



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

October 20, 2009

**RE: MEDINA HOSPITAL  
OHD 060 419 181  
MEDINA COUNTY  
CESQG/CEI/NOV**

Mr. John Ratkovich  
Medina Hospital  
1000 East Washington Street  
Medina, Ohio 44256

Dear Mr. Ratovich:

On October 1, 2009, Ohio EPA conducted a compliance evaluation inspection of Medina Hospital's Medina facility to determine Medina Hospital's compliance with Ohio's hazardous waste laws and regulations as found under the Ohio Revised Code and the Ohio Administrative Code ("ORC" and "OAC" respectively). Medina Hospital was represented by Tom Carabin, Ann Beckman and you. The Ohio EPA was represented by Neil Wasilk, Julia Zhang and me. The Ohio EPA's compliance inspection included an inspection of the facility operations and a review of written documentation.

The inspection included reviews of facility records, interviews with facility personnel and a facility walk-through. The results of these reviews are discussed below.

Medina Hospital was a conditionally exempt small quantity generator (CESQG) of hazardous waste at the time of the inspection (generating between 0 and 220 pounds of hazardous waste in a calendar month). Consequently, the inspection was for compliance with the CESQG requirements. Because the waste generation will be changing due to the collection of the waste alcohol in the lab, the waste generation rate will exceed the 220 pounds per calendar month; therefore, it appears that Medina Hospital will be a small quantity generator (SQG) during some calendar months. When this occurs, the facility must comply with SQG requirements for waste generated during those months. This is discussed in more detail in the *Concerns* section of this letter.

Based on the facility documents reviewed and observations made during the facility walk-through, and the e-mail received on October 8, 2009, Ohio EPA has determined that Medina Hospital has violated the following state hazardous waste regulations.

1. **Labeling/marking- standards for small quantity handlers of universal waste, OAC rule 3745-273-14(E):** Universal waste [fluorescent] lamps shall be labeled as "Universal Waste - Lamps," "Waste Lamp(s)", or "Used Lamp(s)."

None of the universal waste lamps were labeled at the time of the inspection.

Mr. John Ratkovich  
Medina Hospital  
October 20, 2009  
Page 2

Medina Hospital labeled the containers while Ohio EPA was on site, therefore, this violation was abated on the day of the inspection. No further action is required to address this violation.

2. **Labeling/marking- standards for small quantity handlers of universal waste, OAC rule 3745-273-14(A):** Universal waste batteries or containers of batteries shall be labeled as "Universal Waste – Batteries", "Waste Battery(ies)", or "Used Battery(ies)".

The universal waste batteries near the infectious waste incinerator were not labeled.

Based on the photograph submitted in the October 8, 2009 e-mail, it appears this violation has been abated. No further action is required.

## **Concerns**

### **Waste characterization**

The manifests indicated that the waste xylene contained enough methyl ethyl ketone (MEK) in it to be characteristically hazardous for this constituent. This would mean that there was greater than 200.0 mg/L in the waste. Based on a review of the MSDS for the xylene, it is unclear where the MEK may be from, if it is present at all. You were going to discuss having the waste re-profiled by Chemtron. If it is determined that MEK is not present, then a new Land Disposal Restriction form (LDR) would need to be completed for this waste stream and a copy retained on site at the hospital.

Also, if xylene is only used as a clearing agent, it is not a solvent use and therefore, would not be a listed hazardous waste upon disposal (F003 or F005). However, if xylene is used to remove stains and paraffin from specimen slides, then use of the xylene would be a solvent use and the waste would include the F-listed codes upon disposal.

### **Implications of the increase in generation rate.**

During the inspection, Ohio EPA noted that Medina Hospital would be in compliance with most of the small quantity generator of hazardous waste requirements, the following regulations, however, would need to be considered:

OAC rule 3745-52-20(A)(1) - The manifests used to ship the hazardous waste to Chemtron will need to have the generator hazardous waste identification number on them. Based on our telephone discussions, you have already asked Chemtron to address this issue.

OAC rule 3745-52-42(B) - Also regarding manifests, you will need to ensure that the signed return to generator copies are kept on file for all shipments. Based on your e-mail it appears you now have all of the signed return to generator copies on file.

Mr. John Ratkovich  
Medina Hospital  
October 20, 2009  
Page 3

Currently, Medina Hospital ships their hazardous waste directly from the satellite accumulation area in the flammable storage vault and does not "accumulate" hazardous waste in a designated area outside of the satellite area. You stated that for the time being, you are going to accumulate the waste alcohol separate from the waste xylene. If you maintain two separate containers and neither go over the 55 gallon accumulation limit allowed for satellite accumulation, there would be no changes to the current protocol.

However, should you combine these two waste streams and in doing so, accumulate greater than 55 gallons prior to off-site shipment, then you could either send the full container to the hazardous waste accumulation area or make this area an accumulation area. The additional requirements should this occur would include:

OAC rule 3745-66-32 - having emergency equipment for responding to a spill or fire in the area, including an emergency communication device, and portable fire control, spill control and decontamination equipment;

OAC rule 3745-65-33 – having a testing/inspection log for the above mention emergency equipment. An example testing log can be found at: <http://epa.ohio.gov/portals/32/pdf/equiplog.PDF>; and

OAC rule 3745-66-74 - conducting weekly inspections of the accumulation area for evidence of spills or releases. An example of a weekly inspection log can be found at: <http://epa.ohio.gov/portals/32/pdf/sqglog.PDF>

If you have any questions regarding the small quantity generator requirements, please feel free to contact me.

#### **Implications if certain chemotherapy medications become waste.**

Certain chemotherapy medications (e.g., Mitomycin C and Cyclophosphamide), if discarded, would under certain conditions (e.g., in a formulation in which it is the sole active ingredient and in a container that is not empty) be hazardous waste and could not be managed as chemotherapy wastes in "chemo boxes". Even though the facility stated that these drugs are seldom if ever discarded other than as empty containers, the facility is encouraged to make staff aware of how to manage if disposal of such a waste should occur. The facility is encouraged to develop and implement procedures (including training of appropriate personnel) for managing chemotherapy medications, if they should become wastes. A list of these medications includes, but is not limited to:

\*Chloramubucil (U035),  
\*Cyclophosphamide (U058),  
\*Uracil Mustard (U237),  
\*Daunomycin (U059),  
\*Melphalan (U150),  
\*Mitomycin C (U010),

\*Diethylstilbestrol (U089)  
\*Ethyl Carbamate (U238)  
\*Azaserine (U015)  
\*3-Methylcholanthrene (U157)  
\*Arsenic trioxide [Trisenox] (P012)  
\*Streptozotocin (U206).

Mr. John Ratkovich  
Medina Hospital  
October 20, 2009  
Page 4

The Division of Hazardous Waste Management has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link [http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc\\_serve.php?2=subscriptionpage](http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage).

You can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>.

Be advised that the Ohio EPA reserves the right pursuant to ORC Chapters 3734 and 6111 and any other applicable state and federal laws or regulations, to require further site investigation and remediation to address any unpermitted releases of hazardous waste, hazardous substances, industrial wastes, pollutants, and or contaminants into the environment.

Further be advised that any instances of non-compliance can continue as subjects of pending or future enforcement actions.

Should you have any questions or require additional information, please contact Frank Popotnik, my supervisor, or me at (330) 963-1200.

Sincerely,



Karen L. Nesbit  
Division of Hazardous Waste Management

KLN:cl  
Enclosure

ec: Harry Sarvis, DHWM, CO  
Frank Popotnik, DHWM, NEDO  
Natalie Oryshkewych, DHWM, NEDO

cc: Marlene Kinney, DHWM, NEDO

**NOTICE:**

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

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

For Ohio EPA use only

E-mail this completed form to [kristina.durnell@epa.state.oh.us](mailto:kristina.durnell@epa.state.oh.us)  
or mail it to Kristina Durnell, Central Office

<b>Site EPA ID No.</b>	EPA ID Number: <b>OHD060419181</b>	
<b>Site Name</b>	Name: <b>MEDINA HOSPITAL</b>	Website: (Optional)
<b>Site Location Information</b>	Street Address: <b>1000 E WASHINGTON ST</b>	State: OH
	City, Town, or Village: <b>MEDINA</b>	Zip Code: <b>44256</b>
	County Name: <b>MEDINA</b>	
<b>Site Land Type</b> (check only one)	Private <input checked="" 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"/>
<b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	<b>622110</b>	
<b>Facility Representative</b>	First Name: <b>JOHN</b> MI: _____ Last Name: <b>RATKOVICH</b>	Phone Number: <b>330-721-5012</b> Phone Number Extension: _____
Additional names can be recorded in number 12	E-Mail Address: <b>JRATKOVICH@MEDINAHOSPITAL.ORG</b>	Fax Number: _____ Fax Number Extension: _____
Only provide address information if it is different than the site address	Street or P.O. Box: _____	City, Town or Village: _____ Zip Code: _____
	State: _____	
<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: <b>MEDINA HOSPITAL</b>	Date Became Owner (mm/dd/yyyy): _____
	Owner Type: Private <input checked="" 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: <b>1000 E WASHINGTON STREET</b>	Owner Phone #: _____
	City, Town or Village: <b>MEDINA</b>	Country: <b>USA</b> Zip Code: <b>44256</b>
	State: <b>OH</b>	Date Became Operator (mm/dd/yyyy): _____
	Name of Site's Operator: <b>SEE ABOVE</b>	
	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: _____	Operator Phone #: _____
	City, Town or Village: _____	United States Zip Code: _____
	State: _____	

**VIOLATIONS CITED?**  Yes  No

**TYPE OF HANDLER-- A MINIMUM OF ONE BOX MUST BE CHECKED**

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
		<input checked="" 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"/> Recycler of Hazardous Waste                    | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace       |
| <input type="checkbox"/> Underground Injection Control Facility         | <input type="checkbox"/> Small Quantity On-Site Burner Exemption       |
| <input type="checkbox"/> Hazardous Waste Transporter                    | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste |  |

**UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE 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<br>(accumulates 5,000 kg. or more) |   |

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

- Batteries  
 Pesticides  
 Mercury containing equipment  
 Lamps

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

- Used Oil Generator  
 Used Oil Transporter  
 Used Oil Transfer Facility  
 Used Oil Processor  
 Used Oil Re-refiner  
 Off-Specification Used Oil Burner  
 Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil  
 Used Oil Fuel Marketer to Off-Specification Used Oil Burner

**Waste Codes for Federally Regulated Hazardous Wastes.** Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

D001                      F003                      F005

**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:	<b>TOM CARABIN AND ANN BECKMAN</b>
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments:	<b>RCRAInfo had the site located at 990 - this is the same facility, same location - Paula Canter, DHWM, CO confirmed the ID # would remain the same. Was a CESQG at the time of the inspection, however, will be changing waste management practices, and will be a SQG in the future, that is why the SQG box was marked.</b>
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time
KAREN NESBIT	NEIL WASILK & JULIA ZHANG	(mm/dd/yyyy) (hh:mm) 10/1/2009 09:00

**OPTIONAL CERTIFICATION.** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Owner, Operator, or an Authorized Representative	Name and Title (Print)	Date (mm/dd/yyyy)
---	------------------------	-------------------

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

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: *None*

**WASTE EVALUATION**

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
----	--	--

**GENERATOR CLASSIFICATION**

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
----	--	--

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

**OFF-SITE SHIPMENT OF HAZARDOUS WASTE**

3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
----	---	--

**TREATMENT OF HAZARDOUS WASTE**

4.	Does the generator treat hazardous waste in a:	
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 the CESQG conducts treatment they are subject to the LQG requirements.

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

**MIX HAZARDOUS WASTE WITH USED OIL**

5.	Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*Medina Hospital*

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS – BATTERIES AND LAMPS		
(LQUWH) = 5,000 Kg or more (SQUWH) = 5,000 Kg or less		
<b>PROHIBITIONS</b>		
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<b>WASTE MANAGEMENT AND LABELING/MARKING</b>		
<b>UNIVERSAL WASTE BATTERIES</b>		
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<b>UNIVERSAL WASTE LAMPS</b>		
8.	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)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

**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 rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.**

10.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)" [3745-273-14(E)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <i>abated during inspection</i>
-----	---	---

**ACCUMULATION TIME**

11.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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

12.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)]  If yes, describe below:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
-----	---	--

**EMPLOYEE TRAINING**

13.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
-----	---	--

**RESPONSE TO RELEASES**

14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

**OFF-SITE SHIPMENTS**

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

17.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Is the handler aware of DOT requirements for packaging and shipping?  If no, make aware of 49 CFR 171-180.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

19.	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
21.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do one of the following:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**EXPORTS**

23.	Is waste being sent to a foreign destination? If so:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>