

**SMALL QUANTITY HANDLER
UNIVERSAL WASTE REQUIREMENTS**

Large Quantity Handler Universal Waste (LQHUV) = 5,000 Kg or more, aggregate total

Small Quantity Handler Universal Waste (SQHUV) = less than 5,000 Kg, aggregate total

Mark each type of Universal Waste Generated at the facility and attach appropriate checklist

A. Batteries B. Pesticides C. Mercury Containing Equipment D. Lamps

E. Aerosol Cans F. Antifreeze G. Paint and paint-related waste

GENERAL REQUIREMENTS

PROHIBITIONS

1 Did the SQHUV dispose of universal waste? [[3745-273-11\(A\)](#)] Yes No N/A

2 Did the SQHUV dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-37 or managing specific wastes as provided in OAC rule [3745-273-13](#)? [[3745-273-11\(B\)](#)] Yes No N/A

ACCUMULATION TIME

3 Is the SQHUV accumulating UW for less than one year? [[[3745-273-15\(A\)](#)] Yes No N/A

NOTE:

A small quantity handler of universal waste may accumulate universal waste for longer than one year from the date the universal waste is generated, or received from another handler, if such activity is solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal. However, the handler bears the burden of proving that such activity is solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal. [[[3745-273-15\(B\)](#)]

If No to 3 and Yes to this note, then no violation has occurred.

If No, to both, then the facility is in violation of [3745-273-15\(A\)](#)

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

4 Is the SQHUV able to demonstrate the length of time the universal waste has been accumulated? [[[3745-273-15\(C\)](#)] Yes No N/A

If yes, describe below: (Manifest dates, containers labeled)

EMPLOYEE TRAINING

5 Has the the SQHUV informed all of their employees who handle or have responsibility for managing universal waste. Does this information describe proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility? [[3745-273-16](#)] Yes No N/A

RESPONSE TO RELEASES

6 Has the SQHUV had any releases of universal waste? If so,
a. Does the the SQHUV immediately contain releases of universal waste and other residues from UW immediately? [[3745-273-17\(A\)](#)] Yes No N/A

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	b.	Does the the SQHUW characterize the released material? [3745-273-17(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	If the material released is a hazardous waste, does the the SQHUW manage the residue as required in 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code.? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to 3745-52) [3745-273-17(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Also complete the appropriate generator checklist.					
OFF-SITE SHIPMENTS					
7		Does the the SQHUW send universal wastes another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
8		Does the SQHUW self-transport universal waste off-site? If so:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Are the requirements of 3745-273-50 to 3745-273-56 met? [3745-273-18(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<i>NOTE: If a SQHUW self-transport waste, then the handler must comply with the Universal Waste transporter requirements found in 3745-273-50 to 56. If acting as a transporter attach the transporter requirements checklist.</i>					
9		If a universal waste being offered for off-site transportation meets the definition of hazardous materials under 49 CFR Parts 171 to 180. Does the SQHUW package, label, mark and placard the shipment, and prepare the proper shipping papers in accordance with the applicable department of transportation regulations under 49 CFR 171-180? [3745-273-18(C)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
10		Prior to shipping universal waste off-site, does the SQHUW ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
11		Has the SQHUW ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	If yes, did the SQHUW receive the waste back? [3745-273-18(E)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	If yes, did the SQHUW agree to where the shipment was sent? [3745-273-18(E)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
12		Has the SQHUW ever rejected a partial or full load from an off-site shipment received from another handler? If so the handler shall:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Did the SQHUW send the waste back to the originating handler? Or [3745-273-18(F)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Did the SQHUW send the shipment to an agreed upon destination facility? [3745-273-18(F)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
13		Has the SQHUW received a shipment of hazardous waste that was not a universal waste? If so:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Did the SQHUW immediately notify Ohio EPA and provide the name, address, and phone number of the originating shipper? [3745-273-18(G)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
EXPORTS:					
Note: Small quantity handlers that export waste to the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262 subpart H. Small quantity handlers that export waste to a foreign destination other than the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262.53, 40 CFR 262.56(a)(1) to (a)(4), (a)(6), and (b), 40 CFR 262.57, and 40 CFR 262 subpart E. [3745-273-20] Violations or potential violations regarding exporting universal waste to foreign destinations should be referred to U.S. EPA Region 5 because the federal counterpart provisions are not delegable to states.					

Note: The following requirements apply to SQHUW who manage specific categories of UW		
A <input type="checkbox"/> UNIVERSAL WASTE BATTERIES		
1	Does the SQHUW contain batteries that show evidence of leakage, spillage, or damage that could cause leaks? 3745-273-13(A)(1) If so:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2	Has the SQHUW maintained containers of batteries that are closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? 3745-273-13(A)(1)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3	Is the SQHUW conducting any of the following activities listed below as long as the casing of each individual battery cell is not breached and remains intact and closed (except that cells may be opened to remove electrolyte but must be immediately closed after removal)? 3745-273-13(A)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	<input type="checkbox"/> (a) Sorting batteries by type;	<input type="checkbox"/> (b) Mixing battery types in one container;
	<input type="checkbox"/> (c) Discharging batteries so as to remove the electric charge;	<input type="checkbox"/> (d) Regenerating used batteries;
	<input type="checkbox"/> (e) Disassembling batteries or battery packs into individual batteries or cells;	<input type="checkbox"/> (f) Removing batteries from consumer products; or
	<input type="checkbox"/> (g) Removing electrolyte from batteries.	
4	Does the SQHUW who removes electrolyte from batteries, or who generates other waste (e.g., battery pack materials, discarded consumer products) as a result of the activities listed above determined whether the electrolyte or other waste exhibit a characteristic of hazardous waste identified in rules 3745-51-20 to 3745-51-24 of the Administrative Code? 3745-273-13(A)(3)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a If the electrolyte or other waste is characteristic, did the SQHUW manage it in compliance with applicable hazardous waste rules? 3745-273-13(A)(3)(a)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If applicable complete the appropriate generator checklist.
	b If the electrolyte or other waste is not hazardous, did the SQHUW managed it in compliance with applicable law? 3745-273-13(A)(3)(b)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5	Did the SQHUW label batteries or containers of batteries with the words "Universal Waste - Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? 3745-273-14(A)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RMK		

B <input type="checkbox"/> UNIVERSAL WASTE PESTICIDES			
1		Does the SQHUW prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2		If the original pesticide container is in poor condition, did the SQHUW over-pack it into an acceptable container? [3745-273-13(B)(2)]	s <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3		If the pesticide are stored in a tank, does the SQHUW ensure the tank meets the requirements of rules 3745-66-90 to 3745-66-101 of the Administrative Code, except for paragraph (C) of rule 3745-66-97, rule 3745-66-100, and rule 3745-66-101 of the Administrative Code; (Use tank checklist) [3745-273-13(B)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If tanks are used complete the appropriate SQG tank checklist
4		If pesticides are stored in a transport vehicle, does the SQHUW ensure it is closed, structurally sound, compatible with the pesticide(s), and lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(B)(4)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5		Is the SQHUW storing recalled universal waste pesticides containers, (or multiple container package unit), tank, transport vehicle or vessel in which recalled universal waste pesticides as described in paragraph (A)(1) of rule 3745-273-03 of the Administrative Code and are the containers labeled or marked clearly with both: [3745-273-14(B)(1)&(2)]	
	a.	The label that was on or accompanied the product as sold or distributed; and [3745-273-14(B)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	The words "Universal Waste - Pesticide(s)" or "Waste- Pesticide(s);" [3745-273-14(B)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6		Is the SQHUW storing unused pesticide products (as described in paragraph (A)(2) of rule 3745-273-03) that are in containers, tanks, or transport vehicles labeled or marked clearly with both 1(i, or ii, or iii) & 2:	
	A	Labeling	
	i	The label that was on the product when purchased, if still legible; [3745-273-14(C)(1)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	ii	If using the labels described in paragraph (C)(1)(a) of this rule is not feasible, the appropriate label as required under the department of transportation regulation 49 CFR Part 172; [3745-273-14(C)(1)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iii	If using the labels described in paragraphs (C)(1)(a) and (C)(1)(b) of this rule is not feasible, another label prescribed or designated by the waste pesticide collection program administered by a state; and [3745-273-14(C)(1)(c)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	B	The words "Universal Waste - pesticide(s)" or "Waste- Pesticide(s)." [3745-273-14(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RMK			

C <input type="checkbox"/> UNIVERSAL WASTE MERCURY-CONTAINING EQUIPMENT		
	A SQHUW shall manage universal waste mercury-containing equipment in a way that prevents releases of any universal waste or component of a universal waste to the environment, as follows:	
1	Does the SQHUW place universal waste mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage, or damage that could cause leaks been placed in a container? Is that closed, structurally sound, compatible with contents of the device and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions, and is designed to prevent escape of mercury into the environment by volatilization or any other means? [3745-273-13(C)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2	A SQHUW may remove mercury-containing ampules from universal waste mercury-containing equipment provided the handler does all of the following: [3745-273-13(C)(2)]	
	a. Remove and manage the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-13(C)(2)(a)&(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)&(d)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e. Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	f. Pack removed ampules in containers with packing material to prevent breakage during storage, handling, and transportation? [3745-273-13(C)(2)(h)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3	A SQHUW mercury-containing equipment that does not contain an ampule may remove the open original housing holding the mercury from universal waste mercury-containing equipment provided the handler does the following: [3745-273-13(C)(3)]	
	a. Immediately seal the original housing holding the mercury with an air-tight seal to prevent the release of any mercury to the environment? [3745-273-13(C)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Follow all requirements for removing ampules and managing removed ampules in accordance with [3745-273-13(C)(2)]? [3745-273-13(C)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RMK		

4	When a SQHUW removes mercury containing ampules from mercury-containing equipment or seal mercury from its original housing has the handler determined whether the following exhibit a characteristic of hazardous waste identified in rules 3745-51-20 to 3745-51-24 of the Administrative Code? [3745-273-13(C)(4)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Mercury or clean-up residues resulting from spills or leaks [3745-273-13(C)(4)(a)(i)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Other waste generated as a result of the removal of mercury-containing ampules or housings (e.g., the remaining mercury-containing device). [3745-273-13(C)(4)(a)(ii)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5	If the residues, and/or wastes are characteristic, does the SQUWH manage it in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? [3745-273-13(C)(4)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If applicable complete the appropriate generator checklist.
	Note: (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52)	
	Note: If the mercury, residues, or other waste is not hazardous, the handler may manage the waste in any way that is in compliance with applicable law.	
6	Does the SQUWH label the equipment or containers of mercury-containing equipment labelled either "Universal Waste-Mercury-Containing Equipment" or "Waste Mercury-Containing Equipment" or "Used Mercury-Containing Equipment"? [3745-273-14(D)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7	Does the SQUWH label the mercury-containing thermostats or containers containing ONLY thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)"? [3745-273-14(D)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RMK		

D <input type="checkbox"/> UNIVERSAL WASTE LAMPS		
1	Does the SQHUW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(D)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
2	Does the SQHUW immediately clean up and place in a container any lamp that is broken and must place in a container any lamp that shows evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous constituents to the environment. These containers must be closed, structurally sound, compatible with the contents of the lamps, and must lack evidence of leakage, spillage, or damage that could cause leakage or releases of mercury or other hazardous constituents to the environment under reasonably foreseeable conditions. [3745-273-13(D)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
NOTE: : Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities as provided in rule 3745-273-13 of the Administrative Code. [3745-273-11(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 rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.		
3	Does the SQHUW label the lamps or containers or packages of lamps with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
RMK		

OHIO SPECIFIC UNIVERSAL WASTE	
E. UNIVERSAL AEROSOL CONTAINERS 3745-273	
APPLICABILITY 3745-273-89	
1	Chapter 3745-273 of the Administrative Code applies to persons managing "aerosol containers" as defined in rule 3745-273-09 of the Administrative Code, except as provided in paragraph (A)(2) of this rule.
2	Chapter 3745-273 of the Administrative Code does not apply to persons managing the following aerosol containers:
	a Aerosol containers that are not yet a waste under Chapter 3745-51 of the Administrative Code. Paragraph (A)(3) of this rule describes when an aerosol container becomes a waste.
	b Aerosol containers that are not a hazardous waste. An aerosol container is a hazardous waste if the contents of the container exhibit one or more of the characteristics identified in rules 3745-51-20 to 3745-51-24 of the Administrative Code, or if the contents of the container are listed in rules 3745-51-30 to 3745-51-35 of the Administrative Code. An aerosol container is not a reactive hazardous waste unless the contents meet the description of "reactivity" in rule 3745-51-23 of the Administrative Code.
	c Aerosol containers that are empty according to rule 3745-51-07 of the Administrative Code.
3	Generation of universal waste aerosol containers
	a A used, nonempty aerosol container becomes a waste on the date such container is "discarded" as defined in rule 3745-51-02 of the Administrative Code, or on the date such container is not operational.
	b An unused aerosol container becomes a waste on the date the handler decides to discard it.

E. <input type="checkbox"/> AEROSOL CONTAINERS		
	A SQHUW shall manage universal waste aerosol containers in a way that prevents releases of any universal waste or any component of a universal waste to the environment, as follows:	
1	Does the SQHUW store aerosol containers in a cabinet, hopper, container or other unit such as a table top or shelving unit that is structurally sound and compatible with the contents of the containers and that lacks evidence of leakage? [3745-273-13 (E)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2	Does the SQHUW who initially collects aerosol containers at a universal waste satellite accumulation area prior to moving the aerosol containers to a specified accumulation area for storage, puncturing, or shipment off-site move the satellite accumulation container to the specified accumulation area prior to the capacity of the satellite accumulation area being exceeded? [3745-273-13 (E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3	Did the SQHUW immediately empty a leaking aerosol container of the container's contents in accordance with paragraph (E) (4) of this rule individually overpack the leaking aerosol container in a container having enough absorbent material to absorb the leaking contents of the aerosol container? [3745-273-13 (E)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4	A SQHUW may puncture or crush an aerosol container to remove and collect the contents of the aerosol container rendering the container empty provided the handler does the following:	
	a	Does the SQHUW use commercially available equipment, or equipment specifically custom designed or retrofitted according to accepted engineering practices based on established codes, standards, published technical reports, or similar peer reviewed documents, to puncture or crush and empty aerosol containers within an enclosed compartment? [3745-273-13 (E)(4)(a)]
	b	Does the SQHUW use puncturing or crushing equipment that has sufficient processing capacity to puncture or crush the quantity of aerosol containers received or generated within one year? [3745-273-13 (E)(4)(b)]
	c	The small quantity handler of universal waste shall ensure that puncturing or crushing equipment meets the following conditions:
	i	Is the equipment located in a well-ventilated area? [3745-273-13 (E)(4)(c)(i)]
	ii	Is the equipment protected from an ignition source? [3745-273-13 (E)(4)(c)(ii)]
	iii	Is the equipment connected to a container or tank to collect liquids released from the aerosol container? [3745-273-13 (E)(4)(c)(iii)]
	d	Does the SQHUW maintain the puncturing or crushing equipment and replace air filters according to the manufacturer's specifications? [3745-273-13 (E)(4)(d)]
RMK		

4	e	Does the SQHUW determine if the collected liquids, except for liquids consisting solely of paint, and air filters meet the definition of "hazardous waste" according to Chapter 3745-51 of the Administrative Code? [3745-273-13 (E)(4)(e)] If the collected liquids or air filters meet the definition of hazardous waste, the handler is the generator of the hazardous waste and is subject to Chapter [3745-52-11]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If applicable complete the appropriate generator checklist..
The collected liquids, except for liquids consisting solely of paint, and air filters are not classified as universal waste for the purposes of this rule, the empty containers may be recycled			
Comment: Liquids consisting solely of paint from aerosol containers are eligible to be classified and managed as a universal waste paint in accordance with Chapter 3745-273 of the Administrative Code.			
4	f	Does the SQHUW train each operator of the aerosol container puncturing or crushing equipment regarding the safe and proper operation of the puncturing or crushing equipment, the maintenance of the unit, the segregation of incompatible wastes and the identification of aerosol containers for which puncturing, or crushing may not be appropriate? [3745-273-13 (E)(4)(f)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
Comment: Small quantity handlers of universal waste who use aerosol container puncturing or crushing units may be subject to requirements of the Clean Air Act or the Occupational Safety and Health Act.]			
5	Does the SQHUW manage aerosol containers that are ignitable or reactive in accordance with the following:		
	a	Does the SQHUW comply with OAC rule 3745-66-76 or obtain written approval from the authority having jurisdiction over the local fire code allowing alternative aerosol container storage less than fifty feet from the facility's property line? [3745-273-13 (E)(5)(a)] Is the written approval maintained on-site for as long as ignitable or reactive aerosol containers are managed on-site?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	b	Does the SQHUW comply with Rule 3745-65-17 of the Administrative Code? [3745-273-13 (E)(5)(b)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If applicable complete the appropriate generator checklist.
6	Does the SQHUW manage aerosol containers that are incompatible in accordance with rule 3745-66-77 of the Administrative Code? [3745-273-13 (E)(6)]		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If applicable complete the appropriate generator checklist.
7	Does the SQHUW design, construct, maintain, and operate the facility to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of universal waste or hazardous constituents to air, soil, or surface water which could threaten human health or the environment? [3745-273-13 (E)(7)]		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
UNIVERSAL WASTE AEROSOL CONTAINER LABELING			
8	Does the SQHUW label each universal waste aerosol container, multiple aerosol container package, cabinet, or other unit in which the aerosol containers are accumulated with words that identify the contents of the unit (for example, universal waste aerosol containers, used aerosol containers, recyclable aerosol containers). [3745-273-14 (F)] This provision also applies to collection units used in universal waste satellite accumulation areas.		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
RMK			

F. UNIVERSAL WASTE ANTIFREEZE 3745-273	
APPLICABILITY 3745-273-89	
1	Chapter 3745-273 of the Administrative Code applies to persons managing "antifreeze" as defined in rule 3745-273-09 of the Administrative Code, except as provided in paragraph (B)(2) of this rule:
2	Chapter 3745-273 of the Administrative Code does not apply to persons managing the following antifreeze:
a	Antifreeze that is not yet a waste under Chapter 3745-51 of the Administrative Code. Paragraph (B)(3) of this rule describes when antifreeze becomes a waste [3745-273-89]
b	Antifreeze, including aggregated antifreeze batches, that is not a hazardous waste. Antifreeze is a hazardous waste if the antifreeze exhibits one or more of the characteristics identified in rules 3745-51-20 to 3745-51-24 of the Administrative Code, or if the antifreeze is contaminated with a listed hazardous waste as identified in rules 3745-51-30 to 3745-51-35 of the Administrative Code [3745-273-89]
c	Antifreeze that subsequent to generation is mixed with "used oil" as defined in rule 3745-279-01 of the Administrative Code, or is mixed with another waste that exhibits one or more of the characteristics identified in rules 3745-51-20 to 3745-51-24 of the Administrative Code, or is mixed with one or more of the listed hazardous wastes identified in rules 3745-51-30 to 3745-51-35 of the Administrative Code [3745-273-89]
3	(B)(3) Generation of universal waste antifreeze
a	Used antifreeze becomes a waste on the date the used antifreeze is "discarded" as defined in rule 3745-51-02 of the Administrative Code [3745-273-89]
b	Unused antifreeze becomes a waste on the date the handler decides to discard the unused antifreeze [3745-273-89]

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

Specific Gravity of Antifreeze 1.15

$$1.15 \times 8.345 = 9.6 \text{ lbs./g}$$

$$9.6 \text{ lbs./g} \times 55 \text{ g/drum} = 528 \text{ lbs./drum}$$

$$5000 \text{ kg} \times 2.2 \text{ lbs./kg} = 11000 \text{ lbs.}$$

$$11000 \text{ lbs.} / 528 \text{ lbs./drum} \text{ is approximately } = 20.8 \text{ drums}$$

F. <input type="checkbox"/> UNIVERSAL WASTE ANTIFREEZE		
	A small quantity handler of universal waste shall manage universal waste antifreeze in a way that prevents releases of any universal waste or any component of a universal waste to the environment, as follows:	
1	Does the SQHUU store antifreeze in containers or tanks that are structurally sound and compatible with the antifreeze. Such containers and tanks shall lack leakage or damage, including severe corrosion, which could cause leakage under reasonably foreseeable conditions? [3745-273-13 (F)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2	Has a container or tank that does not comply with paragraph (F)(1) of this rule by being overpacked or taken out of service by the SQHUU by transferring the contents of the container or tank to another container or tank? [3745-273-13 (F)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3	Does the SQHUU who stores antifreeze in a container keep the container closed except when adding or removing antifreeze? [3745-273-13 (F)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4	Does the SQHUU store antifreeze in a tank that complies with paragraph (B)(3) of rule 3745-52-16 of the Administrative Code? [3745-273-13 (F)(4)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		If tanks are used complete the SQG tank checklist.
5	Does the SQHUU prevent the commingling or contamination of antifreeze subsequent to the removal of the antifreeze from a heat exchanger or other equipment when used to winterize that equipment with listed hazardous waste or a characteristic hazardous waste as described in Chapter 3745-51 of the Administrative Code? [3745-273-13 (F)(5)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6	Did the SQHUU develop and maintain at the facility a procedure that describes how antifreeze will be prevented from being commingled or contaminated subsequent to removal of the antifreeze from a heat exchanger or other equipment when used to winterize that equipment with a listed hazardous waste or a characteristic hazardous waste as described in Chapter 3745-51 of the Administrative Code? [3745-273-13 (F)(6)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7	Does the SQHUU who manages antifreeze use dedicated antifreeze collection and storage containers and tanks for the management of antifreeze? [3745-273-13 (F)(7)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8	A SQHUU may reclaim antifreeze provided the handler does the following:	
	a	Does the SQHUU use commercially available equipment, or equipment specifically custom designed or retrofitted according to accepted engineering practices based on established codes, standards, published technical reports or similar peer reviewed documents to reclaim the antifreeze as "reclaimed" is defined in rule 3745-51-01 of the Administrative Code? [3745-273-13 (F)(8)(a)]
	b	Does the SQHUU use reclamation equipment that has sufficient processing capacity to reclaim the quantity of antifreeze received or generated by the handler within one year? [3745-273-13 (F)(8)(b)]
	c	Does the SQHUU train each operator of the reclamation equipment regarding the proper operation and maintenance of the antifreeze reclamation equipment? [3745-273-13 (F)(8)(c)]
RMK		

8	d	Has the small quantity handler of universal waste determined if the wastes generated from the reclamation of antifreeze are "hazardous wastes" as described in Chapter 3745-51 of the Administrative Code. [3745-273-13 (F)(8)(d)] If a waste meets the definition of "hazardous waste," the handler is a hazardous waste generator and is subject to Chapter 3745-52-11	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
			If applicable complete the appropriate generator checklist.
9	Does the SQHUW upon detection of a release of antifreeze do the following, as applicable:		
	a	Stop the release of antifreeze? [3745-273-13 (F)(9)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b	Contain the released antifreeze? [3745-273-13 (F)(9)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c	Clean up and properly manage and dispose the released antifreeze and other materials generated from the cleanup according to applicable waste management requirements? [3745-273-13 (F)(9)(c)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d	Remove a leaking container or tank from service by transferring the contents to another container or tank? [3745-273-13 (F)(9)(d)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e	Overpack or replace any leaking storage container? [3745-273-13 (F)(9)(e)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	f	Repair any leaking container or tank prior to returning the container or tank to service? [3745-273-13 (F)(9)(f)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10	Spilled universal waste antifreeze that is recovered in liquid form or materials used to absorb a spill of universal waste antifreeze may be managed as universal waste antifreeze? [3745-273-13 (F)(10)]		
11	Does the SQHUW who manages antifreeze train employees who manage antifreeze regarding the universal waste requirements applicable to antifreeze, the proper management of antifreeze, the procedure to prevent contamination of antifreeze with characteristic hazardous waste or listed hazardous waste, and the proper response to a release of antifreeze? [3745-273-13 (F)(11)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
UNIVERSAL WASTE ANTIFREEZE LABELING			
12	Each container or tank of universal waste antifreeze used to accumulate antifreeze shall be labeled with words that identify the contents of the container or tank (for example, used antifreeze, spent antifreeze, UW antifreeze, recyclable antifreeze) ? [3745-273-14 (F)(11)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RMK			

G. UNIVERSAL WASTE PAINT AND PAINT-RELATED WASTE	
APPLICABILITY 3745-273-89	
1	Chapter 3745-273 of the Administrative Code applies to persons managing "paint" and "paint-related waste" as defined in rule 3745-273-09 of the Administrative Code, except as provided in paragraph (C)(2) of this rule.
2	Chapter 3745-273 of the Administrative Code does not apply to persons managing the following paint and paint-related wastes:
a	Paint and paint-related wastes that are not yet a waste under Chapter 3745-51 of the Administrative Code. Paragraph (C)(3) of this rule describes when paint and paint-related waste becomes a waste.
b	Paint and paint-related waste that is not a hazardous waste. Paint and paintrelated waste is a hazardous waste if the paint or paint-related waste exhibits one or more of the characteristics identified in rules 3745-51-20 to 3745-51-24 of the Administrative Code, or if the paint or paint-related waste is listed in rules 3745-51-30 to 3745-51-35 of the Administrative Code.
c	Paint and paint-related waste that subsequent to generation is mixed with another waste that is not paint or a paint-related waste that exhibits one or more of the characteristics identified in rules 3745-51-20 to 3745-51-24 of the Administrative Code or is mixed with another waste that is listed in rules 3745-51-30 to 3745-51-35 of the Administrative Code.
3	Generation of universal waste paint and paint-related waste
a	Used paint-related waste becomes a waste on the date the used paint-related waste is discarded.
b	Unused paint becomes a waste on the date the handler decides to discard the unused paint, or on the date the unused paint is no longer useable.

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

Specific Gravity of Inks = 0.9 to 1.5

$0.9 \text{ to } 1.5 \times 8.345 = 7.51 \text{ to } 12.52 \text{ lbs./g}$

$7.51 \text{ lbs./g} \times 55 \text{ g/drum} = 413 \text{ lbs./drum}$

$12.52 \text{ lbs./g} \times 55 \text{ g/drum} = 688 \text{ lbs./drum}$

$5000 \text{ kg} \times 2.2 \text{ lbs./kg} = 11000 \text{ lbs.}$

$11000 \text{ lbs.} / 413 \text{ lbs./drum}$ is approximately
= 26 drums

$11000 \text{ lbs.} / 688 \text{ lbs./drum}$ is approximately
= 15 drums

Density of Latex Paints = 11.54 lbs./g

11.54 lbs./g

$11.54 \text{ lbs./g} \times 55 \text{ g/drum} = 634 \text{ lbs./drum}$

$5000 \text{ kg} \times 2.2 \text{ lbs./kg} = 11000 \text{ lbs.}$

$11000 \text{ lbs.} / 634 \text{ lbs./drum}$ is approximately
= 17 drums

G. UNIVERSAL WASTE PAINT AND PAINT-RELATED WASTE

Does the SQHUW manage universal waste paint and paint-related wastes in a way that prevents releases of any universal waste or any component of a universal waste to the environment as follows:

1 A SQHUW may store universal waste paint or paint-related wastes in units that feed crushing or shredding equipment (i.e., hopper), containers, or tanks that are structurally sound and compatible with the paint or paint-related wastes.

Do these hoppers, containers, and tanks shall lack leakage or damage, including severe corrosion, which could cause leakage under reasonably foreseeable conditions? [\[3745-273-13 \(G\)\(1\)\]](#)

Yes No N/A

2 Does the SQHUW ensure that a hopper, container, or tank that does not comply with paragraph (G)(1) of this rule is overpacked or taken out of service by transferring the contents to another hopper, container, or tank? [\[3745-273-13 \(G\)\(2\)\]](#)

Yes No N/A

3 Does the SQHUW keep hoppers and containers that hold paint and paint-related wastes closed except when adding or removing paint or paint-related wastes? [\[3745-273-13 \(G\)\(3\)\]](#)

Yes No N/A

4 Does the SQHUW store paint or paint-related waste in a tank that complies with paragraph (B)(3) of rule 3745-52-16 of the Administrative Code? [\[3745-273-13 \(G\)\(4\)\]](#)

Yes No N/A

If tanks are used complete the SQG tank checklist.

5 A SQHUW who generates universal waste paint and paint-related wastes on-site may recycle such paint and paint-related wastes on-site by reclamation, use, or reuse as described in rule 3745-51-02 of the Administrative Code.

Does the SQHUW ensure that the wastes are not burned for energy recovery or used in a manner constituting disposal according to rule 3745-51-02 of the Administrative Code? [\[3745-273-13 \(G\)\(5\)\]](#)

Yes No N/A

6 A SQHUW who receives universal **waste paint** from another universal waste handler may recycle such paint by reclamation, use, or reuse as described in rule 3745-51-02 of the Administrative Code.

Does the SQHUW ensure that the universal waste paint is not burned for energy recovery or used in a manner constituting disposal according to rule 3745-51-02 of the Administrative Code? [\[3745-273-13 \(G\)\(6\)\]](#)

Yes No N/A

7 Waste from the reclamation of universal waste paint and paint-related wastes are not universal wastes for the purposes of this rule.

Did the SQHUW evaluate the wastes to determine if such wastes are listed hazardous wastes or characteristic hazardous waste as described in Chapter 3745-51 of the Administrative Code? [\[3745-273-13 \(G\)\(7\)\]](#)

Yes No N/A

Comment: If a waste meets the definition of "hazardous waste," the handler is a hazardous waste generator and is subject to Chapter [3745-52](#). If applicable note this on the appropriate generator checklist

RMK	

8	Does the SQHUW who recycles universal waste paint and paint-related wastes as described in paragraphs (G)(5) and (G)(6) of this rule ensure that employees responsible for recycling universal waste paint and paint-related wastes are trained regarding the proper operation and maintenance of the recycling process? [3745-273-13 (G)(8)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9	Does the SQHUW upon detection of a release of paint or paint-related wastes do the following, as applicable:	
a	Stop the release? [3745-273-13 (G)(9)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b	Contain the released paint or paint-related wastes? [3745-273-13 (G)(9)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c	Clean up and properly manage the released paint or paint-related wastes and other materials generated from the clean-up? [3745-273-13 (G)(9)(c)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d	Remove a leaking container or tank from service by transferring the contents to another container or tank? [3745-273-13 (G)(9)(d)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e	Overpack or replace any leaking storage container? [3745-273-13 (G)(9)(e)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
f	Repair any leaking container or tank prior to returning the container or tank to service? [3745-273-13 (G)(9)(f)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10	Does the SQHUW manage paint and paint-related wastes that are ignitable or reactive in accordance with the following:	
a	Does the SQUHW store containers holding paint and paint-related wastes at least 50 feet from the property line [3745-273-13 (G)(10)(a)] or Has the SQUHW obtained and retained written approval from the authority having jurisdiction over the local fire code allowing alternative storage less than fifty feet from the facility's property line? [3745-273-13 (G)(10)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b	Is the SQUHW in compliance with rule 3745-65-17 (General requirements for ignitable, reactive, or incompatible wastes) of the Administrative Code? [3745-273-33 (G)(10)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If applicable refer to the checklist for ignitable, reactive and incompatible wastes.
11	Does the SQHUW manage paint and paint-related wastes that are incompatible in accordance with rule 3745-66-77 of the Administrative Code? [3745-273-13 (G)(11)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12	Does the SQHUW design, construct, maintain, and operate the facility to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of universal waste or hazardous constituents to air, soil, or surface water which could threaten human health or the environment? [3745-273-13 (G)(12)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13	<i>A SQHUW may open containers of universal waste paint and scrape, pour, pump or drain the universal waste paint from the container to collect the paint and render the container empty?</i>	
RMK		

14	The SQHUW may puncture, shred, or crush containers of paint that do not exceed five gallons in volume to remove and collect the contents of the container rendering the container empty provided the handler does all of the following:	
a	Does the SQHUW use commercially available equipment or equipment specifically custom designed or retrofitted according to accepted engineering practices based on established codes, standards, published technical reports, or similar peer reviewed documents to puncture, shred, or crush and empty the paint containers within an enclosed compartment or hopper? [3745-273-13 (G)(14)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b	Does the SQHUW use equipment that has sufficient processing capacity to empty the quantity of paint containers received or generated within one year? [3745-273-13 (G)(14)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c	Does the SQHUW collect the liquids from the paint container. Collected liquids are still classified as universal waste paint? [3745-273-13 (G)(14)(c)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d	Does the SQHUW maintain the puncturing, crushing and shredding equipment and replace air filters according to the manufacturer's specifications? [3745-273-13 (G)(14)(d)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e	Does the SQHUW train each operator of the equipment used to shred, puncture, or crush containers of universal waste paint regarding the maintenance and proper operation of the equipment? [[3745-273-13 (G)(14)(e)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
PAINT AND PAINT-RELATED WASTES LABELING		
15	Does the SQHUW label each container, tank, multiple container package or hopper in which universal waste paints are accumulated with words that identify the contents of the container, tank, multiple container package or hopper (for example, UW paint, paint waste or recyclable paint)? [3745-273-14 (H)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
16	Does the SQHUW label each container or tank in which universal paint-related wastes are accumulated labeled to identify the contents of the container or tank (for example, paint-related UW, paint-related waste, paint wastes, paint rags, used paint stripper or used paint blast media)? [3745-273-14 (H)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RMK		