



State of Ohio Environmental Protection Agency

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P.O. Box 1049
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June 30, 2008

Mr. Chris Garnett
Coloramics, LLC
4077 Weaver Court South
Hilliard, OH 43026

**Re: Coloramics, LLC (DBA) Mayco Colors
OHD986998532 – Franklin County
LQG – Compliance Evaluation Inspection
Notice of Violation & Return to Compliance**

Dear Mr. Garnett:

On June 25, 2008, Ohio EPA conducted a compliance evaluation inspection (CEI) at the Coloramics, LLC facility located at 4077 Weaver Court South, Hilliard, Ohio to determine the facility's compliance with Ohio's hazardous waste, land disposal restriction, universal waste, and used oil regulations, as found in Chapter 3745. of the Ohio Administrative Code (OAC). You represented Coloramics and I represented Ohio EPA at the CEI. During the CEI, we also discussed pollution prevention practices that had already been implemented and any possible alternatives.

As a result of the CEI, it has been determined that Coloramics violated the following hazardous waste management rules:

- 1) **OAC Rule 3745-65-16(C), Personnel Training:** Facility personnel must take part in an annual review of the hazardous waste management training required for new employees.

Although a hazardous waste management training program was available and specified to be given annually within the hazardous waste management contingency plan, only on-the-job training was provided and was not documented.

On the afternoon of the CEI, the required training was presented to the hazardous waste management associated employees. Documentation of the completed training was provided for review.

Coloramics must assure that this training is completed at least annually from the date of June 25, 2008. No further action regarding this violation is needed at this time.

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

- 2) **OAC Rule 3745-65-16(D)(4), Personnel Training:** The owner or operator must maintain records at the facility that document that the required training or job experience has been given to, and completed by, facility personnel.

No formal training session was completed since the last CEI, only on-the-job training, and no associated documentation has been maintained, as required.

On the afternoon of the CEI, the required training was presented to the hazardous waste management associated employees. Documentation of the completed training was provided for review.

Coloramics must assure that this training is completed and documented at least annually from the date of June 25, 2008. No further action regarding this violation is needed at this time.

- 3) **OAC Rule 3745-52-34(C)(1), Accumulation Time of Hazardous Waste:** A generator may accumulate as much as fifty-five (55) gallons of hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, provided the container is closed, except when adding or removing waste, and the container is marked with the words "hazardous waste" or other words that identify the contents of the container.

The 55-gallon container situated under the filter press used to initially manage the hazardous waste filter press cake was not closed or labeled at the time of the CEI. No wastes were being added or removed from the container at this time.

The container was immediately closed and labeled in my presence on this same day. It was reported that these hazardous waste management practices were stressed during the recent training provided to the employees. No further actions are necessary in regards to these violations at this time.

Because all violations cited in this notice of violation were corrected on the same day as the CEI, no further actions are necessary at this time and Coloramics, LLC is returned to compliance.

A copy of the checklists completed as a result of the CEI has been included for your review. Should you have any questions or need additional information, I can be reached by telephone at 614-728-5037.

Mr. Chris Garnett
Coloramics, LLC
Page 3 of 3

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

Respectfully,



Randy Sheldon
Environmental Specialist
Division of Hazardous Waste Management
Central District Office

Enclosures

c: Kristina Durnell, DHWM, CO
~~DHWM, CDO, File~~

RS/nsm NOV



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Ohio Environmental Protection Agency
**RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to kristina.durnell@epa.state.oh.us
or mail it to Kristina Durnell, Central Office

Site EPA ID No.	EPA ID Number: OHD986998532								
Site Name	Name: Coloramics LLC (DBA) Mayco Colors					Website: (Optional)			
Site Location Information	Street Address: 4077 Weaver Court South								
	City, Town, or Village: Hilliard					State: OH			
	County Name: Franklin					Zip Code: 43026			
Site Land Type (check only one)	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"/>	
NAICS code(s) www.census.gov/epcd/www/naics.html									
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Chris			MI:	Last Name: Garnett				
	Phone Number: 614-876-1171					Phone Number Extension: 2200			
	E-Mail Address: cgarnett@maycocolors.com								
	Fax Number: 614-675-2054					Fax Number Extension:			
	Street or P.O. Box: 4077 Weaver Court South								
	City, Town or Village: Hilliard					State: OH		Country: USA	Zip Code: 43026
	Name of Site's Legal Owner: Robert R Umhoefer Trust					Date Became Owner (mm/dd/yyyy): 11/01/2001			
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	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: 10707 Baile Avenue									
City, Town or Village: Chatsworth					Owner Phone #:				
State: CA					Country: USA		Zip Code: 91311		
Name of Site's Operator: Coloramics LLC					Date Became Operator (mm/dd/yyyy):				
Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
Street or P.O. Box: 4077 Weaver Court South									
City, Town or Village: Hilliard					Operator Phone #: 614-876-1171				
State: OH					Country: USA		Zip Code: 43026		
Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
Type of Generator									
<input type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste					
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)									
Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Underground Injection Control Facility				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste									

Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply))			
<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			
(Check all boxes below that apply for each of the three types of facilities above)		Used Oil Activities (Indicate Type(s) of Activity(ies))	
	Managed	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.			
D006	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:
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments:
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)
R. Sheldon			6/25/2008 10:00 am
OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.			
Signature of Owner, Operator, or an Authorized Representative	Name and Title (Print)		Date (mm/dd/yyyy)

FACILITY INFORMATION – PROCESS DESCRIPTION

General Facility Information

Coloramics, LLC (DBA) Mayco Colors is located at 4077 Weaver Court South in Hilliard, Ohio. Coloramics buys/produces various paints and glazes, both water-based and solvent-based, for ceramic products that are sold to customers all over the world. Some products are made special order. This facility has been located at this site since 1975. Coloramics is a large quantity generator (LQG) of hazardous waste and was issued hazardous waste generator ID number OHD986998532. There is currently only D006, D008 coded hazardous waste generated regularly, due to the products used. Coloramics is in the process of ending the production and use of these metal bearing products and the waste stream generation rate has been dropping consistently over the past few years. Some months, only recently, Coloramics would not be a LQG, due to generation of less than 1,000 Kg (2,200 lbs.) of hazardous waste filter cake. Coloramics was required and has filed annual reports for many consecutive years and was inspected as a large quantity generator. Documented, formal hazardous waste management training has not been completed since the last inspection.

Hazardous Waste Accumulation Areas

At the time of the inspection, Coloramics was utilizing a single <90 day hazardous waste accumulation area which is located on the northwest side of the building next to the wastewater treatment unit (WWTU). A 55-gallon container is used to manage the waste filter cake from the filter press associated with the WWTU. When this container is filled, the contents are placed into a 1 CY Gaylord box for on-site management and off-site shipment. Should small amounts of hazardous waste be generated in the laboratory, also only D006 and D008, it is immediately placed into the Gaylord container.

Pollution Prevention

Coloramics has instituted several pollution prevention processes/procedures throughout the years and most recently has made a concentrated effort to reduce and eventually eliminate the lead and cadmium from their products. Some of the processes/procedures already implemented include: 1) small equipment used in the production of lead and cadmium containing products are now washed in a special sink that filters the solids and the wastewaters go into the WWTU instead of discharge directly into the City of Columbus wastewater treatment system and the filters are placed directly into the hazardous waste Gaylord container when changed; 2) when dark colors of solvent-based products are continuously produced, the equipment is not meticulously cleaned with the solvent product due to like colors produced which saves solvent; 3) cleaning solvent are reused several times versus a single use; 4) cleaning solvent is supplied and used solvent managed by Crystal Clean as a product for continued use; 5) high

mercury spent fluorescent light bulbs are recycled and many non-hazardous low mercury bulbs are used where possible; 6) no paper rags are used and the cloth rags are laundered through Cintas commercial laundry; 7) wooden pallets are reused many times, until they are not useable or are sold for reuse.

Process Descriptions, Waste Generation and Management

Water-based products, including those bearing lead and cadmium, are first blended with water. All of the raw materials are dry powders. After blending they are either ball milled or run through a colloid mill for particle size reduction. All water used for cleanup is captured in a trench that goes directly to the WWTU. There are no outlets or floor drains to the sewer system. The wastewater is put through a filter press and any solids captured may be reused. The filter press cake is initially managed in a 55-gallon container, which was not closed or labeled, and when filled the waste is placed into a 1 CY Gaylord box located in the <90 day hazardous waste accumulation area. The hazardous waste is coded D006, D008. The hazardous waste is managed at Michigan Disposal Waste Treatment Plant in Belleville, MI. To date, slightly over 6,000 pounds of this hazardous waste has been shipped this calendar year and the current Gaylord container is approximately ½ filled.

Infrequently, off-specification batches of lead and cadmium bearing paints/glazes that cannot be put through the WWTU or be reused as a product require disposal as a hazardous waste. If necessary, this D006, D008 hazardous waste is shipped to Enviroserve in Cleveland, OH for management/disposal.

Solvent-based ceramic products are also purchased/produced. These products are made using the same types of equipment/methods as the water-based products, except for the water and process rinsing/cleaning. Crystal Clean virgin solvent is used to clean the production equipment. This cleaning is conducted at the western end of the building, across from the non-metal bearing equipment wash area. The solvent is used to clean the equipment and is then placed back into the container until the solvent is no longer useable. Due to this process cleaning method, much less solvent is used than in previous years. When not useable by Coloramics, Crystal Clean takes the solvent back as a product for additional use by other customers.

Lead and cadmium bearing crystals are manufactured for use in the ceramic products in the Crystal Room located on the south side of the facility. This hazardous solid waste is placed directly into the 1 CY Gaylord box when the room is cleaned out.

A single Crystal Clean parts washer with Crystal Clean solvent is located in the area near the solvent product and is used to clean equipment. When the solvent is spent, it is taken back by Crystal Clean as a product for additional use by other customers.

All drains at the facility empty either into a sedimentation trough or a sedimentation tank. All are periodically cleaned and the resulting residue is managed in the Gaylord container as D006, D008 hazardous waste.

Latex paint is manufactured by blending the various powders, resins, and pigments in a 100-gallon plastic tank. There are a few 85-gallon and 200-gallon capacity tanks that also may be used. The material has the viscosity of very thick cream. After quality control checks, most of the product is bottled by machine into 4 fl. oz. plastic jars. Some pints and gallon containers are filled by hand, due to the small volume needed of these sizes. This manufacturing equipment is cleaned in the wash area located at the far northwest end of the building where non-metal bearing equipment is cleaned and the water is discharged directly to the Columbus sanitary system.

Brushes are cleaned in a special sink to capture solids and all water goes through the on-site WWTU. Any captured solids/filters are placed into the Gaylord container.

Waste ceramic tiles used for QA/QC testing in the laboratory are sometimes coated with lead and cadmium bearing paints/glazes. These wastes are managed in the Gaylord container when generated.

Empty aerosol cans are depressurized and disposed with the regular trash. If aerosol products are returned by customers as not useable, they are returned to the manufacturer as defective.

High mercury spent fluorescent lights are containerized and managed in the maintenance shop area. The bulbs are taken to Environmental Recycling in Bowling Green, OH for recycling. Coloramics has made a concentrated effort to use low mercury, non-hazardous waste bulbs where ever possible.

Batteries from safety lights were removed during the past year. These batteries were taken to Batteries Plus for recycling. None of this type of battery was in accumulation at the time of the inspection.

Any used lead acid batteries are recycled through IBS in Columbus, OH.

No paper rags are used by Coloramics in the production area. Cloth rags are laundered through Cintas in Columbus, OH.

Wooden pallets are reused by Coloramics many times. When too many are on hand for their own use, they are sold to outside persons for use.

Waste Management manages all of Coloramics regular trash.

Coloramics also produces plaster molds and some associated plaster products. Waste plaster is disposed with the regular trash. P2 opportunities have been considered throughout the years, but have been determined to not be cost effective.

Only small amounts of used oil are periodically generated by Coloramics. This only occurs during machine servicing, which is not often. The used oil, never in quantities greater than 5 gallons, is immediately taken to Auto Zone for recycling.

Coloramics provides class room instruction to customers on the various uses of their products.

**L IGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: ≥1,000 Kg. (~300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

- 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A
- 2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] Yes No N/A
- 3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes No N/A
- 4. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] Yes No N/A

Remarks: Previous annual reports were filed late, but facility was returned to compliance 8-9-06.

- 5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] Yes No N/A
- 6. Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] Yes No N/A
- 7. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] Yes No N/A
- 8. Does the generator accumulate hazardous waste? Yes No N/A

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

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

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

- 10. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)] **Remarks: Generator does not treat HW other than in an exempt WWTU that discharges to POTW.**

- a. Container that meets 3745-66-70 to 3745-66-77? Yes No N/A
- b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? Yes No N/A
- c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A
- d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: Complete appropriate checklist for each unit.

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

- 11. Does the generator export hazardous waste? If so: Yes No N/A
- a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] Yes No N/A
- b. Has the generator complied with special manifest requirements? [3745-52-54] Yes No N/A
- c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] Yes No N/A
- d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes No N/A
- e. Are export related documents being maintained on-site? [3745-52-57(A)] Yes No N/A

MANIFEST REQUIREMENTS

- 12. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes No N/A

- 13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Yes No N/A

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]

- 14. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] Yes No N/A

NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].

15. If the transporter was unable to deliver 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)] **Remarks: Transporter was able to deliver all shipments to the designated facility.** Yes No N/A
16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] Yes No N/A
17. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] **Remarks: All manifests were signed and received back within 35 days.** Yes No N/A
18. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes No N/A
19. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes No N/A

NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.

PERSONNEL TRAINING

20. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] **Remarks: Although a training program was available and many aspects often discussed, no formal training and associated documentation, only on-the-job training, were completed since the last CEI (5 years). HW Contingency Plan and HW management training were completed and documented on the afternoon of the CEI.** Yes No N/A
21. Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes No N/A
22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A
23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] **Remarks: There is constant on-the-job training given by Mr. Garnett to not only new but veteran employees.** Yes No N/A
24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] **Remarks: A formal training session, as specified in the facility HW contingency plan, with documentation was completed the afternoon of the CEI.** Yes No N/A
25. Does the generator keep records and documentation of:
- a. Job titles [3745-65-16D(1)]? Yes No N/A
- b. Job descriptions [3745-65-16D(2)]? Yes No N/A
- c. Type and amount of training given to each person [3745-65-16D(3)]? Yes No N/A
- d. Completed training or job experience required [3745-65-16D(4)]? **Remarks: Facility did not have records documenting the completed training.** Yes No N/A
26. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] **Remarks: All employees records are maintained and not destroyed.** Yes No N/A

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

Job Performed	Name of Employee	Date Trained
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CONTINGENCY PLAN

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

NOTE: If the facility already has a "Spill Prevention, Control and Counter measures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]

- 29. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes No N/A
- 30. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] Yes No N/A
- 31. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes No N/A

NOTE: The emergency coordinator shall be 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

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

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

PREPAREDNESS AND PREVENTION

- 33. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes No N/A
- 34. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:
 - a. Internal communications or alarm system? [3745-65-32(A)] Yes No N/A
 - b. Emergency communication device? [3745-65-32(B)] Yes No N/A
 - c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes No N/A
 - d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes No N/A

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

- 35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes No N/A
- 36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A

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

SATELLITE ACCUMULATION AREA REQUIREMENTS

42. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes No N/A
- b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes No N/A
- c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A
- d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] **Remarks: No acute HW is generated.** Yes No N/A
- e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] **Remarks: Filter press satellite container was not closed and no HW was being added or removed.** Yes No N/A
- f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] **Remarks: The filter press satellite container was not labeled.** Yes No N/A
43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes No N/A
- a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes No N/A
- b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes No N/A

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less 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

44. Has the generator marked containers with the words "Hazardous Waste"? [3745-52-34(A)(3)] Yes No N/A
45. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No N/A
46. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A
- b. In good condition? [3745-66-71] Yes No N/A
- c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A
- NOTE: Record location on process summary sheets, photograph the area, and record on facility map.*
47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. Yes No N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes No N/A
49. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] **Remarks: No incompatible wastes are generated.** Yes No N/A

50. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] **Remarks:** Yes No N/A

This is not done.

51. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] Yes No N/A

Remarks: This is not done.

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

52. If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] **Remarks: No** Yes No N/A

<90 day are has been closed.

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

53. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes No N/A

54. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] **Remarks: HW is now normally managed in 1 CY containers only.** Yes No N/A

55. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes No N/A



**GENERATOR LDR CHECKLIST
DOES NOT APPLY TO CESQGS**

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)] **Remark: LDRs do apply.** Yes No N/A

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)] Yes No N/A

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 No N/A

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 No N/A

5. Does the generator generate a listed HW that exhibits a characteristic? If yes, Yes No N/A

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 No N/A

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 No N/A

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 to meet the LDR treatment standard? Yes No N/A

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 No N/A

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 No N/A

10. Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)] Yes No N/A

a. Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)] Yes No N/A

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 No N/A

b. Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)] Yes No N/A

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 No N/A

d. A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]. Yes No N/A

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"/>
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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"/>
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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)] Remark: Not these kinds of hazardous wastes.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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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"/>
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13.	Is the HW a metal-bearing HW?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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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 are 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)] Remark: The metal-bearing HW is not incinerated, combusted, or blended and burned.	
	i.	Contains > 1% TOC?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	ii.	Contains organic constituents or cyanide at levels greater than the UST levels?	Yes <input type="checkbox"/> No <input checked="" 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 checked="" type="checkbox"/> N/A <input type="checkbox"/>
	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	v.	Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
15.		Was the HW treated by wastewater treatment?	Yes <input checked="" type="checkbox"/> No <input 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 checked="" type="checkbox"/> N/A <input type="checkbox"/>
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b.	Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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GENERATOR TREATMENT			
16.	Does the generator treat to meet LDRs on-site [3745-270-40(A)]?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <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"/> N/A <input type="checkbox"/>
	If "Yes"...complete the rest of the checklist. If "No"...stop...you are done.		
a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: This is a laboratory analysis but it does not have to be kept by the generator.</i>			
c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Does the WAP include the testing frequency of the treated HW/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"/> N/A <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"/> N/A <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"/> N/A <input type="checkbox"/>
NOTIFICATION FORM			
17.	a.	Contains all information in #11 a-g above and	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	If the treated HW/soil is listed.....notification contains the following certification statement: " I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or trough knowledge of the waste, to support this certification that the waste complies with the treatment stands 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."	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:	
	i.	Send a one-time notification to the director?[3745-270- 09 (D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	ii.	Maintain a copy of the notice onsite?[3745-270-09(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iii.	Include in the notification: [3745-270-09(D)(1)(a)]	
	1.	Name & address of receiving landfill?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	2.	Description of HW when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	3.	HW code when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	4.	Treatability group when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	5.	Underlying hazardous constituents present when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iv.	Contain the right certification statement as required by 3745-70-07(b)(4)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>



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SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - LAMPS

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

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

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes ___ No X N/A ___ RMK# ___
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes ___ No X N/A ___ RMK# ___

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE LAMPS

3. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] Yes X No ___ N/A ___ RMK# ___
4. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes X No ___ N/A ___ RMK# ___
5. 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 X No ___ N/A ___ RMK# ___

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

ACCUMULATION TIME

6. Is the waste accumulated for less than one year? Yes No N/A RMK#
[3745-273-15(A)] If not:
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes No N/A RMK#

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

7. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes No N/A RMK#
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes No N/A RMK#
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes No N/A RMK#
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes No N/A RMK#
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes No N/A RMK#
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes No N/A RMK#
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes No N/A RMK# 1

EMPLOYEE TRAINING

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

RESPONSE TO RELEASES

9. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes No N/A RMK#
10. Is the material released characterized? [3745-273-17(B)] Yes No N/A RMK#
11. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes No N/A RMK#

OFF-SITE SHIPMENTS

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

12. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes No N/A RMK#

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

13. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes No N/A RMK#
14. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No N/A RMK#
15. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes No N/A RMK#

- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes No N/A RMK#
16. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes No N/A RMK#
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes No N/A RMK#
17. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes No N/A RMK#
18. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes No N/A RMK#

EXPORTS

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

REMARKS

1. High mercury spent fluorescent light bulbs are sent directly to the destination facility at the same time of the hazardous waste shipments, at least 4 times per year, and are documented by manifest.