State of Ohio Environmental Protection Agency

Northeast District Office

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

March 14, 2007

RE: FIRST CHOICE DRY CLEANERS
OHD 987-036-027
SUMMIT COUNTY
COMPLAINT INVESTIGATION #6939
NOTICE OF VIOLATION

Ms. Brenda Capastrain
First Choice Professional Dry Cleaners
2391 Triplett Blvd.
Akron, OH 44312

Dear Mr. Capastrain:

On March 6, 2007, I, representing Ohio EPA's Division of Hazardous Waste Management (DHWM), conducted a Resource Conservation and Recovery Act (RCRA) complaint inspection at First Choice Professional Dry Cleaners (FCPDC), located at 2391 Triplett Blvd., Akron, Ohio. The purpose of the inspection was to determine FCPDC's compliance with Ohio's hazardous waste laws and rules as adopted under the Ohio Revised Code (ORC) Chapter 3734 and Chapter 3745 of the Ohio Administrative Code (OAC). You represented the facility during the inspection.

FCPDC provides laundry and dry cleaning services. The facility uses soap and water to clean some laundry, and tetrachloroethylene ("perc") (hazardous waste codes: F002, D039, D007, D040) is used in the dry cleaning end of the business. The perc is recycled in the dry cleaning machine (via a de-stilling unit). The de-stilled perc is reused, while the contaminated perc (a.k.a. muck) is collected in a trap. The trap is emptied daily, and the muck is placed into a 55-gallon drum. It takes FCPDC approximately 3-months to fill the 55-gallon drum. The contaminated perc, which once was sent to Safety-Kleen, now goes to Chemtron Corp. Other wastestreams generated at the site include: fluorescent bulbs, hangers, and cardboard.

The RCRA complaint received by Ohio EPA alleged that illegal mismanagement of waste was occurring or has occurred at this facility. More specifically, the complainant alleged that an employee(s) of FCPDC were dumping dry cleaning waste on the ground behind the facility and in the toilet/down the drain. The complaint appeared to be unfounded, however, the inspection did reveal that FCPDC is in violation of the following regulations. FCPDC was inspected for the requirements of a Conditionally Exempt Small Quantity Generator of hazardous waste, and a Small Quantity Universal Waste Handler. Enclosed is a copy of the inspection checklists pertaining to these requirements.

VIOLATIONS:

1. **Waste Evaluation, OAC rule 3745-52-11:**
Any person who generates a waste, as defined in OAC 3745-51-02, must determine if that waste is a hazardous waste.

FCPDC failed to evaluate the following waste stream:

- Fluorescent bulbs

During the inspection we discussed your past occasional fluorescent lamp disposal. You indicated that in the past you took the bulbs to either Home Depot or Lowes (home improvement warehouses) to have them recycled, without evaluating them to determine if they are hazardous as required by OAC rule 3745-52-11. I contacted both stores, and neither claimed that they take used fluorescent bulbs, to recycle them, as a public service. It was also noted during the inspection that two 8-foot fluorescent bulbs were placed in the dumpster located on the property. During the inspection you were told that often used fluorescent lamps would be hazardous (unless they are a low mercury lamp) and if disposed, would need to be managed as a hazardous waste. However, if they are recycled, they would not be considered a hazardous waste. It was recommended that you have the lamps recycled, or purchase special lamps which do not contain enough mercury to consider them hazardous. Please visit the following web sites regarding fluorescent lamps and ballasts. The first explains why the lamps may be hazardous and how to manage them as a waste or have them recycled. The second is a list of lamp and ballast recyclers. The last describes the Universal Waste Rules.

http://www.epa.state.oh.us/dhwm/pdf/Universal_Waste_Rules_for_Handlers_of_Lamps.pdf
http://www.epa.state.oh.us/dhwm/pdf/comp.lamp.ballast.list.pdf
http://www.epa.state.oh.us/dhwm/pdf/Universal_Waste_Rules_for_Handlers_of_Lamps.pdf

To abate this violation, please inform me as how the fluorescent bulbs will be managed on-site and disposed of or recycled. As stated above, you are encouraged to recycle the fluorescent bulbs instead of disposing of them. Please also inform me, in writing, how you will manage your fluorescent lamps in the future. FCPDC shall document compliance by submitting this information to Ohio EPA's Northeast District Office (NEDO).

2. **Waste Evaluation, OAC rule 3745-52-11:**
Any person who generates a waste, as defined in OAC 3745-51-02, must determine if that waste is a hazardous waste.

FCPDC failed to evaluate the following waste stream:

- One 30-gallon drum
- One 20-gallon drum

It was noted that there was one 30, and one 20-gallon drum of material located in the rear of the facility. You indicated that there was water in the 30-gallon drum, but you were not positive because the container had been on the property for approximately 8 years, which is longer then you have been there. You indicted that the material that was in the 20-gallon container was possibly soap.

To abate this violation, FCPDC shall have the material in both containers evaluated. FCPDC shall also inform me how the material will be managed on-site and disposed. FCPDC shall document compliance by submitting the waste evaluation information to the Ohio EPA's (NEDO).

3. **OAC rule 3745-273-13(D)(1), Lamp Management:**
Small Quantity Generators of Universal Waste Handlers (SQGUWH) shall contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps. All containers or packages shall be closed and lack evidence of leakage, spillage or damage that could cause leakage.

It was noted during the inspection that fluorescent bulbs were found in the dumpster located on the side of the facility.

To abate this violation, FCPDC shall place all of the fluorescent bulbs (that will be managed as a "Universal Waste" into the cardboard box or another container/package that is structurally sound, adequate to prevent breakage, and are compatible with the contents of the lamps. The container/package shall also be closed to prevent spillage or damage of the lamps. FCPDC shall document compliance by submitting a photograph(s) of the closed container of universal waste fluorescent bulbs to the Ohio EPA's NEDO.

4. **OAC rule 3745-273-14(E), Lamp labeling for SQGUWH:**
Lamps or containers or packages of lamps shall be labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s).

It was noted during the inspection that FCPDC failed to label the lamps or lamp containers with the above nomenclature. To abate this violation, FCPDC shall label all spent fluorescent lamps with the words "Universal Waste - Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)." To document compliance FCPDC shall submit photographs of the labeled lamps or container of lamps to the Ohio EPA's NEDO.

5. **OAC rule 3745-273-15(A), Accumulation Time for SQGUW:**
A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler.

FCPDC shall be able to demonstrate the length of time that the universal waste (including both fluorescent bulb and lead-acid batteries) has been accumulated from the date it becomes a waste. FCPDC may make this demonstration by:

a. Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received;

b. Marking or labeling each individual item of universal waste with the date it became a waste or was received;

c. Maintaining an inventory system on-site that identifies the date each universal waste became waste or was received;

d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste became a waste or was received;

e. Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received; or

f. Any other method with clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

Please inform me which method FCPDC will use to demonstrate the length of time that universal waste is accumulated.

The following website contains a list of fluorescent bulb recyclers. Ohio EPA does not endorse any company, and it is suggested that you evaluate their compliance with all applicable agencies prior to shipping your material: http://www.epa.state.oh.us/dhwm/pdf/comp.lamp.ballast.list.pdf

POLLUTION PREVENTION:

As we 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. You may also possibly reduce your regulatory requirements.

It has been estimated that over three quarters of the perc used at a dry cleaning facility can be lost to the atmosphere through emissions. A significant amount of perc also can be lost as hazardous waste. These emissions and wastes represent both a considerable loss of valuable raw material and generation of pollutants.

The best way to reduce pollution, wastes or emissions is to prevent them in the first place. Pollution prevention (P2) is the use of source reduction techniques to reduce risk to public health, safety, welfare and the environment. It also includes recycling, as a second preference, to achieve these same goals. It avoids the transfer of waste/and or pollutants across different environmental media (land, air and water) and addresses all types of waste and environmental releases to all of these media.

P2 at your facility involves good housekeeping practices to minimize losses of solvents in liquid and vapor form, and also modifications to processes, equipment and operating practices. Some of the more easily implemented changes include improved operating practices, inventory control and equipment maintenance.

The most advanced P2 options for your facility preclude the use of organic solvents as the primary cleaning agent. One such technology is multi-process wet cleaning. This uses labor-intensive cleaning techniques and high-tech washing and drying machines that use soap and water to clean clothes. One common misperception is that wet cleaning does not actually clean the garments, but simply removes isolated spots. Wet cleaning actually includes a variety of cleaning technologies, and is specifically tailored for each garment, providing varying levels of cleanliness based upon the requirements of each particular garment. Preliminary testing indicates that owners of garments cleaned by both wet cleaning and dry cleaning rate wet cleaned clothes as equal to or better than dry cleaned clothes. Tests have also shown that wet cleaning can give owners of dry cleaning establishments a slight economic advantage, due to lower cost of start-up capital, supplies, equipment, and hazardous waste disposal.

Other P2 opportunity noted during the inspection included that you may wish to consider:

- Use closed, labeled containers for collection and storage of recovered or new solvent.
- Buy only what you need, and organize shelves so that old material are used first.
- Inspect the following weekly for leaks: hose connections, unions, couplings and valves; machine door gaskets and seating; filter head gasket and seating; pumps; solvent base tanks and solvent and waste storage containers; water separators; filter sludge recovery; distillation units; diverter valves; and cartridge filters.
- Repair all leaks promptly.
- Replace door gasket on button trap.
- Replace gasket around cleaning machine door or tighten enclosure.
- Clean lint buildup on cooling condenser coils weekly.
- Use alternative petroleum solvents (some are being developed with higher flash points to reduce fire hazards).

Hangers:
It was noted during the inspection that hangers were being thrown in the garbage because they were not "sticky" enough to hold pants on them. Please considering recycling the metal and cardboard components, or sending the hangers to another facility that can use them. Another option that you may consider is using the following:

Local Cardboard Recyclers (Taken from OCAPP's Cardboard Recyclers Directory Web page at http://www.epa.state.oh.us/ocapp/p2/recyc/CardboardRecyclers.html)

Ohio Materials Exchange OMEx
Another avenue is to place the hangers on a material available listing in a materials exchange, such as OMEx (Ohio's Material Exchange). Some process related materials may have residual value as a reusable resource for other industries. OMEx also publishes a materials wanted listing. Companies from this listing may be contacted to find potential buyers for FCPDC's solid waste. OMEx can be accessed at www.epa.state.oh.us/opp/recyc/omex.html.

Fluorescent Bulbs and Solvent Waste:

Since FCPDC is classified as a conditionally exempt small quantity generator (CESQG), waste can be taken to BIZMAT. BIZMAT is a low-cost hazardous waste recycling and collection center for small businesses. CESQGs can take a variety of hazardous waste to BIZMAT, including spent chemicals, fluorescent bulbs, used batteries, pesticides, mercury-contaminated materials, etc. Their telephone number is: 330-535-6677. Their website is: www.bizmat.org.

If you would like to be considered for an in depth on-site P2 assessment, or if you would like more information about P2, please contact me at (330) 963-1189. In addition, Ohio EPA has a video entitled "An Ounce of Prevention: The Advantages of Reducing Waste." Feel free to contact me if you are interested in this video.

The Office of Compliance Assistance and Pollution Prevention provides compliance and pollution prevention assistance on environmental issues related to air, land and water. There website is: http://www.epa.state.oh.us/opp/ocapp.html

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you have not already, we encourage you to sign-up for this free service. You can find more information at the following Web link http://www.epa.state.oh.us/dhwm/listserv.html. Please feel free to share this information with your colleagues.

Enclosed you will find a copy of the checklists that we completed during the inspection. You can find copies of the rules and other information on the division's web page at http://www.epa.state.oh.us/dhwm. Ohio EPA also has helpful information about pollution prevention at the following we address: http://www.epa.state.oh.us/opp.

The above violation must be corrected, and documentation of all corrections (i.e. copies of documents) must be sent to this office, to my attention within thirty (30) days after receipt of this letter.

Failure to list specific deficiencies in this communication does not relieve First Choice Professional Dry Cleaners from the responsibility of complying with all applicable regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Should you have any questions or concerns, please do not hesitate to call me at (330) 963-1189.

Sincerely,

Gregory Orr
Environmental Specialist
Division of Hazardous Waste Management

GO:ddw

Enclosure

cc: Natalie Oryshkewych, Ohio EPA, DHWM, NEDO
ec: Gregory Orr, Ohio EPA, DHWM, NEDO

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

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

Safety Equipment Used:

WASTE EVALUATION

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

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: Complete appropriate checklist for each unit.

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

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

REMARKS

Fluorescent bulbs were thrown away. Two unknown containers were noted in the rear of the building.

Name: First Choice Profession Dry Cleaners
ID number: OHD 987036027
Inspection date: March 6, 2007

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 X 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 X 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 X ___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 X ___RMK#___

5. Does the SQUWH conduct any of the following activities:

   a. Sort batteries by type? — Yes___ No___ N/A X ___RMK#___

   b. Mix battery types in one container? — Yes___ No___ N/A X ___RMK#___

   c. Discharge batteries to remove the electric charge? — Yes___ No___ N/A X ___RMK#___

d. Regenerated used batteries? Yes___ No__ N/A __X__RMK#___

e. Disassemble them into individual batteries or cells? Yes___ No__ N/A __X__RMK#___

f. Remove batteries from consumer products? Yes___ No___ N/A __X__RMK#___

g. Remove the electrolyte from the battery? Yes___ No___ N/A __X__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 X___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 __X__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 __X__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 __X__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 __X__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 X 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 X 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 X 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? [3745-273-15(A)] If not:

Yes X No___ N/A ___RMK#___
No lamps other than ones in trash. Trash is emptied regulary.

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 X 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 X___ 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 X__ 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 X__ 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 X__ 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 ___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 X__ 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 X N/A ___RMK#___

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] — Yes___ No X N/A ___RMK#___

15. Is the material released characterized? [3745-273-17(B)] — Yes ___ No X 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 X N/A ___RMK#___

OFF-SITE SHIPMENTS

NOTE: ***If a SQUWH self-transports 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 X 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 X 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 X N/A ___RMK#___

20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do <u>one of the following</u>:

    a. Receive the waste back? [3745-273-18(E)(1)] — Yes___ No<u>X</u>__ N/A ___RMK#___

    b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] — Yes__ No<u>X</u>__ 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 <u>one of the following</u>: — Yes___ No X N/A ___RMK#___

    a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] — Yes___ No<u>X</u>__ 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<u>X</u>__ 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 <u>X</u>__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<u>X</u>___RMK#___

EXPORTS

24. Is waste being sent to a foreign destination? If so: Yes___ No_X_ 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 _X__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_X___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 _X__RMK#___

REMARKS