



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

November 8, 2012

**ADAMS COUNTY
GENERAL FILE
(MANCHESTER HIGH SCHOOL)
DMWM/SEDO**

Mr. Scott Kirk, Maintenance and Transportation Manager
Manchester High School
130 Wayne Frye Drive
Manchester, Ohio 45144

Dear Mr. Kirk:

On October 30, 2012, Melody Stewart and I inspected Manchester High School 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 any violations that were found and what you need to do to correct them, as well as any other 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 above-ground tanks that are used to store used oil at generator facilities must be labeled or clearly marked with the words "Used Oil".

At the time of the inspection, one 55-gallon drum containing used oil, located in the maintenance garage, was not labeled with the words "Used Oil".

Manchester High School correctly labeled the drum during the inspection and has returned to compliance with this rule. No further action is required.

GENERAL COMMENTS:

- **Fluorescent Lamp Management.** As we discussed during the inspection, I have enclosed some information about the 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 fluorescent lamps under the universal waste rule. If the spent lamps are managed as "universal

waste" and they will be recycled, you do not have to evaluate them to determine if they are hazardous waste. Please note that if you do not have your spent fluorescent lamps recycled, it is your responsibility to evaluate them 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 enclosed a list of fluorescent lamp and ballast recyclers for your use; you may also wish to contact your lighting vendor to see if they have a mail-back program to accept your spent lamps.

- **Used Oil Management and Other Information.** I have enclosed Ohio EPA's guidance on used oil management, information on identifying hazardous waste, a list of hazardous waste treatment, storage, and disposal facilities, and several other guidances that you may find useful.

Enclosed you will find a copy of the checklists that were completed as a result of the inspection. You can find copies of the 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 or need assistance, please feel free to contact me at 740-380-5237 or vicky.german@epa.ohio.gov.

Sincerely,



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

VDG/mr

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>	<h2 style="margin:0;">Ohio Environmental Protection Agency</h2> <h3 style="margin:0;">RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM</h3>	<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 ralph.mcginis@epa.state.oh.us

<p>Site EPA ID No.</p> <p>Site Name</p> <p>Site Location Information</p> <p>Site Land Type (check only one)</p> <p>NAICS codes <small>www.census.gov/epcd/www/naics.html</small></p>	<p>EPA ID Number: OHR000146530</p> <p>Name: Manchester High School Website (Optional): http://www.mlsd.us/schools Street Address: 130 Wayne Frye Drive City, Town, or Village: Manchester State: : OH County Name: Adams Zip Code: 45144</p> <p>Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input checked="" type="checkbox"/></p> <p>61111</p>
<p>Facility Representative</p> <p>Additional names can be recorded in comments section.</p> <p>Only provide address information if it is different than the site address.</p>	<p>First Name: Scott MI: Last Name: Kirk Phone Number: 937-549-4777 Extension: E-Mail Address: Fax Number: 937- 549-2872 Fax Number Extension: Street or P.O. Box: same as above City, Town or Village: State: Zip Code:</p>
<p>Legal Owner And Operator</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: BOE, Manchester Local School District Date Became Owner (mm/dd/yyyy): 07/01/2004</p> <p>Owner Type: Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input checked="" type="checkbox"/></p> <p>Street or P.O. same as above City, Town or Village: State: Owner Phone #: Country: US Zip Code:</p> <p>Name of Site's Operator: BOE, Manchester Local School District Date Became Operator:</p> <p>Owner Type: Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input checked="" type="checkbox"/></p> <p>Street or P.O. Box: same as above City, Town or Village: State: Operator Phone #: Country: US Zip Code:</p>

VIOLATIONS CITED?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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TYPE OF HANDLER (MARK AS APPROPRIATE)	
<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). <i>Check the box for the applicable generator status and provide a comment.</i></p>	<p><input type="checkbox"/> Large Quantity Generator (LQG)</p> <p><input type="checkbox"/> Small Quantity Generator (SQG)</p> <p><input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator</p> <p><input type="checkbox"/> U.S. Importer of Hazardous Waste</p> <p><input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator</p>

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 Additional Facility Representatives: Tanks <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Containers <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
ADDITIONAL COMMENTS:	
Latitude/Longitude:	
INSPECTOR(S)	INSPECTION DATE/TIME
Vicky German, DMWM-SEDO	10/30/12

PROCESS INFORMATION AND WASTE ACTIVITIES SUMMARY

GENERAL FACILITY INFORMATION



The Manchester Local School District, consisting of Manchester High School, and Manchester Elementary School (K-8), was created by the South Central Ohio Educational Service Center in January 2004. Formerly, Manchester Local School District territory was a part of Adams County/Ohio Valley School District. The Manchester Local School District encompasses about 115 square miles and includes the villages of Manchester, West Union, Bentonville, Stout, Blue Creek, and Rome Village.

WASTES GENERATED

Manchester High School generates wastes from building maintenance (spent fluorescent lamps); and in the Chemistry department (a small box of outdated chemicals is infrequently generated). The Woodworking Shop uses water-based paints and stains that are non-hazardous. The on-site bus maintenance garage is also where their Auto Mechanics class is held. The maintenance garage generates used oil, which is collected and burned in a used oil-burning furnace that heats their on-site greenhouse; spent antifreeze, which is collected and sent off-site to Glockner Oil for recycling/reuse; spent parts cleaner solvent from one approximately 30-gallon parts washer that is managed through Safety-Kleen; and spent lead-acid batteries, which are managed through a core exchange program with NAPA or O'Reilly's. Any Solid wastes generated are managed through Pike Sanitation.

REGULATORY HISTORY

Manchester High School notified EPA of its hazardous waste generation activities as a Conditionally Exempt Small Quantity Generator (CESQG) on 11/8/2007. File information indicates the facility has not been previously inspected for compliance with Ohio's hazardous waste regulations.

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 wastes 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?
If yes: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| 2. Is used oil used as a dust suppressant? [3745-279-12(B)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| 3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |

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 <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |

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.

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|---|------------------------------|-----------------------------|---|
| 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 <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
|---|------------------------------|-----------------------------|---|

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 <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |

One 55-gallon drum containing used oil was not labeled with the words "Used Oil". The drum was correctly labeled during the inspection. Manchester High School has returned to compliance with this rule.

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|---|---|-----------------------------|------------------------------|
| 9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] | | | |
| a. Stopped the release? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| b. Contained the release? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| c. Cleaned up and properly managed the used oil and other materials? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

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)] 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

Manchester High School did not have any spent fluorescent lamps accumulated on-site at the time of the inspection. The facility usually contracts out for lighting changes. The facility will begin managing any spent lamps that are generated as universal waste in accordance with the requirements outlined in this checklist and in OAC 3745-273.

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

Manchester High School must use one of the methods listed above to document the length of time that spent fluorescent lamps are being accumulated on-site prior to recycling.

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