



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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

December 11, 2007

**SCIOTO COUNTY
GENERAL FILE
(KSA)
DHWM/SEDO
NON NOTIFIER**

Mr. Dick Burke
KSA
PO Box 4039
Sciotoville, Ohio 45662

Dear Mr. Burke:

On December 6, 2007, Ohio EPA inspected KSA's facility in Sciotoville, Ohio to determine KSA'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). During the inspection, I also helped you identify ways to prevent pollution by reducing waste. This letter will explain general concerns I have, what you need to do to respond to my general concerns and pollution prevention opportunities I identified.

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

- (1) **OAC Rule 3745-52-11, Waste Evaluation:** Any person who generates a waste in the state of Ohio must evaluate the waste to determine if it is a hazardous waste. During the inspection, I observed three pallets of 5-gallon containers of unevaluated wastes which were stored in a Quonset hut. According to you, the containers held "add mixtures" and super plasticizers which were considered a waste.

On December 11, 2007, you contacted me by telephone with the results of KSA's evaluation of these wastes. Using MSDS information and process knowledge, KSA determined that the some of the containers held materials that can be reused onsite (such as a release agent for the wall panel and grade crossing department); some can be used in the manufacturing of concrete, some were empty; some held an epoxy that is not usable and will be returned to the manufacturer, and several held a nonhazardous fly ash product sold by LaFarge North America, according to MSDS information which you faxed to me. Therefore, KSA has now abated this violation.

Fly ash is exempt from regulation as a solid waste. While the material can be disposed of as a solid waste, KSA suggested that they would like to allow their employees to recycle the product fly ash along with bag house dust (cement dust) which is currently recycled by employees for use in home projects. While recycling these materials in this manner is acceptable, please note that the MSDS information for fly ash recommends that it not be washed into bodies of water. You may wish to inform employees of this as well as other handling and storage recommendations noted in the MSDS information.

- (2) **OAC Rule 3745-279-22 (C), Used Oil Storage Requirements for Generators:** Used oil generators must store used oil in containers which are labeled with the words "used oil."

Several 55-gallons drums of used oil outside the manufacturing building were not labeled. During the inspection, your employee properly labeled with the words "used oil." As a result of this action, you have now abated this violation.

GENERAL COMMENTS

- (a) During the inspection, Mr. Harold Ehrhart, KSA's Environmental Safety Manager, requested a list of used oil recycling companies. You will find a list of at the following link:
<http://www.epa.state.oh.us/ocapp/p2/recyc/oilmark.html>

- (b) KSA regularly generates a significant number of wood pallets and boxes which are used for the delivery of raw materials to KSA. Once emptied, they are considered waste and are typically given to employees for use at home. Ohio EPA recommends that KSA minimize, to the extent possible, waste pallets and boxes. During the inspection, we discussed the use of alternatives which are reusable such as plastics or steel. Unfortunately, KSA has not been able to find suppliers who are willing to transport pallets back for reuse. The following link will provide information on minimizing and recycling of wood waste:

<http://www.epa.state.oh.us/opp/recyc/pallets.html>

In addition, the following link will provide additional information, and perhaps some ideas on the use of non-wood alternatives to pallets:

<http://www.epa.state.oh.us/opp/recyc/pallet2.html>

- (c) KSA has been able to minimize the use of some pallets now that certain raw materials are shipped to them in plastic bags. Ohio EPA recommends that KSA recycle, to the extent possible, these and any other plastic which are currently disposed as a solid waste. The following is a list of plastic markets and recyclers in Ohio which may be able to accept your plastics:

<http://www.epa.state.oh.us/opp/recyc/pete-rc.html>

Mr. Dick Burke
December 11, 2007
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- (d) Please note the following information on management of universal waste lamps (spent fluorescent lamps), which contains a link to the universal waste lamp regulations in the Ohio Administrative Code:

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

- (e) During the inspection, you requested a determination from Ohio EPA regarding the use of waste concrete as fill on KSA property. KSA is currently using concrete fines and chips to fill low areas of plant property near the Little Scioto River. According to the Division of Solid Waste, clean concrete may be used onsite as fill. Note, however, that filling of floodplain may be regulated by your municipality or county, and filling of riparian and other wetlands (such as some floodplains and other low areas) may also be regulated by the US Army Corp of Engineers. I recommend that you contact your county and the US Army Corp of Engineers to ensure that you are in compliance with any applicable regulations.

Enclosed you will find a copy of the checklists that were completed as a result of 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.

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 or mail it to Tammy
McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: non notifier								
3. Site Name	Name: KSA					Website: (Optional)			
4. Site Location Information	Street Address: 6501 Pershing Avenue								
	City, Town, or Village: Sciotoville					State: OH			
	County Name: Scioto					Zip Code: 45662			
5. 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"/>	
6. NAICS code(s) www.census.gov/epcd/www/naics.html	238110								
7. Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Dick			MI:	Last Name: Burke				
	Phone Number: 740-776-3238				Phone Number Extension:				
	E-Mail Address:								
	Fax Number:				Fax Number Extension:				
	Street or P.O. Box: PO Box 4039								
	City, Town or Village: Sciotovilles					State: OH		Country: USA	Zip Code: 45662
	Name of Site's Legal Owner: KSA								
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	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:								
	City, Town or Village:				Owner Phone #:				
	State:				Country:		Zip Code:		
	Name of Site's Operator:				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:		
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input checked="" 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 type="checkbox"/> Small Quantity Generator (SQG)									
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Underground Injection Control Facility									

10B. 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"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	
<input type="checkbox"/> Destination Facility for Universal Waste			
Check all boxes below that apply for each of the three types of facilities above		10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
	Managed	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
11. 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.			
12. 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:
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments:
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Donna Goodman			12/6/2007
14. 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)

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: KSA Facility Type: unknown Date of Inspection: 12/06/07 EPA ID#:

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 Concrete Cleanup	wastewater	Varies	pH adjustment prior to releasing via NPDES outfall			
2 Concrete Cleanup	Cement chips	Varies	Collected and used as onsite fill			
3 Vehicle and Machinery Maintenance	Used oil	200 gallons per year		Recycled to Safety Kleen	recycled	
4 Vehicle and Machinery Maintenance	Spent antifreeze	varies		Recycled to Safety Kleen, Poca, WV	recycled	
5 Concrete mixing	Unevaluated, unused or spent add mixtures and plasticizers	3 pallets of 5-gallon containers				
6 Maintenance	Oil dry	Several drums per year		Safety Kleen		

7	Lighting	Universal Waste lamps	varies		Safety Kleen Allentown, PA	recycled	
8	Shipping and receiving	Spent pallets and wood boxes	varies	Given to employees			Recycle to wood pallet recycler
9							

REMARKS-GENERAL INFORMATION

General Process Information:

KSA manufactures concrete railroad ties which are 8.5 feet in length. Ties are used in curves, grades and in southern states where termites will destroy creosoted wood ties. The ties are manufactured by pouring concrete which is mixed onsite into a series of forms, each of which has 8 strands of heavy steel cable stretched through it. The concrete cures for 12 hours before the ties are removed, stacked in the yard and shipped offsite for use. Wastewater from the cleanup of concrete mixing machinery is collected in a basin outside the manufacturing building, and sent to a settling pond where sodium bisulfate is added to adjust pH prior to releasing via a permitted NPDES outfall to the adjacent Little Scioto river. Waste concrete chips from the forms, and cleanings from the wastewater basin are dried and used as fill onsite. Several baghouses are inspected regularly by the Portsmouth Local Air Agency. Baghouse dust, which is concrete, is given to employees for reuse. Used oil and antifreeze are generated and accumulated in the maintenance room. A Quonset hut used for storage contains three pallets of five gallon buckets of unevaluated "add mixtures" and plasticizers.

KSA also has a wooden tie rehabilitation process which has not been in use for several years although there are plans to continue this process line in the future. In a separate building which is currently used mainly as storage space, wooden ties which are removed from RR tracks are unloaded, placed on a conveyor, spikes and plates are removed, the ties are graded, holes are plugged, the ties are adzed, permeate (a preservative product called Perm-E8) is applied via a spraying unit, and the rehabilitated ties are then shipped offsite. Currently there is no waste on-site which is associated with this process.

Regulatory/Enforcement History (if applicable):

NA

Additional P2 remarks and information:

Company is interested in P2 information on pallet recycling and alternative used oil recyclers.

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.

Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other: NA

USED OIL GENERATOR REQUIREMENTS

NOTE: (Short Version) - 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 NA
- 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 NA
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No NA
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes No NA

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 NA
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 NA
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 NA
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]. Yes No NA
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] **Several used oil containers were not labeled. This was corrected during the inspection.** Yes No NA
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 NA
- b. Contained the release? Yes No NA
- c. Cleaned up and properly managed the used oil and other materials? Yes No NA
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No NA

10. Does the generator burn used oil in used oil fired space heaters? [3745-279-23] If so: Yes No NA
- 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 NA
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No NA
- c. Are the combustion gases from heater vented to the ambient air? Yes No NA
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 NA

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 NA
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes No NA
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 NA

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes No NA

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 NA
- 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 NA

WASTE MANAGEMENT - LABELING/MARKING

UNIVERSAL WASTE BATTERIES

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

If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)?
[3745-273-13(A)(2)]
- 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 NA
 - 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 NA
 - 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 NA

7. Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Batteries" or "Used Batteries"? [3745-273-14(A)] Yes No NA

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 NA
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 No NA
10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamps" or "Waste Lamps" or "Used Lamps"? [3745-273-14(E)] Yes No NA

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

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

11. Is the waste accumulated for less than one year? [3745-273-15(A)] Yes No NA
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 NA
12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes No NA
- 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 NA
- 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 NA
- 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 NA

- 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 NA
- 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 NA
- 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 NA

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 NA

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes No NA
15. Is the material released characterized? [3745-273-17(B)] Yes No NA
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 NA

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 NA

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 NA
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No NA
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes No NA

b. Agree to where the shipment will be sent?
[3745-273-18(E)(2)]

Yes No NA

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 NA

a. Sending the waste back to the originating handler?
[3745-273-18(F)(1)]

Yes No NA

b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)]

Yes No NA

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 NA

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 NA

EXPORTS

24. Is waste being sent to a foreign destination? If so:

Yes No NA

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 NA

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 3745-52-57? [3745-273-20(B)]

Yes No NA

c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]

Yes No NA

REMARKS