

# 2013 Compliance Assistance Conference

An Overview of Ohio's Hazardous Waste Requirements



# An Overview of Ohio's Hazardous Waste Requirements

Presented by:

Tammy McConnell

Dan Sowry

# What We Will Cover

- Hazardous Waste Basics
  - Waste Evaluation
  - Generator Categories
  - Generator Requirements
- Universal Waste Rule
- Most Commonly Cited Violations
- Resources

# Resource Conservation and Recovery Act (RCRA)

## Cradle-To-Grave Management

### “Cradle-to-Grave” Management



**Generator**

**Transporter**

**T**reatment  
**S**torage  
**D**isposal  
**F**acility

# Waste Evaluation

# Waste Evaluation Requirement



Don't throw any waste into the dumpster unless you have confirmed and demonstrated that it is NOT a hazardous waste.

# Hazardous Waste Evaluation

- Under Ohio's laws, all wastes must be evaluated by the generator.
- Generator – any person, by site, whose act or process produces or causes a hazardous waste to become subject to the hazardous waste rules.
- In order for a material to be a hazardous waste, it must be a waste.

# What Is A Waste?

A waste is any material that will be discarded by:

- Disposal
- Burning
- Storing or treating in lieu of discard
- Recycling
  - Used on the ground
  - Burned for energy
  - Speculatively accumulated

# What is Not a Waste?

- Commercial chemical products that are not being discarded
- Excluded waste
  - Wastes specifically defined in rule as not being a waste or a hazardous waste
- Materials that will be reused or reclaimed
  - Only applies to certain materials

# Hazardous Waste Evaluation

Tools you can use:

- Ohio hazardous waste rules
- Lab analysis of waste
- Generator knowledge
  - Process inputs
  - Information from vendor/supplier
  - Material Safety Data Sheet (MSDS)

\*\*Need to document your evaluation and keep on file

# Steps To Properly Evaluate Your Waste

1st – Determine if your waste is excluded

2nd – Determine if your waste is listed

3rd – Determine if your waste exhibits a characteristic

# Excluded Wastes

- Excluded wastes are not subject to Ohio's hazardous waste regulations
- Ohio Administrative Code (OAC) rule [3745-51-04](#)
- Examples: Domestic sewage, NPDES discharge, nontern oil filters, shredded circuit boards, excluded scrap metal, household hazardous waste

# Steps To Properly Evaluate Your Waste

- 2nd – Determine if your waste is listed

# Listed Hazardous Wastes

- Non-specific waste sources (F listed)
  - OAC rule [3745-51-31](#)
- Specific waste sources (K listed)
  - OAC rule [3745-51-32](#)
- Discarded commercial chemical products (P and U listed)
  - OAC rule [3745-51-33](#)

# F Listed Hazardous Wastes

- Non-specific sources
  - Means HW can be generated from any type of manufacturing process
- Examples
  - Spent solvents
    - F001, F002, F003, F004, F005
  - Spent electroplating operation wastes
    - F006, F007, F008, F009

# F Listing Table Example

Industry and EPA hazardous waste no.	Hazardous waste	Hazard code
F004	The following spent non-halogenated solvents: cresols and cresylic acid, and nitrobenzene; all spent solvent mixtures/blends containing, before use, a total of ten per cent or more (by volume) of one or more of the above non-halogenated solvents or those solvents listed in F001, F002, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.	(T)
F005	The following spent non-halogenated solvents: toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine, benzene, 2-ethoxyethanol, and 2-nitropropane; all spent solvent mixtures/blends containing, before use, a total of ten per cent or more (by volume) of one or more of the above non-halogenated solvents or those solvents listed in F001, F002, or F004; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.	(I, T)

# K Listed Hazardous Wastes

- Specific waste sources
  - Meaning waste is only generated from the specific type of industry and process given in the listing description
- Examples
  - Spent potliners from primary aluminum-K088
  - Iron and steel production
    - Electric arc furnace dust - K061
    - Spent pickle liquor - K062

# K Listing Table Example

Industry and EPA hazardous waste no.	Hazardous waste	Hazard code
Wood preservation K001	Bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote and/or pentachlorophenol.	(T)
Inorganic pigments K002..... K003..... K004.....	Wastewater treatment sludge from the production of chrome yellow and orange pigments  Wastewater treatment sludge from the production of molybdate orange pigments  Wastewater treatment sludge from the production of zinc yellow pigments	(T)  (T)  (T)

# P or U Listed Hazardous Wastes

- Must be an unused commercial chemical product
- Examples of P listed hazardous wastes:
  - Copper cyanide – P029
  - Phosgene – P095
- Examples of U listed hazardous wastes:
  - Creosote – U051
  - Lindane shampoo – U129

# Steps To Properly Evaluate Your Waste

- 3rd – Determine if your waste exhibits a characteristic

# Characteristic Hazardous Wastes

- 4 categories of characteristic hazardous wastes:
  - Ignitable - OAC rule [3745-51-21](#)
  - Corrosive - OAC rule [3745-51-22](#)
  - Reactive - OAC rule [3745-51-23](#)
  - Toxic - OAC rule [3745-51-24](#)

# Ignitable Hazardous Wastes

## D001 waste code

- Liquid & flash point <140 F (except solution <24% alcohol)
- Flammable compressed gas
- Solid that spontaneously ignites & burns vigorously
- Oxidizer as defined DOT rules
- Examples include:
  - Solvents/degreasers
  - Some metal swarfs



# Corrosive Hazardous Wastes

## D002 waste code

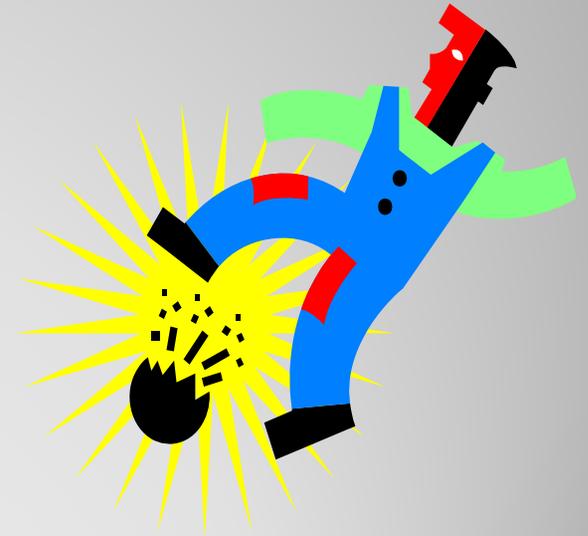
- Aqueous solution;  $\text{pH} \leq 2$  or  $\text{pH} \geq 12.5$
- Liquid that corrodes steel at a specified rate
- Examples include:
  - Acids
  - Alkaline cleaning fluids
  - Waste battery acids



# Reactive Hazardous Wastes

## D003 waste code

- Explosive, unstable, reacts violently with water or generates toxic gas
- Examples include:
  - Dynamite
  - Waste peroxides and ethers



# Toxic Hazardous Wastes

## D004 –D043 waste codes

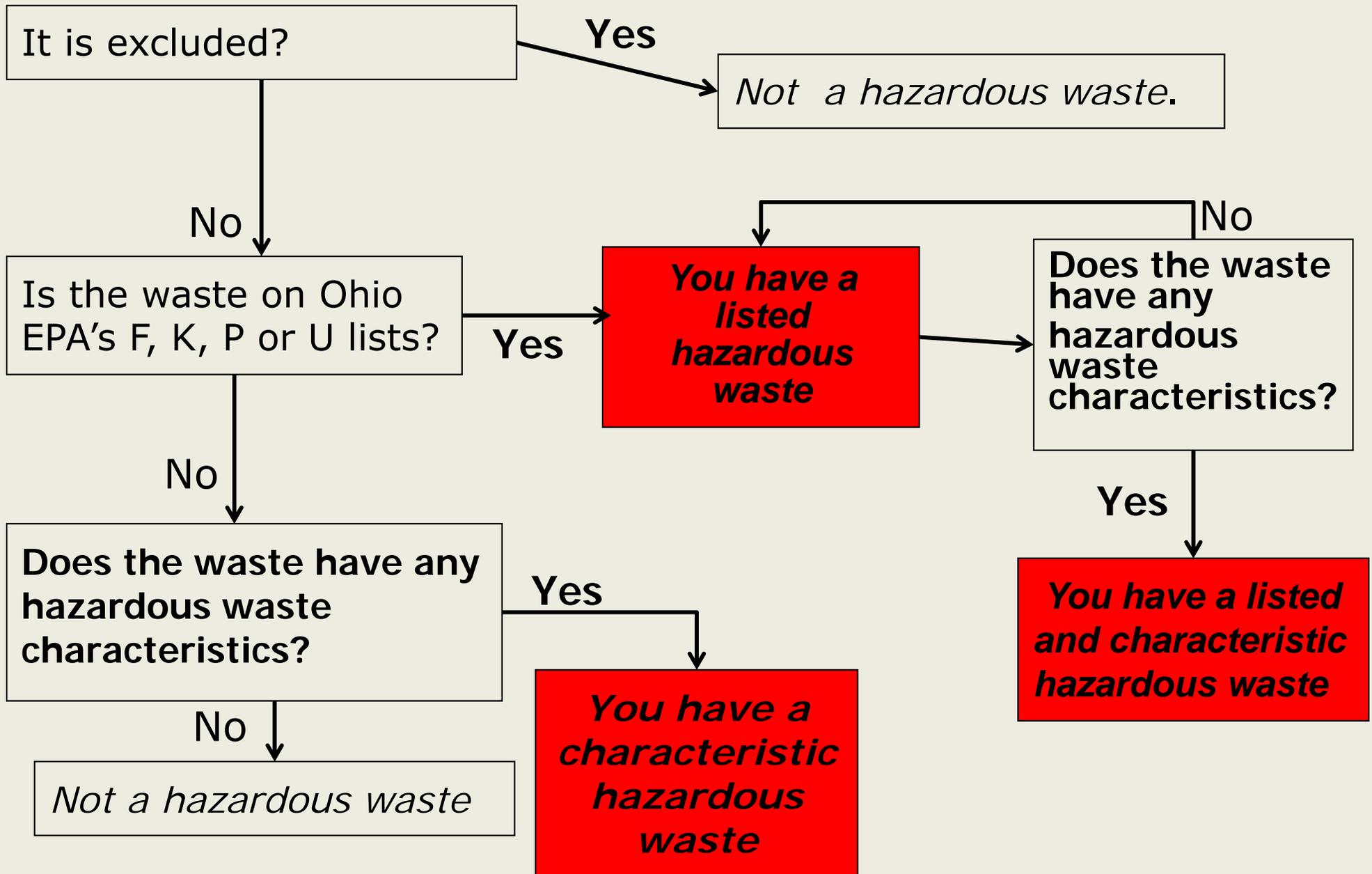
- Contain toxic constituents equal to or above regulatory levels
  - 8 metals; 32 organics
- Determined by Toxicity Characteristic Leaching Procedure (TCLP)
- Examples include:
  - Electronic equipment, most cathode ray tubes
  - Spent foundry sand, some clay poker chips, certain waste pesticides



# Toxic Hazardous Waste Examples

Ohio EPA Hazardous Waste No.	Contaminant	CAS No	Regulatory Level (mg/l)
D004	Arsenic	7440-38-2	5.0
D005	Barium	7440-39-3	100.0
D006	Cadmium	7440-43-9	1.0
D007	Chromium	7440-47-3	5.0
D008	Lead	7439-92-1	5.0
D009	Mercury	7439-97-6	0.2
D010	Arsenic	7782-49-2	1.0
D011	Silver	7440-22-4	5.0

# Do I Have A Hazardous Waste?



# Generator Categories

# Generator Categories

There are three hazardous waste generator categories:

- Conditionally Exempt Small Quantity Generators (CESQGs);
- Small Quantity Generators (SQGs); and
- Large Quantity Generators (LQGs).

# Determining Your Category

- Total weight of hazardous waste that the entire facility generates (produces) in any given month of the calendar year;
  - For example: Hazardous waste that you generate between October 1st and October 31<sup>st</sup>
- Total amount of hazardous waste on-site at any given time (only pertains to CESQGs and SQGs)
- NOTE: Generator categories are NOT determined by the weight of waste shipped off-site or by averaging.

# Determining Your Category Cont.

- OAC rule [3745-51-05](#) – Special requirements for hazardous waste generated by conditionally exempt small quantity generators.

# Conditionally Exempt Small Quantity Generators (CESQGs)

You are a CESQG if you:

- generate no more than 220 pounds of hazardous waste in a calendar month; AND
- never accumulate more than 2,200 pounds of hazardous waste on your property

Note:

- 220 pounds is about half of a 55-gallon drum
- 2,200 pounds is about five 55-gallon drums

# What If I Go Over The CESQG Limits?

- Generate more than 220 pounds of HW/month
  - you become either an SQG or an LQG for that month
- Accumulate more than 2,200 pounds of HW at any given time
  - you become an SQG until that HW is moved off-site

# Small Quantity Generators (SQGs)

You are an SQG if you:

- generate more than 220 pounds but less than 2,200 pounds of hazardous waste/month; and
- never accumulate over 13,200 pounds of hazardous waste on-site

# What If I Go Over The SQG Limits?

- Generate more than 2,200 pounds of hazardous waste in a calendar month
  - you become an LQG until that hazardous waste is moved off-site
- Accumulate over 13,200 pounds of hazardous waste on-site
  - you become a treatment, storage and disposal facility (TSDF) and must have a hazardous waste installation and operation [permit](#)

# Large Quantity Generators (LQGs)

You are an LQG if you:

- generate 2,200 or more pounds of hazardous waste/month

Note: LQGs do not have a limit on the amount of hazardous waste stored on-site

# What Is Episodic Generation?

- Often termed [episodic generation](#)
- Must manage your hazardous waste under all applicable generator requirements for hazardous wastes generated that month for as long as that waste remains on-site
- If you reach LQG status at any time during the calendar year, you must file a [biennial report](#) (if the generation is in an odd year)

# Generator Requirements

# Generator Requirements Summary Table

- Management requirements
- OAC references
- CESQG, SQG, or LQG compliance requirement
- DMWM has a Web page on [Hazardous Waste Generator Requirements](#)

# Hazardous Waste Determination

- Applies to all generators
- Failure to properly evaluate your waste may lead to unsafe conditions or violations from improper management
- OAC rule [3745-52-11](#)



# Remember This!



Don't throw any waste into the dumpster unless you have confirmed and demonstrated that it is NOT a hazardous waste.

# U.S. EPA Identification Number\* (12-digit)

- **CESQGs** - Not Required – but...
  - Waste hauler might want you to have one
- **SQGs** and **LQGs** – Required
- Site specific, identifies company that created the waste
- No fee – just fill out 9029 Site ID form

[epa.ohio.gov/portals/32/pdf/WasteActivityBook.pdf](http://epa.ohio.gov/portals/32/pdf/WasteActivityBook.pdf)

Need help? Call me! 614-728-8575

# How Long Can I Accumulate (store) HW On-site?

- **CESQGs** do not have any storage time limits
- **SQGs** can store hazardous waste on-site for up to 180 days; HOWEVER, if transporting a distance of 200 miles or more, can store for up to 270 days (30 day extension available)
- **LQGs** can store hazardous waste on-site for up to 90 days (30 day extension available)

# What Is Satellite Accumulation?

- Use of this rule reduces some regulatory requirements for storage areas
- Only applies to SQGs and LQGs
- [Satellite Accumulation Guidance Document](#)
- Found in OAC rule [3745-52-34\(C\)](#)



# What Requirements Apply to Satellite Accumulation Areas?

- Up to 55 gallons of hazardous waste in containers at or near each point of generation
- Containers must be under control of the operator of the process which generated the waste
- Containers must be compatible with waste and in good condition – not leaking



# What Requirements Apply to Satellite Accumulation Areas?

- Containers must be marked with the words “Hazardous Waste” (or other words that identify contents)
- Containers must remain closed except when adding or removing hazardous waste



# What Happens When I Reach the 55-Gallon Limit?

- Put the date on container
- Move the container within 3 days
- Put new date on container
- Comply with accumulation requirements (180/90 day storage limits)



# What Happens When I Reach the 55-Gallon Limit?

- Put the date on container
- Move the container within 3 days
- Put new date on container
- Comply with accumulation requirements (180/90 day storage limits)



# What is Treatment?

- Treatment - any method, technique or process, designed to:
  - render waste non-hazardous
  - less-hazardous
  - safer to transport, store or dispose of
  - amenable for recovery
  - amendable for storage
  - reduced in volume
- Defined in OAC rule [3745-50-10\(A\)\(125\)](#)
- [Generator Treatment Guidance Document](#)

# Can I Treat My Hazardous Waste On-site?

- Allowed forms without a permit:
  - Neutralization
  - Polymerization
  - Stabilization
  - Wastewater treatment
- Generator treatment no-no's:
  - Thermal treatment (incineration, certain evaporators)
  - Land disposal (surface impoundments, landfills)
- 90/180 day time limits still apply during treatment
- Consult with us if you wish to treat your hazardous waste



# Container or Tank

**Portable**

**Stationary**



**Container**



**Tank**

# What Are My Container Management Requirements for SQGs and LQGs?

- Only applies to SQGs and LQGs
- Must be in good condition
- Compatible with the hazardous waste and area
- Clearly labeled as "Hazardous Waste"
- Closed (lids)
- Conduct weekly inspections

 SOLID  LIQUID; HAZARDOUS PROPERTIES:  CORROSIVE  REACTIVITY  OTHER;  FLAMMABLE  TOXIC. At the bottom, it says 'D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX' and 'HANDLE WITH CARE!'."/>

**HAZARDOUS WASTE**

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.  
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY  
AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY  
OR THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCE CONTROL.

GENERATOR INFORMATION:

NAME \_\_\_\_\_

ADDRESS \_\_\_\_\_ PHONE \_\_\_\_\_

CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP \_\_\_\_\_

EPA / MANIFEST ID NO. / DOCUMENT NO. \_\_\_\_\_

EPA WASTE NO. \_\_\_\_\_ CA. WASTE NO. \_\_\_\_\_ ACCUMULATION START DATE \_\_\_\_\_

CONTENTS COMPOSITION

PHYSICAL STATE:  SOLID  LIQUID

HAZARDOUS PROPERTIES:  CORROSIVE  REACTIVITY  OTHER

FLAMMABLE  TOXIC

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

**HANDLE WITH CARE!**

# What Are My Container Management Requirements for SQGs and LQGs? (cont.)

- Label storage start date
- Maintain aisle space (as part of Preparedness and Prevention)
- Ignitable/reactive located 15 meters (50 feet) from facility's property line
- U.S. EPA air emission standards (i.e. AA, BB, CC) (LQGs only)

# What Are My Tank Management Requirements?

- They only apply to SQGs and LQGs
- [Large Quantity Generator Tank System Requirements](#)
- Found in OAC rules [3745-66-90 through 3745-66-101](#)



# What Are the SQG Tank Management Requirements?

- Be able to show - emptied/overturned once every 180 days
- Good condition
- Compatible with waste and area
- Labeled as "Hazardous Waste"
- Daily inspections
- Remove all hazardous waste from site when facility closes

OAC rule [3745-66-101](#) specific to SQGs

# What Are the LQG Tank Management Requirements?

- Be able to show - emptied/overturned once every 90 days
- Good condition
- Compatible with waste and area
- Labeled as "Hazardous Waste"
- Daily inspections

# What Are the LQG Tank Management Requirements?

- Secondary containment
- Leak detection system
- Tank system assessment/certification by PE
- Closure
- U.S. EPA air emission standards (i.e. AA, BB, CC)

# What Am I Required to do When I Ship My HW Off-site?

CESQGs are not required to prepare a manifest  
SQGs and LQGs must prepare manifest and:

- Package your HW
- Label each package of HW
- Mark each package of HW
- Placard or offer the initial transporter the appropriate placards
- Contact [Public Utilities Commission of Ohio](#) for more information (800-686-7826)



Found in OAC rules [3745-52-30 to 3745-52-33](#)

# Does My Business Need Personnel Training?

- CESQGs are not required to conduct personnel training
- SQGs must:
  - ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures
- LQGs must:
  - conduct classroom instruction or on-the-job personnel training for facility employees
  - conduct annual refreshers and keep records

OAC rules [3745-65-16](#) and [3745-52-34](#)

# How Do I Prepare for Emergencies?

No requirements for CESQGs

SQGs and LQGs must:

- Maintain emergency equipment on-site
- Maintain and operate your facility to minimize the possibility of emergencies
- Test and maintain your emergency equipment 'as necessary' and record the inspections in a log
- Maintain adequate aisle space
  - Movement of personnel and emergency response equipment
- Make arrangements with local emergency authorities



Found in OAC rules [3745-65-30 to 3745-65-37](#)

# When Do I Need Emergency Procedures and a Contingency Plan?

- SQGs – at least one employee on-site or on-call to respond to all emergencies
- LQGs – prepare and maintain a written contingency plan
  - Maintain all reports of contingency plan implementation on-file and report the incidents to Ohio EPA
  - A copy of your contingency plan must be maintained at your facility & submitted to local police, fire, hospitals, emergency response teams and Ohio EPA

[Example contingency plan available!](#)

# What Are My Recordkeeping Requirements?

- SQGs and LQGs must keep a copy of the following for at least 3 years:
  - Test results
  - Waste evaluation
- CESQG must be able to show that they evaluated their waste



Found in OAC rule [3745-52-40](#)

# What Are SQG's Additional Recordkeeping Requirements?

- Additionally, SQGs must keep a copy of these for at least 3 years:
  - Weekly container inspections;
  - All manifests; and
  - Land disposal restriction notifications, certifications and waste analysis data

# What Are LQG's Additional Recordkeeping Requirements?

- LQGs must keep a copy of these for at least 3 years:
  - Everything mentioned in the previous two slides;
  - Personnel training documents;
  - Biennial reports; and
  - Daily tank inspection logs



# What Are My Manifesting Requirements?

- Manifests are HW tracking documents
  - Revised form – [US EPA has info where to get them](#)
- Only **SQGs** and **LQGs** must manifest their HW
  - Each person who transports, stores, treats or disposes must sign & retain a copy
  - Must receive signed copy of your manifest from the final destination facility
  - Each transporter must have a copy for their records
  - Destination facility must have a copy

Found in OAC rules [3745-52-20 to 3745-52-23](#)

# What Is An Exception Report?

- Exception reports are part of the RCRA manifest tracking system
- After you send waste off-site for disposal, the TSDF is required to return to you a copy of the original manifest
- If you don't receive the manifest from the TSDF, then you must submit an exception report to Ohio EPA

Found in OAC rule [3745-52-42](#)

# Am I Required To File An Exception Report?

- CESQGs - Not Required
- SQGs – Required
  - If you do not receive a copy of the manifest signed by the designated facility within 60 days: Send exception report to Ohio EPA
- LQGs – Required
  - If you do not receive a copy of the signed manifest within 35 days: Contact transporter and/or the designated facility
  - If you do not receive a copy of the signed manifest within 45 days: Send exception report to Ohio EPA

# Rejected Loads

- A shipment of hazardous waste that cannot be accepted because:
  - Facility permit restriction, or
  - Capacity limitations
- Includes all shipments in whole or in part regardless whether the manifest has been signed
- Generators can store rejected loads or residues sent back to them for 90 or 180 days depending on the amount of hazardous waste on-site during the calendar month the rejected load/residue was received

# What Are The Land Disposal Restrictions (LDRs)?

- These only apply to SQGs and LQGs
- Standards developed to ensure that toxic constituents present in hazardous waste are properly treated before land disposal
- Under LDRs, generators need to complete a notification (one-time) which accompanies manifest to TSD facility
- TSDFs treat your HW to meet LDRs
- [Land Disposal Restrictions \(An Overview\)](#)

Found in OAC Chapter [3745-270](#)

# Must I File a Biennial Report?

- Only LQGs file biennial reports
  - Includes episodic generators who became LQGs
- Report provides Ohio EPA and U.S. EPA with data concerning your facility's hazardous waste generation, management and waste minimization activities
- Due by March 1<sup>st</sup> in even numbered years

OAC rule [3745-52-41](#)

# Universal Waste Rules

# What We Will Cover

- Background information
- Types of universal waste
- Handler categories
- Green-tipped light bulbs
- Crushing light bulbs
- Packaging
- Notification
- Labeling
- Storage
- Manifesting
- Transportation
- Recordkeeping



# Background

## What are the universal waste rules?

- Subset of hazardous waste regulations
- Intended to promote recycling
- Eases certain regulatory requirements

## What determines a universal waste (UW)?

- Must be a hazardous waste
- Must be widespread
- Commonly found in medium to large volumes
- Exhibit low-level hazards
- Must be easily managed
- Generated by numerous businesses



# Types of Universal Waste

- Hazardous waste pesticides
  - Recalled or suspended under FIFRA
- Mercury-containing devices
  - Includes all mercury-containing devices
- Discarded batteries
  - Alternative option for lead acid batteries
- Light bulbs
  - Includes incandescent, fluorescent, compact fluorescent, LED, high intensity discharge, neon, high pressure sodium, etc.



# What About Those "Green" Light Bulbs?

- They still contain mercury
  - regulatory level 0.2 mg/L
- We encourage recycling rather than disposal
- If disposed, must evaluate and retain documentation for three years



# Who are the UW handlers?

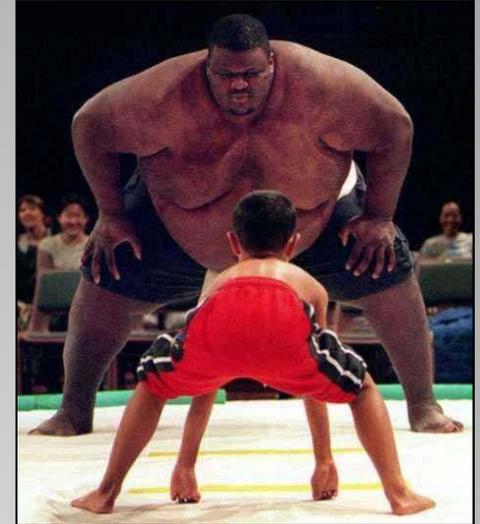
- UW Handlers are persons who
  - Generate
  - Receive
  - Store (but do not treat, dispose of or recycle UW generated elsewhere)

Note: UW handlers cannot treat, dispose of or recycle UW



# What are the UW Handler Categories?

- Two categories:
  - Small quantity handlers
    - Accumulates on-site less than 5,000 kilograms (11,023 pounds) of UW (not by type) at any time.
  - Large quantity handlers
    - Accumulates on-site more than 5,000 kilograms (11,023 pounds) of UW (not by type) at any time.



# What are UW Destination Facilities?

- UW Destination Facilities
  - Permitted hazardous waste treatment, storage and disposal facilities (TSDFs)
  - They can:
    - Receive
    - Store
    - Treat
    - Recycle and/or Dispose of Universal Waste

[Commercial Facilities Accepting Hazardous Waste](#)

# Where do I send my UW?

- Another UW handler

OR

- Permitted UW destination facility
  - A facility permitted to treat, dispose of or recycle your UW

# Do I Count my UW Towards my Hazardous Waste Generator Category?

**No** - UW does not count towards your hazardous waste category.

\*\* do not confuse these categories with the hazardous waste generator categories (CESQG, SQG, or LQG)

# Am I required to notify Ohio EPA of my UW activities?

- Small quantity handlers are NOT required to notify Ohio EPA or to obtain a U.S. EPA identification number
- Large quantity handlers ARE required to notify and obtain a [U.S. EPA identification number](#) (unless you already have one)

# What are the packaging requirements for UW?

## Batteries

- only required if leaking

## Mercury-Containing Devices, Light Bulbs and Pesticides

- place in closed container
  - must be designed to contain potential releases
  - broken or damaged light bulbs can be sent to a permitted facility
- **Warning about mercury...**

# DOT rules for batteries

- Batteries destined for recycling need to be properly packaged per [DOT rules](#)
- Some batteries present a fire hazard if they short circuit
- Terminals must be taped, or batteries placed in individual bags or original containers

# Can I use a crusher to crush my light bulbs?



- UWR prohibits handlers from crushing light bulbs
- If you crush your bulbs, you must manage them under the hazardous waste requirements

# What are the labeling requirements for UW?

- Each category of UW must be clearly marked with the appropriate wording
  - For example: “Universal Waste Lamps;” “Waste Lamps;” or “Used Lamps”
- Be able to demonstrate accumulation time



# How long can I accumulate UW?

- Up to one year on-site regardless of your handler category
- If greater than one year is required, you must be able to prove why it is necessary



# Do I manifest my UW?

NO

- UW handlers are not required to manifest off-site shipments of UW
- UW handlers, however, must ensure delivery to another UW handler or to a permitted destination facility



# Can I transport my own UW?

YES

- Deliver only to another UW handler or to a permitted UW destination facility
- Must follow all DOT requirements
  - Check with Public Utilities Commission of Ohio (PUCO)
  - 800-866-7826
  - responsible for spills and clean up



# Can I take or send my UW to any recycler?

No

UW handlers must ensure delivery to another UW handler or to a permitted destination facility



# What are my recordkeeping requirements?

- No recordkeeping requirements for small quantity handlers of UW
- Large quantity handlers of UW must retain on- and off-site shipment records for at least three years
  - Name and address
  - Quantity of each type of UW
  - Date of shipment



# UW Resources

- [Universal Waste Rule Guidance Document](#)
- [Universal Waste Webpage](#)
- [Universal Waste Handler Requirements Summary Table](#)
- [Fluorescent Light Bulb Management Webpage](#)

# Most Commonly Cited Violations

# Most Commonly Cited Violations

- [Violations Most Frequently Cited Fact Sheet](#)
- Failure to evaluate your waste
- Not labeling used oil containers, tanks or fill pipes
- Not properly managing containers or maintaining an inspection log
- Not testing or maintaining emergency equipment
- Not filing your biennial (formerly annual) report correctly

# Key Point With Waste Evaluation



Don't throw **any** waste into the dumpster unless you have confirmed **and** demonstrated that it is **NOT** a hazardous waste.

# Avoiding Used Oil Violations

- OAC Chapter [3745-279](#)
- Labeling Tanks and Containers with – “Used Oil”
  - Do Not Label as “Waste Oil” or “Hazardous Waste”
- Containers and tanks must be in good condition
- Releases – Be sure to clean up



# Container Management

- OAC rules [3745-66-73](#) and [3745-66-74](#)
- Keep [containers closed](#) while in storage
- Do not open, handle or store containers in a manner that will cause them to rupture or leak
- Conduct inspections of container storage areas, at least weekly, looking for signs of leaks or deterioration
- Record inspections in a log or summary ([SQG](#), [LQG](#))

# Emergency Equipment

- OAC rule [3745-65-33](#)
- Alarm systems, fire protection equipment, spill control equipment and decontamination equipment must be tested and maintained as necessary to ensure proper operation in time of emergency
- Record inspections in [log](#) or summary



# Avoiding Biennial Reporting Violations

- OAC rule [3745-52-41](#)
- Due by March 1<sup>st</sup> of each even numbered year.
- Only report hazardous waste; not universal waste or used oil
- Cover generator activities for the previous calendar year
- Check accuracy and completeness

# Resources

# DMWM's Web site

Division Home Page

<http://epa.ohio.gov/dmwm/Home.aspx>

Rules

<http://epa.ohio.gov/dmwm/dmwmrules.aspx>

Publications/Guidance Documents

<http://ohioepapubs.custhelp.com/>

Notifier (Newsletter – Hazardous Waste News for Ohio)

[www.epa.ohio.gov/dhwm/newsletter.aspx](http://www.epa.ohio.gov/dhwm/newsletter.aspx)

## DMWM's Web site (cont.)

Recyclers List

<http://epawebapps.epa.state.oh.us/Recyclers/jsp/search.jsp>

Receiving Facilities (facilities accepting hazardous waste or recyclable materials)

[www.epa.ohio.gov/dhwm/receiving\\_facilities.aspx](http://www.epa.ohio.gov/dhwm/receiving_facilities.aspx)

Universal Waste

<http://www.epa.ohio.gov/dhwm/universalwaste.aspx>

# Guidance Documents

Hazardous Waste Generator Handbook

[www.epa.ohio.gov/portals/32/pdf/gen\\_handbook.pdf](http://www.epa.ohio.gov/portals/32/pdf/gen_handbook.pdf)

Generator Requirements Summary Table

[www.epa.ohio.gov/portals/32/pdf/GeneratorRequirementsTable.pdf](http://www.epa.ohio.gov/portals/32/pdf/GeneratorRequirementsTable.pdf)

Identifying Your Hazardous Waste

[www.epa.ohio.gov/portals/41/sb/publications/identifyingwaste.pdf](http://www.epa.ohio.gov/portals/41/sb/publications/identifyingwaste.pdf)

# Additional Web sites

How to clean up a broken mercury lamp

[http://www.epa.ohio.gov/pic/cfl\\_info.aspx#break](http://www.epa.ohio.gov/pic/cfl_info.aspx#break)

[DOT - Transportation of batteries](#)

U.S. EPA – RCRA On-Line (rule interpretations)

[www.epa.gov/waste/inforesources/online/index.htm](http://www.epa.gov/waste/inforesources/online/index.htm)

# Ohio EPA Resources

[Information and Resources from Ohio EPA](#)

[Answer Place](#)

Division of Materials and Waste Management Hazardous  
Waste Inspection and Compliance Assistance

Weekdays from 8 AM – 5 PM

(614) 644-2621

Office of Compliance Assistance & Pollution Prevention

Weekdays, 8 AM - 5 PM

(800) 329-7518

**Questions?**