | District <input type="checkbox"/> | Federal <input type="checkbox"/> | Indian <input type="checkbox"/> | Municipal <input type="checkbox"/> | State <input type="checkbox"/> | Other <input type="checkbox"/> | | |
| | Street or P.O. Box: 198 Wayne Street | | Owner Phone #: | | | | | | | | |
| | City, Town or Village: Mansfield | | Country: USA | | Zip Code: 44902 | | | | | | |
| | State: OH | | Date Became Operator (mm/dd/yyyy): | | | | | | | | |
| | Name of Site's Operator: | | 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: | | Operator Phone #: | | | | | | | | |
| | City, Town or Village: | | Country: | | Zip Code: | | | | | | |
| | State: | | | | | | | | | | |

| | |
|--------------------------|---|
| VIOLATIONS CITED? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
|--------------------------|---|

| | | |
|--|--|--|
| TYPE OF HANDLER - MARK "X" AS APPROPRIATE | | |
| <input type="checkbox"/> Not a HW Generator | <input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 | <input checked="" type="checkbox"/> Large Quantity Generator (LQG) |
| | <input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment. | <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 | |
|--|--|
| <input type="checkbox"/> Batteries | |
| <input type="checkbox"/> Pesticides | |
| <input type="checkbox"/> Mercury containing equipment | |
| <input checked="" type="checkbox"/> Lamps | |

| USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S)) | |
|--|--|
| <input 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 box(es) below to indicate the laboratory type. | |
|--|--|
| <input type="checkbox"/> College or University | |
| <input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university | |
| <input type="checkbox"/> Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university | |

Waste Codes for Federally Regulated Hazardous Wastes: Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments, if more space is needed. If the waste codes are the same as listed in the most recent RCRA info source record, you do not need to list them. Instead just indicate the date of the most recent source record:

D008

| COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC. | | |
|--|---|--|
| Announced | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Additional Facility Representatives: Mac Flinn (Sales) & Kevin Harris |
| Tanks | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| Containers | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |

| | | |
|----------------------|----------------------|--|
| Name of Inspector(s) | Name of Inspector(s) | Date of Inspection/Time (mm/dd/yyyy) (hh:mm) |
| Amber Hicks | Kara Reynolds | 05/20/13 11:05 |

Comments:
Two day inspection 5-20-13 & 5-31-13.

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Brost Foundry Company
Facility Type: LQG
SQG
CESQG
TSD
Date of Inspection: 5-20-13
EPA ID#: OHR000002295

| Waste Generated | | | On- or Off-Site Management | | P2 Activities | |
|---|--|---|---|---|-----------------------|------------------|
| Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc) | Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic. | QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area | Type of On-Site Treatment (recycle, wwt, etc) | Name, state, and type of activity occurring at the off-site facility. | Current P2 Activities | P2 Opportunities |
| 1 Aluminum & Brass Foundry | Waste Sand/D008 | Varies but ~ 7-8 Yards (roll-off box) every 90 days; ~24-34 tons per year; roll off-box located outside beside building | NA | Envirite Corporation - Canton, OH - Stabilization or or chemical fixation prior to disposal at another site (recycled). | Recycled for metals. | |
| 2 Lighting | Lamps | 1-2 boxes/year; upstairs in warehouse/storage area | NA | Safety-Kleen | Recycled | |
| 3 General Maintenance of air compressor & tumbler | Used Oil | ~55-gallons/year | NA | Sensmeier Oil Company - Mansfield, OH | Recycled. | |
| 4 Casting of molds | Core sand (used once then disposed) - non-hazardous according to TCLP analytical. | Unsure | NA | Richland County Landfill | | |
| | | | | | | |

| | | | | | | | |
|---|---|---|---|----|-----------------------------------|---|--|
| 5 | | | | | | | |
| 6 | Melting of metals in induction furnace. | Clay crucibles generated when the crucible (container which holds the metal) wears out. | Unsure; Broken up and mixed with scrap metal. | NA | Total Metals Recycling - Illinois | Crucibles are considered scrap metal and thus are melted to recover metals. | |
| 7 | | | | | | | |
| 8 | | | | | | | |
| 9 | | | | | | | |

REMARKS-GENERAL INFORMATION

General Process Information:

Brost is a foundry that produces aluminum and brass castings for a variety of industries. Brost takes sand (crushed rock called olivine) and mixes it with water and clay in a big mixer. Patterns for the molds (flask) are created as the sand with moisture takes shape to create the molds. Metals (40-60 alloys of brass and lead) are melted in clay crucibles in the facility's induction furnaces. The metal then is poured into sand molds and a product is created. The sand falls apart and is re-used or over time after much re-use the sand becomes so fine that it goes up the dust collector and ends up as a waste (D008). The sand is managed as a hazardous waste while on-site and is ultimately sent to a recycler (brass & bronze). Fumes from the pouring of the metal into the molds is also collected via the dust collector (D008). Excess metal is remelted and re-used. Core sand is added to the molds but this sand is only used once and is non-hazardous and disposed at the landfill. Dross & slag from the melting of the metals is sent to Total Metals Recycling. Product castings are then sent to the first wheelabrator (for sand blasting). Sand/dust from the wheelabrator is collected in the dust collector and sent off as waste (D008). Product castings then are sent to the grinding area where fumes are collected via the dust collector (metal dust which is recycled) then to a final wheelabrator (final inspection) which also collects dust (D008). The facility has five satellite accumulation areas A) furnace fume collector B) wheelabrator C) container in foundry area D&F) two containers in the cut-off area. The facility has one container storage area (E) which is a roll-off box where satellite drums are emptied into which is shipped off-site every 90-days.

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information:

Facility may be interested into investigating if there is enough of the core sand to send for recycling.

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.

Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other:

**LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

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

Safety Equipment Used:

GENERAL REQUIREMENTS

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

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

| | | | | |
|----|--|------------------------------|--|------------------------------|
| 9. | Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
|----|--|------------------------------|--|------------------------------|

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

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

NOTE: Complete appropriate checklist for each unit.

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

| | | | | |
|-----|---|------------------------------|--|---|
| 11. | Does the generator export hazardous waste? If so: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| | a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| | b. Has the generator complied with special manifest requirements? [3745-52-54] | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| | c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| | d. Has an annual report been submitted to U.S. EPA? [3745-52-56] | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |

| | | |
|---|--|--|
| e. | Are export related documents being maintained on-site? [3745-52-57(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| MANIFEST REQUIREMENTS | | |
| 12. | Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 13. | Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <i>NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]</i> | | |
| 14. | 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"/> N/A <input type="checkbox"/> |
| <i>NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]</i> | | |
| 15. | If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 16. | Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <i>NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.</i> | | |
| 17. | 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"/> N/A <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"/> N/A <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"/> N/A <input checked="" type="checkbox"/> |
| 18. | If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 19. | If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 20. | Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <i>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)]</i> | | |
| <i>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.</i> | | |
| PERSONNEL TRAINING | | |
| 21. | Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 22. | Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]

| | | | | |
|-----|--|---|--|------------------------------|
| 23. | Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 24. | Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 25. | Does the generator provide refresher training to employees during each period from January 1 st to December 31 st and does each training occur within 15 months after the previous training? [3745-65-16(C)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| 26. | Does the generator keep records and documentation of: | | | |
| a. | Job titles? [3745-65-16(D)(1)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| b. | Job descriptions? [3745-65-16(D)(2)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| c. | Type and amount of training given to each person? [3745-65-16(D)(3)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| d. | Completed training or job experience required? [3745-65-16(D)(4)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 27. | Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

| Job Performed | Name of Employee | Date Trained |
|---------------|------------------|--------------|
| | | |
| | | |
| | | |

CONTINGENCY PLAN

| | | | | |
|-----|--|---|-----------------------------|------------------------------|
| 28. | Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 29. | Does the plan describe the following: | | | |
| a. | Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| b. | Arrangements with emergency authorities? [3745-65-52(C)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| c. | A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| d. | A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| e. | An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]

| | | | | |
|-----|--|---|-----------------------------|------------------------------|
| 30. | Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
|-----|--|---|-----------------------------|------------------------------|

| | | |
|-----|---|--|
| 31. | Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 32. | Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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

EMERGENCY PROCEDURES

| | | |
|-----|--|--|
| 33. | Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Was the contingency plan implemented? [3745-65-51(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| c. | Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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

PREPAREDNESS AND PREVENTION

| | | |
|-----|---|--|
| 34. | Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 35. | Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: | |
| a. | Internal communications or alarm system? [3745-65-32(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Emergency communication device? [3745-65-32(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Portable fire control, spill control and decon equipment? [3745-65-32(C)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <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"/> N/A <input type="checkbox"/> |

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

| | | |
|-----|--|--|
| 36. | 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"/> N/A <input type="checkbox"/> |
| 37. | Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 38. | Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 39. | If there is only one employee on the premises, is there immediate access to a device (eg. phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 40. | 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"/> N/A <input type="checkbox"/> |
| 41. | Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 42. | Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

SATELLITE ACCUMULATION AREA REQUIREMENTS

| | | | |
|-----|---|---|--|
| 43. | 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 checked="" type="checkbox"/> | No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d. | Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> N/A <input type="checkbox"/> |
| e. | Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> N/A <input type="checkbox"/> |
| f. | Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 44. | 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 type="checkbox"/> | No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> N/A <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 IN <90 DAY ACCUMULATION AREAS

| | | | |
|-----|--|---|--|
| 45. | Has the generator marked containers with the words "Hazardous Waste"? [3745-52-34(A)(3)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 46. | Is the accumulation date on each container? [3745-52-34(A)(2)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 47. | 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"/> N/A <input type="checkbox"/> |
| b. | In good condition? [3745-66-71] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Compatible with wastes stored in them? [3745-66-72] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d. | Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> N/A <input type="checkbox"/> |

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

| | | | |
|-----|---|---|--|
| 48. | Is the container accumulation areas(s) inspected at least once during the period from Sunday to Saturday? [3745-66-74] | | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Are inspections recorded in a log or summary? [3745-66-74] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 49. | Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 50. | 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"/> N/A <input type="checkbox"/> |
| 51. | 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 checked="" type="checkbox"/> | No <input type="checkbox"/> N/A <input type="checkbox"/> |

| | | |
|--|---|--|
| 52. | 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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input 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. | | |
| 53. | If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34] | | |
| PRE-TRANSPORT REQUIREMENTS | | |
| 54. | Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 55. | Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 56. | Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| NOTE: Continue with the generator LDR requirements on the next page. | | |

GENERATOR LDR REQUIREMENTS

NOTE: This LDR checklist does not include the requirements for generators that treat to meet LDR standards. If the generator treats, the inspector should use the stand-alone Generator LDR checklist instead of this checklist.

GENERAL REQUIREMENTS

| | | |
|----|--|--|
| 1. | If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07(A)(7)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 2. | Did the generator determine if the HW/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"/> N/A <input type="checkbox"/> |
| a. | Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

NOTE: This is done by determining if the HW/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 HW, 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).

| | | |
|----|--|--|
| 3. | Does the generator have documentation of how he determined whether the HW/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"/> N/A <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 HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 5. | Does the generator generate a listed HW that exhibits a characteristic? If yes, | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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 HW is treated for.

| | | |
|----|---|--|
| 6. | Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|--|

NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW 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 HWs.

NOTE: Written documentation of this determination is not required.

| | | |
|----|---|--|
| 7. | Did the generator treat his HW /soil on-site <u>to meet</u> the LDR treatment standard? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|--|

NOTE: If "Yes" see question #16.

| | | |
|------|--|--|
| 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"/> N/A <input type="checkbox"/> |
| a. | If the generator chose not to make the determination of whether his waste must be treated, did he 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"/> N/A <input checked="" type="checkbox"/> |
| i. | Applicable HW codes? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| ii. | Manifest number of the first shipment to the TSD? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| iii. | A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination.?" | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 9. | Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 10. | Does the generator have a copy of the LDR notification form/notice on file? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

| | | |
|--|---|--|
| [3745-270-07(A)(2)] | | |
| a. | Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <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"/> N/A <input type="checkbox"/> |
| b. | Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | A statement that conveys that the HW 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"/> N/A <input type="checkbox"/> |
| d. | A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| NOTE: A wastewater contains <1% by wt. total suspended solids (TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC. | | |
| e. | Designation of the waste subcategory when applicable? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories | | |
| 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"/> N/A <input type="checkbox"/> |
| NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents. | | |
| g. | If the HW 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"/> N/A <input checked="" type="checkbox"/> |
| NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents. | | |
| PROHIBITED DILUTION | | |
| 12. | Is the HW treated by burning? If "No" go to #15. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 13. | Is the HW a metal-bearing HW? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs is given in the Appendix to 3745-270-03. | | |
| 14. | a. Metal-bearing HWs 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"/> N/A <input type="checkbox"/> |
| | ii. Contains organic constituents or cyanide at levels greater than the UTS levels? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | iii. Is made up of combustible material e.g., paper, wood, plastic? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | iv. Has a reasonable heating value (e.g., > 5000 Btu)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | v. Co-generated with a HW that must be combusted? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 15. | Was the HW treated by wastewater treatment? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <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"/> | N/A <input checked="" type="checkbox"/> |
| <i>NOTE: If "Yes", HW is improperly being treated by dilution.</i> | | | | |
| | b. Does the waste carry the D001 code and contain $\geq 10\%$ TOC? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <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"/> | N/A <input checked="" type="checkbox"/> |
| <i>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)].</i> | | | | |
| <i>NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.</i> | | | | |

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

NOTE: 1. 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.

2. Inspectors can check BUSTR's web-site at https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at: https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp.

PROHIBITIONS

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| 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"/> |
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| 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"/> |
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NOTE: For example, used oil contaminated scrap metal stored in a pile.

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

GENERATOR STANDARDS

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| 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"/> |
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| 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"/> |
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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.

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| 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"/> |
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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.

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| 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"/> |
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| 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"/> |
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| 8. | Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
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| 9. | Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
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| a. | Stopped the release? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
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| b. | Contained the release? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
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| 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"/> |
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| 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"/> |
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| ON-SITE BURNING IN SPACE HEATER | | |
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| 10. | Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| c. | Are the combustion gases from heater vented to the ambient air? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| <i>NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).</i> | | |
| 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| <i>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).</i> | | |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 14. | Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| <i>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.</i> | | |

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

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| 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 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES (NA)

| | | |
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| 3. | Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 4. | If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 5. | Does the SQUWH conduct any of the following activities: | |
| | a. Sort batteries by type? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | b. Mix battery types in one container? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | c. Discharge batteries to remove the electric charge? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | d. Regenerated used batteries? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | e. Disassemble them into individual batteries or cells? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | f. Remove batteries from consumer products? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | g. Remove the electrolyte from the battery? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 6. | If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 7. | Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

UNIVERSAL WASTE LAMPS

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| 8. | Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 9. | Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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| | releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] | |
| 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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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

ACCUMULATION TIME

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| 11. | Is the waste accumulated for less than one year? [3745-273-15(A)] If not: | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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

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| 12. | Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input 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)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <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)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| f. | Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] (shipping papers) | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

EMPLOYEE TRAINING

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| 13. | Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
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RESPONSE TO RELEASES

| | | |
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| 14. | Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 15. | Is the material released characterized? [3745-273-17(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 16. | If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

OFF-SITE SHIPMENTS

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

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| 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"/> |
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NOTE: SQUWHs are prohibited to send waste to any other facility.

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| 18. | If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 19. | Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 20. | If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do <u>one of the following</u> : | |
| a. | Receive the waste back? [3745-273-18(E)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Agree to where the shipment will be 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 <u>one of the following</u> : | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| a. | Sending the waste back to the originating handler? [3745-273-18(F)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Sending 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 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"/> |
| 23. | If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

EXPORTS

| | | |
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| 24. | Is waste being sent to a foreign destination? If so: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| c. | Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |