

VA Medical Center
CA
002
File



State of Ohio Environmental Protection Agency

Southwest District Office

401 E. Fifth St.
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249
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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

May 31, 2007

VA Medical Center
Mr. James Provins, CHSP
Industrial Hygiene and Safety
3200 Vine Street
Cincinnati, Ohio 45220

**RE: COMPLIANCE EVALUATION INSPECTION – VA MEDICAL CENTER –
OH8360010369**

Dear Mr. Provins:

Thank you for assisting the Ohio EPA on the May 24, 2007, compliance evaluation inspection of the VA Medical Center located at 3200 Vine Street, Cincinnati, Ohio. The inspection was to determine the VA Medical Center's compliance with Ohio's hazardous waste laws and regulations as found under the Ohio Revised Code and the Ohio Administrative Code ("ORC" and "OAC" respectively). Paul Pardi and I represented the Ohio EPA. Ohio EPA's inspection included an inspection of facility operations and a review of written documentation. Based on the inspection, Ohio EPA has determined that the VA Medical Center has violated the following state hazardous waste regulations:

- 1. Used oil storage requirements for generators, OAC 3745-279-22(C)(1):**
Containers and above ground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

The VA Medical Center failed to comply with this rule by not having the used oil tank properly labeled.

The VA Medical Center corrected this violation on May 24, 2007, by emailing pictures documenting the properly labeled used oil tank. **Therefore, the VA Medical Center is no longer in violation of OAC 3745-279-22(C)(1).**

General Comments

1. During the inspection we discussed the management of chemotherapy waste. The following nine (9) chemotherapy drugs when disposed are listed hazardous wastes:



Mr. James Provins
May 31, 2007

Clorambucil; Alanine; Uracil; Daunomycin; Mitomycin-C; Melphalan; Azirino; and Streptozotocin

Chlorambucil is the only chemowaste on the pharmacy's current usage list. As discussed during the inspection, you may want to review the other chemotherapy drugs used by the pharmacy. If those drugs do not have a hazardous waste characteristic (e.g., corrosive, toxic) and are not a listed hazardous waste, then they may be handled as non-hazardous waste. Please note the wastes may still be subject to infectious waste regulations.

The VA Medical Center handles the chemowaste on-site as hazardous, but allows Environmental Enterprises, Inc. (EEI) to make the final determination upon pickup. EEI has shipped the chemowaste as non-hazardous. For clarification, please review EEI's waste handling procedures for the chemowaste, specifically looking at how EEI determined the chemowaste to be non-hazardous. Please document this internal review and submit a copy to the Ohio EPA.

2. We discussed whether or not you needed to separate specimens from formaldehyde prior to being picked up for disposal as infectious waste. I spoke with Holly Hillyer, Division of Solid and Infectious Waste Management, about the regulatory requirements of preserved specimens. Specimens that are preserved are no longer considered infectious waste and may be handled as solid waste. I have attached a copy of a memo explaining this. As for hazardous waste requirements of formaldehyde, as long as the formaldehyde is used for its intended purpose it is no longer considered a listed hazardous waste. You may want to check with the Cincinnati Metropolitan Sewer District to see if they will allow you to dispose of the formaldehyde down the drain.
3. Upon reviewing manifest information, we determined the VA Medical Center is a conditionally exempt small quantity generator of hazardous waste. Please be aware, if at any time the VA Medical Center's monthly hazardous waste generation increases you must comply with all applicable state hazardous waste regulations.

I have enclosed a copy of the checklists completed during the inspection. If you have any questions, please call me at (937) 285-6093.

Sincerely,


Cathy L. Altman

Division of Hazardous Waste Management

cc: Dinah Crawford, DHWM-SWDO/SWDO File

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.





State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor
Donald R. Schregardus
Director

INTEROFFICE COMMUNICATION

TO: Dana Thompson, DAPC
FROM: Alison M. Shockley, DSIWM
DATE: March 9, 1992
SUBJECT: DSIWM Interpretation of Pathological Waste Category

3745-75-01 (C)(5)(c), which is the same as DSIWM's 3745-27-01 (Z)(3), states:

"Pathological wastes, including, without limitation, human and animal tissues, organs, and body parts, and body fluids and excreta that are contaminated with or likely to be contaminated with infectious agents, removed or obtained during surgery or autopsy or for diagnostic evaluation."

Since all human and animal blood meets the definition of infectious waste, it would seem logical to conclude that pathological waste, which by nature has an extremely high blood content, would also be considered infectious waste. Tissues that have been preserved should not count as infectious waste. The fixing procedure, usually via formalin, inactivates most bacteria, fungi, and viruses. It is this inactivation of bacteria that prevents the corpse or tissue from decaying.

You may want to revised your response to indicate that pathological waste, because of its blood content, is considered infectious waste unless the pathological waste has been placed into a fixative.

AMS/PF/jm



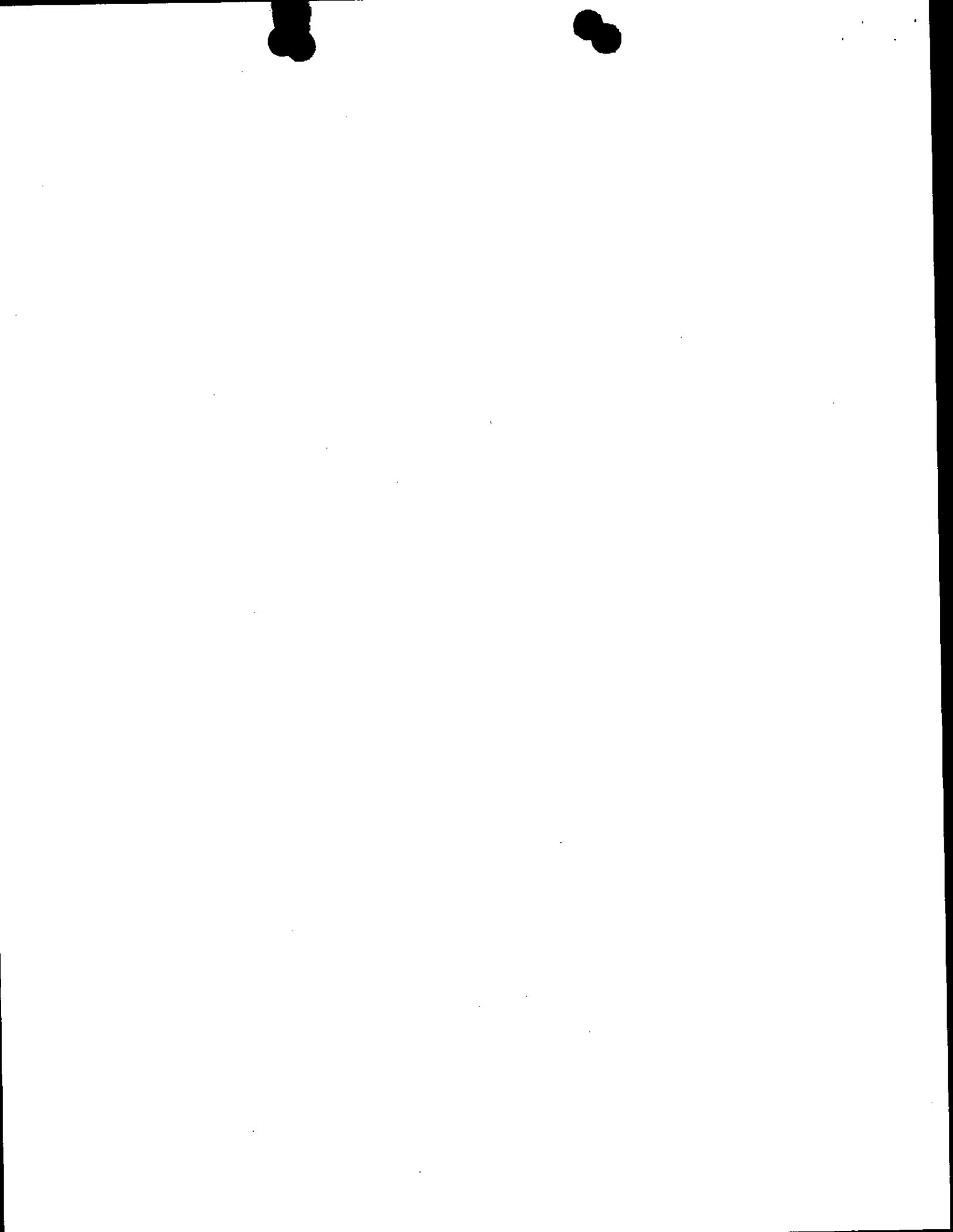
Ohio Environmental Protection Agency
RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM

For Ohio EPA use only

E-mail this completed form to
tammy.mccconnell@epa.state.oh.us or mail it to Tammy
McCConnell, Central Office

Site EPA ID No.	EPA ID Number: OH8360010369								
Site Name	Name: VA Medical Center				Website: (Optional)				
Site Location Information	Street Address: 3200 Vine Street								
	City, Town, or Village: Cincinnati				State: OH				
	County Name: Hamilton				Zip Code: 45220				
Site Land Type (check only one)	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input checked="" type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
NAICS code(s) www.epa.gov/epcd/www www.naics.org	62211 General Medical and Surgical Hospital								
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: James			MI: R	Last Name: Provins				
	Phone Number: 513-475-6363				Phone Number Extension:				
	E-Mail Address: jamesprovins@med.va.gov								
	Fax Number:				Fax Number Extension:				
	Street or P.O. Box:								
	City, Town or Village:		State:		Country:		Zip Code:		
Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Dept of Veteran's Affairs				Date Became Owner (mm/dd/yyyy): 01/01/1952				
	Owner Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input checked="" type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: 3200 Vine Street								
	City, Town or Village: Cincinnati				Owner Phone #: 513-475-6363				
	State: Ohio				Country: USA		Zip Code: 45220		
	Name of Site's Operator: same				Date Became Operator (mm/dd/yyyy):				
	Owner Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box:								
	City, Town or Village:				Operator Phone #:				
	State:		Country:		Zip Code:				
Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
Type of Generator									
<input type="checkbox"/> Not Regulated				<input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste					
<input type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)									
Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Underground Injection Control Facility				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste									

Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply))						
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste			<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)			
<input type="checkbox"/> Destination Facility for Universal Waste						
(Check all boxes below that apply for each of the three types of facilities above)			Used Oil Activities (Indicate Type(s) of Activity(ies))			
Managed			<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner		
Batteries	<input checked="" type="checkbox"/>		<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil		
Pesticides	<input type="checkbox"/>		<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner		
Mercury containing equipment	<input type="checkbox"/>		<input type="checkbox"/> Used Oil Processor			
Lamps	<input checked="" type="checkbox"/>		<input type="checkbox"/> Used Oil Re-refiner			
Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRA info source record, you do not need to list them all. Instead just indicate the date of the most recent source record.						
D001	D002	D003	D007	D008	D009	F003
Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.						
Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:			
Tanks	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Other Comments:			
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Used oil tank only			
Name of Inspector(s)		Name of Inspector(s)		Date of Inspection/Time (mm/dd/yyyy) (hh:mm)		
Cathy Altman		Paul Pardi		05/24/07 10:15		
OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.						
Signature of Owner, Operator, or an Authorized Representative			Name and Title (Print)		Date (mm/dd/yyyy)	



PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: VA Medical Center Facility Type: CESQG Date of Inspection: May 24, 2007 EPA ID#: OH8360010369

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1 Research/Lab activities	Out of date product or unused product	Less than 25 gallons/month (mostly a couple grams at a time) Small lab containers	None	Environmental Enterprises Inc. Cincinnati, Ohio	Try to find another lab to use unused products or transfer products when researcher goes to another facility	
2 Pharmacy	Chemo waste	1-2 five gallon buckets/month, most of waste is non-hazardous – gloves, gowns, and empty chemo bags	None	Environmental Enterprises, Inc, Cincinnati, Ohio		
3 General maintenance	Used oil	Above ground tank	None	Environmental Enterprises, Inc		
4 Lamps	Used lamps	Stored in original boxes	None	Environmental Enterprises, Inc	Recycled	
5 Batteries	Used batteries	Stored in buckets and boxes	None	Environmental Enterprises, Inc	Recycled	

6							
7							
8							
9							

REMARKS-GENERAL INFORMATION

General Process Information:

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.
 Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other:

USED OIL INSPECTION CHECKLIST (Short Version)

NOTE: This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes ___ No N/A ___ RMK#
- Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes ___ No N/A RMK#
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No N/A ___ RMK#
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes ___ No N/A RMK#

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes ___ No N/A RMK#
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes ___ No N/A RMK#
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes No N/A ___ RMK#
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No N/A ___ RMK#
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes ___ No N/A ___ RMK#
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes ___ No N/A RMK#

- b. Contained the release? Yes ___ No N/A RMK#
- c. Cleaned up and properly managed the used oil and other materials? Yes ___ No N/A RMK#
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A RMK#
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes ___ No ___ N/A RMK#
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes ___ No N/A RMK#
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes ___ No N/A RMK#
- c. Are the combustion gases from heater vented to the ambient air? Yes ___ No N/A RMK#
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes No N/A ___ RMK#

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes ___ No N/A RMK#
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes ___ No N/A RMK#
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes ___ No N/A RMK#

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes No N/A ___ RMK#

L:\Inspection Checklist\MegaSet Rule Updates\USED OIL.SHORT.11.2004.fin.megaset.wpd

REMARKS

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#
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#

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#

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#

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#
[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#

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#

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#

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#

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#

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#

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#

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#

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#

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes No N/A ___RMK#
15. Is the material released characterized? [3745-273-17(B)] Yes No N/A ___RMK#
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#

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#

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#
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#
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#

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

Yes ___ No ___ N/A X RMK#

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 X RMK#

a. Sending the waste back to the originating handler? [3745-273-18(F)(1)]

Yes ___ No ___ N/A X RMK#

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 X RMK#

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 X RMK#

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 X RMK#

EXPORTS

24. Is waste being sent to a foreign destination? If so:

Yes ___ No X 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 X 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 X 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 X RMK#

REMARKS