



State of Ohio Environmental Protection Agency

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BM  
FL

Southwest District

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Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

March 30, 2007

Dan Green  
President  
L.W.G. Finishing Company  
9461 LeSaint Drive  
Fairfield, Ohio 45014

**Re: L.W.G. Finishing Company; Hazardous Waste; Butler County;  
OHD980990436,SQG**

Dear Mr. Green:

On March 8, 2007, representatives of Ohio Environmental Protection Agency (Ohio EPA) and United States Environmental Protection Agency conducted a compliance evaluation of L.W.G. Finishing Company (LWG) to determine your compliance with Ohio's hazardous waste laws and regulations as found under the Ohio Revised Code (ORC) and the Ohio Administrative Code (OAC). Ohio EPA's inspection included an inspection of facility operations and a review of written documentation and records. During the inspection we also discussed pollution prevention and waste reduction. This letter will explain the violations we found, what you need to do to correct the violations.

Additional information was submitted to Ohio EPA as a follow-up to this inspection during our telephone conversation on March 28, 2007.

We found the following violations of Ohio's hazardous waste laws. In order to correct these violations you must do the following and send me the required information within 21 days of your receipt of this letter:

**1. Satellite Accumulation**

A generator may accumulate as much as fifty-five gallons of hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste. Any waste accumulation in excess of 55 gallons must be dated at the time of excess accumulation and moved to the storage area within three days. LWG had accumulated waste in the "floor sweepings" satellite accumulation area in excess of 55 gallons. This is a violation of OAC Rule 3745-52-34(C)(2) for not dating the excess accumulation and moving it to the storage area within

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the required time frame. Please immediately date the drums in accordance with the requirements described in rule and move the drums to the storage area. I have enclosed guidance on satellite accumulation to assist you with compliance.

**2. Universal Waste**

LWG is in violation of OAC 3745-273-13(D)(1) which requires a small quantity handler manage universal waste lamps appropriately. Please prepare a written plan for managing universal wastes generated at LWG and submit this plan to Ohio EPA within 21 days of receipt of this letter. I have enclosed guidance on fluorescent lamps to assist you with compliance.

**3. Solvent-Contaminated Rags**

Solvent-contaminated rags and wipers which are contaminated with listed solvent constituents are not considered listed hazardous waste except in situations where the rag or wiper is used to clean up a spill of a used solvent that is a listed hazardous waste; those rags or wipers become a listed hazardous waste.

Even though the Division of Hazardous Waste Management no longer considers solvent-contaminated rags and wipers as being listed hazardous waste, if you generate solvent-contaminated rags or wipers, and do not have them laundered, you will still need to evaluate this waste stream to determine whether they would be a characteristic hazardous waste for purposes of storage, transportation, and disposal. Please submit waste profile information regarding the solvent-contaminated rags to demonstrate that they are not characteristic hazardous waste within 21 days of receipt of this letter.

**4. PVC Tape**

The PVC tape used in the chrome plating process was formerly managed as a hazardous waste and included with floor sweepings as a waste stream. During the inspection you described a process change LWG has made where you now rinse the tape to decontaminate it. This tape is now being managed as a solid waste. Please submit waste profile information regarding the PVC tape to demonstrate that it is no longer a hazardous waste within 21 days of receipt of this letter.

**5. Pollution Prevention**

You may be able to reduce the waste LWG generates. If you find ways to recycle, reduce, or altogether eliminate the amount of waste that you generate you may be able to reduce

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treatment and disposal costs, and you may possibly reduce your regulatory requirements. We discussed pollution prevention during the inspection, however, we did not identify any pollution prevention opportunities within your operations. For other possible pollution prevention opportunities please visit our Office of Compliance Assistance and Pollution Prevention's (OCAPP) website at <http://www.epa.state.oh.us/ocapp>. I will inform OCAPP if you desire an on-site pollution prevention assessment.

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information at the following web address: [www.epa.state.oh.us/dhwm/listserv.html](http://www.epa.state.oh.us/dhwm/listserv.html). Please feel free to share this information with your colleagues. You can find copies of the rules, compliance checklists, and other information on the division's web page at [www.epa.state.oh.us/dhwm](http://www.epa.state.oh.us/dhwm).

**Please submit the information requested in items number 2, 3, and 4 above within 21 days of receipt of this letter.** Copies of the checklists completed for this inspection are attached. Should you have any questions, please contact me at (937) 285-6083.

Sincerely,



Brian Marlatt  
Environmental Specialist  
Division of Hazardous Waste Management

cc: Dinah Crawford, DHWM/SWDO File  
Duncan Campbell, USEPA

BM/plh

**NOTICE:**

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.



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LW5

OAD 980990436

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

CESQG: <= 100 Kg. (approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month
LQG: >= 1,000 Kg. (-300 gallons) of waste in a calendar month or >= 1 Kg. of acutely hazardous waste in a calendar month
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds
Safety Equipment Used:

GENERAL REQUIREMENTS

- 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] ADDITION PROFILE INFO REQUESTED. Yes [ ] No [ ] N/A [ ]
2. Has the generator obtained a U.S. EPA I.D. number? [3745-52-12] Yes [x] No [ ] N/A [ ]
3. Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)] Yes [ ] No [x] N/A [ ]
4. Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)] Yes [ ] No [x] N/A [ ]
5. Does the generator accumulate hazardous waste? Yes [x] No [ ] N/A [ ]

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

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

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

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

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

- 8. Does the generator treat hazardous waste in a:
a. Container that meets 3745-66-70 to 3745-66-77? Yes [ ] No [x] N/A [ ]
b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? Yes [ ] No [x] N/A [ ]
c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes [ ] No [x] N/A [ ]
d. Containment building that meets 3745-256-100 to 3745-256-102? Yes [ ] No [x] N/A [ ]

NOTE: Complete appropriate checklist for each unit.

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

MANIFEST REQUIREMENTS

- 9. Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)] Yes [x] No [ ] N/A [ ]
10. Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)] Yes [ ] No [x] N/A [ ]
a. Does the contractual agreement specify the type of waste and frequency of shipment? Yes [ ] No [ ] N/A [x]

[Facility Name/Inspection Date]
[ID number]
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- b. Is the transport vehicle owned and operated by the reclaimer? Yes  No  N/A
- c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? Yes  No  N/A

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

11. Have items 1 through 20 of each manifest been completed?[3745-52-20(A)] Yes  No  N/A

*NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be complete. [3745-52-20 (A)]*

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

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

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

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

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

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

16. Are signed copies of all manifests being retained for at least three years? [3745-52-40] Yes  No  N/A

*NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.*

**PREPAREDNESS AND PREVENTION**

17. Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)] Yes  No  N/A

18. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]
- a. Name and telephone number of emergency coordinator? Yes  No  N/A
- b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes  No  N/A
- c. Telephone number of local fire department? Yes  No  N/A

19. Are employees familiar with waste handling and emergency procedures [3745-52-34(D)(5)(c)] Yes  No  N/A

20. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)] Yes  No  N/A

21. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31] Yes  No  N/A

22. Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:
- a. Internal Alarm system? [3745-65-32(A)] Yes  No  N/A
  - b. Emergency communication device? [3745-65-32(B)] Yes  No  N/A
  - c. Portable fire control, spill control and decon equipment? [3745-65-32(C)]? Yes  No  N/A
  - d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes  No  N/A
23. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency?[3745-65-33]
- a. Are inspections recorded in a log or summary? [3745-65-33]? Yes  No  N/A
24. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)] Yes  No  N/A
25. If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32?) [3745-65-34(B)] Yes  No  N/A
26. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes  No  N/A
27. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes  No  N/A
28. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes  No  N/A

**SATELLITE ACCUMULATION AREA REQUIREMENTS**

29. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? {3745-52-34(C)(1)} Yes  No  N/A
  - b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes  No  N/A
  - c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]. Yes  No  N/A
  - d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes  No  N/A
  - e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. Yes  No  N/A
  - f. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes  No  N/A
30. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:
- a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes  No  N/A
  - b. Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes  No  N/A

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

### USE AND MANAGEMENT OF CONTAINERS

31. Has the generator marked containers with the words "Hazardous Waste" [3745-52-34(D)(4)] Yes  No  N/A
32. Is the accumulation date on each container? [3745-52-34(D)(4)] Yes  No  N/A
33. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes  No  N/A
- b. In good condition? [3745-66-71] Yes  No  N/A
- c. Compatible with wastes stored in them? [3745-66-72] Yes  No  N/A
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes  No  N/A

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

34. Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days. Yes  No  N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes  No  N/A
35. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes  No  N/A
36. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B) 3745-66-77(A)] Yes  No  N/A
37. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B) ? [3745-66-77(B)] Yes  No  N/A

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

### PRE-TRANSPORT REQUIREMENTS

38. Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes  No  N/A
39. Does each container  $\leq$  100 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes  No  N/A
40. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes  No  N/A

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

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

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

**PROHIBITIONS**

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

**WASTE MANAGEMENT & LABELING/MARKING**

**UNIVERSAL WASTE BATTERIES**

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes  No  N/A  RMK#
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes  No  N/A  RMK#
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes  No  N/A  RMK#
  - b. Mix battery types in one container? Yes  No  N/A  RMK#
  - c. Discharge batteries to remove the electric charge? Yes  No  N/A  RMK#
  - d. Regenerated used batteries? Yes  No  N/A  RMK#
  - e. Disassemble them into individual batteries or cells? Yes  No  N/A  RMK#
  - f. Remove batteries from consumer products? Yes  No  N/A  RMK#
  - g. Remove the electrolyte from the battery? Yes  No  N/A  RMK#
- If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] Yes  No  N/A  RMK#

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

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

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

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

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

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

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

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

### UNIVERSAL WASTE LAMPS

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

Yes \_\_\_ No  N/A \_\_\_ RMK# 1

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

Yes \_\_\_ No  N/A \_\_\_ RMK# 1

10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)]

Yes \_\_\_ No  N/A \_\_\_ RMK# 1

**NOTE:** Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of

generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

### ACCUMULATION TIME

11. Is the waste accumulated for less than one year? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# 1  
[3745-273-15(A)] If not:
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes \_\_\_ No  N/A \_\_\_ RMK# 1

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

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes \_\_\_ No  N/A \_\_\_ RMK# 1
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# 1
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# 1
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# 1
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# 1
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# 1
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# 1

### EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]

Yes \_\_\_ No  N/A \_\_\_ RMK# 1

**RESPONSE TO RELEASES**

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

Yes \_\_\_ No  N/A \_\_\_ RMK# 1

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

Yes \_\_\_ No  N/A \_\_\_ RMK# 1

16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)]

Yes \_\_\_ No  N/A \_\_\_ RMK# 1

**OFF-SITE SHIPMENTS**

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

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]

Yes \_\_\_ No  N/A \_\_\_ RMK# 1

**NOTE: SQUWHs are prohibited to send waste to any other facility.**

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)]

Yes \_\_\_ No  N/A \_\_\_ RMK# 1

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

Yes \_\_\_ No  N/A \_\_\_ RMK# 1

20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:

a. Receive the waste back? [3745-273-18(E)(1)]

Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# 1

b. Agree to where the shipment will be sent? [3745-273-18(E)(2)]

Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# 1

21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:  
 Yes \_\_\_ No  N/A \_\_\_ RMK# 2
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)]  
 Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# 2
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)]  
 Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK# 2
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]  
 Yes \_\_\_ No  N/A \_\_\_ RMK# 2
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)]  
 Yes \_\_\_ No  N/A \_\_\_ RMK# 2

**EXPORTS**

24. Is waste being sent to a foreign destination? If so:  
 Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]  
 Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)]  
 Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]  
 Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

**REMARKS**

1) LWL HAS NOT BEEN MANAGING WASTE FLOURESCENT LAMPS APPROXIMATELY. NO WASTE LAMPS WERE ON-SITE AT THE TIME OF THE INSPECTION.

