



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

CERTIFIED MAIL

April 9, 2007

John Cestaric
Engineering Manager
Coretec Cleveland, Inc.
7 Ascot Parkway
Cuyahoga Falls, OH 44223

RE: CORETEC CLEVELAND, INC., OHR000029793, SUMMIT COUNTY, NOV-PRTC

Dear Mr. Cestaric:

On March 22, 2007, Sherry Slone and I, representing Ohio EPA, Division of Hazardous Waste Management (DHWM), visited Coretec Cleveland, Inc. (Coretec) located at 7 Ascot Parkway in Cuyahoga Falls, Ohio to conduct a hazardous waste compliance evaluation inspection (CEI). Coretec was represented by Mr. Robert Owen and you.

The purpose of the inspection was to determine Coretec's 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). The inspection included a review of the facility's operations and records, as well as the management of wastes. Coretec was inspected for the requirements of a large quantity generator (LQG) of hazardous waste.

Information obtained pertaining to process descriptions, hazardous waste generation and amount, and hazardous waste management units, is specified on the Process Description-Waste Activities Summary Sheet within the enclosed inspection checklist.

Based on the inspection, Ohio EPA has identified the following violations:

1. **OAC rule 3745-52-11, Waste Evaluation:** Any person who generates a waste must evaluate that waste to determine if it is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51.
 - A. Coretec failed to evaluate the waste stream consisting of spent rags in accordance with OAC Chapter 3745-51. To abate this violation, submit waste evaluation information for the aforementioned waste stream and inform me how it will be managed on-site and disposed. In lieu of disposal, Coretec may send the rags off-site to a commercial laundering/dry cleaning facility for cleaning and reuse.
 - B. Coretec failed to evaluate the waste stream consisting of dust from machining operations in accordance with OAC Chapter 3745-51. To abate this violation, submit waste evaluation information for the aforementioned waste stream and inform me how it will be managed on-site and disposed.

2. **OAC rule 3745-52-20(A), Manifest Requirements:** A generator who offers hazardous waste for off-site treatment, storage or disposal must prepare a uniform hazardous waste manifest.

Coretec failed to identify the correct amount of spent etchant (in gallons) on the manifests corresponding to the following dates: May 24, 2006; August 17, 2006; September 21, 2006 and October 19, 2006. To abate this violation, Coretec must provide instruction to all affected employees on the proper completion of a hazardous waste manifest. This instruction must be included as part of the facility's personnel training program required under OAC rule 3745-65-16. Coretec must address the aforementioned violation and submit documentation concerning the training provided to all affected employees in response to violation number four.

3. **OAC rule 3745-52-34 (A)(2)&(3), Labeling & Dating Accumulation Containers:** While being accumulated on-site, each container with hazardous waste contents must be labeled or clearly marked with the words "Hazardous Waste" and the date upon which the accumulation period began.

Coretec failed to label one tote of spent etchant with the words "hazardous waste" and apply the date upon which the accumulation period began. **This violation was abated during the inspection. No further response is required.**

4. **Personnel Training, OAC rule 3745-65-16(A)(1-3), (B), (C), & (D)(1-4):** Facility personnel must complete training on hazardous waste management and emergency response procedures.

Coretec failed to meet the following requirements of this rule:

- A. OAC rules 3745-65-16(A)(1-3): Facility personnel did not complete training that teaches them to perform their duties in a way that ensures compliance with the hazardous waste laws. The personnel training program must be directed by a person trained in hazardous waste management procedures; include instruction on hazardous waste management procedures and contingency plan implementation; and ensure facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems.
- B. OAC rule 3745-65-16(B): The facility failed to ensure that employees do not work in unsupervised positions until they have completed the required training.
- C. OAC rule 3745-65-16(C): The facility failed to conduct annual personnel training.
- D. OAC rules 3745-65-16(D)(1-4): The facility failed to maintain the following documents and records at the facility: (1) job titles, as they relate to hazardous waste management, and the name of each employee filling each job; (2) a written job description for each position at the facility, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position; (3) a written description of the type and amount of both introductory and continuing training to be given to each person filling a position; and (4) records that document that the training or job experience required by this rule has been given to, and completed by, facility personnel.

To abate this violation, Coretec must provide personnel training and submit the following documentation:

- A copy or description of the training topics provided to each employee;
- A copy of the sign-in sheets documenting the date(s) when training was provided to each employee; and
- Personnel training documents and records required by OAC rule 3745-65-16(D)(1-4).

5. **OAC rule 3745-65-52(A)(C)(D)&(E), Content of Contingency Plan:** (A) The contingency plan must describe the actions to be taken to comply with OAC rules 3745-65-51 and 3745-65-56 in response to fires, explosions, or unplanned releases of hazardous waste; (C) Describe arrangements with local police, fire, hospitals, contractors, emergency response teams and Ohio EPA to coordinate emergency services; (D) List names, addresses, phone numbers of all persons qualified to act as an emergency coordinator; and (E) Include a list of all emergency equipment at the facility, including, but not limited to, fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. This list must be kept up to date and must include the location, and a physical description of each item on the list, and a brief outline of its capabilities.

Coretec failed to maintain a contingency plan that meets all of the requirements of OAC rule 3745-65-52. To abate this violation, develop and submit a contingency plan that meets the requirements of OAC rule 3745-65-52. Please be advised that once the plan is developed, all required personnel must be trained on the plan per OAC rule 3745-65-16.

6. **OAC rule 3745-65-53(B), Copies of Contingency Plan:** A copy of the contingency plan and all revisions must be submitted to local police departments, fire departments, hospitals, emergency response teams, and Ohio EPA.

Coretec failed to distribute a copy of the facility's contingency plan to all emergency authorities. To abate this violation, develop a contingency plan in compliance with OAC rule 3745-65-52 and submit documentation (e.g., copy of cover letter or certified mail receipt) that the plan was distributed to emergency authorities as required by OAC rule 3745-65-53(B).

7. **OAC rule 3745-66-73(A), Management of Containers:** Any container holding hazardous waste must be closed ... except when it is necessary to add or remove waste.

Coretec failed to close the following containers of hazardous waste:

- One tote of spent etchant. This violation was abated during the inspection.
- One, 55-gallon drum of spent etchant located near the etch line.
- One, 55-gallon drum of spent flux located near the molten solder pot.

To abate this violation, submit photographs which clearly show the spent etchant and spent flux drums are closed.

8. **OAC rule 3745-66-74, Inspections:** The owner or operator must inspect areas where hazardous waste containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The owner or operator must record the inspections in an inspection log or summary.

Coretec failed to record weekly inspections of hazardous waste containers between the following time periods: June 26 through July 10, 2006; July 17 through July 31, 2006; August 20 through September 5, 2006 and February 19, 2007 through March 19, 2007. On April 5, 2007, Coretec submitted two weeks of documented weekly inspections for hazardous waste containers. **Based upon submitted documentation, this violation has been adequately abated. No further response is required.**

9. **OAC rule 3745-270-07(A)(2), LDR Requirements:** (A)(2) A generator of a hazardous waste must determine if the waste has to be treated before it can be land disposed. If the waste does not meet the treatment standard, with the initial shipment of waste to each treatment or storage facility, the generator shall send a one-time written notice to each treatment or storage facility receiving the waste, and place a copy in the generator's files. The notice must include the information in Column A of Table 1 of this rule. No further notification is necessary until such time as the waste changes or the treatment or storage facility changes, in which case a new notification must be sent to the new treatment or storage facility and a copy placed in the generator's files.

- A. OAC rule 3745-270-07(A)(2): Coretec failed to retain a copy of the land disposal restriction (LDR) notification form for the spent flux transported to Envirite of Ohio and the waste corrosive liquid transported to Vickery Environmental. To abate this violation, submit a copy of the LDR notification form for the aforementioned wastes in compliance with this rule.
- B. OAC rule 3745-270-07(A)(2): Coretec failed to identify the appropriate wastewater or non-wastewater category on the LDR notification form for the spent etchant transported to Heritage Micronutrients. To abate this violation, submit a copy of the LDR notification form in compliance with this rule.

10. **OAC rule 3745-273-13(D)(1), Universal Waste Management Standards for Small Quantity Handlers:** A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

Coretec failed to accumulate universal waste lamps in containers/packages since several loose lamps were observed in the Mezzanine Area. To abate this violation, submit a photograph which clearly shows the universal waste lamps are being accumulated in an adequate container.

11. **OAC rule 3745-273-14(E); Labeling/marketing Standards for Small Quantity Handlers of Universal Waste:** Universal waste lamps must be labeled/marked with one of the following phrases: "universal waste-lamp(s)," or "waste lamp(s)" or "used lamp(s)."

Coretec failed to label/mark universal waste lamps with the words required by this rule. To abate this violation, submit a photograph which clearly shows that the containers of lamps have been labeled in compliance with this rule.

12. **OAC Rule 3745-273-15(C); Accumulation Time Limits - Standards For Small Quantity Handlers of Universal Waste:** A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler, unless the requirements of paragraph (B) of this rule are met. A small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration through methods identified in OAC rule 3745-273-15(C).

Coretec failed to track the length of time that the universal waste lamps have been accumulated. To abate this violation, Coretec must track the accumulation time through methods identified in OAC rule 3745-273-15(C). Please submit documentation which demonstrate the length of time that the universal waste lamps have been accumulated.

13. **OAC rule 3745-273-16, Employee Training for Small Quantity Handlers of Universal Waste:** A small quantity handler of universal waste must inform all employees who handle or have responsibility for managing universal waste. The information must describe proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility.

Coretec failed to provide training to employees involved with universal waste management. To abate this violation, submit documentation that relevant employees were trained on universal waste management procedures.

Ohio EPA offer the following comments:

1. Ohio EPA has created an electronic news service to provide facilities with quick and timely updates on news and events related to hazardous waste activities in Ohio. For more information, please refer to: <http://www.epa.state.oh.us/dhwm/listserv.html>
2. Technical assistance and pollution prevention information is available from Ohio EPA at: <http://www.epa.state.oh.us/ocapp/ocapp.html>
3. You may be able to reduce the amount of waste your facility generates by finding ways to recycle, reduce, or eliminate it. Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides free compliance and pollution prevention assistance on environmental issues related to air, land, and water. Should your facility be interested in receiving a free pollution prevention assessment in the future, please contact me or OCAPP. OCAPP may be contacted at (800) 329-7518 or via the internet at: <http://www.epa.state.oh.us/opp/ocapp.html>

CORETEC CLEVELAND, INC.
APRIL 9, 2007
PAGE - 6 -

The above violations must be immediately addressed and all of the above requested documentation must be submitted to my attention at the Ohio EPA within 30 days of receipt of this letter. You may find copies of the hazardous waste rules and other information on Ohio EPA's web page at: <http://www.epa.state.oh.us/dhwm>.

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

Should you have any questions, please contact me at (330) 963-1108.

Sincerely,



Frank A. Zingales
Environmental Specialist
Division of Hazardous Waste Management

FAZ:ddw

Enclosure

cc: Natalie Oryshkewych, DHWM, NEDO
Harry Sarvis, DHWM, NEDO
ec: Sherry Slone, NEDO, DHWM

E-mail this completed form to tammy.mccconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM		For Ohio EPA use only																					
2. Site EPA ID No.	EPA ID Number: OHR000029793																							
3. Site Name	Name: Coretec Cleveland, Inc.		Website (optional): www.coretec-inc.com																					
4. Site Location Information	Street Address: 7 Ascot Pkwy																							
	City, Town, or Village: Cuyahoga Falls		State: OH																					
	County Name: Summit		Zip Code: 44223																					
5. Site Land Type (check only one)	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input type="checkbox"/></td> </tr> </table>				Private	County	District	Federal	Indian	Municipal	State	Other	<input type="checkbox"/>											
Private	County	District	Federal	Indian	Municipal	State	Other																	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																	
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A.		B.																					
	C.		D.																					
7. Facility Representative: Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	First Name: John		MI:	Last Name: Cestaric																				
	Phone Number: 330-572-3406			Phone Number Extension:																				
	E-Mail Address: jcestaric@usa.coretec-inc.com																							
	Fax Number: 330-572-3434			Fax Number Extension:																				
	Street or P.O. Box:																							
	City, Town or Village:																							
	State:		Country:		Zip Code:																			
8. 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.	A. Name of Site's Legal Owner:		Date Became Owner (mm/dd/yyyy):																					
	Owner Type: Mark with an X	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input type="checkbox"/></td> </tr> </table>							Private	County	District	Federal	Indian	Municipal	State	Other	<input type="checkbox"/>							
	Private	County	District	Federal	Indian	Municipal	State	Other																
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																
	Street or P.O. Box:																							
	City, Town, or Village:		Owner Phone #:																					
	State:		Country:		Zip Code:																			
	B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):																					
	Operator Type: Mark with an X	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input type="checkbox"/></td> </tr> </table>							Private	County	District	Federal	Indian	Municipal	State	Other	<input type="checkbox"/>							
	Private	County	District	Federal	Indian	Municipal	State	Other																
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																	
Street or P.O. Box:																								
City, Town, or Village:		Operator Phone #:																						
State:		Country:		Zip Code:																				
9. Violations Cited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																								
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.) <input type="checkbox"/> Not Regulated																								

PROCESS DESCRIPTION / WASTE ACTIVITIES SUMMARY

Facility Name: Coretec Cleveland, Inc.

Facility Type: Large Quantity Generator (LQG)

EPA ID#: OHR000029793

Process Information: Facility manufactures printed circuit boards (PCBs). See matrix for activities generating hazardous waste. Hazardous waste accumulated near the Waste Treatment Area.

Regulatory / Enforcement History: None to date.

<i>Description of Waste</i>				<i>On-Site Management</i>	<i>Off-Site Management</i>
Process/Activity Generating Waste	Waste Generated	Waste Code(s)	Quantity Generated	Type of Accumulation	Name, state, and type of activity occurring at the facility.
1.	Chemical etching of PCBs.	Spent etchant	D002	LQG	Container-tote Heritage Micronutrients Indianapolis, IN INR000000463
2.	Wastewater treatment	Sludge	F006		Container-supersac World Resources Co. Pottsville, PA PAD981038227
3.	Soldering of PCBs.	Spent flux	D002/D008		Container-drum Envirite of Ohio, Inc. Canton, OH OHD980568992
4.	Facility clean-up due to broken water line. One time event in April 2006.	Corrosive liquid	D002/D008		Vickery Environmental Vickery, OH OHD020273819
5.	PCB manufacturing-materials for recycling: copper, aluminum, frames, and dross.				Container Metallic Resources Twinsburg, OH OHD980701072
6.	X-ray development	Spent silver film			Container Metallic Resources
7.	Maintenance	Used Oil			Container-drum Akron Canton Waste Oil Canton, OH OHD000724286
8.	Maintenance	Spent lamps			
9.	Machining of PCBs.	Waste dust			Awaiting evaluation information.

Note 1: See annual hazardous waste report for amount generated.

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE - DO NOT ATTACH A PROCESS DESCRIPTION SUMMARY

CESQG: ≤ 100Kg. (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] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| 2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| 3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 4. Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 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)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| 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)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| 8. Does the generator accumulate hazardous waste? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

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

- | | | | |
|--|------------------------------|--|------------------------------|
| 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)? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
|--|------------------------------|--|------------------------------|

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? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| c. Drip pads that meet 3745-69-40 to 3745-69-45? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| d. Containment building that meets 3745-256-100 to 3745-256-102? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |

NOTE: Complete appropriate checklist for each unit.

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

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

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)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |

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)]

- | | | | |
|--|---|-----------------------------|------------------------------|
| 14. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
|--|---|-----------------------------|------------------------------|

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)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| 16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

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 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)] Yes No N/A
18. 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)] Yes No N/A
19. Are signed copies of all manifests and any exception reports 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.

PERSONNEL TRAINING

20. 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 No N/A
21. 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)(a-f)] Yes No N/A
22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A
23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes No N/A
24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A
25. Does the generator keep records and documentation of:
- a. Job titles [3745-65-16D(1)]? Yes No N/A
 - b. Job descriptions [3745-65-16D(2)]? Yes No N/A
 - c. Type and amount of training given to each person [3745-65-16D(3)]? Yes No N/A
 - d. Completed training or job experience required [3745-65-16D(4)]? Yes No N/A
26. Are training records for current personnel kept until closure of the facility and 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)] Yes No N/A

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date Trained</u>

CONTINGENCY PLAN

27. 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 No N/A
28. 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 No N/A
 - b. Arrangements with emergency authorities [3745-65-52(C)]. Yes No N/A
 - 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 No N/A
 - d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes No N/A

- e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes No N/A

NOTE: If the facility already has a "Spill Prevention, Control and Counter measures Plan" under 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. [3745-65-52(B)]

29. 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 No N/A
30. 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 No N/A
31. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes No N/A

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES

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

33. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes No N/A
34. 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

NOTE: Verify that the equipment is listed in the contingency plan.

35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes No N/A
36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A
37. 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 No N/A
38. 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
39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes No N/A
41. 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

42. 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 one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes No N/A

- d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes No N/A
- e. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes No N/A
- 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 excess with the accumulation date when the 55 gallon (one quart) limit was exceeded?[3745-52-34(C)(2)] 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

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 IN <90 DAY ACCUMULATION AREAS

44. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes No N/A
45. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No N/A
46. 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, photograph the area, and record on facility map.

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. Yes No N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes No N/A
49. 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
50. 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
51. 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.

52. 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)] Yes No N/A

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

53. 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 No N/A
54. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A
55. 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

LDR REQUIREMENTS

- 1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] (possibly also cite 3745-52-11) **If so:** Yes No N/A RMK#____
Excluding those wastes under evaluation.
- a. **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-270-07(A)(6)] Yes No N/A RMK#____
- b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes No N/A RMK#____

2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] (possibly also cite 3745-52-11) Yes No N/A RMK#____

3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes No N/A RMK#____

4. Does the generator generate a characteristic hazardous waste? **If so:** Yes No N/A RMK#____

a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes No N/A RMK#____
To be determined.

NOTE: *If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] **If so:** Yes No N/A RMK#____

a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes No N/A RMK#____

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*

6. Has the generator **correctly** determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)] Yes No N/A RMK#_____
7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] Yes No N/A RMK#_____
8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] Yes No N/A RMK#_____
- Note:** In other words, is combustion a legitimate treatment method
9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes No N/A RMK#_____
10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] **If so:** Yes No N/A RMK#_____
- a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05]
11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] **If so:** Yes No N/A RMK#_____
- a. The facility can land dispose of the waste. [3745-270-06]
12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? **If so:** Yes No N/A RMK#_____
- a. Has the facility complied with 3745-270-04? Yes No N/A RMK#_____

REMARKS

NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1? [3745-270-07(A)(2)] Yes No N/A RMK#____
14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1? [3745-270-07(A)(3)] Yes No N/A RMK#____
15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1? [3745-270-07(A)(4)] Yes No N/A RMK#____
16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1? [3745-270-07(A)(9)] Yes No N/A RMK#____
17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] **If so:** Yes No N/A RMK#____
- a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes No N/A RMK#____
Pre-treatment followed by discharge to City of Akron's sewer system, with authorization.
- NOTE:** Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit. (See 270-07(A)(7))
18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)] Yes No N/A RMK#____

REMARKS

USED OIL INSPECTION CHECKLIST

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes No N/A
- 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
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No N/A
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes No N/A

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
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
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
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
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
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
- b. Contained the release? Yes No N/A
- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A
10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: Yes No N/A

- 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
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A
11. Does the generator have the used oil hauled only by transporters that have obtained a 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

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)] Yes No N/A
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

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE LAMPS

3. Does the SQUWH 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
4. 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
5. 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

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

6. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes No N/A
Accumulation time not tracked.
- 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

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

7. Is the length of time the universal waste is stored documented by **one** of the following: [3745-273-15(C)] Yes No N/A
- 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
- 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
- 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
- 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
- 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
- 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

EMPLOYEE TRAINING

8. 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

RESPONSE TO RELEASES-no releases observed during inspection.

9. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes No N/A
10. Is the material released characterized? [3745-273-17(B)] Yes No N/A
11. 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

OFF-SITE SHIPMENTS-no off-site shipments at time of inspection.

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

12. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes No N/A

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

13. 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
14. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No N/A
15. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following: Yes No N/A

- a. Receive the waste back? [3745-273-18(E)(1)] Yes No N/A
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes No N/A
16. 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:
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes No N/A
- 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
17. 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
18. 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

EXPORTS

19. Is waste being sent to a foreign destination? If so: Yes No N/A
- 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
- 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
- c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes No N/A