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State of Ohio Environmental Protection Agency

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P.O. Box 1049  
Columbus, OH 43216-1049

February 26, 2007

Re: Leggett & Platt  
Small Quantity Generator  
OH0 000 935 189  
Franklin County, CDO  
NOV - PRTC

Mr. John Santo  
Leggett & Platt  
939 East Starr Avenue  
Columbus, OH 43201

Dear Mr. Santo:

Thank you for accompanying me during Ohio EPA's February 21, 2007 inspection of Leggett & Platt's facility in Columbus, Ohio. Leggett & Platt was inspected to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). During the inspection, I also helped you identify possible alternatives to prevent pollution by reducing wastes generated.

We found the following violations of Ohio's hazardous waste laws. In order to correct these violations, you must do the following and send me the required information within 30 (thirty) days of your receipt of this letter:

1. **OAC Rule 3745-52-34(C)(1)(b), Accumulation Time of Hazardous Waste:** A generator may accumulate as much as 55-gallons of hazardous waste in containers at or near the point of generation which is under the control of the operator of the process which is generating the waste, without a permit and without complying with paragraph (A) of this rule, provided he marks his containers with the words "hazardous waste" or other words that identify the contents of the containers.

The satellite area accumulation container located in the paint room had a paper label attached to the container. Although reportedly labeled with words identifying the contents of the container as hazardous waste, this label was not legible.

On this same day, in my presence, this satellite accumulation area container was appropriately labeled with the words, "hazardous waste." This violation has been adequately abated.

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

2. **OAC Rule 3745-66-73(A), Management of Containers:** A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

The satellite area accumulation container in the paint room was not appropriately closed at the time of the inspection and no waste was being added or removed at this time.

On this same day, in my presence, this satellite accumulation area container was appropriately closed. This violation has been adequately abated.

3. **OAC Rule 3745-279-22(C)(1), Used Oil Storage Requirement for Generators:** Containers and tanks used to store used oil at generator facilities must be labeled or marked with the words "used oil."

The 55-gallon container designated for the management of used oil was not appropriately labeled with the words "used oil" at the time of the inspection.

On this same day, in my presence, this container of used oil was appropriately labeled. This violation has been adequately abated.

4. **OAC Rule 3745-66-73, Inspections:** The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The owner or operator must record inspections in an inspection log or summary.

Although it was reported that the <180 day hazardous waste accumulation area is reviewed and/or inspected on an almost daily basis, the results of these inspections have not been consistently recorded in a log or summary.

Weekly inspections of this hazardous waste accumulation area must be conducted at least once every seven days with the results of the inspections recorded in a log or summary. Please send 3 consecutive weeks of completed <180 day hazardous waste accumulation area logs or summaries to my attention for review.

#### General Comments

Please find enclosed a "Newstripe" publication discussing the management of aerosol cans and any associated wastes. As we discussed, once these cans are punctured and any contents remaining removed, the can could be managed as scrap metal. Please be advised that supplying you with this document is not an endorsement by Ohio EPA of this

Leggett & Platt  
NOV - PRTC  
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specific product but is only intended to better provide you with a description of this waste management concept. Also be advised that an appropriate hazardous waste determination/characterization associated with the contents and management of this container would be required.

Enclosed, you will also find a copy of the checklists completed during the inspection. Should you have any questions, please feel free to call me at 614-728-5037. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/opp>.

Respectfully,



Randy Sheldon  
Division of Hazardous Waste Management  
Central District Office

Enclosures

c: Tammy McConnell, DHWM, CO  
DHWM; CDO File

RS/ct DSHWMnov 07



## **FACILITY INFORMATION - PROCESS DESCRIPTION - WASTE MANAGEMENT**

### Company History

Leggett & Platt (L&P) was founded as a partnership in Carthage, Missouri in 1883 and was incorporated in 1901. L&P, originally a pioneer in the development of bedsprings, is now a diversified manufacturer that conceives, designs, and produces a wide range of engineered components and products that can be found in many homes, offices, retail stores, and automobiles. The business is currently organized into 29 business units, those units organized into 11 groups, and those groups into 5 segments (i.e., Residential Furnishings; Commercial Fixturing & Components; Aluminum Products; Industrial Materials; Specialized Products (Automotive, Machinery, Commercial Vehicle Products)).

### Facility Information

This Leggett & Platt facility, (FKA) America's Body Company and/or Buckeye Truck Equipment, is located at 939 East Starr Avenue in Columbus, Ohio 43201. This facility is a part of the Commercial Vehicle Products group, which was created in 2005 with the acquisition of the former America's Body Company. Previously manufactured products for service van interiors, truck bodies for cargo vans, flatbed trucks, service trucks, and dump trucks are fitted and installed at this location. It was estimated that 95% of the work completed is for installation of new products with the remaining 5% as service work on previously installed equipment. This business address was issued hazardous waste generator ID number OH0 000 935 189. This business entity is currently a small quantity generator of hazardous waste (paint wastes), a small quantity universal waste generator (spent fluorescent/mercury laden light bulbs), and a used oil generator (hydraulic fluids).

There are 2 main buildings used at this facility for installation of the products. The "paint building" is located east of the "office/sales building" where installations also take place. In the paint building, there are 2 large paint spray booths and/or drying ovens. A diked paint room, used for paint storage, paint mixing, spray gun cleaning, hazardous waste satellite accumulation, etc. is located in the center of the building, between the booths/ovens. Per discussions with Ohio EPA staff, these paint booths/ovens have been reviewed and permitted by Ohio EPA, Division of Air Pollution Control. A small building located east of the paint building and a large building to the north across Starr Avenue are used for warehousing of products.

### Waste Generation and Management

Some of the equipment installations require painting. This painting may be completed by paint spray guns. Hazardous waste coded D007, D008, F003, F005 is generated from the paint spray gun cleaning operations. This hazardous waste is initially managed in a satellite accumulation area container (~ 3 gallons) located in the paint room. When this container is filled, it is taken to the <180 day hazardous waste accumulation shed located near the east entrance to the paint building where it is emptied into a 55-gallon metal

container. About 50 -100 gallons of this hazardous waste is managed by Heritage-Crystal Clean, Gahanna, Ohio on a monthly basis. It is ultimately taken to Giant Resource Recovery in Sumter, SC (SCD036275626) for disposal/incineration (H061). It was discussed that the use of paint spray gun cups may reduce the amount of solvent required for cleaning the spray guns after use. Although a paper label was present on the hazardous waste satellite accumulation area container, reportedly with the words "hazardous waste" listed on it, the label was not legible. Also, this satellite accumulation container was not appropriately closed. These violations were abated on this same day. As the <180 day hazardous waste accumulation area is reviewed/inspected on an almost daily basis, the required weekly documentation of the inspections was not being consistently recorded.

Used oils (mainly hydraulic fluids) are generated at the facility. This used oil is also managed by Heritage-Crystal Clean. About 55 gallons is sent off-site every other month. There was 1 55-gallon container currently being used for accumulation and was located with the oil products at the east end of the office/sales building. The container of used oil was not appropriately labeled at the time of the inspection. This violation was abated on this same day.

A Crystal Clean, model 1830, parts washer is located in the service area of the office/sales building. This machine is supplied with Crystal Clean 106 mineral spirits and is a part of the Crystal Clean reuse program, previously acknowledged and accepted by Ohio EPA.

It was reported that as old light bulbs go out, they are being replaced with non-hazardous green tipped bulbs by McKeever Electric and Supply, Columbus, Ohio. The spent, non-green tipped/mercury laden bulbs, are taken by McKeever Electric when they are replaced with the new bulbs.

Regular trash, recyclable paper products, wood, and scrap metals are managed separately at the facility and are taken off-site by Republic Waste Services, Columbus, Ohio.

Paint booth filters were characterized annually for several years by analytical testing. The test results did not indicate the presence of characteristic hazardous wastes above regulatory requirements. As the products and processes that generate these wastes have reportedly not changed since the last analytical testing, these filters continue to be managed as a non-hazardous waste

When emptied, aerosol cans are placed with the regular trash. It was discussed that equipment for puncturing and/or containing any possible remaining liquids or gases should be purchased and put into use. It was also discussed that after puncturing the cans could possibly be managed with the scrap metals.

**SMALL QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

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

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

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

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. Has the generator obtained a U.S. EPA I.D. number? [3745-52-12] Yes  No  N/A
3. Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)] Yes  No  N/A
4. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)] Yes  No  N/A
5. Does the generator accumulate hazardous waste? Yes  No  N/A

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

6. Has the generator accumulated hazardous wastes **in excess of** (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)] Yes  No  N/A

NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]

7. Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)] Yes  No  N/A

NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.

8. Does the generator treat hazardous waste in a:
- 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) and 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

\* The generator does not treat wastes.

NOTE: Complete appropriate checklist for each unit.

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

### MANIFEST REQUIREMENTS

9. Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)] Yes  No  N/A

10. Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)] Yes  No  N/A

a. Does the contractual agreement specify the type of waste and frequency of shipment? Yes  No  N/A

b. Is the transport vehicle owned and operated by the reclaimer? Yes  No  N/A

c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? Yes  No  N/A

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

11. Have items 1 through 20 of each manifest been completed? [3745-52-20(A)] Yes  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 complete. [3745-52-20 (A)]

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

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

13. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes  No  N/A

\* Transporter was always able to deliver wastes to the initial designated facility.

14. Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)] Yes  No  N/A

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.

15. If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? 3745-52-42(B)] Yes  No  N/A

\* All manifests were returned signed within 60 days.

16. Are signed copies of all manifests 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.

## PREPAREDNESS AND PREVENTION

17. Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)] Yes  No  N/A
18. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]
- a. Name and telephone number of emergency coordinator? Yes  No  N/A
- b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes  No  N/A
- c. Telephone number of local fire department? Yes  No  N/A
19. Are employees familiar with waste handling and emergency procedures [3745-52-34(D)(5)(c)] Yes  No  N/A
20. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(a)] Yes  No  N/A
21. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31] Yes  No  N/A
22. Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:
- a Internal Alarm system? [3745-65-32(A)] Yes  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? [3745-65-32(D)] Yes  No  N/A
23. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency [3745-65-33] Yes  No  N/A
24. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes  No  N/A
25. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)] Yes  No  N/A
26. If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32?) [3745-65-34(B)] Yes  No  N/A

27. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes  No  N/A
28. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes  No  N/A
29. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes  No  N/A
- \* No authorities have refused to respond to this facility.

#### SATELLITE ACCUMULATION AREA REQUIREMENTS

30. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes  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 one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes  No  N/A
  - d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. Yes  No  N/A
  - e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes  No  N/A
- Satellite accumulation area container was not labeled to be legible.
31. 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 the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] 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

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

#### USE AND MANAGEMENT OF CONTAINERS

32. Has the generator marked containers with the words "Hazardous Waste" [3745-52-34(D)(4)] Yes  No  N/A
33. Is the accumulation date on each container? [3745-52-34(D)(4)] Yes  No  N/A
34. Are hazardous wastes stored in containers which are:

- a. Closed (except when adding moving 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\_\_

**Satellite accumulation area container was not closed.**

*NOTE: Record location on process summary sheets and photograph the area.*

35. Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days. Yes  No  N/A\_\_
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes\_\_ No  N/A\_\_

**Although reportedly inspected almost daily, the inspections were not being consistently recorded.**

36. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes  No  N/A\_\_
37. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B) 3745-66-77(A)] Yes\_\_ No  N/A\_\_\*
- \* This is not done at this facility.
38. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B) ? [3745-66-77(B)] Yes\_\_ No  N/A\_\_\*
- \* This is not done at this facility.

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

**PRE-TRANSPORT REQUIREMENTS**

39. Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes  No  N/A\_\_
40. Does each container ≤100 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes  No  N/A\_\_
41. 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\_\_



E-mail this completed form to <a href="mailto:tammy.mcconnell@epa.state.oh.us">tammy.mcconnell@epa.state.oh.us</a> or mail it to Tammy McConnell, Central Office	U.S. Environmental Protection Agency <b>RCRA SUBPART C SITE IDENTIFICATION/VERIFICATION FORM</b>		For Ohio EPA use only																		
2. Site EPA ID No.	EPA ID Number: OH0 000 935 189																				
3. Site Name	Name: Leggett & Platt		Website (optional):																		
4. Site Location Information	Street Address: 939 East Starr Avenue																				
	City, Town, or Village: Columbus	State: OH																			
	County Name: Franklin	Zip Code: 43201																			
5. Site Land Type (check only one)	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	X									
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6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	A.		B.																		
C.		D.																			
7. Facility Representative:  Additional names can be recorded in number 12.  Only provide address information if it is different than the site address.	First Name: John		MI:	Last Name: Santo																	
	Phone Number: 614-299-1136		Phone Number Extension:																		
	E-Mail Address:																				
	Fax Number: 614 299 2314		Fax Number Extension:																		
	Street or P.O. Box: 939 East Starr Avenue																				
	City, Town or Village: Columbus																				
	State: Ohio		Country: USA		Zip Code: 43201																
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	A. Name of Site's Legal Owner: ERC Real Estate LLC		Date Became Owner (mm/dd/yyyy): 02/12/1998																		
	Owner Type: Mark with an X		<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	X							
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	X																				
	Street or P.O. Box: 1 Acorn Drive																				
	City, Town, or Village: Oakwood Village		Owner Phone #:																		
	State: Ohio		Country: USA		Zip Code: 44146																
	B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):																		
	Operator Type: Mark with an X		<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other								
	Private	County	District	Federal	Indian	Municipal	State	Other													
Street or P.O. Box:																					
City, Town, or Village:		Operator Phone #:																			
State:		Country:		Zip Code:																	
9. Violations Cited?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No																		
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)																					
<input type="checkbox"/> Not Regulated																					

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

**A. Hazardous Waste Activities**

(choose only one of the following categories)

- |                                     |  |                          |   |
|-------------------------------------|--|--------------------------|---|
| <input type="checkbox"/>            | UNKNOWN: Cited for violation of 3745-52-11           | <input type="checkbox"/> | 3. Treater, Storer or Disposer of Hazardous Waste |
| <input type="checkbox"/>            | a. Large Quantity Generator (LQG):                   | <input type="checkbox"/> | 4. Recycler of Hazardous Waste                    |
| <input checked="" type="checkbox"/> | b. Small Quantity Generator (SQG)                    | <input type="checkbox"/> | 5. Exempt Boiler and/or Industrial Furnace        |
| <input type="checkbox"/>            | c. Conditionally Exempt Small Quantity Generator     | <input type="checkbox"/> | a. Small Quantity On-site Burner Exemption        |
| <input type="checkbox"/>            | d. United States Importer of Hazardous Waste         | <input type="checkbox"/> | b. Smelting, Melling, Refining Furnace Exemption  |
| <input type="checkbox"/>            | e. Mixed Waste (hazardous and radioactive) Generator | <input type="checkbox"/> | 6. Underground Injection Control Facility         |
|                                     |  | <input type="checkbox"/> | 7. Hazardous Waste Transporter                    |

**B. Universal Waste Activities**

**C. Used Oil Activities**

- |                                     |   |                                     |   |
|-------------------------------------|---|-------------------------------------|---|
| <input checked="" type="checkbox"/> | 1. Small Quantity Handler of Universal Waste  | <input checked="" type="checkbox"/> | 1. Used Oil Generator                                     |
|                                     | (Indicate types of universal waste generated and/or accumulated (check all boxes that apply): | <input type="checkbox"/>            | 2. Used Oil Transporter Indicate Type(s) of Activity(ies) |
| <input type="checkbox"/>            | 2. Large Quantity Handler of Universal Waste  | <input type="checkbox"/>            | Transporter   |
|                                     | (accumulates 5,000 kg or more).   | <input type="checkbox"/>            | Transfer Facility   |
| <input type="checkbox"/>            | 3. Destination Facility for Universal Waste   | <input type="checkbox"/>            | 3. Used Oil Processor and/or Re-refiner                   |
|                                     | (Check all boxes below that apply for each of the three types of facilities above.)           | <input type="checkbox"/>            | Indicate Type(s) of Activity(ies)                         |
|                                     |   | <input type="checkbox"/>            | Processor   |
|                                     |   | <input type="checkbox"/>            | Re-refiner  |
|                                     |   | <input type="checkbox"/>            | 4. Off-Specification Used Oil Burner                      |
|                                     |   | <input type="checkbox"/>            | 5. Used Oil Fuel Marketer -                               |
|                                     |   | <input type="checkbox"/>            | Indicate Type(s) of Activity(ies)                         |
|                                     |   | <input type="checkbox"/>            | a. Marketer Who Directs Shipment of Off-Specification Oil |
|                                     |   | <input type="checkbox"/>            | b. Used Oil to Off-Specification Used Oil Burner          |

Generated      Accumulated

- |                |                                     |                          |
|----------------|-------------------------------------|--------------------------|
| A. Batteries   | <input type="checkbox"/>            | <input type="checkbox"/> |
| B. Pesticides  | <input type="checkbox"/>            | <input type="checkbox"/> |
| C. Thermostats | <input type="checkbox"/>            | <input type="checkbox"/> |
| D. Lamps       | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your 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.

D007	D008	F003	F005			
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12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

N	Announced?	Additional Facility Representatives:	Kelly Moore
N	Tanks?	Other comments: Container labeling violations and closed container violation abated at the time of the inspection. Inspections of container accumulation area to be documented and provided for review.	
Y	Containers?		

13.	Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm-dd-yyyy) (HH:MM)
	R. Sheldon		02/21/2007 10:30 AM

14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of owner, operator, or an authorized representative	Name and Title (Print)	Date (mm-dd-yyyy)
---	------------------------	-------------------

## USED OIL INSPECTION CHECKLIST (Short Version)

**NOTE:** *This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.*

### PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes  No  N/A  RMK#
- Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes  No  N/A  RMK#
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes  No  N/A  RMK#
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes  No  N/A  RMK# 1

### USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes  No  N/A  RMK# 2
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes  No  N/A  RMK# 3
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes  No  N/A  RMK#
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes  No  N/A  RMK#
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes  No  N/A  RMK# 4
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes  No  N/A  RMK#
- b. Contained the release? Yes  No  N/A  RMK#

- c. Cleaned up and properly managed the used oil and other materials? Yes  X No  N/A \_\_\_ RMK# \_\_\_
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes  X No  N/A \_\_\_ RMK# \_\_\_
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes \_\_\_ No  X N/A \_\_\_ RMK# \_\_\_
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes \_\_\_ No  N/A  X RMK# \_\_\_
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes \_\_\_ No  N/A  X RMK# \_\_\_
- c. Are the combustion gases from heater vented to the ambient air? Yes \_\_\_ No  N/A  X RMK# \_\_\_
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes  X No  N/A \_\_\_ RMK# \_\_\_

**USED OIL COLLECTION CENTERS AND AGGREGATION POINTS**

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes \_\_\_ No  N/A  X RMK# \_\_\_
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes \_\_\_ No  N/A  X RMK# \_\_\_
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes \_\_\_ No  N/A  X RMK# \_\_\_

**WASTE EVALUATION**

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes  X No  N/A \_\_\_ RMK# \_\_\_

G:\RSHELDON\amer body\uo\_07.wpd

**REMARKS**

1. The used oil is not burned.

2. Nothing is mixed with the used oil.
3. No used oils are known to be generated containing >1,000 ppm halogens.
4. The container of used oil was not appropriately labeled with the words "used oil."



**SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS**

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

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

**PROHIBITIONS**

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

**WASTE MANAGEMENT & LABELING/MARKING**

**UNIVERSAL WASTE BATTERIES**

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes \_\_\_ No  N/A \_\_\_ RMK# 1
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes \_\_\_ No  N/A \_\_\_ RMK# 1
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- b. Mix battery types in one container? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- c. Discharge batteries to remove the electric charge? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- d. Regenerated used batteries? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- e. Disassemble them into individual batteries or cells? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- f. Remove batteries from consumer products? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

g. Remove the electrolyte from the battery?

Yes  No  N/A  RMK#

If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)?  
[3745-273-13(A)(2)]

Yes  No  N/A  RMK#

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)]

Yes  No  N/A  RMK# 1

a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]

Yes  No  N/A  RMK#

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]

Yes  No  N/A  RMK#

7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"?  
[3745-273-14(A)]

Yes  No  N/A  RMK# 1

### UNIVERSAL WASTE LAMPS

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]

Yes  No  N/A  RMK# 2

9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]

Yes  No  N/A  RMK# 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 \_\_\_ No  N/A \_\_\_ RMK# 2

**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**

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# 2

- 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 X RMK# \_\_\_

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

12. 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# 2

- 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 X 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 X 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 X 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 X 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 X RMK# \_\_\_

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

Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

### EMPLOYEE TRAINING

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 \_\_\_ No  N/A \_\_\_ RMK# 2

### RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]

Yes  No  N/A \_\_\_ RMK# \_\_\_

15. Is the material released characterized? [3745-273-17(B)]

Yes  No  N/A \_\_\_ RMK# \_\_\_

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  No  N/A \_\_\_ RMK# \_\_\_

### OFF-SITE SHIPMENTS

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

17. 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.*

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 \_\_\_ No  N/A \_\_\_ RMK# 2

19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)]

Yes \_\_\_ No  N/A \_\_\_ RMK# 2

20. 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# 2
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# 2
21. 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 X 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 X RMK# \_\_\_
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 \_\_\_ No  N/A \_\_\_ RMK# 2
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 \_\_\_ No  N/A \_\_\_ RMK# 2

**EXPORTS**

24. Is waste being sent to a foreign destination? If so: Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# 2
- 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 X 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 X 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 X RMK# \_\_\_

## REMARKS

1. Used batteries are not managed at the facility. Only new batteries are placed into new vehicles.
2. Spent light bulbs are taken back by McKeever Electric and Supply, Columbus, Ohio for management/recycling/disposal at the time of their replacement. There is no accumulation and/or management of spent bulbs at this facility.

## LDR CHECKLIST

### GENERAL LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] If so: Yes  No  N/A \_\_\_ RMK# \_\_\_
- a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)] Yes  No  N/A \_\_\_ RMK# \_\_\_
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes  No  N/A \_\_\_ RMK# \_\_\_
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] Yes  No  N/A \_\_\_ RMK# \_\_\_
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes  No  N/A \_\_\_ RMK# \_\_\_
4. Does the generator generate a characteristic hazardous waste? If so: Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes  No  N/A \_\_\_ RMK# \_\_\_

**NOTE: If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.**

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so: Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes  No  N/A \_\_\_ RMK# \_\_\_

**NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]**

6. Has the generator correctly determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)] Yes  No  N/A \_\_\_ RMK# \_\_\_

**NOTE: Wastes with EPA hazardous waste numbers K174 and K175 (chlorinated aliphatic wastes) have specific requirements in rule 3745-270-33. Waste with EPA hazardous waste numbers K176, K177 and K178 (inorganic chemical wastes) have specific requirements in rule 3745-270-36.**

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] Yes  No  N/A  RMK#

**NOTE: A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (§402 of CWA), that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater.[3745-270-03(B)]**

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] Yes  No  N/A  RMK#

**NOTE: In other words, is combustion a legitimate treatment method.**

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes  No  N/A  RMK#

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] If so: Yes  No  N/A  RMK#

a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05] Yes  No  N/A  RMK#

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] If so: Yes  No  N/A  RMK#

a. The facility can land dispose of the waste. [3745-270-06] Yes  No  N/A  RMK#

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment?  
If so:

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

a. Has the facility complied with 3745-270-04?

Yes \_\_\_ No  N/A  RMK# \_\_\_

### REMARKS

### NOTIFICATION AND CERTIFICATION REQUIREMENTS

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

Yes  No  N/A \_\_\_ RMK# \_\_\_

14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so:

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)]

Yes \_\_\_ No  N/A  RMK# \_\_\_

**NOTE: Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit.(See 270-07(A)(7))**

18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? Yes  No  N/A  RMK#   
[3745-270-07(A)(8)]

REMARKS