



State of Ohio Environmental Protection Agency

Southeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
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February 15, 2007

**WASHINGTON COUNTY
RJF INTERNATIONAL CORPORATION
DHWM/SEDO
OHD004328878**

Mr. Joe Kunze
Safety/Environmental Manager
RJF International Corporation
P.O. Box 657
Marietta, OH 45750

Dear Mr. Kunze:

On February 1, and February 5, 2007, Ohio EPA inspected RJF International Corporation's facility in Marietta, Ohio to determine 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, we also helped you identify ways to prevent pollution by reducing waste. This letter will explain the violations we found, what RJF has done to correct the violations, other general concerns we have, and what you need to do to respond to the general concerns.

Ohio EPA found the following violations of Ohio's hazardous waste laws. RJF has already taken corrective measures to abate the violations as noted below.

- (1) **OAC 3745-279-22(C)(1), Used Oil Storage Requirements for Generators:** Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "used oil."

Several small containers in the milling and compounding departments and 55-gallon drums in the drum room were not labeled "used oil", in violation of this rule. RJF submitted photographs on February 13, 2007, showing that the containers were properly labeled, returning to compliance with this rule. No further action is necessary.

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

Spent fluorescent bulbs were not contained properly in a container or package, in violation of this rule. RJF must make sure all containers of fluorescent bulbs are properly closed and must submit photographs to Ohio EPA documenting this rule is being met. RJF submitted photographs on February 15, 2007, showing that fluorescent bulbs were properly contained in suitable boxes, returning to compliance with this rule. No further action is necessary.

- (3) **OAC Rule 3745-273-14(E), Labeling/Marketing - Standards for Small Quantity Handlers of Universal Waste:** Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)."

The boxes of spent fluorescent bulbs were not labeled properly, in violation of this rule. RJF must make sure all containers of spent fluorescent bulbs are properly labeled and must submit photographs to Ohio EPA documenting this rule is being met. RJF submitted photographs on February 15, 2007, showing that boxes of fluorescent bulbs were properly labeled, returning to compliance with this rule. No further action is necessary.

General Comments:

- (a) Based on a review of RJF's hazardous waste manifests, RJF is normally a Conditionally Exempt Small Quantity Generator (CESQG), however, there were months in 2004 and 2005 when RJF was considered an episodic large quantity generator or small quantity generator. RJF should closely monitor their monthly waste generation amounts so that you know which generator category RJF falls under and which regulations apply to the facility. Since RJF was a large quantity generator in 2005 (see manifests dated 3/31/05), RJF needs to submit an Annual Report. The web link to get additional information on the annual report requirements, including the actual hazardous waste report forms, can be found at: http://www.epa.state.oh.us/dhwm/ann_report05.html. I have enclosed a guidance document concerning episodic generators for your information.
- (b) As we discussed during the inspection, Ohio EPA recommends that RJF take a sample of the wastewater in Aztran, where lead is used in the roll process. You sent me an e-mail on February 7, 2007, indicating that you had already taken a sample that was being analyzed at Kemron. Please forward the results to me when you receive them.
- (c) Starting September 5, 2006, all hazardous wastes must be shipped using the new hazardous waste manifest form. Please be advised that you may only use blank manifest forms from printers approved by US EPA. US EPA maintains a list of approved registered printers on their Web site at: <http://www.epa.gov/epaoswer/hazwaste/gener/manifest/registry/index.htm>.
- (d) Please provide Ohio EPA with a receipt for the recycling of universal wastes (i.e., spent fluorescent bulbs).

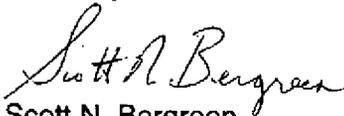
As discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce, or altogether eliminate the amount of waste that your company generates, you may be able to reduce treatment and disposal costs, and you may possibly reduce your regulatory requirements. The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound

Mr. Joe Kunze
RJF International Corporation
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manner. You may benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. You can find more information about pollution prevention, including fact sheets, at the following web address: <http://www.epa.state.oh.us/ocapp/recycle.html>. If you would like to be considered for an in-depth on-site pollution prevention assessment, or if you would like more information about pollution prevention assessments, please contact me.

Enclosed, you will find a copy of the checklists that were completed during the inspection. Should you have any questions, please feel free to contact me at (740) 380-5288. 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,



Scott N. Bergreen
Environmental Specialist
Division of Hazardous Waste Management

SNB/mlm

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.

E-mail this completed form to tammymcconnell@pa.state.oh.us or mail it to Tammy McConnell, Central Office

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

For Ohio EPA use only

2. Site EPA ID No. EPA ID Number: OHD004328878

3. Site Name Name: RJF International Corporation Website (optional): www.rjfinternational.com

4. Site Location Information
 Street Address: 700 BF Goodrich Road
 City, Town, or Village: Marietta State: OH
 County Name: Washington Zip Code: 45750

5. Site Land Type (check only one)

Private	County	District	Federal	Indian	Municipal	State	Other
<input checked="" type="checkbox"/>							

6. NAICS code(s) www.census.gov/eprd/www/naics.html
 A. B.
 C. D.

7. Facility Representative:
 First Name: Joe MI: Last Name: Kunze
 Phone Number: (740) 374-0817 Phone Number Extension:
 E-Mail Address: jkunze@rjfn.net
 Fax Number: (740) 568-5509 Fax Number Extension:
 Street or P.O. Box: 700 BF Goodrich Road
 City, Town or Village: Marietta
 State: OH Country: USA Zip Code: 45750

Additional names can be recorded in number 12.
Only provide address information if it is different than the site address.

8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.

A. Name of Site's Legal Owner: Richard J. Fasenmyer Foundation Date Became Owner (mm/dd/yyyy):

Owner Type:	Private	County	District	Federal	Indian	Municipal	State	Other
Mark with an X	<input checked="" type="checkbox"/>							

 Street or P.O. Box: 3875 Embassy Parkway
 City, Town, or Village: Fairawn Owner Phone #:
 State: OH Country: USA Zip Code: 44333

B. Name of Site's Operator: RJF International Corp. Date Became Operator (mm/dd/yyyy):

Operator Type:	Private	County	District	Federal	Indian	Municipal	State	Other
Mark with an X	<input checked="" type="checkbox"/>							

 Street or P.O. Box: P.O. Box 657
 City, Town, or Village: Marietta Operator Phone #: (740) 374-0817
 State: OH Country: USA Zip Code: 45750

9. Violations Cited? Yes No

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)
 Not Regulated

REMARKS-GENERAL INFORMATION

General Process Information:

RJF International Corporation, located at 700 BF Goodrich Road in Marietta, produces a variety of polyvinyl chloride (PVC) products for industrial and commercial use. Their products include Koroseal and Vicrtex wallcoverings, wall protection products, dry erase surfaces, industrial transit matting, Korokleer sheet products, and specialty films. The plant, which was previously owned and operated by B.F. Goodrich dating back to 1947, was taken over by RJF in 1988. The plant is a 295,000 square foot facility located on 67 acres along the west bank of the Muskingum River in the village of Oak Grove. An on-site natural gas power plant provides steam for the manufacturing plant. The PVC production process involves compounding, milling, calendaring, embossing, laminating, and printing. The plant has a series of 15,000 gallon carbon steel tanks, located in an outside tank farm, for the storage of plasticizer and other chemicals used in production. One of the tanks formerly stored methyl ethyl ketone (MEK), which was used as a solvent in the process. RJF has eliminated this solvent in their production operation and only uses very small quantities in the lab for quality testing purposes. Solvent-based inks have been replaced with water-based inks. PVC stabilizers formerly containing cadmium and lead have been replaced with zinc and barium compounds. RJF has an electroplating operation where embossing rolls are created for internal use in the plant. This process uses silver and lead compounds which generates an electroplating waste water. This wastewater has tested non-hazardous in the past using TCLP metals. The majority of the PVC scrap generated at the plant is re-worked back into the process. Used oils generated from the various machinery at the plant is sent off-site for recycling.

Regulatory/Enforcement History:

The last compliance evaluation inspection was a multimedia pollution prevention inspection performed on May 15, 2002.

Other:

Through RJF's pollution prevention efforts, the facility's hazardous waste generation amounts have been reduced significantly. RJF is typically a Conditionally Exempt Small Quantity Generator (CESQG), but is also an episodic large and small quantity generator at times.

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: RJF International Corporation

Facility Type: CESQG

EPA ID#: OHD004328878

Description of Waste				On-Site Management			Off-Site Management	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	Waste Generated (e.g. sludge, spent solvent, ash, etc)	EPA Waste Code	QTY Generated per Month	Type of Accumulation/Storage (e.g. container, tank, etc)	Type of On-Site Treatment (recycle, wwt, etc)	Waste Location (include map if possible)	Name, state, and type of activity occurring at the facility.	P2 Activities
1. Cleaning	Ink Wash Water	N/A	~6,000 gallons	Container	N/A	Milling Department	BBU Services then taken to Suburban Landfill, Glenford, OH	RJF has switched to water based inks.
2. Maintenance	Spent Mercury Containing Equipment	D009	Varies	Container	N/A	Maintenance Area	Veolia Technical Solutions West Carrollton, OH	
3. Maintenance	Used Oil	N/A	Varies	Container	N/A	Drum Room	Veolia Technical Solutions, then to: United Waste Water Services Cincinnati, OH	
4. Maintenance	Spent Fluorescent Bulbs	N/A	Varies	Box	N/A	Maintenance area	AERC	Recycle spent bulbs
5. Air Pollution Control	Baghouse Dusts	D008	One time generation; baghouse dusts	Container	N/A	Baghouse Collector	Onyx West Carrollton, OH	
Maintenance (Calendar roll grinding)	Waste kerosene	D001	Varies	Container	N/A	Maintenance area	Onyx West Carrollton, OH	

**CONDITIONAL 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.

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] Yes No N/A

GENERATOR CLASSIFICATION

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

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 No N/A

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 No N/A
 - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C) Yes No N/A
 - c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A
 - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

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

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)] 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? 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 oil 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#

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 ___ RMK# ___
- If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] 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) or container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [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 cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes No N/A RMK#
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 No N/A RMK#

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 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 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 N/A ___ RMK# ___
- 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# ___

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

REMARKS