

Ohio Hazardous Waste

Notifier

A Publication of Ohio EPA, Division of Hazardous Waste Management

Generator Treatment and the Requirements for Closed Containers

Under Ohio's hazardous waste rules, generators can treat hazardous waste they generate on-site without a hazardous waste permit provided they comply with the requirements of Ohio Administrative Code (OAC) rule **3745-52-34**. This is known as "**generator treatment**." We have received numerous questions from hazardous waste generators about the application of the requirement in OAC rule **3745-66-73** for "closed" containers during hazardous waste treatment.

There may be compelling reasons why a container cannot be tightly closed or covered during storage or treatment because of unique circumstances about the waste or how it is being managed. We have discussed some of those unique circumstances in the **closed container guidance**.

Unique circumstances that may occur during treatment include a reaction between the treatment reagent and the hazardous waste that produces volatile gases or vapors that may cause the container to deform or rupture. Another example is when the reaction during treatment generates considerable amounts of heat and waste expansion which may cause the hazardous waste to

ignite or weaken the container if the container is tightly closed.

There are two parts to Ohio's closed container requirements, located in OAC rule 3745-66-73.

- Containers holding hazardous waste must remain **closed during storage**, except when it is necessary to add or remove waste.
- A container holding hazardous waste **shall not be opened, handled or stored in a manner which may rupture the container or cause it to leak**.

The intent of the requirement to maintain a closed container, as explained in the preamble to the May 19, 1980, hazardous waste regulations (45 Federal Register 33066) is:

- to minimize emission of volatile wastes (compliance with the federal hazardous waste rules in **subparts AA, BB and CC** addresses this concern more comprehensively);
- to help protect ignitable or reactive wastes from sources of ignition or reaction;
- to help prevent spills; and

- to reduce the potential for mixing incompatible wastes and direct contact of facility personnel with waste.

There may be specific circumstances when you can comply with the closed container rule without having lids tightly secured to the container and in fact if you were to comply with the first part of the rule you may violate the second part of the rule.

Whether a container must be closed often depends on the type of waste and management activities that are occurring. For example, if a generator is treating waste in a closed container and the type of treatment involves an exothermic reaction, the generator may be violating the second part of the closed container requirements because the heat of the reaction could cause the container to rupture or leak.

When performing generator treatment, keep the following management practices in mind:

- All Land Disposal Restrictions (**OAC Chapter 3745-270**) apply to treatment of any hazardous waste stream.

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Generator Treatment

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- Evaporation of hazardous waste is not appropriate treatment.
- OAC rule **3745-270-03** prohibits dilution of a hazardous waste to meet Land Disposal Restrictions. However, there are exceptions that allow dilution, such as OAC rule 3745-270-03(B).
- Depending on the amount of volatile organic constituents on your waste you may have to comply with federal hazardous waste regulations regarding air emissions from hazardous waste management—found in 40 Code of Federal Regulations (CFR) part **265 subpart AA, BB and CC**. Any questions concerning subparts AA, BB and CC can be directed to U.S. EPA Region V at (312) 353-2000.
- You may be required to comply with applicable provisions of other environmental and workplace regulations.

In general, Ohio EPA, DHWM recognizes that a closed cover or lid is not always feasible. As explained in this article, the requirement for a tightly closed lid on a container does not always apply to a generator's containers while the contents undergo treatment. However, some situations may require evaluation on a case-by-case basis to determine if the intent of the closed container requirement is being met. Contact your district office inspector for site specific questions regarding closed containers and generator treatment:

Central District Office

614-728-3778

Northeast District Office

330-963-1200

Northwest District Office

419-352-8461

Southeast District Office

740-385-8501

Southwest District Office

937-285-6357

For general questions regarding closed containers, contact DHWM's Regulatory Services Unit at: (614) 644-2917 or jeff.mayhugh@epa.state.oh.us.

Example:

A company has safety concerns with leaving lids secured to their drums during a polymerization treatment process. The company explains that the lids interfere with the operation of the company's foam fire suppression system and the secured lids trap gasses that build up during the treatment process. In the event of an explosion or fire, the lids would have to be manually opened for the foam fire suppression to be effective, thus putting emergency response personnel at unnecessary risk.

The company proposes to keep the containers closed until treatment begins. At such time, the lids would be removed. The containers would be immediately closed again once the treatment process ends. The company's containers remain covered in the sense that they remain enclosed in the treatment unit which consists of a built-in containment system. If any waste is spilled within the unit it would be captured.

Ohio EPA has determined that waste containers within the treatment unit are technically in process and not in storage. Therefore, the closed container requirements do not apply to this company's containers while the container contents are undergoing treatment. The company must comply with the closed container requirements before and after treatment. The company may also be subject to regulations under Ohio EPA's Division of Air Pollution Control if discharges to air occur. 

by Rose McLean, Regulatory Services Unit, DHWM

Revised Generic Risk-Based Cleanup Numbers

 n February 13, 2004, Ohio EPA, Division of Hazardous Waste Management (DHWM) released Revised Generic Risk-Based Cleanup Numbers (GRBCN). The revised numbers were developed to help determine if remediation is necessary at facilities with units undergoing closure.

Previously, GRBCNs were published as an appendix to the **Closure Plan Review Guidance (CPRG)** for hazardous waste facilities. However, because the updated CPRG is not available for release, the revised GRBCNs have been released separately to provide access to the revisions in a timely manner (See the **Winter 2003 Notifier**, page 5). Additional information on the GRBCN s can be found in the 1999 CPRG.

The methodology used to generate GRBCNs has not changed. The GRBCN s are based on current toxicological data, and must be regularly updated to reflect new information. The current changes were made to address chemicals with updated toxicity data and to correct minor errors in the previous version. GRBCNs were also calculated for chemicals that were not previously listed. Additions include acrolein, cyclohexane, dichloroacetic acid, 2-methylnaphthalene and mirex. Facilities can request that GRBCN s be developed for chemicals that are not currently listed. DHWM will generate the numbers if adequate information is available. To request additional GRBCNs please contact your district office.

You can obtain a copy of the revised GRBCNs and corresponding chemical-specific input values **online**. If you would prefer to receive a copy by mail, please contact Angela Scott-Owens at (614) 644-2944. 

by Lisa Wiklanski, Risk Assessment Unit, DHWM

Ask the Inspector:

May I throw my used oil filters in the trash?

You first need to know whether your used oil filters are terne plated or non-terne plated.

Terne plated used oil filters are made from a mixture of lead and tin which could cause the filters to exceed established characteristic hazardous waste levels for lead (5.0 mg/L). Before you dispose of terne plated used oil filters, you must evaluate them to determine if they are hazardous waste.

Non-terne plated used oil filters are excluded from the hazardous waste regulations if applicable hot-draining methods have been properly employed. While we would prefer that you have your used oil filters recycled, you can dispose of non-terne plated, hot-drained used oil filters in the regular trash provided they do not contain free liquids.

According to **Ohio Administrative Code (OAC) rule 3745-51-04(B)(13)**, non-terne plated used oil filters that are hot-drained are not hazardous wastes. We consider a filter to be hot-drained when it is brought up to normal engine operating temperature (~60°) just before you remove it for draining. This means that no matter what draining option is used, you should remove the filter from a warm engine and drain it immediately. Three distinct methods of hot-draining can be used.

Gravity Draining: When the filter is removed from the engine, it should be placed with its gasket side down in a drain pan. If the filter has an anti-drain valve, the dome end of the filter should be punctured with a screwdriver or similar device so that oil can flow freely. Allow the filter to drain for 12 to 14 hours.

Crushing: Crush the filter using a mechanical, pneumatic or hydraulic device to squeeze out the used oil/fuel and compact the remaining filter materials.



Disassembly: Separate the filter into its different parts using a mechanical device. This allows most of the used oil/fuel to drain from the filter, and the metal, rubber and paper parts of the filter to be recycled separately.

After the oil has been drained, you may dispose of your non-terne plated filters in the municipal waste stream. However, Ohio EPA encourages you to recycle your filters as scrap metal. The oil collected must be managed in accordance with the used oil regulations in **OAC Chapter 3745-279**. Ohio EPA's Office of Pollution Prevention maintains an **updated list** of commercial used oil marketers and recyclers in Ohio.

If you don't know what kind of filter you have, contact the manufacturer. Industrial filters and other types may still be terne plated. The Filter Manufacturers Council (FMC) maintains information on filters. For specific data on the discontinuation of terne plated oil filters and other types of filters, refer to **FMC's Web site**.



by Dan Sowry, Regulatory Services Unit, DHWM

Ohio Hazardous Waste Facility Board Eliminated

On June 26, 2003, Governor Taft signed into law the 2004-2005 Budget Bill. A provision of this law, Amended Substitute **House Bill H.B. 95** of the 125th General Assembly, eliminated the Ohio Hazardous Waste Facility Board (effective September 26, 2003) and transferred the Board's authority to process certain proposed modifications to existing permits, as well as new facility permit applications, to Ohio EPA. In so doing, this legislation also established both the substantive requirements and the procedural framework for Ohio EPA to follow in its decision-making processes.

Division of Hazardous Waste Management (DHWM) staff are **amending DHWM's administrative rules** on permitting, making them consistent with the statutory changes. These rules will soon be formally proposed. DHWM expects the rules to become effective in September 2004.

New Facility Permit Application Requirements and Review Process

Amended Substitute H.B. 95 requires that new facility permit applicants conduct at least one public meeting prior to the submission of a complete permit application to Ohio EPA in order to inform the community of the proposed hazardous waste management activities and to solicit questions from the community concerning the activities. This meeting is to be held in the township or municipal corporation in which the facility is proposed to be located. In addition, an applicant for a new disposal or thermal treatment facility must give actual notice of the general design and purpose of the facility to the legislative authority

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of each municipal corporation, township and county in which the facility is proposed to be located at least 90 days prior to submission of a permit application to Ohio EPA.

The proposed rules will require all applicants to give notice that an application for a new hazardous waste facility was submitted to Ohio EPA. This notice is provided to the legislative authority of each municipal corporation, township and county in which the facility is proposed to be located and must be provided within 10 days after a permit application is submitted to Ohio EPA. Ohio EPA is also proposing a rule that requires the applicant to initiate a 60-day public comment period and conduct a public meeting before this comment period ends. All comments received will need to be forwarded to Ohio EPA for consideration by the close of the comment period.

An applicant for a new facility permit shall submit a complete permit application and accompanying detail plans, specifications and such information as the director may require to Ohio EPA. On receipt of a complete application, the statute directs Ohio EPA to consider the application and accompanying information to determine if the application complies with Ohio EPA's rules and the requirements of division (D)(2) of **Ohio Revised Code Section 3734.05** (also known as the siting criteria). Ohio EPA will complete its review of the new facility permit application and prepare a draft permit or notice of intent to deny. Ohio EPA will then release the application and appropriate draft action for public comment. The public notice will also announce the time and location of Ohio EPA's public meeting on the draft action. Ohio EPA is required to take final action on the permit within 180-days of the close of the public comment period.

By statute, the permitting process begins with the submission of a complete application to

the director of Ohio EPA. A complete application must include the siting criteria document.

DHWM staff will encourage prospective applicants to work with Ohio EPA to develop an understanding of the siting criteria as they apply to the proposed site prior to the application. Ohio EPA will use this opportunity to express expectations for the form and content of the application.

Once an application is received, DHWM begins its review. DHWM staff will review the siting criteria document for obvious concerns. These concerns will be communicated to the applicant for clarification or rectification. DHWM staff will then complete the review and make a determination on the application and prepare either the draft permit or notice of intent to deny the permit, as well as a responsiveness summary that responds to public comments received during or following the public meeting conducted by the applicant. Ohio EPA then issues a public notice announcing a 45-day public comment period and the availability of the application and appropriate draft action. Ohio EPA will conduct a public meeting on the draft action for every new facility application. At the conclusion of the comment period, Ohio EPA will consider the comments received and develop the final action along with a responsiveness summary to address any comments received. This process must be completed within 180 days of the close of the public comment period. As a final action, Ohio EPA's decision may be appealed to the Environmental Review Appeals Commission.

Permit Modification Application Requirements and Review Process

For continuity purposes, DHWM will continue to refer to Class 3 permit modifications as

Class 3A modifications (when the Board existed, these modifications were under the director's jurisdiction) and Class 3B modifications (when the Board existed, these modifications were also under the Board's jurisdiction). By law, both Class 3A and Class 3B permit modification requests must be acted upon within 365 days after submission of the request.

Class 3B permit modification requests will be processed in a manner very similar to Class 3A modification requests. The current Class 3 procedural requirements found in Ohio Administrative Code (OAC) rule **3745-50-51(D)(3)(c)** continue to apply to Class 3B modification requests (e.g., a 60-day comment period and a public meeting held by the applicant). Ohio EPA will make a determination on whether or not a Class 3B permit modification application demonstrates compliance with the applicable Ohio EPA rules and siting criteria requirements. This determination is made with a method very similar to the process outlined for Class 3A permit modification requests in OAC rule **3745-50-51 (D)(4)**. Ohio EPA will complete its review of the application and prepare a draft permit or notice of intent to deny. Ohio EPA will then issue a public notice of the application and appropriate draft action and provide a 45-day public comment period. Ohio EPA may conduct a public meeting on the draft permit action if significant public interest is shown.

Questions about the permitting process may be directed to Ed Lim at (614) 644-2944 or elim@epa.state.oh.us.

by Ed Lim, Manager, Engineering Unit, DHWM

What Should I Expect During a Hazardous Waste Generator Inspection?

The more hazardous waste your facility generates the greater your regulatory responsibilities. There are three hazardous waste generator classifications: **Conditionally Exempt Small Quantity Generators**, **Small Quantity Generators** and **Large Quantity Generators**. These classifications are based on the cumulative amount of hazardous waste generated (produced), in kilograms, per calendar month. Generator classifications are NOT determined by the amount of waste shipped off-site.

Ohio EPA, Division of Hazardous Waste Management inspectors inspect all three types of generators, plus treatment, storage and disposal facilities in Ohio to determine compliance with Ohio's hazardous waste rules. These rules are located in **Chapter 3745** of the Ohio Administrative Code (OAC). **Ohio Revised Code (ORC) §3734.07** provides Ohio EPA with the authority to conduct inspections. Sometimes inspections are announced, meaning we call to schedule a time for our inspection, but other times inspections are unannounced. A generator should always be prepared for an Ohio EPA hazardous waste inspection.

To be prepared for an inspection, you should always ensure that your facility:

- is managing hazardous waste properly;
- has designed and operated each hazardous waste management unit at the facility according to the hazardous waste regulatory requirements;
- is conducting appropriate personnel training;

- is maintaining the appropriate hazardous waste related documents (e.g. manifests, land disposal restriction forms, personnel training records, inspection logs, etc.); and

- is maintaining appropriate emergency response and communication equipment.

Upon arrival at your facility, the DHWM inspector will explain the purpose of the inspection. The inspector will ask questions regarding your facility's function, the process operations that generate waste and the types of hazardous waste generated. The actual inspection has two main elements: a facility walk-through and an inspection of facility records. The inspector will conduct a complete walk-through of your facility as it relates to the management of hazardous waste. The facility walk-through generally includes:

- an overview and complete tour of your facility's process operations that generate hazardous waste (starting at the beginning of the process through the end of the process);
- a visual inspection of ancillary/support operations (e.g. lab, electric shop, paint shop, maintenance area) that may contribute to the generation of hazardous waste;
- a visual inspection of each hazardous waste generator accumulation area;
- a visual confirmation of the presence and maintenance of required emergency response and safety equipment; and
- a visual inspection of other plant/facility areas as determined necessary by the inspector.

The facility records inspection will depend on your facility's generator status. The more hazardous waste you generate in a calendar month, the more records you are required to maintain. Listed below are the types of records you may be required to maintain on-site:

- waste evaluation information;
- identification number;
- accumulation extensions;
- pre-transport requirements;
- manifests;
- manifest exception reports;
- land disposal restriction documents;
- inspection records;
- personnel training documents;
- emergency equipment documentation;
- emergency requirements;
- contingency plan;
- generator annual report; and
- tank system assessment documentation.

Once the inspector has completed the facility walk-through and reviewed the appropriate records, the inspector will conduct an exit interview. During the exit interview, the inspector will discuss any violations found and other concerns or issues. The inspector will also discuss any pollution prevention (P2) opportunities and ask if your company is interested in obtaining more **information on P2** or having Ohio EPA conduct a P2 assessment.

After the inspection and collection of any necessary follow up information, the inspector will summarize his or her findings in a letter to you. This letter will document your facility's compliance status and include appropriate checklists used to inspect your facility. If the inspector finds noncompliance issues, he/she will inform you what you need to do to return to compliance. Otherwise,

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Reducing Solvent Purchase and Disposal Costs - Part II

The **Winter 2003 edition** of the Notifer contained an article titled *Reducing Solvent Purchase and Disposal Costs - On-Site Solvent Recycling Equipment May Be the Answer*. This article covered solvent recycling and reuse through on-site solvent distillation units and reviewed costs and payback associated with the purchase of such a unit. As a follow-up to the article, the following information explains how using an on-site solvent distillation unit can reduce regulatory requirements for companies if recycling sufficiently lowers your waste volume.

If your company's recycling efforts sufficiently lower the volume of waste generated, you may be reclassified into a smaller generator category. In this instance, using a solvent distillation unit may sufficiently lower the amount of waste you generate because Ohio EPA's hazardous waste rules state that recycled materials should only be counted as wastes towards your generator status the first time they are generated. After recycled materials are generated once, they no longer count toward your monthly generator status, no matter how many times the recycled materials are put through your process. For example, when a tank is emptied and the solvent is distilled and then returned to the tank, the annual waste volume is the solvent capacity of the tank—counted one time—plus the volume of all still bottoms generated over one year. The method for determining which hazardous wastes are counted in a generator's monthly quantity determination is found in OAC rules **3745-51-04** and **3745-51-05(C) and (D)**.

To break the concept down into smaller chunks:

- Hazardous spent solvent waste is subject to regulation prior to distillation. Your business would be responsible for maintaining compliance with applicable hazardous waste rules if you accumulate spent solvent prior to the distillation process.
- The distillation process itself is exempt from regulation as a hazardous waste treatment process, per **OAC rule 3745-51-06 (C)(1)**. Therefore, a business operating a still would not be required to maintain a hazardous waste treatment permit for this unit.
- Still bottoms generated from distillation units are generally hazardous wastes. If the spent solvent your business generates is listed in **OAC rule 3745-51-31**, the still bottoms generated from the distillation of this solvent would also be a listed hazardous waste. Still bottoms may also exhibit characteristics of hazardous wastes as defined in **OAC rules 3745-20 through 24**.
- The reclaimed solvent resulting from on-site recycling is considered a product as long as it is used for its intended purpose (treated as virgin solvent).

So how does the installation of a distillation unit relate to generator classifications?

If your business generates hazardous waste, you need to measure (or count) the quantity of hazardous waste you generate per month to determine what hazardous waste regulations you must follow. Waste must be counted when generated. Waste is generated when it is first produced, not when the drum (or other container or tank) is full and not when you get analytical results back from the lab. Adding the weight of all the hazard-

ous waste your business generates during a calendar month generally will determine your generator category.

There are three hazardous waste generator classifications. These classifications are based on the cumulative amount of hazardous waste generated (produced), in kilograms, per calendar month. Generator classifications are NOT determined by the amount of waste shipped off-site.

Conditionally Exempt Small Quantity Generator:

If you generate less than 100 kilograms (about 220 pounds or 25 gallons) of hazardous waste, and no more than one kilogram (about 2.2 pounds) of acutely hazardous waste in any calendar month AND never accumulate more than 1,000 kilograms of hazardous waste on your property, you are a conditionally exempt small quantity generator. See OAC rule **3745-51-05** for more information on Ohio's hazardous waste rules for conditionally exempt small quantity generators.

Small Quantity Generator:

If you generate more than 100 and less than 1,000 kilograms (between 220 and 2,200 pounds, or about 25 to less than 300 gallons) of hazardous waste, and not more than one kilogram (about 2.2 pounds) of acutely hazardous waste in any calendar month AND never accumulate 6,000 kilograms of non acutely hazardous waste on-site at any one time, you are a small quantity generator. See OAC rule **3745-52-34(D)(E) and (F)** more information on Ohio's hazardous waste rules for small quantity generators.

Large Quantity Generator:

If you generate 1,000 kilograms (about 2,200 pounds or 300 gallons) or more of hazardous waste, or more than one kilogram

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(about 2.2 pounds) of acutely hazardous waste in any calendar month, you are a large quantity generator. See OAC rule **3745-52-34(A)** for the Ohio hazardous waste rules for large quantity generators.

What if the installation of a distillation unit changes my generator category?

A hazardous waste generator may change generator categories. A generator's category is related to the cumulative amount of hazardous waste produced on a monthly basis and/or the amount of waste on-site. This amount may vary from month to month. A change in generator category is sometimes due to production levels or seasonal changes. In this instance, your change in generator category is the result of the installation of a distillation unit.

For example, if in June a business generates 500 kg of hazardous waste, it would be a small quantity generator, subject to all applicable requirements for small quantity generators. If in July the business generates 90 kg of hazardous waste, it would be a conditionally exempt small quantity generator for the month of July. If the business continues to generate less than 100 kg of hazardous waste per month (e.g., continuing to be a conditionally exempt small quantity generator), Ohio EPA requests that the generator re-notify so that our information correctly reflects the actual generation status of the generator. Re-notification can be done by completing the **Notification of Regulated Waste Activity form**.

by: Rose McLean, Regulatory Services Unit, DHWM

Do You Crush Your Lamps?

Lamps will be added to Ohio's list of universal wastes in the summer of 2004. At that time, we will revise our classification of lamps in the hazardous waste program.

Currently, hazardous lamps that have been *used* and are being recycled are considered characteristic by-products. Hazardous lamps that *have not been used* and are being recycled are considered commercial chemical products. Characteristic by-products and commercial chemical products that are being reclaimed are not regulated as wastes and therefore would not be considered hazardous waste. Used and unused lamps that are *disposed of* must be evaluated in accordance with Ohio Administrative Code (OAC) rule **3745-52-11**.

When the rules change later this year, hazardous lamps will be defined as "spent materials" and will be a hazardous waste even when reclaimed. Generators of hazardous waste lamps have the option of handling their lamps as either hazardous waste or universal waste.

Managing hazardous lamps according to the universal waste rules eases certain regulatory requirements otherwise imposed on generators of spent lamps. However, the universal waste rule prohibits universal waste handlers from crushing hazardous lamps. If you are the generator of hazardous lamps and you are presently crushing your lamps, and want to continue to do so, you would be required to manage your lamps according to the hazardous waste rules (**OAC Chapter 3745-52**). It is important to note that lamp crushing is a form of generator treatment, therefore OAC rule **3745-52-34** would apply (see Ohio EPA's fact sheet entitled, "**Generator Treatment**").

Under the new requirements, you cannot send crushed lamps that are hazardous waste to an unpermitted facility (i.e., universal waste handler). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

While some commercially available lamp crushers are designed to control mercury emissions when properly maintained, please be aware that due to the unique properties of mercury there is still a high potential of exposure to harmful mercury vapors when you crush your lamps. 

by Dan Sowry, Regulatory Services Unit, DHWM

Coming Soon...

The Division of Hazardous Waste Management's Regulatory Services Unit is developing a new and improved Generator Handbook. This handbook will replace the 1994 version **currently available** on our Web page. We are anticipating the handbook to be available this summer in both hard-copy and Web-based versions.

Across

3. You need to know and be able to explain how your hazardous waste is ___ after you send it off-site to a destination facility.

5. Frequent violations discovered during inspections by Ohio hazardous waste inspectors include waste ___, container labeling, and personnel training.

7. Training, inspection, manifest/land disposal restriction and ___ records will be requested and reviewed during an inspection. (2 words)

8. ___ may be collected during an inspection to confirm that an adequate waste evaluation has been made.

9. An ___ ___ ___ noted during an inspection requires additional research by the inspector, after returning to the office, to determine a company's compliance. (3 words)

10. Ohio EPA expects companies who are violating the hazardous waste rules to ___ the violations as soon as possible.

12. When revisions are made to your ___ plan, you must provide copies of the updates to the state and local emergency service authorities.

14. An ___ is conducted to make sure a company is applying the hazardous waste rules properly.

16. During an inspection, you will need to be able to discuss the processes at your company which generate ___. (2 words)

17. You will typically receive a Notice of Compliance/Notice of Violation letter ___ days after an inspection.

18. Refresher training, so that employees are thoroughly familiar with proper waste handling and emergency procedures, must be conducted ___.

19. If you are a Large Quantity Generator and you have closed a less than ninety day hazardous waste storage area, you need to be able to provide documentation during an inspection that the generator ___ requirements have been met.

20. If you are a Small Quantity Generator and you are not reclaiming waste under a contractual agreement, then you are subject to the ___ requirements.

Down

1. In general, Ohio EPA will take an enforcement action against companies we determine to be in substantial ___ with the hazardous waste rules.

2. In addition to determining compliance with the hazardous waste rules, another purpose of inspections is to provide ___ assistance.

4. Hazardous waste generators can discuss compliance and technical issues anytime with the Division of Hazardous Waste Management, Regulatory Services Unit in Central Office; Trade Associations, and

their ___ ___ hazardous waste inspector. (2 words)

6. An inspector will not typically provide ___ ___ prior to arriving on-site to conduct an inspection. (2 words)

11. ___ is the number of days normally provided to submit documentation following an inspection which demonstrate that hazardous waste violations were immediately abated.

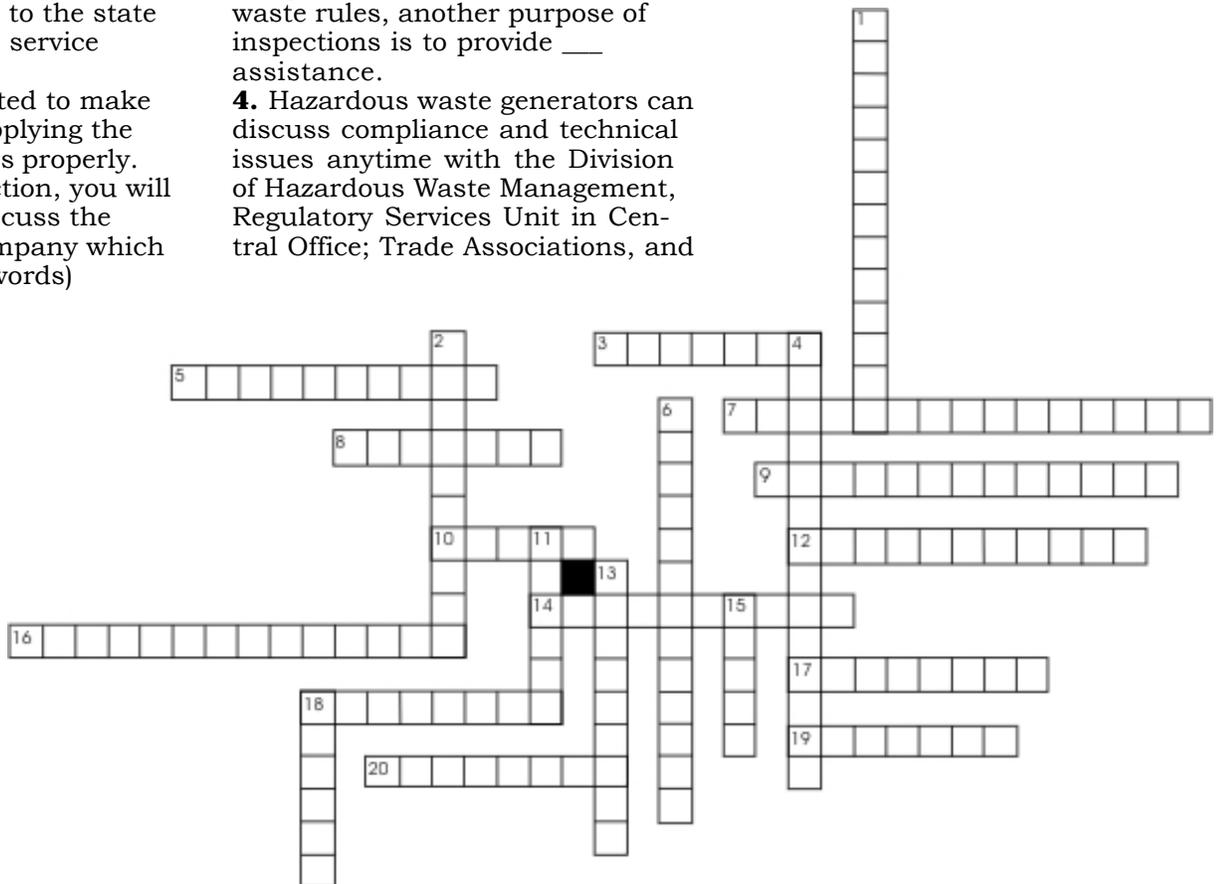
13. We evaluate the results of each inspection to determine if an ___ enforcement action is warranted.

15. Manifest records must be maintained for ___ years from the date the waste is shipped off-site.

18. Facility ___ during an inspection must be provided so that all areas at the company may be properly inspected.



by Andy Kubalak, Regulatory Services Unit, DHWM



Notifier

Bob Taft: Governor
Chris Jones, Director

Editor:
Rose McLean

Contributors:
Andy Kubalak,
Ed Lim, Jeff Mayhugh,
Ralph McGinnis, Rose McLean,
Dave Sholtis, Dan Sowry
and **Lisa Wiklanski**

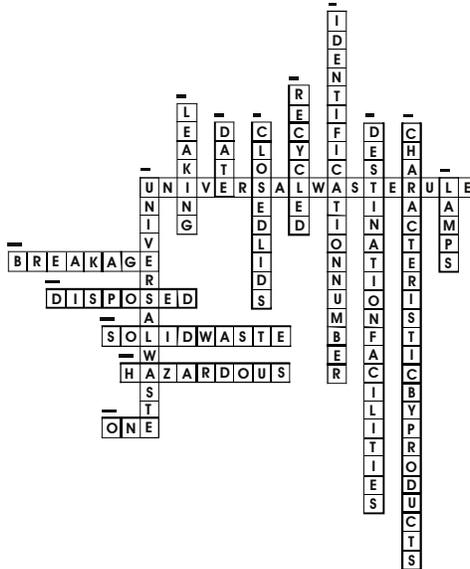
Editorial Assistance:

Cathryn Grote

Graphics and Layout:
Pattie Rhodes-Mehrle

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Answer Key to Winter 2003 Fluorescent Lamps Puzzle



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you will receive a notice of compliance letter. If violations were found at your facility, the inspector will evaluate whether or not to take escalated enforcement action depending upon the significance of the violations found and your facility's compliance history.

If you would like more information about Ohio's hazardous waste regulatory requirements, please contact us at: (614) 644-2917, go to the **forms and publications** section of DHWM's Web page or go to Ohio EPA, Small Business Assistance Office's **Compliance Tools**.



by Ralph McGinnis, Inspection Support Unit, DHWM