



**Environmental  
Protection Agency**

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

March 27, 2012

**ADAMS COUNTY  
GENERAL FILE  
(ADAMS CO. HIGHWAY DEPT.)  
DMWM/SEDO  
OHR000110262**

Mr. Mike Hughes  
Adams County Engineer  
75 Willow Drive  
West Union, Ohio 45693

Dear Mr. Hughes:

On March 20, 2012, Rich Stewart and I inspected the Adams Co. Highway Department, located at 11260 State Route 41 in West Union, Ohio, to determine compliance with Ohio's hazardous waste laws found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). During the inspection, we spoke with you at the Engineer's Office and with Sandy Roush at the garage location. This letter will explain any violations found during the inspection and what you need to do to correct the violations, as well as other general concerns noted and what you can do to respond to those concerns.

We found the following violation of Ohio's hazardous waste laws:

- (1) OAC Rule 3745-279-22(C) Used Oil Storage Requirements for Generators – Labeling.** Containers and aboveground tanks that store used oil must be labeled with the words "Used Oil".

At the time of the inspection, two 55-gallon drums containing used oil located inside the garage were not labeled "Used Oil".

***Adams Co. Highway Department labeled the drums during the inspection, and has returned to compliance with this rule. No further action is necessary.***

**GENERAL COMMENTS:**

- **On-site Recordkeeping.** As we discussed during the inspection, Adams Co. Highway Department should maintain on-site all documentation of off-site disposal of waste (i.e., manifests, receipts, or bills of lading for disposal of used oil, spent fluorescent lamps, spent parts cleaner solvent, etc.).
- **Fluorescent Lamp Management.** I have enclosed information regarding management of spent fluorescent lamps under Ohio's Universal Waste Rule (UWR). Because all fluorescent lamps contain mercury, Ohio EPA recommends that you manage your

spent lamps under the universal waste rule, if you are not already doing so. The universal waste rule eliminates many regulatory requirements such as waste evaluation, manifesting and record keeping. If you manage your spent lamps as universal waste and they will be recycled, you do not have to determine if they are hazardous waste. If you do not have your spent fluorescent lamps recycled, it is your responsibility to evaluate the lamps to determine if they are hazardous prior to their disposal. Under no circumstances should unevaluated spent fluorescent lamps be disposed of in the trash, as this could result in violations for improper/illegal disposal of a hazardous waste. I have also included a list of fluorescent lamp recycling facilities.

- **Used Oil Management.** I have enclosed Ohio EPA's fact sheet that contains information regarding used oil management, and a list of used oil recycling facilities.

Enclosed you will find a copy of the checklists that were completed during the inspection. You can find copies of the hazardous waste rules and other information on our divisions web page at: <http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/dhwm>. Compliance assistance and pollution prevention information is available at: <http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/ocapp>.

If you have any questions or need assistance, please feel free to contact me at 740-380-5237 or at [vicky.german@epa.ohio.gov](mailto:vicky.german@epa.ohio.gov).

Sincerely,



Vicky D. German  
Division of Materials and Waste Management  
Ohio EPA, Southeast District Office

VDG/sb

Enclosure

cc: Sandy Roush, Adams Co. Highway Department (c/o Adams Co. Engineer)

**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.*

 <p>Environmental Protection Agency</p> <p>Send to Central Office <input checked="" type="checkbox"/></p>	<p><b>Ohio Environmental Protection Agency</b></p> <p><b>RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM</b></p>	<p>For Ohio EPA use only</p>
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*Completed forms that are required to be submitted to CO should be e-mailed to [brad.hauser@epa.state.oh.us](mailto:brad.hauser@epa.state.oh.us)*

<p><b>Site EPA ID No.</b></p>	EPA ID Number: <b>OHR000110262</b>									
<p><b>Site Name</b></p>	Name: <b>Adams Co. Highway Department</b> Website (Optional):									
<p><b>Site Location Information</b></p>	Street Address: <b>11260 State Route 41</b> City, Town, or Village: <b>West Union</b> State: <b>OH</b> County Name: <b>ADAMS</b> Zip Code: <b>45693</b>									
<p><b>Site Land Type</b> (check only one)</p>	<table style="width:100%; border: none;"> <tr> <td>Private <input type="checkbox"/></td> <td>County <input checked="" type="checkbox"/></td> <td>District <input type="checkbox"/></td> <td>Federal <input type="checkbox"/></td> <td>Indian <input type="checkbox"/></td> <td>Municipal <input type="checkbox"/></td> <td>State <input type="checkbox"/></td> <td>Other <input type="checkbox"/></td> </tr> </table>		Private <input type="checkbox"/>	County <input checked="" 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"/>
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<p><b>NAICS codes</b> <a href="http://www.census.gov/epcd/www/naics.htm">www.census.gov/epcd/www/naics.htm</a></p>										
<p><b>Facility Representative</b></p> <p>Additional names can be recorded in comments section. Only provide address information if it is different than the site address.</p>	<p>First Name: <b>Sandy</b> MI: Last Name: <b>Roush</b> Phone Number: <b>937- 544-2533 ()</b> Extension: E-Mail Address: Fax Number: Fax Number Extension: Street or P.O. Box: <b>same as above</b> City, Town or Village: State: Zip Code:</p>									
<p><b>Legal Owner And Operator</b></p> <p>List additional Owners and/or Operators in the Comments Section or on another copy of this page.</p>	<p>Name of Site's Legal Owner: <b>Adams County Engineer</b> Date Became Owner (mm/dd/yyyy): Owner Type: Private <input type="checkbox"/> County <input checked="" type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> Street or P.O. Box: <b>75 Willow Drive</b> City, Town or Village: <b>West Union</b> Owner Phone #: <b>937-544-7505</b> State: <b>OH</b> Country: <b>US</b> Zip Code: <b>45693</b> Name of Site's Operator: <b>Adams County Engineer</b> Date Became Operator: Owner Type: Private <input type="checkbox"/> County <input checked="" type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> Street or P.O. Box: <b>75 Willow Drive</b> City, Town or Village: <b>West Union</b> Operator Phone #: <b>937-544-7505</b> State: <b>OH</b> Country: <b>US</b> Zip Code: <b>45693</b></p>									

<b>VIOLATIONS CITED?</b>	<input checked="" type="checkbox"/> Yes    No <input type="checkbox"/> <i>(Returned to compliance during inspection)</i>
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<b>TYPE OF HANDLER (MARK AS APPROPRIATE)</b>	
<p><input type="checkbox"/> Not a HW Generator</p> <p><input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11</p> <p><input type="checkbox"/> Short-Term/Temporary Generator (short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.</p>	<p><input type="checkbox"/> Large Quantity Generator (LQG)</p> <p><input type="checkbox"/> Small Quantity Generator (SQG)</p> <p><input checked="" type="checkbox"/> <b>Conditionally Exempt Small Quantity Generator (CESQG)</b></p> <p><input type="checkbox"/> U.S. Importer of Hazardous Waste</p> <p><input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator</p>

<b>TYPE OF REGULATED WASTE ACTIVITY (MARK AS APPROPRIATE)</b>		
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace	
<input type="checkbox"/> Hazardous Waste Transfer Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption	
<input type="checkbox"/> Treater, Storer, or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption	
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility	
<input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Receives Hazardous Waste from Off-site	
<b>UNIVERSAL WASTE ACTIVITIES (MARK AS APPROPRIATE)</b>		
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste	
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)		
<b>TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES (MARK ALL THAT APPLY)</b>		
<input type="checkbox"/> Batteries		
<input type="checkbox"/> Pesticides		
<input type="checkbox"/> Mercury containing equipment		
<input checked="" type="checkbox"/> Lamps		
<b>USED OIL ACTIVITIES (MARK ALL THAT APPLY)</b>		
<input checked="" type="checkbox"/> Used Oil Generator		
<input type="checkbox"/> Used Oil Transporter		
<input type="checkbox"/> Used Oil Transfer Facility		
<input type="checkbox"/> Used Oil Processor		
<input type="checkbox"/> Used Oil Re-refiner		
<input type="checkbox"/> Off-Specification Used Oil Burner		
<input type="checkbox"/> Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil		
<input type="checkbox"/> Used Oil Fuel Marketer who first claims the Used Oil meets the specifications		
<b>Eligible Academic Entities with Laboratories:</b> Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the boxes below to indicate the laboratory type.		
<input type="checkbox"/> College or University		
<input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university		
<input type="checkbox"/> Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university		
<b>Waste Codes for Federally Regulated Hazardous Wastes:</b> List the codes for the federally regulated hazardous waste handled at the site, in the order they are presented in the regulations (e.g., D001, D003, F007, U112). 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; just indicate the date of the most recent source record.		
D001		
<b>COMMENTS: Use this area to describe inspection conditions and additional information.</b>		
Announced	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Additional Facility Representatives: <b>Mike Hughes, Adams County Engineer, 75 Willow Drive, West Union, Ohio 45693</b>
Tanks	<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Used Oil Tank
Containers	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>ADDITIONAL COMMENTS:</b>		
Latitude/Longitude: 38.781808,-83.56321		
<b>INSPECTOR(S)</b>		<b>INSPECTION DATE/TIME</b>
Vicky German, DMWM-SEDO	Rich Stewart, DMWM-SEDO	3/20/12

**PROCESS INFORMATION AND WASTE ACTIVITIES SUMMARY**

**Adams Co. Highway Department      OHR000110262**

<i>Description of Waste</i>			<i>On-Site Management</i>			<i>Off-Site Management</i>
<b>Waste Generated</b>	<b>EPA Waste Code</b>	<b>Amount Generated per Month</b>	<b>Accumulation and/or Storage</b>	<b>On-Site Treatment</b>	<b>Waste Location</b>	<b>Name, state, and activity</b>
Used oil	NA	30 to 40 G	55-G drums inside garage; pumped to 300-G outdoor AST	NA	55-G drums inside garage; pumped to 300-G outdoor AST	Safety-Kleen Wheeling WV
Used oil filters	NA	Varies	55-G drum	Filters are drained, crushed and managed as scrap metal	55-G drum	
Spent parts cleaner solvent	D001	30 G	NA	NA	Inside garage	Safety-Kleen Wheeling WV
Spent batteries	D008 unless recycled	Varies	Pallet inside garage	NA	Pallet inside garage	Interstate Battery Chillicothe OH (recycled)
Spent fluorescent lamps	D009 unless recycled	Varies	None accumulated at time of inspection Cardboard mail-back containers	NA	Inside garage when accumulated on-site	Rumpke lamp mail-back program (recycled)
Aerosol cans	NA	Varies	55-G drum inside garage	RCRA empty	55-G drum inside garage	Sardinia Recycling Sardinia OH (scrap metal)

### **FACILITY AND PROCESS INFORMATION**



The Adams County Highway Department is located at 11260 State Route 41 in West Union, Ohio. The facility serves as a maintenance garage for county highway vehicles and equipment, and a storage area for highway maintenance materials.

### **WASTE INFORMATION**

Wastes are generated from vehicle and equipment maintenance and repairs, and from building maintenance. Wastes generated include spent parts cleaner solvent (petroleum naphtha, D001); used oil and spent oil filters; spent lead-acid batteries; spent fluorescent lamps; empty paint aerosol cans; and miscellaneous scrap metal.

### **REGULATORY HISTORY**

The facility was last inspected on 3/7/2002. Violations discovered during the inspection were abated on 5/31/2002.

## CONDITIONALLY EXEMPT SMALL QUANTITY (CESQG) GENERATOR REQUIREMENTS

*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.*

### WASTE EVALUATION

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

### GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg. of hazardous waste per month?  
(CESQG - Conditionally Exempt Small Quantity Generator) Yes  No  NA

**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).**

### OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD?  
[ORC §3734.02(F)] Yes  No  NA

### 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  NA
  - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes  No  NA
  - c. Drip pad that meets 3745-69-40 to 3745-69-45? Yes  No  NA
  - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes  No  NA

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

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

## USED OIL GENERATOR COLLECTION CENTER, AND AGGREGATION POINT REQUIREMENTS

**NOTE:** A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

### PROHIBITIONS

1. Does the generator manage used oil in a surface impoundment or waste pile? Yes  No  N/A   
If yes:
- a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] Yes  No  N/A
2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes  No  N/A
3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? Yes  No  N/A

**NOTE:** Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists).

### GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil? If so, Yes  No  N/A   
a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] Yes  No  N/A

**NOTE:** Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

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

**NOTE:** If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6. Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] Yes  No  N/A

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

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

*Two 55-gallon drums containing used oil located inside the garage were not labeled "Used Oil". The drums were labeled during the inspection.*

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
- b. Contained the release? Yes  No  N/A
- c. Cleaned up and properly managed the used oil and other materials? Yes  No  N/A
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes  No  N/A

### ON-SITE BURNING IN SPACE HEATERS

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

**NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).**

### GENERATOR TRANSPORTATION

11. Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24] Yes  No  N/A
12. If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]
- a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24] Yes  No  N/A
- b. Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24] Yes  No  N/A

**NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).**

### COLLECTION CENTERS AND AGGREGATION POINTS

13. 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
14. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes  No  N/A
15. 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

**NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.**

# SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - LAMPS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more  
Small Quantity Universal Waste Handler (SQUWH) = Less than 5,000 Kg (11,023 lb)

## 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

## LABELING

8. Does the SQUWH 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   
*At the time of the inspection, no lamps were being accumulated on-site at Adams Co. Highway Department. Any lamps that are generated must be accumulated in containers or boxes that are closed and labeled as required above.*

**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)] If not: Yes  No  NA
- 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)]  
*In addition to the accumulation requirements noted above, Adams Co. Highway Department must document how long spent lamps are accumulated on-site in one of the following manners, and maintain documentation of their disposal.*
- 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:

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