



**Environmental
Protection Agency**

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

December 10, 2010

Mr. Andrew Millitzer
Spear USA
5510 Courseview Drive
Mason OH 45040

Re: NOV/PARTIAL RTC SPEAR USA OHD986986578

Dear Mr. Millitzer:

On November 18, 2010, George Strobel, Jeff Smith, and I attempted to perform an inspection at the Spear USA facility noted above to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). As is our practice, our inspection was unannounced. You told us that this was a very bad day for you as you were scheduled to take your wife later that morning to a very important medical procedure which had only recently been scheduled. I suggested that you give us a very quick ten-minute walk-around inspection immediately and that I could return the next day to perform a complete inspection. You agreed with that approach and you showed us the drums of hazardous waste on your loading dock, the satellite accumulation area (SAA) in the solvent room, and we took a quick general tour of your facility. We note the following observations:

- 1) There was a strong odor of solvents in the solvent room.
- 2) We saw two small, u-shaped fluorescent bulbs on a shelf in the production area. We infer that these were used lamps that had not yet been placed in storage.
- 3) The containers of hazardous waste on the loading dock were properly stored and properly labeled and the SAA drum in the solvent room was properly labeled and closed.

I returned alone on November 19. We began by discussing the purpose and scope of the inspection. We reviewed Spears process changes since my last inspection in 2006 and we discussed your pollution prevention and waste minimization efforts. During the physical inspection, we looked at the ink room, the solvent room, the waste storage room, the press area and the warehouse, and the maintenance room. You provided me a photocopy of your emergency evacuation map, which I have marked with the names of the locations we inspected. We returned to your office and I reviewed your contingency plan and inspection records. Cindy Feldman maintains training records. Since she was on vacation, we agreed to review your personnel training records by phone after lunch on Monday.

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I found the following violations of Ohio's hazardous waste rules:

- 1) Inspection of areas where hazardous waste is stored: OAC 3745-66-74 requires areas where hazardous waste containers are stored be inspected at least weekly. The inspections must be recorded in a log or summary. The weekly inspection requirement is interpreted to mean 'every seven days'.**

On Friday, I only reviewed inspection records for previous six months. I found five instances where the interval between inspections was longer than seven days. What I failed to do was to determine if wastes were actually in storage during the gaps in the inspections (inspections of the < 90 day storage area are only required when wastes are actually in storage.) During our phone call on November 22, I informed you of this omission and when we revisited the issue by phone on November 29, we concluded that I would return and inspect the records more thoroughly on December 1. When I returned with Laura Marshall, we attempted to correlate your waste manifests with your inspection records. We also checked with your colleague Mary O'Malley who inventories raw materials stored the same room. Ms. O'Malley takes inventory at least once and frequently twice weekly. She told us she checks the integrity of all the containers in storage as a matter of course, but she maintains no written records of her inspections. After careful attempts to correlate records, we conclude that on at least 8 occasions so far in calendar year 2010, Spear performed the inspection on the 8th or 9th day after the previous inspection. On three occasions, the re-inspection interval was two weeks or more. I conclude from your records that wastes were actually in storage on at least several occasions and perhaps on every occasion where the re-inspection interval was longer than seven days. I only looked at records for 2010 but I believe that your records would show that inspections were missed in previous years.

I note for the record that violations of this rule were cited in inspections conducted by Ohio EPA on May 30, 2006 and April 27, 1999, and February 28, 1996.

- Devise and implement an inspection plan to assure that all wastes in storage are inspected every seven days. Your plan should account for personnel absences, planned vacations, and unplanned absence caused by illness or injury as well as plant shut downs.
- Be sure to identify any employees who are newly assigned to perform hazardous waste inspections so that they can be properly trained. Please note that OAC 3745-65-16(B) requires that new employees be trained within six months of being assigned the new hazardous waste duties.
- To be returned to compliance, provide me a written copy of the plan by e-mail within 30 days of your receipt of this letter. In the meantime, I expect you to comply with the seven-day inspection requirement.

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- 2) **OAC 3745-273-13(D)(1) requires that universal waste lamps be stored in a container which is structurally sound and adequate to prevent breakage.**

During our quick walk-thru on November 18, we noticed two U-shaped fluorescents stored on a shelf in the maintenance shop. I did not see the lamps on my return the next day and I assume that they were properly packaged. The four-foot incandescent tubes I inspected on November 19 near the electric shop were properly labeled and packaged.

- Since the tubes were properly contained the next day, there are no further actions required on your part to be returned to compliance.

- 3) **OAC 3745-279-22(C) requires that containers of used oil be marked with the words 'used oil'. No other wording is allowed by the rules.**

During our inspection of the 90-day storage area on December 1, Laura noticed a 55-gallon drum was marked 'waste oil'. I failed to notice the labeling on the drum during my first two inspections on November 18 and 19 and I conclude that the drum had been improperly labeled all along. You re-marked the drum with the correct wording before we left the area.

- Since the container is now properly labeled, there are no further actions required on your part to be returned to compliance. Be aware however, that the used oil rules do not allow the label to be marked with wording other than 'used oil'.

General Issue- dating of satellite accumulation drums

The drum managed in the solvent room under the satellite accumulation area (SAA) rules was labeled with the date during which waste was first placed in the drum. This is not appropriate, as the date of first waste placement is not relevant. As a generator, you may manage up to 55-gallons of hazardous waste under the SAA rules for an indefinite period of time. When the drum is filled, Spear has three days to move the drum to the < 90 day storage area and subsequently begin management under the rules applicable to waste being accumulated. So, to remain compliant, the drum should be labeled with the date it is first filled. Then Spear has three days to move the drum to the storage area, at which time the 90-day requirement is triggered. When it enters storage, the 'first-filled' date should be obliterated and the drum should be properly labeled with the new date. The drum is now subject to all the labeling, dating, inspecting, etc. requirements of OAC 3745-52-34(A) and OAC 3745-66-70 to OAC 3745-66-77.

Enclosed you will find a copy of the LQG checklist, a used oil checklist, a universal waste checklist, a process description summary, and a copy of the sketch of your facility layout.

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If you have any questions about this inspection, or if you want to discuss your progress in devising a compliant strategy to inspect your accumulated hazardous waste, please call me at (937) 285-6090.

Sincerely,



Tom Ontko
Hazardous Waste Inspector
Southwest District Office

TO/ka

Enclosures

cc: DHWM Data Entry/Facility 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.

Send to Central Office <input type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to paula.canter@epa.state.oh.us.

Site EPA ID No. Site Name Site Location Information	EPA ID Number: OHD986986578		Website: (Optional)	
	Name: Spear USA			
	Street Address: 5510 Courseview Drive		State: OH	
	City, Town, or Village: Mason		Zip Code: 45040	
Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html	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"/>

Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address.	First Name: Andrew		MI:	Last Name: Milizer		
	Title: Safety Manager					
	Phone Number: 513-459-3272		Phone Number Extension:			
	E-Mail Address:					
	Fax Number:		Fax Number Extension:			
	Street or P.O. Box:					
	City, Town or Village:					
	State:			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:				Date Became Owner (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:				Owner Phone #:				
	State:				Country:		Zip Code:		
	Name of Site's Operator:				Date Became Operator (mm/dd/yyyy):				
	Operator 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? Yes No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input checked="" type="checkbox"/> Large Quantity Generator (LQG)
	<input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.	<input type="checkbox"/> Small Quantity Generator (SQG)
		<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
		<input type="checkbox"/> U.S. Importer of Hazardous Waste
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK 'X' IN ALL OF THE APPROPRIATE BOXES)

<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Hazardous Waste Transfer Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility
<input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Receives Hazardous Waste from Off-site

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY))

<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

<input type="checkbox"/> Batteries
<input type="checkbox"/> Pesticides
<input type="checkbox"/> Mercury containing equipment
<input checked="" type="checkbox"/> Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))

<input checked="" type="checkbox"/> Used Oil Generator
<input type="checkbox"/> Used Oil Transporter
<input type="checkbox"/> Used Oil Transfer Facility
<input type="checkbox"/> Used Oil Processor
<input type="checkbox"/> Used Oil Re-refiner
<input type="checkbox"/> Off-Specification Used Oil Burner
<input type="checkbox"/> Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil
<input type="checkbox"/> Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into the laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type:

<input type="checkbox"/> College or University
<input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
<input type="checkbox"/> Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

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 or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

D001 D002 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:	Mike Ison
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Tom Ontko		(12/01/2010)(14:20)

Comments:
Violations cited for failure to inspect waste in storage, OAC 3745-66-74

isopropanol - cleaning

CS2068/PTM-PTA cleaning product

MSDS

one dim HW storage alarm
alarm for outside HW storage is inside

send Hg switch link to Andy for
maintenance crew
recycle cardboard

**LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

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: safety shoes

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes
4.	Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)]	Yes
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes
6.	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)]	No
7.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	No
8.	Does the generator accumulate hazardous waste?	Yes

See enclosed sketch for locations of SAA storage area in solvent room and < 90 day storage area.

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	No
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NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]	
a.	Container that meets 3745-66-70 to 3745-66-77?	N/A
b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	N/A
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	N/A
d.	Containment building that meets 3745-256-100 to 3745-256-102?	N/A

No generator treatment.

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

11.	Does the generator export hazardous waste? If so:	No
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	N/A
b.	Has the generator complied with special manifest requirements? [3745-52-54]	N/A
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	N/A
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	N/A
e.	Are export related documents being maintained on-site? [3745-52-57(A)]	N/A

MANIFEST REQUIREMENTS

12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes
13.	Have items (1) through (20) of each manifest been completed?	Yes

SPEAR USA/Nov 19, 2010
 OHD986986578
 LQG checklist

[3745-52-20(A)(1)]&[3745-52-27(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 completed. [3745-52-20(A)(1)]		
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes
NOTE: The generator may designate on the manifest one alternate 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)]		
15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	N/A
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.		
17.	If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	N/A
18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	N/A
19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	N/A
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes
I looked at manifests for CY 2010 and CY 2009.		
PERSONNEL TRAINING		
21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]	Yes
NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]		
23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes
25.	Does the generator provide annual refresher training to employees? [3745-65-16(C)]	Yes
26.	Does the generator keep records and documentation of:	
a.	Job titles? [3745-65-16(D)(1)]	Yes
b.	Job descriptions? [3745-65-16(D)(2)]	Yes
c.	Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes
d.	Completed training or job experience required? [3745-65-16(D)(4)]	Yes
27.	Are training records for current personnel kept until closure of the facility and	Yes

are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	see remark
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Deficiencies were cited in the personnel training methods in the 2006 CEI. Major changes were made at that time and Spear has evolved to using a spreadsheet to track training. It is doubtful whether any training records are available from before the transition to the spreadsheet.

Safety and hazardous waste management training/proper practices are also elements of the monthly production meetings.

Job Performed	Name of Employee	Date Trained
authorized to sign manifests	Roy Decker	
	Chris Hoerth	

CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]	Yes
29.	Does the plan describe the following:	
a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes
b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes
c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes
d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes
e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]	Yes
31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes

Mason FD responds at the Spear facility.

EMERGENCY PROCEDURES

33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	No
a.	Was the contingency plan implemented? [3745-65-51(B)]	N/A
b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	N/A
c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)?	N/A

NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

PREPAREDNESS AND PREVENTION

34.	Is the facility operated to minimize the possibility of fire, explosion, or any	Yes
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	unplanned release of hazardous waste? [3745-65-31]	
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:	
	a. Internal communications or alarm system? [3745-65-32(A)]	Yes
	b. Emergency communication device? [3745-65-32(B)]	Yes
	c. Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes
	d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes
NOTE: Verify that the equipment is listed in the contingency plan.		
36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes
39.	If there is only one employee on the premises, is there immediate access to a device (eg., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] The solvent room has a sprinkler system, an eye wash and an emergency shower. The plant is sprinklered. Fire extinguishers and fire alarms are located through out the facility. Spill cleanup items are stored in the warehouse.	N/A
SATELLITE ACCUMULATION AREA REQUIREMENTS		
43.	Does the generator ensure that satellite accumulation area(s):	
	a. Are at or near a point of generation? [3745-52-34(C)(1)]	Yes
	b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes
	c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes
	d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	N/A
	e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes
	f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	No
	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)]	N/A

	b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	N/A
<p>One drum of solvent waste is managed in the solvent room under the SAA rules. Products are also stored there. Several different employees add waste to the drum. The solvent room is located near the press area where the operators sharing the SAA drum work.</p>			
<p>USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS</p>			
45.		Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes
46.		Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes
47.		Are hazardous wastes stored in containers which are:	
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes
	b.	In good condition? [3745-66-71]	Yes
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes
<p><i>NOTE: Record location on process summary sheets, photograph the area, and record on facility map.</i></p>			
48.		Is the container accumulation areas(s) inspected weekly? [3745-66-74]	No
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes
<p><i>NOTE: "Week" means 7 consecutive days per ORC§1.44(A).</i></p>			
49.		Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes
50.		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
51.		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)]	N/A
52.		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)]	N/A
53.		If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	N/A
<p>Spear stores drums of hazardous waste in a room next to the loading dock. The room is entered from a door that opens to the outside. I saw drummed hazardous waste staged inside the dock on Thursday and when I returned on Friday these drums had been manifested off-site. One drum of ignitable waste was stored in the < 90 day storage area on Friday. Apparently, the drum had been moved to the storage area sometime between when the other drums were prepared for shipment and my inspection on Friday morning. The drum was properly labeled and closed. Inspection records for the < 90 day storage area for the later part of 2010 showed that on occasion, occurred more than 7 days after the previous inspection</p>			
<p>PRE-TRANSPORT REQUIREMENTS</p>			
54.		Does the 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
55.		Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
56.		Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Spear USA
Facility Type: LQG
 SQG
 CESQG
 TSD
Date of Inspection: November 18, 2010
EPA ID#: OHD986986578

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 applicable	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 waste printing ink contaminated w/ solvents	sludge D001, F003	container storage			Reclaimed Energy-Connersville IN	
2 cleaning parts	rags damp w/ solvent				laundered off-site by Absorbtech	
3 cleaning adhesive from rings	sludge		cleaning w/ a non-haz solvent supplied by Safety Kleen			
4 cleaning ink from parts	spent ethyl acetate, F003				Reclaimed Energy-Connersville IN	
5 ultra-sound cleaner	spent NaOH D002	process discontinued			caustic cleaner has been replaced by a powder blasting method which generates non-hazardous waste	
6 rewind waste	rolls of plastic w/ label holes	non-hazardous		incinerated		

7	cardboard from incoming materials					recycled	
8	used fluorescent lamps		near electric crib, off maintenance shop			Veola-recycled at Port Washington	
9							

REMARKS GENERAL INFORMATION

General Process Information:

Spear manufactures pressure sensitive labels on clear film. Incoming raw material includes a two ply film w/ adhesive sandwiched between. Spear prints the label. Wastes are generated from the process that prints the label and cleaning inks and adhesives from process equipment. Rags are laundered off-site.

Inks are UV-cured and do not flash. The waste ink manifested as hazardous waste is mixed with ethyl acetate which causes the lo-flask characteristic.

The hazardous waste is accumulated in a < 90 day storage area referred to as 'holding area-rear' in the inspection checklist. Used oil and raw materials are also stored here. Flammable solvents and a drum managed under the SAA rules are stored in the solvent room next to the ink room. Ethyl acetate is used to clean ink and acetone is used to clean adhesive.

During the 2006 inspection, Spear was using acetone to soften dried adhesive adhering to rings (see 'Additional Comments and General Concerns' section of June 21, 2006 inspection letter. The rings are now being cleaned using a process that doesn't generate hazardous wastes. Because of this process change, there no longer is container storage of HW under the SAA rules in the production area.

Regulatory/Enforcement History (if applicable):

The May 30, 2006 inspection resulted in a March 23, 2007 proposed Director's Final Findings and Orders.

Violations cited in the June 21, 2006 inspection letter are as follows:

- 1A)...personnel training OAC 3745-65-16(D)(1)
- 1B)...written job descriptions OAC 3745-65-(D)(2)
- 1C)...written description of training OAC 3745-65-16(A)(3)
- 1D)...minimum training levels OAC 3745-65-16(A)(3)
- 2)...inspections of emergency equipment OAC 3745-65-13
- 3)...inspections of containers of hazardous waste OAC 3745-66-74
- 4)...content of contingency plan OAC 3745-65-52(E)
- 5)...hazardous waste determination (fluorescent tubes) OAC 3745-52-11

from May 5, 1999 inspection letter from Cori Van Atta

- 1) waste ethyl acetate container in solvent room not closed
- solvent room waste ink drum not closed
- 2) solvent room drum not marked as HW-no accumulation date
- 3) no inspections of < 90 day storage area
- 4) no inspection of emergency equipment
- 5) failed to post telephone number of FD at telephone next to waste storage area
- 6) no fire extinguisher or spill control equipment in HW storage area

In an inspection conducted on 2/28/96, Spear was found to be in violation of the following:

- 1) OAC 3745-52-34(D)(5)(b), failure to post emergency information by telephones
- 2) OAC 3745-65-13 failure to test emergency equipment and to record the inspections in a log
- 3) OAC 3745-66-74, failure to inspect waste accumulation area weekly.

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
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

NOTE: 1. A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

2. Inspectors can check BUSTR's web-site at https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at:

https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp.

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	No
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a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	N/A
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NOTE: For example, used oil contaminated scrap metal stored in a pile.

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	No
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3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	No
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NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,	No
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a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	N/A
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NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

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)]	N/A
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NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	No
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7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes
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8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil"? [3745-279-22(C)]	No
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9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	
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a.	Stopped the release?	N/A
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b.	Contained the release?	N/A
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c.	Cleaned up and properly managed the used oil and other materials?	N/A
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d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	N/A
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ON-SITE BURNING IN SPACE HEATER

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	No
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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?	N/A
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	N/A
c.	Are the combustion gases from heater vented to the ambient air?	N/A
<i>NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).</i>		
GENERATOR TRANSPORTATION		
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes
12.	If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	N/A
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	N/A
<i>NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).</i>		
COLLECTION CENTERS AND AGGREGATION POINTS		
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	N/A
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	N/A
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	N/A
<i>NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.</i>		

Spear manages used oil in a 55-gallon drum located in the same room as hazardous waste and some raw materials.

A violation/RTC was cited for improper labeling.

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

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)]	No
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	No

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	N/A
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)]	N/A
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	N/A
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	N/A
	a. If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	N/A
	b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	N/A
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)] No universal waste batteries were inspected.	N/A

UNIVERSAL WASTE PESTICIDES

8.	Does the SQUWH 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)]	N/A
9.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]	N/A
10.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97, of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]	N/A
11.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(B)(4)]	N/A
12.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides"? [3745-273-14(B)(1)&(2)]	N/A
13.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste-Pesticides" or "Waste Pesticides"? [3745-273-14(C)(1)&(2)] No universal waste pesticides were inspected.	N/A

UNIVERSAL WASTE MERCURY-CONTAINING EQUIPMENT		
14.	Has 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 that is closed, structurally sound, compatible with contents of the device and lacks evidence of leakage, spillage or damage that could cause leakage and is designed to prevent escape of mercury into the environment by volatilization or any other means? [3745-273-13(C)(1)]	N/A
15.	If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]	N/A
	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)]	N/A
	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)]	N/A
	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)]	N/A
	d. Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	N/A
	e. Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	N/A
	f. Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-13(C)(2)(h)]	N/A
16.	If the open original housing holding mercury is removed from a mercury-containing equipment that does not contain an ampule, does the SQUWH: [3745-273-13(C)(3)]	N/A
	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)]	N/A
	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)]	N/A
17.	When removing mercury containing ampules from mercury-containing equipment or sealing mercury from its original housing if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining mercury-containing device), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-13(C)(4)(a)]	N/A
	a. If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-13(C)(4)(b)]	N/A
18.	Is mercury-containing equipment or containers of mercury-containing equipment labelled either "Universal Waste-Mercury-Containing Equipment" or "Waste Mercury-Containing Equipment" or "Used Mercury-Containing Equipment"? [3745-237-14(D)(1)]	N/A
19.	Are 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)] No universal waste mercury containing devices were inspected. On Dec 6 I e-mailed Andy a .pdf of the Fall 2004 'Notifier' with articles	N/A

about used vs. waste oil and mercury thermostats		
UNIVERSAL WASTE LAMPS		
20.	Does the SQUWH 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)]	No
21.	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)]	N/A
Two U-shaped fluorescent tubes were observed in storage in the maintenance area lying on shelves during our quick walk-thru on November 18. They were not labeled or packaged. Spear was cited for an NOV/RTC. On November 19, I inspected two boxes of properly-packaged and labeled 4-foot tubes in the electrical shop.		
22.	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)]	No
ACCUMULATION TIME		
23.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes
a.	If not, is 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)]	N/A
<i>NOTE: Accumulation is defined as date generated or date received from another handler.</i>		
24.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below: Spear ships universal waste oil and universal waste lamps more quarterly.	Yes
EMPLOYEE TRAINING		
25.	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
RESPONSE TO RELEASES		
26.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	N/A
27.	Is the material released characterized? [3745-273-17(B)]	N/A
28.	If the material released is a hazardous waste, was 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 OAC Chapter 3745-52) [3745-273-17(B)] Spear reported no releases of universal waste.	N/A
OFF-SITE SHIPMENTS		
<i>NOTE: If a SQUWH self-transportes waste, then the handler must comply with the Universal Waste transporter requirements.</i>		
29.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes
30.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes

31.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	Yes
32.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	No
	a. If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)]	N/A
33.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u> :	N/A
	a. Send the waste back to the originating handler or send the shipment to a destination facility (if both the originating and receiving handler agree)? [3745-273-18(F)]	N/A
34.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	N/A
EXPORTS		
35.	Is waste being sent to a foreign destination? If so:	No
	a. Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	N/A
	b. Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	N/A
	c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	N/A