



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

February 2, 2011

**RE: YOUNGSTOWN PRE-PRESS, INC.
EPA ID NO. OHD 981 535 735
MAHONING COUNTY
NOTICE OF VIOLATION (NOV)
CESQG**

Gary Dobrindt
Youngstown Pre-Press
P O Box 2375
Youngstown, Ohio 44509

Dear Mr. Dobrindt:

On January 19, 2011, I, as a representative of the Ohio EPA Division of Hazardous Waste Management, conducted an inspection of Youngstown Pre-Press, Inc., located at 3691 Leharps Road, Austintown, for compliance with Ohio's hazardous waste and used oil laws and regulations. You and Kenneth Slater represented Youngstown Pre-Press during the inspection.

The facility's primary businesses are the design and manufacture of pre-press plates for printing labels, primarily on cans but also on paper products such as cardboard boxes. The facility's products are computer files from which the press plates can be created by the printer or the actual physical press plates. The facility does not do any printing.

The physical press plates are usually produced on a sheet of aluminum metal coated with a polymeric material. Automated equipment uses lasers to set (harden) some of the constituents of the polymeric coating. This is followed by wash steps that include an alkaline water wash that uses potassium hydroxide. This results in a small volume of waste water that is discharged directly to the municipal sewer without intermediate storage.

Films similar to photographic film are also used to produce pre-press plates on a separate machine. This is a relatively small part of the business. The films contain a light sensitive silver compound. Film processing generates a few gallons per day of an aqueous solution containing dissolved silver. This solution is processed in a silver recovery unit. Cleaned water from the silver recovery unit is discharged directly to the municipal sewer without intermediate storage.

The facility also generates used fluorescent lamps.

The inspection included a review of the facility's operations, as well as waste management practices and documentation. Youngstown Pre-Press was inspected for the requirements of a conditionally exempt small quantity generator (CESQG) of hazardous waste.

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This letter will explain the violations I found and steps you need to take to correct them. I found the following violations of Ohio's hazardous waste, used oil and universal waste laws and regulations:

1. OAC Rule 3745-52-11 Waste Evaluation

OAC Rule 3745-52-11 requires "Any person who generates a waste...[to] determine if that waste is a hazardous waste..."

The facility generates used fluorescent lamps. Based on comments during the inspection and lack of documentation of recycling, it appears that used lamps are disposed in the trash. The facility did not provide evidence during the inspection that it had evaluated its used lamps to determine if they are hazardous wastes.

To return to compliance the facility must:

-Either manage used fluorescent lamps (i.e., bulbs) as universal waste or evaluate all used lamps not managed as universal wastes to determine if they exhibit any characteristic of hazardous waste.

You may use either generator knowledge based on documentation provided by the lamp manufacturer for each model number lamp at the facility or you may take a representative sample of the lamps for an analysis using the TCLP test. (Because of the high cost sampling and analysis it is almost never done by generators of used lamps).

-Only lamps that are determined to NOT exhibit any characteristic of hazardous waste may be placed in the trash dumpster. (Ohio EPA encourages recycling of these lamps too). All other discarded used lamps must be managed in compliance with either the hazardous waste or universal waste rules. (Most generators of discarded lamps that cannot be disposed as trash elect to manage them as universal waste since this entails a lower regulatory burden).

-Develop a plan that describes how Youngstown Pre-Press intends to evaluate and manage discarded lamps. Submit a copy of the plan to this office within 30 days of the date of receipt of this letter.

I previously emailed guidance documents on used lamps that might be useful in responding to this violation.

Another source of information is the Answer Place on the Ohio EPA Internet site.

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To use Answer Place go to <http://www.epa.state.oh.us/>, click on the Answer Place logo in the banner across the top of the screen, enter the words fluorescent lamps in the search box, and then click Search.

Submit a copy of the above requested documentation to this office within 30 days of receipt of this letter.

Enclosed you will find a copy of the checklists completed during the inspection.

Other Information

The division 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/ci/documents/detail/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/laws_regs.aspx.

Should you have any questions regarding this letter, please contact me at (330) 963-1165.

Sincerely,



Neil J. Wasilk
Environmental Specialist
Division of Hazardous Waste Management

NJW:cl

Enclosure

ec: Natalie Oryshkewych, Ohio EPA, DHWM, NEDO
Nyall McKenna, Ohio EPA, DHWM, NEDO
Marlene Kinney, Ohio EPA, DHWM, NEDO
Harry Sarvis, Ohio EPA, DHWM, CO

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
or mail it to Kristina Durnell, Central Office

Site EPA ID No.	EPA ID Number: OHD 981 535 735	
Site Name	Name: Youngstown Pre-Press Inc.	Website: (Optional)
Site Location Information	Street Address: 3691 Leharps Road	State: OH
	City, Town, or Village: Austintown	Zip Code: 44507
	County Name: Mahoning	
Site Land Type (check only one)	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>
NAICS code(s)	District <input type="checkbox"/>	Federal <input type="checkbox"/>
www.census.gov/epcd/www/wnaics.html	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>
	State <input type="checkbox"/>	Other <input type="checkbox"/>
Facility Representative	First Name: Gary	MI: Last Name: Dobrindt
Additional names can be recorded in number 12	Phone Number: 330-793-3690	Phone Number Extension:
Only provide address information if it is different than the site address	E-Mail Address:	Fax Number Extension:
	Fax Number:	
	Street or P.O. Box: PO BOX 2375	
	City, Town or Village: Youngstown	
	State: Ohio	Zip Code: 44509
Legal Owner And Operator of the Site.	Name of Site's Legal Owner:	
List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Owner Private <input checked="" type="checkbox"/>	Date Became Owner (mm/dd/yyyy):
	County <input type="checkbox"/>	Federal <input type="checkbox"/>
	District <input type="checkbox"/>	Indian <input type="checkbox"/>
	Street or P.O. Box: Same as above address.	Municipal <input type="checkbox"/>
	City, Town or Village:	State <input type="checkbox"/>
	State:	Other <input type="checkbox"/>
	Name of Site's Operator: Same as above	Owner Phone #:
	Owner Private <input type="checkbox"/>	Country:
	County <input type="checkbox"/>	Date Became Operator (mm/dd/yyyy):
	District <input type="checkbox"/>	Federal <input type="checkbox"/>
	Street or P.O. Box:	Indian <input type="checkbox"/>
	City, Town or Village:	Municipal <input type="checkbox"/>
	State:	State <input type="checkbox"/>
		Other <input type="checkbox"/>
		Operator Phone #:
		United States
		Zip Code:

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 type="checkbox"/> Small Quantity Generator (SQG)
		<input checked="" 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)

- Recycler of Hazardous Waste
- Underground Injection Control Facility
- Hazardous Waste Transporter
- Treater, Storer or Disposer of Hazardous Waste
- Exempt Boiler and/or Industrial Furnace
- Small Quantity On-Site Burner Exemption
- Smelting, Melting, Refining Furnace Exemption

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED)

(CHECK ALL BOXES THAT APPLY)

- Small Quantity Handler of Universal Waste
- Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)
- Destination Facility for Universal Waste

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 RCRA info source report, you do not need to list them all. Instead just indicate the date of the most recent source report.

COMMENTS. USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

- Announced: Yes No
- Tanks: Yes No
- Containers: Yes No
- Additional Facility Representatives: _____
- Other Comments: _____

Name of Inspector(s): _____ Name of Inspector(s): _____ Date of Inspection/Time: (mm/dd/yyyy) (hh:mm)
 N. Wall 1-19-2001 10:30 am

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): _____

SIGNATURE NOT REQUIRED

PROCESS DESCRIPTION

Facility:

Youngstown Pre-Press Inc.
3691 Leharps Road
Austintown, OH 44515

EPA ID NO.: OHD 981 535 735

The facility's primary businesses are the design and manufacture of pre-press plates, primarily for printing labels on cans. Printing on paper products such as cardboard boxes is also a part of the market served by this facility. The facility's products are computer files from which the plates can be created by the final printer and the actual physical pre-press plates. This facility does not do any printing.

The facility formerly used an acid bath as part of the process of making pre-press plates. No longer necessary with the machines currently used.

The pre-press plates are created on a flexible material such as a sheet of aluminum metal coated with a polymeric material. Automated equipment uses a laser to set (harden) some of the constituents of the polymeric coating. Set material is insoluble in the wash steps, which include an alkaline water wash that uses potassium hydroxide, that follow the laser process.

Spent wash water from the potassium hydroxide containing water wash is discharged directly to the city sewer without intermediate storage. The exact pH of the wash water was not provided. The sewer into which it is discharged also handles sanitary waste. Therefore even if the pH of spent water wash is greater than 12.5 it would not be regulated as hazardous waste because it is not stored and mixtures of domestic (i.e., sanitary) sewage and hazardous waste are excluded from regulation as a waste under RCRA.

Films similar to photographic film are also used to produce produced pre-press plates at this facility. These are produced on a separate machine that utilizes film that contains a light sensitive silver compound. The exposed film is processed which results in the generation of a few gallons per day of water-based solution that contains dissolved silver.

The facility uses a METAFIX silver recovery unit to process water from the developing and fixing process. Cleaned water from the silver recovery unit is discharged directly to the municipal sewer without intermediate storage. The facility did not know silver content of the cleaned water. The sewer into which it is discharged also handles sanitary waste. Even if silver content is greater than TCLP limits, the solution would not be regulated as a hazardous waste because it is not stored and mixtures of domestic (i.e., sanitary) sewage and hazardous waste are excluded from regulation as a waste under RCRA.

Recovered silver from the silver recovery unit and scrap film are recycled for silver value.

No mineral spirits or parts washers used are used at the facility and no used oil is generated.

The facility uses fluorescent lamps and apparently generates used lamps. No fluorescent lamps were in inventory. No documentation that used lamps are recycled was provided.

YOUNGSTOWN PRE-PRINT

**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:

WASTE EVALUATION

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11] <i>USED LAMPS NOT EVALUATED</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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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"/>
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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"/>
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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"/>

YOUNGSTOWN PRE-PRINT

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS		
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more		
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less		
PROHIBITIONS		
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/> No <input 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"/>
WASTE MANAGEMENT AND LABELING/MARKING		
UNIVERSAL WASTE BATTERIES <i>NO U.W. BATTERIES</i>		
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 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 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 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 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 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 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 type="checkbox"/> N/A <input type="checkbox"/>
UNIVERSAL WASTE LAMPS <i>NO U.W. LAMPS OBSERVED</i>		
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 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 type="checkbox"/>
<p>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.</p>		
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 type="checkbox"/> N/A <input type="checkbox"/>

ACCUMULATION TIME		
11.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input 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 type="checkbox"/>
<i>NOTE: Accumulation is defined as date generated or date received from another handler.</i>		
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 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 type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RESPONSE TO RELEASES <i>NO RELEASES OBSERVED</i>		
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 type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input 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 type="checkbox"/>
OFF-SITE SHIPMENTS <i>NO DOCUMENTATION OF OFF-SITE SHIPMENTS</i>		
<i>NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.</i>		
17.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input 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 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 <u>one of the following</u> :	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"/> <input checked="" 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 checked="" type="checkbox"/> N/A <input checked="" 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 checked="" 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 checked="" type="checkbox"/>