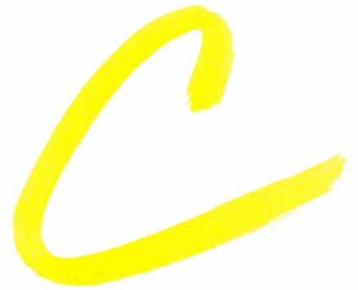




John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director



March 13, 2013

RE: LUKE ENGINEERING & MFG. CO.  
WAYNE COUNTY  
OH0000935163, LQG  
NOTICE OF VIOLATION (NOV)

Jim Eaton  
Technical Director  
Luke Engineering & Mfg. Co.  
P.O. Box 478  
456 South Boulevard  
Wadsworth, OH 44282

Dear Mr. Eaton:

On February 26, 2013, I as a representative of the Ohio EPA Division of Materials and Waste Management, conducted an inspection of Luke Engineering & Mfg. Co. (Luke Engineering) at 11 Pipestone Drive, Rittman, Ohio, for compliance with Ohio's hazardous waste and used oil regulations. You, Meghan Bates, and Scott Hays represented Luke Engineering during that inspection.

The Luke Engineering facility conducts sulfuric acid anodizing of aluminum and finishing of the anodized parts. Machined aluminum components are delivered to the facility and placed racks for processing in a series of tanks. The components are cleaned in several tanks holding aqueous solutions of proprietary cleaners, sodium hydroxide, and detergents. Anodizing is performed in an electrolytic bath of sulfuric acid which creates an oxidized surface coating that is corrosion and wear resistant. The porous nature of this coating allows the parts to be dyed and for protective sealing materials to be added. The finished parts are shipped off-site.

Wastewaters from the anodizing process are collected in a holding tank and treated using basic neutralization techniques. Neutralized wastewater is drained from the holding tank to an in-ground sump for secondary neutralization. Treated wastewater is discharged to the Rittman sewer system. On occasion sludge is cleaned out of the sump; this material is a non-hazardous waste.

Typically most of the hazardous waste generated at the facility is a mixture of solids and liquids from clean-outs of the caustic cleaning/etch tank (D002) which are done approximately once per year. Luke Engineering commonly holds the containers of hazardous waste on-site for a significant portion of the 90 day accumulation period to allow liquid caustic solution to separate from the solids for decanting and for water to evaporate. Smaller quantities of sludge from tanks containing chromium (D007) are generated but on a much less frequent basis.

The facility is a generator of used lamps which are managed as universal waste.

No organic or chlorinated solvent cleaning processes are used. No painting is conducted.

The inspection included a review of the facility's operations, as well as waste management practices and documentation. Luke Engineering was inspected for the requirements of a large quantity generator (LQG) of hazardous waste because the facility generates more than 2,200 pounds of hazardous waste in a calendar month.

This letter identifies violations observed during the inspection and steps that must be taken to address those violations. Based on the facility documents reviewed and observations made, Ohio EPA has determined that Luke Engineering has violated the following state hazardous waste and universal waste regulations.

1. **OAC Rule 3745-273-13(D)(1) Small Quantity Handler Must Contain Lamps In Proper Containers Or Packaging And Containers Or Packaging Must Be Closed.**
2. **OAC Rule 3745-273-14(E) Small Quantity Handler Must Label Containers Or Packaging Holding Universal Waste Lamps.**
3. **OAC Rule 3745-273-15(C) Small Quantity Handler Must Have System To Demonstrate Length Of Accumulation.**

The facility generates used fluorescent lamps which it manages as universal waste and is classified as a small quantity handler of universal waste.

Approximately six used 4-foot fluorescent lamps were observed in a container that was not closed located in the 90 day accumulation area. The container of used fluorescent lamps was not labelled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)". No date was marked on the container nor was an alternative tracking system identified.

These practices were not in compliance with the above cited regulations.

That container was closed and labeled during the inspection. Closing and labeling the container during the inspection abated this violation. No further action regarding those violations is necessary at this time. In the future all used lamps should be stored in properly labeled and closed containers.

The date when the first used lamp was placed in the box must be marked on the box.

To return to compliance the facility must:

- Mark the date when the first lamp was placed in the box on the outside of the box; and,

- Submit a photo of the box holding the used lamps with the date visible to this office within 14 days of receipt of this letter.

4. **OAC Rule 3745-52-66-77(C) Separation of Incompatible Wastes and Other Materials**

This rule requires that “A storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers...be separated from the other materials or protected from them by means of a dike, berm, wall, or other device.”

Five 55-gallon capacity containers holding a mixture of solids and liquids from a clean-out of the caustic cleaning/etch tank (D002) were present in the 90 day accumulation area. The hazardous waste containers were separated from several containers of fresh acid by less than 3 feet without any barriers between them. Acids and sodium hydroxide (i.e. a base/caustic) are incompatible and should be separated.

To return to compliance the facility must:

- Separate or protect waste caustic from acids by means of a dike, berm, wall, or other device, such as a minimum spacing distance; and,
- Submit a written description of the protection method selection and, if the caustic wastes are still on-site, submit a picture of the current storage arrangement, to this office within 14 days of receipt of this letter.

5. **OAC Rule 3745-52-34(A)(2) Accumulation Date Must Be Clearly Marked**

6. **OAC Rule 3745-52-34(A)(3) Containers Must Be Labeled With the Words “Hazardous Waste”**

These rule sections allow a LQG to accumulate, for ninety days or less, hazardous waste that is generated on-site without an Ohio hazardous waste permit, provided each container in the 90 day accumulation area is labeled or marked clearly with:

- The words “Hazardous Waste”; and,
- The date upon which each period of accumulation begins.

Five 55-gallon capacity containers holding a mixture of solids and liquids from a clean-out of the caustic cleaning/etch tank (D002) were present in the 90 day accumulation area. None had the words “Hazardous Waste” or the accumulation start date marked on them.

These containers were labeled with the words “Hazardous Waste” and marked

with the accumulation date during the inspection. These actions abated this violation. No further action regarding this violation is necessary at this time. In the future all containers of hazardous waste in the 90 day accumulation area should be labeled with the words "Hazardous Waste" and marked with the accumulation date.

**7. OAC Rule 3745- 66-74 Weekly Inspections Of Hazardous Waste Containers**

A large quantity generator of hazardous waste is required to inspect all containers of hazardous waste in a 90 day accumulation area at least weekly (i.e., at least once during the period from Sunday to Saturday) and to record the inspections in a log or summary. At the time of the inspection five 55-gallon capacity containers holding a mixture of solids and liquids from a clean-out of the caustic cleaning/etch tank (D002) were present in the 90 day accumulation area. They had been in the 90 day area since about January 26, 2013. No inspection documentation was provided by the facility for the 90 day area.

An example inspection log is attached for your assistance in responding to this violation.

To return to compliance the facility must:

- Prepare inspection forms for the 90 day accumulation area;
- Conduct inspections of the hazardous waste containers in the 90 day accumulation area for 2 weeks;
- Continue conducting these inspections; and,
- Submit copies of the completed inspection forms for 2 weeks to this office within 14 days of receipt of this letter.

These inspections need only be conducted and documented when hazardous waste is in the 90 day area. When hazardous waste is not present in the 90 day area, I'd suggest noting this on the log sheet and placing the log sheet in the file.

**8. OAC Rule 3745-65-33 Testing And Maintenance Of Equipment**

This rule states, "All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency. The owner or operator must record the inspections in a log or summary."

No records of the required inspections for the 90 day hazardous waste accumulation area were provided by the facility. Inspections are required for the emergency and spill response equipment for the 90 day hazardous waste accumulation area. Please note that the emergency equipment inspected should be consistent with that listed in the facility's contingency plan.

An example inspection log is attached for your assistance in responding to this violation.

To return to compliance the facility must:

- Develop an inspection log for the 90 day accumulation area;
- Provide a completed inspection log for one inspection cycle; and,
- Submit the completed inspection log to this office within 14 days of receipt of this letter.

9. **OAC Rule 3745 65-52(D) Contingency Plan Must List Names, Addresses, And Phone Numbers Of Emergency Coordinators And Be Kept Current.**

One of the individuals on the list of emergency coordinators in the contingency plan was not current; she had retired as of the end of the year in 2012.

You submitted a revised updated list of emergency coordinators in the contingency plan by email dated March 5, 2013. These actions abated this violation.

The updated contingency plan, or the plan revisions, must be distributed to the local police department, fire department and hospital identified in the plan and proof of such distribution provided to Ohio EPA.

10. **OAC Rule 3745-65-16(A)(2) Personnel Training Must Include Instruction Relevant To The Job Position Of The Employee.**

LQGs must have a formal written training program. The facility has been providing employees with training on the facility contingency plan and Hazard Communication requirements to meet the hazardous waste personnel training requirements. While there is some overlap in the training required for Hazard Communication and for hazardous waste management, the training provided does not meet the regulatory requirement in OAC Rule 3745-65-16(A)(2) to provide instruction which teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed. For example, no documentation was provided that responsible facility personnel have been trained in: identifying hazardous wastes, labeling containers of hazardous waste, inspecting hazardous waste in the 90 day accumulation area, and preparing and approving hazardous waste manifests.

To return to compliance Luke Engineering is required to:

- Identify those employees that require additional training;
- Amend the training plan to provide these facility personnel with training relevant to the hazardous waste management responsibilities of the position in which they are employed; and,

- Submit a copy of the revised training plan or a schedule for revising the training plan to this office within 14 days of receipt of this letter.

After OEPA review of the program, Luke Engineering will be required to document that required additional training has been provided.

Please also note that in the above rule, “facility personnel” are those employees that have responsibilities for hazardous waste management and that the personnel training program only applies to facility hazardous waste management responsibilities and activities. Hazardous waste management responsibilities include but are not limited to: labeling hazardous waste containers, moving hazardous waste containers, inspecting the 90 day area and emergency response equipment, responding to fires, releases and other emergencies involving hazardous waste, preparing hazardous waste for shipment, and, signing hazardous waste manifests. Employees whose only hazardous waste responsibility is to place hazardous waste in a satellite accumulation container need not be part of the formal personnel training program.

Enclosed you will find a copy of the checklists completed during the February 26, 2013 inspection.

Luke Engineering needs to immediately take the necessary measures to return to compliance with Ohio’s environmental laws. Within 14 days of receipt of this letter, Luke Engineering is requested to provide documentation to this office including the steps taken to abate the violations cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to [neil.wasilk@epa.ohio.gov](mailto:neil.wasilk@epa.ohio.gov).

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, Luke Engineering is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

**Submit the above requested response documentation to this office within 14 days of receipt of this letter. Response correspondence sent by the U.S. Postal Service should be sent to:**

**Neil Wasilk  
Northeast District Office  
Ohio Environmental Protection Agency  
2110 East Aurora Road  
Twinsburg, OH 44087**

LUKE ENGINEERING & MFG. CO.

MARCH 13, 2013

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## OTHER INFORMATION

The Division of Materials and Waste Management has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link: [http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc\\_serve.php?2=subscriptionpage](http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage).

Should you have any questions regarding this letter, please contact me at (330) 963-1165.

Sincerely,



Neil J. Wasilk  
Environmental Specialist  
Division of Materials and Waste Management

Enclosure

NJW:ddw

cc: Marlene Kinney, Ohio EPA, DMWM, NEDO  
ec: Natalie Oryshkewych, Ohio EPA, DMWM, NEDO  
Nyall McKenna, Ohio EPA, DMWM, NEDO  
Jeff Mayhugh, Ohio EPA, DMWM, CO



LQG Container Inspection Log OAC Rule 3745-66-74

Inspection Item	Inspection Schedule (i.e., daily, monthly, weekly)	Date:	Date:	Date:	Date:	Date:	Date:
Are all containers closed?							
Are containers in good condition?	Weekly						
Are any containers leaking or is there evidence of a spill?	Weekly						
Are containers stored/handled in a manner that would prevent leaks/spills?	Weekly						
Are containers compatible with the wastes stored in them?	Weekly						
Are containers labeled with the words "Hazardous Waste" and the accumulation date?							
Have any containers been stored for more than 90 days?							
Is aisle space adequate for passage of emergency equipment?							
Are incompatible wastes stored separately?							
Are containers that hold ignitable or reactive wastes stored at least 50 feet from the property line?							
Inspector's Name							

Note: Information in the shaded area is not required by OAC rule 3745-66-74, but you are encouraged to record it, regardless.

Comments/Problems/Corrective Action Required/ Date Completed	Week 1	
	Week 2	
	Week 3	
	Week 4	
	Week 5	
	Week 6	



LQG Container Inspection Log OAC Rule 3745-66-74

Inspection Item	Inspection Schedule (i.e., daily, monthly, weekly)	Date:	Date:	Date:	Date:	Date:	Date:
Are all containers closed?							
Are containers in good condition?	Weekly						
Are any containers leaking or is there evidence of a spill?	Weekly						
Are containers stored/handled in a manner that would prevent leaks/spills?	Weekly						
Are containers compatible with the wastes stored in them?	Weekly						
Are containers labeled with the words "Hazardous Waste" and the accumulation date?							
Have any containers been stored for more than 90 days?							
Is aisle space adequate for passage of emergency equipment?							
Are incompatible wastes stored separately?							
Are containers that hold ignitable or reactive wastes stored at least 50 feet from the property line?							
Inspector's Name							

Note: Information in the shaded area is not required by OAC rule 3745-66-74, but you are encouraged to record it, regardless.

Comments/Problems/Corrective Action Required/ Date Completed	Week 1	
	Week 2	
	Week 3	
	Week 4	
	Week 5	
	Week 6	



# Emergency Equipment Inspection Log OAC Rule 3745-65-33

Inspection Item	Inspection Schedule (i.e., daily, monthly, weekly)	Date:	Date:	Date:	Date:	Date:	Date:
Operational Internal Alarm/Intercom, if required by 3745-65-32							
Telephone, Radio or other Emergency Summoning Device Present and Working, if required by 3745-65-32							
Fire Extinguishers charged and working, if required by 3745-65-32							
Spill/Decon equipment, if required by 3745-65-32, is fully stocked							
Water of Adequate Volume and Pressure, if required by 3745-65-32							
ER Equipment Consistent with Contingency Plan and easily Accessible							
Other							
Other							
Inspector's Name							

Note: Information in the shaded area is not required by OAC rule 3745-65-33, but you are encouraged to record it, regardless.

Comments/Problems/Corrective Action Required/ Date Completed	Day 1	
	Day 2	
	Day 3	
	Day 4	
	Day 5	
	Day 6	
	Day 7	



Emergency Equipment Inspection Log OAC Rule 3745-65-33

Inspection Item	Inspection Schedule (i.e., daily, monthly, weekly)	Date:	Date:	Date:	Date:	Date:	Date:
Operational Internal Alarm/Intercom, if required by 3745-65-32							
Telephone, Radio or other Emergency Summoning Device Present and Working, if required by 3745-65-32							
Fire Extinguishers charged and working, if required by 3745-65-32							
Spill/Decon equipment, if required by 3745-65-32, is fully stocked							
Water of Adequate Volume and Pressure, if required by 3745-65-32							
ER Equipment Consistent with Contingency Plan and easily Accessible							
Other							
Other							
Inspector's Name							

Note: Information in the shaded area is not required by OAC rule 3745-65-33, but you are encouraged to record it, regardless.

Comments/Problems/Corrective Action Required/ Date Completed	Day 1	
	Day 2	
	Day 3	
	Day 4	
	Day 5	
	Day 6	
	Day 7	

Send to Central Office <input type="checkbox"/>	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE</b> <b>IDENTIFICATION/VERIFICATION FORM</b>	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to RCRAInfo.Data@epa.state.oh.us.

<b>Site EPA ID No.</b>	EPA ID Number: <b>OH0000935163</b>	
<b>Site Name</b>	Name: <b>LUKE ENGINEERING &amp; MFG CO</b>	Website: (Optional)
<b>Site Location Information</b>	Street Address: <b>11 PIPESTONE DRIVE</b>	
	City, Town, or Village: <b>Rittman</b>	State: <b>OH</b>
<b>Site Land Type</b> (check only one)	County Name: <b>Wayne</b>	
<b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	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"/>	Zip Code: <b>44270</b>

<b>Facility Representative</b>	First Name: <b>Meghan</b>	MI:	Last Name: <b>Bates</b>
Additional names can be recorded in number 12	Title: <b>Plt. Mgr.</b>		
Only provide address information if it is different than the site address	Phone Number: <b>330-925-3344</b>		Phone Number Extension:
	E-Mail Address:		
	Fax Number:		Fax Number Extension:
	Street or P.O. Box: <b>P.O. Box 478, 456 South Boulevard</b>		
	City, Town or Village: <b>Wadsworth</b>		Zip Code: <b>44282</b>
	State: <b>OH</b>		

<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner:		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:		Owner Phone #:	
	City, Town or Village:		Country:	Zip Code:
	State:		Date Became Operator (mm/dd/yyyy):	
	Name of Site's Operator:	Operator 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"/>
	Street or P.O. Box:		Operator Phone #:	
	City, Town or Village:		Country:	Zip Code:
	State:			

<b>VIOLATIONS CITED?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
--------------------------	---

**TYPE OF HANDLER - MARK "X" 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 (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.	<input checked="" type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input 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
---	--	--

**TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)**

- |   |  |
|---|--|
| <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        |

**UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED**

**(CHECK ALL BOXES THAT APPLY)**

- |   |   |
|---|---|
| <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<br>(accumulates 5,000 kg. or more) |   |

**CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES**

- Batteries
- Pesticides
- Mercury containing equipment
- Lamps

**USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))**

- Used Oil Generator
- Used Oil Transporter
- Used Oil Transfer Facility
- Used Oil Processor
- Used Oil Re-refiner
- Off-Specification Used Oil Burner
- Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil
- 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 box(es) below to indicate the laboratory type.

- College or University
- Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
- 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.** Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

**COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.**

- |            |   |  |                                      |
|------------|---|--|--------------------------------------|
| 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            |                                      |

Name of Inspector(s)  
**Neil Wasilk**

Name of Inspector(s)

Date of Inspection/Time  
(mm/dd/yyyy) (hh:mm)  
**02/26/2013 10:10 a.m.**

**Comments:**

## Hazardous Waste Process Flow

Facility:

OH0000935163

Luke Engineering & Mfg. Co.  
11 Pipestone Drive  
Rittman, OH 44270

The facility conducts sulfuric acid anodizing of aluminum and finishing of the anodized parts. Machined aluminum components are delivered to the facility. The components are placed on dip racks for processing in a series of tanks. The components are cleaned in several tanks holding aqueous solutions of proprietary cleaners, sodium hydroxide, and detergents. Anodizing is performed in an electrolytic bath of sulfuric acid which creates an oxidized surface coating that is corrosion and wear resistant. The porous nature of this coating allows the parts to be dyed and for protective sealing materials to be added. The finished parts are shipped off-site.

Chromate is present in at least one of the dyes. Sodium dichromate is used as a sealant. Nickel acetate is one of the sealants. Lead piping is used for chilled water in some tanks because it is corrosion resistant.

Wastewaters from the anodizing process are collected in a holding tank and treated using basic neutralization techniques (e.g., addition of sulfuric acid or sodium hydroxide as appropriate). Neutralized wastewater is drained from the holding tank to an in-ground sump for secondary neutralization. Treated wastewater is discharged to the Rittman sewer system (i.e., Publically Owned Treatment Works (POTW)). Occasionally sludge is cleaned out of the sump; it is a non-hazardous waste as it is not listed and does not exhibit a characteristic according to a 2001 TCLP Test for RCRA metals.

Hazardous wastes generated include:

- A mixture of solids and liquids from clean-outs of the caustic cleaning/etch tank (D002). It is the primary hazardous waste generated at the facility; typically generated once annually.
- Sludge from tanks containing chromium (D007). Generated infrequently.

The 90 day area is located in the north end of the building. The facility treats containers of caustic waste in the 90 day area by decanting and evaporating water to reduce the quantity of waste. Used fluorescent lamps are stored in the 90 day area.

No used oil is collected by the facility. Forklift oil is changed and managed by the company that leases them. Universal waste lamps are generated and either shipped directly to a recycler or transferred to the Wadsworth facility for consolidation prior to shipment to a recycler.

**LARGE QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

CESQG: ≤100 Kg. (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:

**GENERAL REQUIREMENTS**

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Were annual reports filed with Ohio EPA on or before March 1 <sup>st</sup> ? [3745-52-41(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	Has the generator transported or caused to be transported hazardous waste to <b>other</b> than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
7.	Has the generator disposed of hazardous waste <b>on-site without a permit</b> or at another facility <b>other</b> than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
----	--	--

NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]	
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

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

11.	Does the generator export hazardous waste? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>MANIFEST REQUIREMENTS</b>		
12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]</i>		
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]</i>		
15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.</i>		
17.	If the generator received a rejected load or residue, did the generator:	
a.	Sign item 20 of the new manifest or item 18c of the original manifest? [3745-52-23(F)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Provide the transporter a copy of the manifest? [3745-52-23(F)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Send a copy of the manifest to the designated facility that returned the shipment with 30 days after delivery of the rejected shipment? [3745-52-23(F)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: A generator who sends a shipment of hazardous waste to a TSD facility with the understanding that the TSD facility can accept and manage the waste and later receives that shipment back as a rejected load or residue may accumulate the waste on-site for &lt;90 days or &lt;180 days depending on the amount of hazardous waste on-site in that calendar month. [3745-52-34(M)]</i>		
<i>NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.</i>		
<b>PERSONNEL TRAINING</b>		
21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]

23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
25.	Does the generator provide refresher training to employees during each period from January 1 <sup>st</sup> to December 31 <sup>st</sup> and does each training occur within 15 months after the previous training? [3745-65-16(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
26.	Does the generator keep records and documentation of:	
a.	Job titles? [3745-65-16(D)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Job descriptions? [3745-65-16(D)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Completed training or job experience required? [3745-65-16(D)(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained

**CONTINGENCY PLAN**

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	Does the plan describe the following:	
a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.*

**EMERGENCY PROCEDURES**

33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.*

**PREPAREDNESS AND PREVENTION**

34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:	
a.	Internal communications or alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: Verify that the equipment is listed in the contingency plan.*

36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
39.	If there is only one employee on the premises, is there immediate access to a device (eg. phone, and hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

SATELLITE ACCUMULATION AREA REQUIREMENTS		
43.	Does the generator ensure that satellite accumulation area(s): <i>NO SAT. ALL CONTAINERS OBSERVED</i>	
a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	
a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.		
USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS		
45.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
46.	Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
47.	Are hazardous wastes stored in containers which are:	
a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	<i>OPEN FOR TREATMENT (EVAPORATION OF WATER)</i> In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Record location on process summary sheets, photograph the area, and record on facility map.		
48.	Is the container accumulation areas(s) inspected at least once during the period from Sunday to Saturday? [3745-66-74]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] <i>OR OTHER INCOMPATIBLE MATERIALS</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<p><i>NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.</i></p>		
53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<p><i>NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a &lt;90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]</i></p>		
<p><b>PRE-TRANSPORT REQUIREMENTS</b></p>		
54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**GENERATOR LDR CHECKLIST  
DOES NOT APPLY TO CESQGS**

**GENERAL REQUIREMENTS**

1. If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07 (A)(7)] Yes  No  N/A

2. Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] Yes  No  N/A

*NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07 (A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).*

3. Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)] Yes  No  N/A

4. Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)] Yes  No  N/A

5. Does the generator generate a listed HW that exhibits a characteristic? If yes, Yes  No  N/A

a. Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)] Yes  No  N/A

*FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.*

6. Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)] Yes  No  N/A

*NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.*

*NOTE: Written documentation of this determination is not required.*

7. Did the generator treat his HW /soil on-site to meet the LDR treatment standard? Yes  No  N/A

*NOTE If "Yes" see question #16.*

8. Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility?[3745-270-07(A)(2)] Yes  No  N/A

9. Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)] Yes  No  N/A

10. Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)] Yes  No  N/A

a. Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)] Yes  No  N/A

**NOTIFICATION FORM**

11. Does the LDR Notification form contain the following information:

a. Manifest number of the first waste shipment to the TSD?[3745-270-07(A)(2)] Yes  No  N/A

b. Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)] Yes  No  N/A

c. A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)] Yes  No  N/A

d. A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]. Yes  No  N/A

NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.

e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories

f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NO UHCs
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NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.

g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for?[3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.

**PROHIBITED DILUTION**

12.	Is the HW treated by burning? If "No", go to #15.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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13.	Is the HW a metal-bearing HW?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.

14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless <u>one</u> of the following conditions apply. [3745-270-03(c)]	
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	i.	Contains > 1% TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	ii.	Contains organic constituents or cyanide at levels greater than the UST levels?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	v.	Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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15.	Was the HW treated by wastewater treatment?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: If Yes, HW is improperly being treated by dilution.

	b.	Does the waste carry the D001 code <u>and</u> contain ≥10% TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B) and 3745-270-40(A)(3)].

NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.

GENERATOR TREATMENT			
16.	Does the generator treat to meet LDRs on-site [3745-270-40(A)]?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	If "yes"...complete the rest of the checklist. If "No"...stop...you are done.		
a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: This is a laboratory analysis but it does not have to be kept by the generator.</i>			
c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTIFICATION FORM			
17.	a.	Contains all information in #11 a-g above and	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	If the treated HW/soil is listed.....notification contains the following certification statement:  "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment stands specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:	
	i.	Send a one-time notification to the director?[3745-270-09(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	ii.	Maintain a copy of the notice onsite?[3745-270-09(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iii.	Include in the notification: [3745-270-09(D)(1)(a)]	
	1.	Name & address of receiving landfill?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	2.	Description of HW when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	3.	HW code when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	4.	Treatability group when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	5.	Underlying hazardous constituents present when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iv.	Contain the right certification statement as required by 3745-70-07(B)(4)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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

**WASTE MANAGEMENT & LABELING/MARKING**

**UNIVERSAL WASTE BATTERIES** *NO U.W. BATTERIES OBSERVED*

3.	Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Does the SQUWH conduct any of the following activities:	
	a. Sort batteries by type?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Mix battery types in one container?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Discharge batteries to remove the electric charge?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. Regenerated used batteries?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e. Disassemble them into individual batteries or cells?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	f. Remove batteries from consumer products?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	g. Remove the electrolyte from the battery?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**UNIVERSAL WASTE LAMPS**

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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>NO REPAIRS OBSERVED.</i>

	releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	
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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

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

**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 <b>one</b> of the following: [3745-273-15(C)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

#### 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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#### RESPONSE TO RELEASES - NO RELEASES OBSERVED

14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

#### 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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**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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Agree to where the shipment will be sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Sending the waste back to the originating handler? [3745-273-18(F)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

**EXPORTS**

24.	Is waste being sent to a foreign destination? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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[ID Number]