



State of Ohio Environmental Protection Agency

Main  
Plant

**Southeast District Office**

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Logan, Ohio 43138

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

May 25, 2007

**ROSS COUNTY  
PH GLATFELTER-CHILLICOTHE FACILITY  
DHWM/SEDO  
OHD046428363**

Ms. Katherine A. Weideman  
PH Glatfelter Company - Chillicothe Facility  
401 South Paint Street  
Chillicothe, Ohio 45601

Dear Ms. Weideman:

On May 15, 2007, Ohio EPA inspected PH Glatfelter Company – Chillicothe Facility (“Glatfelter”) of Chillicothe, Ohio to determine Glatfelter’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). Glatfelter was represented by Mr. Bryan Barker and Mr. Jim Flanders. This letter will explain the violations I found, what you need to do to correct the violations, other general concerns we have, what you need to do to respond to my general concerns and any pollution prevention opportunities I identified.

I found the following violations of Ohio’s hazardous waste laws. In order to correct these violations, you must do the following and send me the required information **within 30 days** of the date of this letter:

- (1) **OAC Rule 3745-52-11, Waste Evaluation:** Any person who generates a waste must evaluate the waste to determine if the waste is a hazardous waste in accordance with the criteria set forth in OAC Chapters 3745-51.

Glatfelter failed to determine if the following wastes were a hazardous waste: three containers in the Used Oil Pump Building and a five-gallon bucket containing a granular substance found in large pile of debris in the near the Metal Recycling Dumpster south of the Hazardous Waste Storage Building.

Glatfelter submitted a letter to Ohio EPA dated May 18, 2007 stating that these wastes were to be evaluated by Safety Kleen on May 22, 2003. In order to document compliance with this rule, please submit analytical results for these three wastes to this office for review.

- (2) **OAC Rule 3745-52-34 (D (5)(b)), Accumulation Time of Hazardous Waste:** The generator must post next to the telephone the name and telephone number of the emergency coordinator.

During the inspection, this information was not posted by the telephone located at the entrance to the Hazardous Waste Storage Building. Following the inspection, Glatfelter submitted a May 18, 2007 letter to Ohio EPA documenting via a photograph that this information has now been posted. Therefore, Glatfelter has now abated this violation.

- (3) **OAC Rule 3745-279-22 (D), Used Oil Storage Requirements for Generators:** Upon detection of a release of used oil to the environment, a used oil generator must stop the release, contain the released used oil, clean up and properly manage the released used oil and materials used to clean up the used oil, and if necessary, repair or replace any leaking used oil storage containers prior to returning them to service for used oil storage.

A used oil tank located next to the Woodyard Garage appeared to be leaking. A large portion of the dike surrounding the tank, as well as the ground outside the tank, was stained with used oil.

On May 18, 2007, Glatfelter submitted a letter stating that they had discovered that the drain plug at the bottom of the containment area was not in place. Glatfelter stated that they had replaced the plug and cleaned the area. Please describe if any soils surrounding the tank were impacted by this leakage and if so, how soils were excavated and disposed.

- (4) **OAC Rule 3745-65-31, Maintenance and Operation of a Facility:** Facilities shall be operated and maintained to minimize the possibility of fire, explosion or release of hazardous waste.

A number of unevaluated wastes being stored in the hazardous waste storage building had not yet been evaluated and there was no apparent schedule for conducting a waste evaluation. Furthermore, the generation date of the wastes was not being tracked and, therefore, the accumulation times for these wastes, if evaluated as hazardous, could possibly be exceeded by the time they were evaluated. Some containers of unevaluated waste were not adequately closed. In addition, it appeared as though a container was leaking or had leaked. Oil dry which had been used to absorb the leak had not been cleaned up. It was not clear if the container was still leaking or what the leaked material was. Waste containers were not adequately separated from the leak or from each other in case of incompatibility. All of the above problems could lead to the possibility of a release of hazardous waste.

On May 18, 2007, Glatfelter submitted a letter documenting that the apparent leak that had been observed had been from a drum that had leaked and been addressed prior to the inspection. Glatfelter stated that the oil dry observed on the floor during the inspection had now been cleaned up. In addition, Glatfelter stated that all unevaluated wastes were to be evaluated by Safety Kleen on May 22 and that all unevaluated wastes were now being logged in.

In order to further abate this violation, please submit documentation that all wastes stored in this building are in closed containers and are adequately spaced so incompatibility will not be a problem in the future. Note that Glatfelter's weekly inspections of the hazardous waste storage building should note conditions such as the above-described ones. Ohio EPA recommends that the inspection procedure and checklist be revised to consider the storage of unevaluated wastes, since the management of these wastes is not an infrequent occurrence.

#### GENERAL COMMENTS

- (a) During the inspection, Ohio EPA observed the following issues: Cardboard and pallets which can be recycled were in the solid waste dumpster near the woodyard garage. It is our understanding that Glatfelter has a program for recycling these wastes. Ohio EPA recommends that Glatfelter take steps to assure that these types of wastes be separated and recycled.
- (b) Ohio EPA recommends that Glatfelter review its aerosol can management program to assure that all aerosol cans are being adequately managed and submit a description of its aerosol can management program to Ohio EPA for review. The most recent Ohio EPA regulatory interpretations of aerosol can management can be found in The Notifier, an Ohio EPA publication, at the following link:

<http://www.epa.state.oh.us/dhwm/pdf/NotifierWinter05.pdf>

Enclosed, you will find a copy of the checklists that were completed during the inspection. Should you have any questions, please feel free to call me at (740) 380-5293. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,



Donna Goodman  
District Representative  
Division of Hazardous Waste Management

DG/mlm

Enclosure

**NOTICE:**

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

## PROCESS, WASTE, P2 SUMMARY SHEET

**Facility Name:** PH Glatfelter- Chillicothe Facility **Facility Type:** SQG/Episodic LQG **Date of Inspection:** 5/15/07 **EPA ID#:** OHD046428363

Waste Generated		On- or Off-Site Management			P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc).	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	Quality Assurance Lab testing procedure	methanol and toluene D001/22 F003/5	5 gallons per mo. in drum in SAA in #3 Mill.		Safety Kleen Smithville, KY Incineration	
2	Clean out of labs and other plant areas	misc. lab wastes and materials D001/2/3/5/35	volume varies; Haz. Waste Storage Bldg		same as above	
3	Various plant processes	unknown wastes taken to haz waste storage bldg pending analysis	varies		same as above	
4	Hydraulic maintenance	Used oil in tanks in containment area and Wood-yard garage	varies		Heartland Oil Columbus, Ohio	
5	Lighting	Universal Waste lamps in EI bldg.				

6							
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**REMARKS GENERAL INFORMATION**

**General Process Information:** PH Glatfelter-Chillicothe Facility notified as an SQG but is often a CESQG and episodically an LQG (due to spills or clean out of lab wastes) at various times of the year. In 2006, they were an LQG for one month of the year, hence they filed an annual report for 2006. During the inspection, a number of wastes in the haz waste storage facility had not yet been evaluated so their generator status was unclear. For inspection purposes, the SQG checklist was used.

PH Glatfelter-Chillicothe facility is an 800 acre, 1600 employee pulp and paper mill that manufactures carbonless paper and book paper. The pulping process consists of the following steps: 1) Wood chips and a white liquor (sodium hydroxide and sodium sulfide) are cooked in digesters (large pressure vessels) producing a mixture of pulp, sodium salts and various organics. 2) The pulp mixture is screened to separate out unusable wood fines. 3) The Chemiwasher washes the pulp mixture with reclaimed condensate, removing liquor (weak black liquor) from the pulp. 4) The pulp is bleached and the weak black liquor is ready for recovery or reuse in the pulping process as white liquor. Bleaching is done using chlorine dioxide which is manufactured on-site.

Weak black liquor undergoes the following recovery steps: 1) The liquor is concentrated in evaporators (from 13% to 70% solids). 2) This stronger black liquor is burned in a recovery furnace, creating smelt. 3. The smelt is dissolved in water (called green liquor). 4) Green liquor is causticized with lime to create white liquor which is settle and then reused in the pulping process.

**Regulatory/Enforcement History** (if applicable): This plant was last inspected by Ohio EPA, DHWM in 2003 when it was owned by MeadWestvaco, It was then sold to NewPage and then to the current owner, PH Glatfelter.

**Additional P2 remarks and information:**

Would this facility be interested in a P2 assessment? A pollution prevention assessment of this plant was conducted in 2002 by the Ohio EPA Office of Pollution Prevention when the plant was owned by Mead-Westvaco.

**Other:**

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

For Ohio EPA use only

E-mail this completed form to  
[tammy.mcconnell@epa.state.oh.us](mailto:tammy.mcconnell@epa.state.oh.us) or mail it to Tammy  
McConnell, Central Office

Site EPA ID No.	EPA ID Number: OHD046428363								
Site Name	Name: P.H. Glatfelter Company – Chillicothe Facility				Website: (Optional)				
Site Location Information	Street Address: 401 S. Paint Street								
	City, Town, or Village: Chillicothe				State: OH				
	County Name: Ross				Zip Code:				
Site Land Type (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"/>	
NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	322121								
Facility Representative  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: Katherine		MI: A		Last Name: Wiedeman				
	Phone Number: 740-772-3387				Phone Number Extension:				
	E-Mail Address: KWiedeman@glatfelter.com								
	Fax Number: 740-772-0014				Fax Number Extension:				
	Street or P.O. Box:								
	City, Town or Village: Chillicothe		State: OH		Country: USA		Zip Code: 45601		
Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: PH Glatfelter Company				Date Became Owner (mm/dd/yyyy): 04/01/06				
	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: 96 South George St.								
	City, Town or Village: York				Owner Phone #: 717-225-2755				
	State: PA				Country: USA		Zip Code: 17401		
	Name of Site's Operator: (same as site name and address)				Date Became Operator (mm/dd/yyyy):				
	Owner Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box:								
City, Town or Village:				Operator Phone #:					
State:				Country:		Zip Code:			
Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
Type of Generator									
<input type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste					
<input type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input checked="" type="checkbox"/> Small Quantity Generator (SQG)									
Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Underground Injection Control Facility				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste									

**Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply))**

<input checked="" type="checkbox"/> <b>Small Quantity Handler of Universal Waste</b> <input type="checkbox"/> <b>Destination Facility for Universal Waste</b>	<input type="checkbox"/> <b>Large Quantity Handler of Universal Waste</b> (accumulates 5,000 kg. or more)
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(Check all boxes below that apply for each of the three types of facilities above)		Used Oil Activities (Indicate Type(s) of Activity(ies))	
	<b>Generated</b>	<b>Accumulated</b>	
<b>Batteries</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> <b>Used Oil Generator</b> <input type="checkbox"/> <b>Used Oil Transporter</b>
<b>Pesticides</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Transfer Facility</b> <input type="checkbox"/> <b>Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil</b>
<b>Thermostats</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Processor</b>
<b>Lamps</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Re-refiner</b>

Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your 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.

D001/2/3/5/	D022/35	F003	F005			
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Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

<b>Announced</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Additional Facility Representatives:</b>	Brian Barker, Jim Flanders
<b>Tanks</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Other Comments:</b>	
<b>Containers</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		

Name of Inspector(s) Donna Goodman	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm) 5/15/07, 9:00 AM
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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)

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

CESQG: ≤ 100 Kg. (approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.  
 SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month  
 LQG: ≥ 1,000 Kg. (-300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month  
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds  
 Safety Equipment Used:

**GENERAL REQUIREMENTS**

- |  |     |                                     |    |                                     |     |                          |
|--|-----|-------------------------------------|----|-------------------------------------|-----|--------------------------|
| 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] <b>Several wastes found at Glatfelter had not been evaluated.</b>   | Yes | <input type="checkbox"/>            | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 2. Has the generator obtained a U.S. EPA I.D. number? [3745-52-12]   | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/> |
| 3. Has the generator transported or caused to be transported hazardous waste to <b>other</b> 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"/> |
| 4. Has the generator disposed of hazardous waste <b>on-site without a permit</b> or at another facility <b>other</b> than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)] | Yes | <input type="checkbox"/>            | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 5. Does the generator accumulate hazardous waste?  | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/> |

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

- |  |     |                          |    |                                     |     |                          |
|--|-----|--------------------------|----|-------------------------------------|-----|--------------------------|
| 6. Has the generator accumulated hazardous wastes <u>in excess of</u> (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
|--|-----|--------------------------|----|-------------------------------------|-----|--------------------------|

NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]

- |  |     |                          |    |                                     |     |                          |
|--|-----|--------------------------|----|-------------------------------------|-----|--------------------------|
| 7. Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
|--|-----|--------------------------|----|-------------------------------------|-----|--------------------------|

NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.

- |   |     |                          |    |                          |     |                                     |
|---|-----|--------------------------|----|--------------------------|-----|-------------------------------------|
| 8. 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 waste is treated to meet LDRs, use LDR checklist.

**MANIFEST REQUIREMENTS**

- |   |     |                                     |    |                                     |     |                                     |
|---|-----|-------------------------------------|----|-------------------------------------|-----|-------------------------------------|
| 9. Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site 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"/>            |
| 10. Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)]  | Yes | <input type="checkbox"/>            | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/>            |
| a. Does the contractual agreement specify the type of waste and frequency of shipment?  | Yes | <input type="checkbox"/>            | No | <input type="checkbox"/>            | N/A | <input checked="" type="checkbox"/> |

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 [ID number]  
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- b. Is the transport vehicle owned and operated by the reclaimer? Yes  No  N/A
- c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? Yes  No  N/A

NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.

11. Have items 1 through 20 of each manifest been completed?[3745-52-20(A)] Yes  No  N/A

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be complete. [3745-52-20 (A)]

12. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] Yes  No  N/A

NOTE: The generator may designate on the manifest one alternative 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)]

13. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes  No  N/A

14. Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)] Yes  No  N/A

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.

15. If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? 3745-52-42(B)] Yes  No  N/A

16. Are signed copies of all manifests 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.

#### PREPAREDNESS AND PREVENTION

17. Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)] Yes  No  N/A

18. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]

- a. Name and telephone number of emergency coordinator? **This info not posted at haz waste storage building.** Yes  No  N/A

- b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes  No  N/A

- c. Telephone number of local fire department? Yes  No  N/A

19. Are employees familiar with waste handling and emergency procedures [3745-52-34(D)(5)(c)] Yes  No  N/A

20. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)] Yes  No  N/A

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[ID number]

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21. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31].  
**Unevaluated unknown wastes in the haz waste storage building were not logged in, not labeled, not closed, not separated from each other in case of incompatibility, and it appeared as though a container had been leaking. There was no record of how long these wastes had been accumulate in the building.**
- Yes  No  N/A
22. 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
23. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency?[3745-65-33]
- a. Are inspections recorded in a log or summary? [3745-65-33]? Yes  No  N/A
24. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)] Yes  No  N/A
25. 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
26. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes  No  N/A
27. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes  No  N/A
28. 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

29. 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 a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes  No  N/A
- d. Do not exceed one quart of acutely hazardous waste at any one time? {3745-52-34(C)(1)} Yes  No  N/A
- e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. Yes  No  N/A
- f. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes  No  N/A
30. 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 the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] 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

31. Has the generator marked containers with the words "Hazardous Waste"[3745-52-34(D)(4)] Yes  No  N/A
32. Is the accumulation date on each container? [3745-52-34(D)(4)] Yes  No  N/A
33. 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 and photograph the area.*

34. Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days. Yes  No  N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes  No  N/A
35. 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
36. 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
37. 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.*

#### PRE-TRANSPORT REQUIREMENTS

38. Does each 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
39. Does each container ≤ 100 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes  No  N/A
40. 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 CHECKLIST

### GENERAL LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] If so:
- Yes  No  N/A  RMK#
- 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]
- 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#

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**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#

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**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#

**NOTE: Wastes with EPA hazardous waste numbers K174 and K175 (chlorinated aliphatic wastes) have specific requirements in rule 3745-270-33. Waste with EPA hazardous waste numbers K176, K177 and K178 (inorganic chemical wastes) have specific requirements in rule 3745-270-36.**

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#

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**NOTE: A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (§402 of CWA), that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater.[3745-270-03(B)]**

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#

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**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] Yes  No  N/A  RMK#

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] Yes  No  N/A  RMK#

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# \_\_\_

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**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 of 3745-270-07? [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 of 3745-270-07? [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 of 3745-270-07? [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 of 3745-270-07? [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# \_\_\_

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**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# \_\_\_

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**REMARKS**

## USED OIL INSPECTION CHECKLIST (Short Version)

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

### PROHIBITIONS

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

### USED OIL GENERATOR STANDARDS

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

9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- b. Contained the release? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- c. Cleaned up and properly managed the used oil and other materials? **Leaking oil from the used oil tank in the wood yard must be investigated, repaired and cleaned up.** Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes \_\_\_ No  N/A  RMK# \_\_\_
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes \_\_\_ No  N/A  RMK# \_\_\_
- c. Are the combustion gases from heater vented to the ambient air? Yes \_\_\_ No  N/A  RMK# \_\_\_
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

#### USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

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

#### WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated?  
[3745-52-11]

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

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**REMARKS**

**SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS**

*Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more*

*Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less*

**PROHIBITIONS**

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes . No  N/A \_\_\_ RMK# \_\_\_
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes . No  N/A \_\_\_ RMK# \_\_\_

**WASTE MANAGEMENT & LABELING/MARKING**

**UNIVERSAL WASTE BATTERIES**

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes  No . N/A \_\_\_ RMK# \_\_\_
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes  No . N/A \_\_\_ RMK# \_\_\_
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. Mix battery types in one container? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- c. Discharge batteries to remove the electric charge? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- d. Regenerated used batteries? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- e. Disassemble them into individual batteries or cells? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- f. Remove batteries from consumer products? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

g. Remove the electrolyte from the battery?

Yes \_\_\_  
No \_\_\_  
 N/A  
RM  
K# \_\_\_

Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)]

Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]

Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]

Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

7. Are the battery(ies) of container(s) of batteries labeled with the words <sup>A</sup>Universal Waste - Batteries<sup>@</sup> or <sup>A</sup>Waste Battery(ies)<sup>@</sup> or <sup>A</sup>Used Battery(ies)?<sup>@</sup> [3745-273-14(A)]

Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

### UNIVERSAL WASTE LAMPS

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]

Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could

Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]

10. Are the lamps or containers or packages of lamps labeled with the words AUniversal Waste - Lamp(s)@ or AWaste Lamp(s)@ or AUsed Lamp(s)?@ [3745-273-14(E)]

**NOTE:### Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)].** A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

**ACCUMULATION TIME**

11. Is the waste accumulated for less than one year? Yes x No \_\_\_ N/A \_\_\_ RMK# \_\_\_  
[3745-273-15(A)] If not:
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes \_\_\_ No. N/A x RMK# \_\_\_

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

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)]

Yes  No  N/A  RMK#

a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)]

Yes  No  N/A  RMK#

b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)]

Yes  No  N/A  RMK#

c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)]

Yes  No  N/A  RMK#

d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)]

Yes  No  N/A  RMK#

e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)]

Yes   
No   
x  
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  RMK#

RM  
K#

### EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]

Yes  No  N/A  RMK#

### RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]       Yes \_\_\_ No. N/A  RMK# \_\_\_
15. Is the material released characterized? [3745-273-17(B)]      Yes \_\_\_ No. N/A  RMK# \_\_\_
16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)]      Yes \_\_\_ No. N/A  RMK# \_\_\_

**OFF-SITE SHIPMENTS**

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

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

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

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)]      Yes  No. N/A \_\_\_ RMK# \_\_\_

19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)]

Yes x  
No  
If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:

N/A

RM  
K#

20.

a. Receive the waste back? [3745-273-18(E)(1)] Yes \_\_\_ No \_\_\_ N/A x RMK# \_\_\_

b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes \_\_\_ No \_\_\_ N/A x RMK# \_\_\_

21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following: Yes \_\_\_ No \_\_\_ N/A x RMK# \_\_\_

a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes \_\_\_ No \_\_\_ N/A X RMK# \_\_\_

b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes \_\_\_ No \_\_\_ N/A x RMK# \_\_\_

22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes \_\_\_ No \_\_\_ N/A x RMK# \_\_\_

23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes \_\_\_ No \_\_\_ N/A x RMK# \_\_\_

**EXPORTS**

24. Is waste being sent to a foreign destination? If so:  Yes  No  N/A  RMK#
- a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes  No  N/A  RMK#
- b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's Acknowledgment of Consent as defined in 3745-52-50 to -52-57? [3745-273-20(B)] Yes  No  N/A  RMK#
- c. Is a copy of U.S. EPA's Acknowledgment of Consent provided to the transporter? [3745-273-20(C)]

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### REMARKS

#2. Spent lamps were not properly labeled.