



**Environmental
Protection Agency**

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

July 12, 2012

**PERRY COUNTY
LUDOWICI ROOF TILE
DMWM/SEDO
OHD004302188**

Mr. Brad Smith
Ludowici Roof Tile
4757 Tile Plant Road, P.O. Box 69
New Lexington, Ohio 43764

Dear Mr. Smith:

On July 10, 2012, I inspected Ludowici Roof Tile in New Lexington, 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). This letter will explain the violations we found and what you need to do to correct the violations. The General Comments section of the letter will explain any other general concerns we have and what you can do to respond to those concerns.

We found the following violation of Ohio's hazardous waste laws. In order to correct this violation, you must do the following and send me the required information ***within 21 days*** your receipt of this letter:

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

The outside above-ground used oil tank was incorrectly labeled "Waste Oil" instead of "Used Oil" as required by this rule.

To demonstrate a return to compliance with this rule, Ludowici Roof Tile must label the used oil tank with the words "Used Oil" and submit a photograph to me demonstrating that the tank has been correctly labeled.

General Comments:

- **Spent Fluorescent Lamps.** As we discussed during the inspection, 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

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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.

- **State Emergency Response Commission (SERC).** Per our discussion, I have enclosed some information regarding SERC filing. More information can be found on their web page at: <http://www.epa.ohio.gov/dapc/serc/index.aspx> or by contacting their office at (614) 644-2260.
- **Use/re-use of Scrap Clay.** I have also enclosed information about the Ohio Materials Exchange (OMEX) and the Worldwide Materials Exchange.

Enclosed you will find a copy of the checklists that were completed as a result of the inspection. I have also enclosed several fact sheets and lists of recyclers that you may find useful. You can find copies of Ohio's hazardous waste rules and other information on our division's web page at <http://www.epa.ohio.gov/dhwm/lawsregs.aspx>. Pollution prevention and compliance assistance information can be found at <http://www.epa.ohio.gov/ocapp>.

If you have any questions, please feel free to call me at (740) 380-5237.

Sincerely,



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

VDG/sb

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.

| | | |
|--------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|-----------------------|
| Environmental Protection Agency Send to Central Office <input checked="" type="checkbox"/> | Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM | For Ohio EPA use only |
|--------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|-----------------------|

Completed forms that are required to be submitted to CO should be e-mailed to brad.hauser@epa.state.oh.us

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|------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Site EPA ID No. Site Location Information Site Land Type (check only one) | EPA ID Number: OHD004302188 Name: Ludowici Roof Tile Website (Optional): http://www.ludowici.com Street Address: 4757 Tile Plant Road, P.O. Box 69 City, Town, or Village: New Lexington State: OH County Name: Perry Zip Code: 43764 Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> |
| NAICS codes www.census.gov/epcd/www/naics.html | |

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| Facility Representative Additional names can be recorded in comments section. Only provide address information if it is different than the site address. | First Name: Bradley MI: J. Last Name: Smith Phone Number: 740-342-5821 Extension: E-Mail Address: brad.smith@ludowici.com Fax Number: 740-342-0025 Fax Number Extension: Street or P.O. Box: same as above City, Town or Village: State: Zip Code: |
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| Legal Owner And Operator List additional Owners and/or Operators in the Comments Section or on another copy of this page. | Name of Site's Legal Owner: Ludowici Roof Tile 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: same as above City, Town or Village: Owner Phone #: State: Country: Zip Code: Name of Site's Operator: Ludowici Roof Tile Date Became Operator: 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: same as above City, Town or Village: Operator Phone #: State: Country: Zip Code: |
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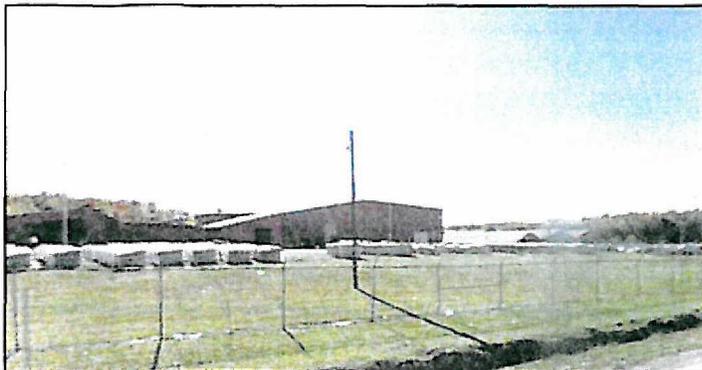
| | |
|--------------------------|---------------------------------------------------------------------|
| VIOLATIONS CITED? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
|--------------------------|---------------------------------------------------------------------|

| | | |
|----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| TYPE OF HANDLER (MARK AS APPROPRIATE) | | |
| <input type="checkbox"/> Not a HW Generator | <input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input type="checkbox"/> Short-Term/Temporary Generator (short-term or one-time event and not from on-going processes). <i>Check the box for the applicable generator status and provide a comment.</i> | <input type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator <input type="checkbox"/> U.S. Importer of Hazardous Waste <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator |

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|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| TYPE OF REGULATED WASTE ACTIVITY (MARK AS APPROPRIATE) | |
| <input type="checkbox"/> Hazardous Waste Transporter <input type="checkbox"/> Hazardous Waste Transfer Facility <input type="checkbox"/> Treater, Storer, or Disposer of Hazardous Waste <input type="checkbox"/> Recycler of Hazardous Waste <input type="checkbox"/> 72-Hour Recycler | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace <input type="checkbox"/> Small Quantity On-Site Burner Exemption <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption <input type="checkbox"/> Underground Injection Control Facility <input type="checkbox"/> Receives Hazardous Waste from Off-site |
| UNIVERSAL WASTE ACTIVITIES (MARK AS APPROPRIATE) | |
| <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 |
| TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES (MARK ALL THAT APPLY) | |
| <input type="checkbox"/> Batteries <input type="checkbox"/> Pesticides <input type="checkbox"/> Mercury containing equipment <input checked="" type="checkbox"/> Lamps | |
| USED OIL ACTIVITIES (MARK ALL THAT APPLY) | |
| <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 | |
| Eligible Academic Entities with Laboratories: 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 | |
| Waste Codes for Federally Regulated Hazardous Wastes: 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. | |
| | |
| COMMENTS: Use this area to describe inspection conditions and additional information. | |
| Announced <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Tanks <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Containers <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | Additional Facility Representatives: |
| ADDITIONAL COMMENTS: | |
| Latitude/Longitude: 39.721632, -82.241723 | |
| INSPECTOR(S) | INSPECTION DATE/TIME |
| Vicky German, Ohio EPA, DMWM-SEDO | 7/10/2012 |

PROCESS INFORMATION AND WASTE ACTIVITIES SUMMARY

GENERAL FACILITY INFORMATION



Ludowici Roof Tile manufactures glazed and non-glazed clay roofing tiles. Ludowici began U.S. operations in Chicago in the early 1800's when the owners moved to the U.S. from Italy and Germany. In the early 1900's, Ludowici purchased the Celadon Roofing Tile Company that was operating in the location of the former Imperial Brick plant in New Lexington, Ohio, and the plant became known as Ludowici-Celadon. In

1989, CertainTeed purchased Ludowici-Celadon, and the company was renamed Ludowici Roof Tile. In 2003, Ludowici merged with Terreal, Europe's largest manufacturer of clay building products. In addition to manufacturing industrial and ornamental roof tile, Ludowici Roof Tile also does historic tile reproduction such as Ludowici's early 1900-style tiles, as well as those that were manufactured by other early roof tile companies. Because of the long life of clay tile, Ludowici offers a 75-year warranty on their clay roofing tile.

SOURCE: WWW.LUDOWICI.COM

PROCESS INFORMATION

Raw materials used include shale and clay, which are extracted from local southeastern Ohio quarries. This material undergoes crushing, grinding, screening, and mixing. Water is added to the clay mixture for the extruding, cutting, pressing, and moulding operations. After pressing and moulding, the green tile is dried, glazed (if required), and fired to form a finished product. Approximately 30-40% of Ludowici's products are glazed.

WASTES GENERATED

Used oil is generated from maintenance of the crushing, grinding, and mixing machines, as well as from tow motors. Approximately 600 gallons of this waste is taken off-site by Safety-Kleen on a yearly basis. Spent parts cleaner solvent is generated in the maintenance department and is also managed through Safety-Kleen. Spent fluorescent and metal-halide lamps are generated from building maintenance and are collected for recycling.

Scrap clay and mold material, as well as some cardboard, packing materials, and plastics are managed as solid waste; it is hauled by BSS Waste and goes to Athens-Hocking Landfill. Fired clay waste is stored on-site and either disposed as solid waste or is used as road base material. Ludowici Roof Tile is looking into other possible "product use" for this material.

REGULATORY HISTORY

Ludowici Roof Tile was last inspected for compliance with Ohio's hazardous waste regulations on 8/14/2003. No violations were discovered during the inspection.

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

At the time of the inspection, the above ground used oil tank was labeled "Waste Oil" instead of "Used Oil" as required.

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-transport 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 3745-273-11(B)? [3745-273-11(B)] Yes No NA

CONTAINERS AND 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

At the time of the inspection, there were no spent fluorescent lamps accumulated on-site.

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

When the facility begins accumulating spent lamps, the spent lamps must be accumulated in structurally adequate containers and be labeled with the words "Universal Waste-Lamps" or "Waste Lamps" or "Used Lamps".

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)]
- 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

When the facility begins accumulating spent lamps, they must track how long the spent lamps have been on-site, and document this by using one of the above methods.

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