

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS

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

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

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

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

POLLUTION PREVENTION

Note to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention (P2) practices that the company may have initiated or attempted to initiate. The checklist is also used to:

- ◇ Facilitate P2 discussions;
- ◇ Identify barriers to P2;
- ◇ Define the P2 universe;
- ◇ Identify the need for future P2 initiatives;
- ◇ Identify partnership opportunities; and
- ◇ Link companies with better P2 resources.

As a prelude to completing this checklist the inspector should use the following list of questions as a way to initiate a dialogue concerning P2:

1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate?
2. What is the largest waste stream that you generate?
3. How important would it be to you to eliminate that waste stream?
4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have?
5. Could you use better housekeeping practices to reduce the amount of waste that you generate?

If the company responds with one of the answers below, the appropriate box should be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided in the remarks section.

1. Has the company undertaken any P2 activities to reduce the amount of waste generated? Yes No N/A RMK#

a. If so, what has the company done to minimize waste generation?

- A change in the process resulting in less waste.
- A change in the product resulting in less waste.
- Use of fewer and less toxic hazardous raw materials.
- Better operations/improved housekeeping.
- On-site recycling/reuse of hazardous materials.
- Sending waste off-site for recycling/reuse.
- Other activities (specify):

b. **If so**, what wastes have been addressed?

- | | |
|---|---|
| <input type="checkbox"/> Solvents | <input type="checkbox"/> Waste water |
| <input type="checkbox"/> Paint related wastes | <input type="checkbox"/> Solid waste (paper, plastic, metal, wood, blasting material) |
| <input type="checkbox"/> Industrial process wastes (sludges, slags, contaminated wastes waters, etc.) | <input type="checkbox"/> Air emissions |
| <input type="checkbox"/> Contaminated oils/hydraulic fluids | <input type="checkbox"/> Energy use |
| <input type="checkbox"/> Off-spec chemicals | <input type="checkbox"/> Fluorescent light bulbs |
| <input type="checkbox"/> Shop rags | <input type="checkbox"/> Used batteries |
| <input type="checkbox"/> Other (specify): | |

c. If they haven't minimized waste are there barriers that are preventing them from doing it?

- Lack of information about practical alternatives.
- Lack of capital to make process changes.
- Lack of internal management support.
- The company does not generate enough waste to consider P2.
- Other reason given (specify):

- | | |
|--|-----------------------------|
| 2. Does the company plan to do P2 activities in the future? | ___Yes ___No ___N/A ___RMK# |
| 3. Would the company be interested in receiving additional information from Ohio EPA about P2? | ___Yes ___No ___N/A ___RMK# |
| 4. Did you give the company information about P2 during the inspection? | ___Yes ___No ___N/A ___RMK# |

5. Would the company like a P2 assessment? Yes No N/A RMK#

A. If yes, provide information that makes the company a good candidate for an assessment (i.e., known specific P2 opportunities exist, the company is willing to cooperate and commit resources to the assessment, the company fully understands DHWM's P2 assessment process, etc.)

B. If no, list the reasons the facility representative gave for not wanting an assessment.

If the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the Pollution Prevention for Hazardous Waste Generators document and discuss it with them.

REMARKS

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WASTE EVALUATION

1. Have all wastes generated at the facility been evaluated? Yes ___ No___ N/A ___RMK#___
[3745-52-11]

GENERATOR CLASSIFICATION

2. Does the generator produce ≤ 100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes ___ No___ N/A ___RMK#___

NOTE: *If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). **If so**, complete the Small Quantity Generator Requirements checklist.*

NOTE: *To convert from gallons to pounds:*

Amount in gallons x Specific Gravity x 8.345 = Amount in pounds

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3745-51-05(G)(3)] Yes ___ No___ N/A ___RMK#___

REMARKS