



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

July 24, 2013

Ms. Christy Aeh
Administrative Director of Safety
Southern Ohio Medical Center (SOMC)
1805 27th Street
Portsmouth, Ohio 45662

SCIOTO COUNTY
GENERAL FILE
(SOUTHERN OHIO MEDICAL
CENTER - SOMC)
DMWM/SEDO
OHD075019810

CERTIFIED
#70122920000138146567

Dear Ms. Aeh:

On July 10, 2013, Melody Stewart and I inspected Southern Ohio Medical Center (SOMC)'s main campus location at 1805 27th Street in Portsmouth, Ohio to determine compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). This letter will explain any violations that were discovered during our inspection and what you need to do to abate those violations. The general comments section of the letter will explain any general concerns we identified and what you can do to address our concerns.

We found the following violations of Ohio's hazardous waste laws. In order to correct these violations you must do the following and send me the required information *within 14 days* of your receipt of this letter:

- (1) **OAC Rule 3745-52-42(B), Exception Report.** A Small Quantity Generator (SQG) of hazardous waste who does not receive a copy of the manifest with the handwritten signature of the owner/operator of the designated treatment, storage, or disposal facility within 60 days of the date the waste was accepted by the initial transporter must submit to Ohio EPA a legible copy of the manifest, indicating that the generator has not received confirmation of delivery of the waste.

At the time of the inspection, SOMC was unable to produce completed manifests that had been signed by the destination facility (Petro-Chem Processing) confirming that they had received SOMC's waste. SOMC did not submit exception reports to Ohio EPA for those manifests that had not been signed by the destination facility.

To abate this violation, SOMC must contact the destination facility (Petro-Chem Processing) and receive from them signed completed manifests for all off-site shipments of hazardous waste from SOMC to Petro-Chem Processing for one year, beginning July 2012 and running through July 2013. SOMC must submit

legible copies of the completed signed manifests for the time period stated above to me for review.

- (2) **OAC Rule 3745-52-34(C)(2), Accumulation Time of Hazardous Waste - Satellite Accumulation.** A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acute hazardous waste in containers at or near any point of generation where wastes initially accumulate without obtaining a hazardous waste permit, provided that the generator complies with the following: the containers are under the control of the operator of the process; the containers are closed and appropriately labeled as set forth in this rule; and once the 55-gallon limit has been reached the waste is labeled with the accumulation date (the date the 55-gallon limit was reached) and moved to the hazardous waste storage area within 3 days of reaching the limit.

SOMC had not marked the hazardous waste containers with the accumulation date when the 55 gallon (one quart for acute waste) limit was exceeded. It could not be determined during the inspection if satellite accumulation containers reaching the accumulation limit were moved to the hazardous waste storage area within 3 days of becoming full. Containers that had been transferred to the hazardous waste storage area were not dated with the accumulation date.

To abate this violation, SOMC must begin to label containers in satellite accumulation areas once the 55-gallon accumulation limit has been reached with the accumulation date and moved to the hazardous waste storage area within 3 days of reaching the limit. Containers that are transferred to the hazardous waste area prior to reaching the 55-gallon limit should be labeled upon their arrival to the hazardous waste storage area. To demonstrate a return to compliance with this rule, SOMC must submit to me photographs of sufficient quality to show that containers of hazardous waste in the hazardous waste storage area are clearly labeled with the accumulation start date.

- (3) **OAC Rule 3745-52-34(D)(4), Accumulation Time of Hazardous Waste - Management of Containers.** A Small Quantity Generator (SQG) of hazardous waste may accumulate hazardous waste that is generated on-site for 180 days without obtaining a hazardous waste permit, provided that the generator complies with the generator container storage requirements of OAC Rule 3745-52-34. Containers in the hazardous waste storage area must be clearly labeled with the date upon which the period of accumulation or storage began (the accumulation date). The accumulation date must be visible for inspection on each container.

SOMC had not marked the hazardous waste containers that were in the hazardous waste storage area with the dates upon which the period of accumulation or storage began.

To abate this violation, SOMC must ensure that containers in the hazardous waste storage area are clearly labeled with the accumulation start date, and ensure that the containers are positioned so that the label/date are visible for inspection. To demonstrate a return to compliance with this rule, SOMC must submit to me photographs of sufficient quality to show that containers of

hazardous waste in the hazardous waste storage area are clearly labeled with the accumulation start date.

- (4) **OAC Rule 3745-279-22(C), Used Oil Storage Requirements for Generators – Labeling.** Containers and aboveground tanks used to store used oil must be clearly labeled with the words “Used Oil”.

At the time of the inspection, one 55-gallon drum of used oil located in the Maintenance Department was not labeled with the words “Used Oil”.

To abate this violation, SOMC must label the drum with the words “Used Oil” and submit a photograph to me that clearly shows the drum has been appropriately labeled.

SOMC needs to immediately take the necessary measures to return to compliance with Ohio’s environmental laws. **Within 14 days of receipt of this letter**, SOMC 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 vicky.german@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, SOMC is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

GENERAL COMMENTS:

- **Crushing of Spent Fluorescent and CFL lamps.**

As we discussed during the inspection, spent fluorescent and CFL lamps can either be managed as hazardous waste or universal waste. At the time of the inspection, SOMC was putting their spent lamps, as well as those from other SOMC locations such as the SOMC Cancer Center, into a bulb crusher unit and sending the crushed lamps off-site as hazardous waste. As we discussed, if the spent lamps are crushed, they must be managed as hazardous waste, and SOMC must comply with all applicable hazardous waste regulations (labeling, accumulation, and weekly inspection requirements). In addition, SOMC’s main campus would not be permitted to transport or receive spent lamps from each individual branch or campus (e.g., the SOMC Cancer Center) and crush them at SOMC’s main campus. Each branch or campus location would need to crush its own bulbs and individually comply with the hazardous waste regulations. As we discussed, SOMC can reduce its regulatory burden by managing the bulbs as universal waste and recycling the bulbs. I have enclosed several fact sheets on management of universal waste lamps for your reference.

As we discussed, SOMC Cancer Center, located at 1121 Kinneys Lane was cited in violation of *OAC Rule 3745-273-18(A), Off-site Shipments - Standards for Small Quantity Handlers of Universal Waste* because as a small quantity handler of universal waste they are prohibited from sending universal waste to a place other than another universal waste handler, or a foreign or domestic universal waste destination facility. At the time of the inspection, SOMC’s main campus did not meet either of these

requirements because they were crushing and managing the spent lamps as hazardous waste. SOMC has indicated that they will begin managing spent lamps as universal waste that will be recycled. **Please submit documentation to this office demonstrating that arrangements have been made to have the spent lamps recycled by a universal waste handler.** Once this documentation is received, SOMC may accept spent lamps from SOMC Cancer Center and other campus locations for off-site shipment for recycling, and Ohio EPA will return SOMC Cancer Center to compliance.

• **Other Standards for Management of Universal Waste – Accumulation Time.**

SOMC should document the length of time that universal waste is stored on-site prior to off-site shipment for recycling by using one or more of the methods outlined in OAC Rule 3745-273-15(C). Other SOMC locations should also use one of the above methods to document the length of time that universal waste is accumulated at their respective sites prior to being sent to SOMC's Main Campus for off-site shipment to be recycled. Please refer to the Small Quantity Handler of Universal Waste Checklist and the enclosed fact sheets on management of universal waste for further information.

• **Other Standards for Management of Universal Waste – Employee Training.**

Employees who have the responsibility of handling/managing universal waste must be informed of waste handling/emergency procedures relative to their responsibilities, as outlined in OAC Rule 3745-273-16. SOMC should design and implement a training program to ensure employees that are responsible for handling/managing universal waste spent lamps are trained in proper management and emergency procedures.

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 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

Enclosure

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.



Environmental Protection Agency

Ohio Environmental Protection Agency

For Ohio EPA use only

Send to Central Office



RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM

Completed forms that are required to be submitted to CO should be e-mailed to RCRAInfoData@epa.ohio.gov

Site EPA ID No.	EPA ID Number: OHD075019810	
Site Name	Name: Southern Ohio Medical Center Website (Optional): http://www.somc.org	
Site Location Information	Street Address: 1805 27th Street City, Town, or Village: Portsmouth State: : OH County Name: Scioto Zip Code: 45662	
Site Land Type (check only one)	Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	
NAICS codes www.census.gov/ipcd/www/naics.html		
Facility Representative	First Name: Christy MI: Last Name: Aeh Phone Number: 740-356-8435 Extension: E-Mail Address: aehc@somc.org Fax Number: 740-356-6265 Fax Number Extension: Street or P.O. Box: 1805 27th Street City, Town or Village: Portsmouth State: OH Zip Code: 45662	
Legal Owner And Operator	Name of Site's Legal Owner: Southern Ohio Medical Center (SOMC) Date Became Owner (mm/dd/yyyy): 11/01/2004 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: 1805 27th Street City, Town or Village: Portsmouth Owner Phone: 740-356-8401 State: OH Country: US Zip Code: 45662 Name of Site's Operator: Southern Ohio Medical Center (SOMC) Date Became Operator: 11/01/2004 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: 1805 27th Street City, Town or Village: Portsmouth Operator Phone: 740-356-8401 State: OH Country: US Zip Code: 45662	

VIOLATIONS CITED? Yes No

TYPE OF HANDLER (MARK AS APPROPRIATE)

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

TYPE OF REGULATED WASTE ACTIVITY (MARK AS APPROPRIATE)		
<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 (MARK AS APPROPRIATE)		
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste	
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)		
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.		
Same as codes listed on form updated on 9/15/2000.		
COMMENTS: Use this area to describe inspection conditions and additional information.		
Announced	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Additional Facility Representatives: Roxanne Robinson, Plant Operations, SOMC
Tanks	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Containers	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
ADDITIONAL COMMENTS:		
Latitude/Longitude: 38.753200, -82.978000		
INSPECTOR(S)		INSPECTION DATE/TIME
Vicky German, DMWM-SEDO	Melody Stewart, DMWM-SEDO	7/10/13

PROCESS INFORMATION AND WASTE ACTIVITIES SUMMARY

Southern Ohio Medical Center (SOMC)

OHD075019810

SQG

Description of Waste

On-Site Management

Off-Site Management

Process	Waste Generated	EPA Waste Code	Approx. Amount Generated per Month	Type of Accumulation or Storage	Type of On-Site Treatment	Waste Location	Name, state, and type of activity
Mammography and other x-rays that require film (non-digital)	Spent x-ray film containing silver	D011	Varies	Boxes in X-ray Dept. Picked up monthly	NA	X-Ray Dept.	Cintas, Columbus OH; United DMS, Knoxville TN (silver recovery)
Pharmacy; Laboratory	Debris, gowns, gloves, masks contaminated with pharmaceuticals	NA	200 P	Containers in Pharmacy and Lab; transferred to hazardous waste storage area	NA	Pharmacy Dept. Laboratory	Petro-Chem Processing, Detroit MI
Laboratory	Chemicals, reagents, solvents	D001 F003	350 P	Containers in Pharmacy and Lab; transferred to hazardous waste storage area	NA	Pharmacy Dept. Laboratory	Petro-Chem Processing, Detroit MI
Pharmacy	Out-dated medications (warfarin, nicotine)	P001 P075	1 P (acute hazardous waste)	Containers in Pharmacy and Lab; transferred to hazardous waste storage area	NA	Pharmacy Dept.	Petro-Chem Processing, Detroit MI
Pharmacy	Out-dated medications (mitomycin C; phenol, etc.)	D001 D007 D009 D011 D022 D024	5 P	Containers in Pharmacy and Lab; transferred to hazardous waste storage area	NA	Pharmacy Dept.	Petro-Chem Processing, Detroit MI
Equipment maintenance	Mercury-containing wastes, blood pressure cuffs, etc.	D009 unless universal waste	Varies	Container in Maintenance Dept.	NA	Maintenance Dept.	Petro-Chem Processing, Detroit MI

PROCESS INFORMATION AND WASTE ACTIVITIES SUMMARY (cont'd)

Southern Ohio Medical Center (SOMC)

OHD075019810

SQG

Description of Waste				On-Site Management			Off-Site Management
Process	Waste Generated	EPA Waste Code	Approx. Amount Generated per Month	Type of Accumulation or Storage	Type of On-Site Treatment	Waste Location	Name, state, and type of activity
Equipment maintenance	Spent batteries (NiCd, NiMh, alkaline)	NA recycled	Varies	Maintenance Dept.	NA	Maintenance Dept.	Petro-Chem Processing, Detroit MI
Building maintenance	Spent fluorescent lamps, including CFLs	D009 unless universal waste	Varies	Inside bulb crushing unit in Maintenance Dept.	NA	Maintenance Dept.	Petro-Chem Processing, Detroit MI
Building, equipment, and grounds maintenance	Used oil	NA	Varies	55-G drum	NA	Maintenance Dept.	Petro-Chem Processing, Detroit MI
Painting of walls, signs, markings, etc.	Paint-related wastes	NA	Rarely generated	NA	NA	Maintenance Dept.	Petro-Chem Processing, Detroit MI

FACILITY AND PROCESS INFORMATION



Southern Ohio Medical Center (SOMC) is a 222-bed not-for-profit hospital in Portsmouth, Ohio, that provides emergency and surgical care, as well as a wide range of other health care services such as heart and cardiovascular services, medical imaging, laboratory services, inpatient rehabilitation, and a nutritional support program. SOMC currently employs 2,200 full time employees and part time employees, has a

medical staff of more than 140 physicians and specialists, and is supported by approximately 800 regular volunteers. Physician Offices are located in the Waller, Fulton, and Braunlin Buildings on the main SOMC Campus, and a Wound Care Center is located in the Rardin Building.

WASTE INFORMATION

SOMC generates primarily medical and treatment-related wastes from the pharmacy and laboratory. Although most x-rays are digital, mammography and a few other specialized x-rays still use x-ray film and are sent off-site for silver recovery. Mercury wastes are sometimes generated from mercury-containing equipment; NiCd, NiMh, and alkaline batteries are generated from monitoring and other equipment. Building maintenance wastes are also generated, such as spent fluorescent and CFL lamps, used oil, and paint-related wastes.

REGULATORY HISTORY

SOMC first notified Ohio EPA of its hazardous waste generation activities as a Conditionally Exempt Small Quantity Generator (CESQG) on 12/14/1998, and updated their facility information on 9/15/2000 maintaining their CESQG status. At the time of the 7/10/2013 inspection, the facility was operating as a Small Quantity Generator (SQG) of hazardous waste.

SMALL QUANTITY GENERATOR REQUIREMENTS

CESQG: <100Kg. (less than 27 ½ gallons or 220 pounds) of waste in a calendar month.

SQG: Between 100 and 1,000 Kg. (Between 28 to 275 gallons or between 220 to 2200 pounds) of waste in a calendar month.

LQG: >1,000 Kg. (more than 275 gallons or 2200 pounds) of waste in a calendar month or >1 Kg. (2.2 pounds) of acutely hazardous waste in a calendar month.

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"/>	NA <input type="checkbox"/>
2.	Has the generator obtained a U.S. EPA I.D. number? [3745-52-12]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
3.	Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
4.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
5.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<i>NOTE: If the SQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements might still apply, e.g. manifest, marking, LDR, etc.</i>				
6.	Has the generator accumulated hazardous wastes <u>in excess of</u> (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
<i>NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]</i>				
7.	Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
<i>NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.</i>				
8.	Does the generator treat hazardous waste in a:			
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
<i>NOTE: Complete appropriate checklist for each unit. NOTE: If waste is treated to meet LDRs, use LDR checklist.</i>				

MANIFEST REQUIREMENTS

9.	Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
10.	Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Does the contractual agreement specify the type of waste and frequency of shipment?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
b.	Is the transport vehicle owned and operated by the reclaimer?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
c.	Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
<i>NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.</i>				

11.	Have items 1 through 20 of each manifest been completed? [3745-52-20(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
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 complete. [3745-52-20 (A)]				
12.	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"/>	NA <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternative 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)]				
13.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
14.	Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.				
15.	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"/>	NA <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"/>	NA <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"/>	NA <input checked="" type="checkbox"/>
16.	If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? 3745-52-42(B)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
At the time of the inspection, SOMC was unable to produce completed manifests that had been signed by the destination facility (TSDf), confirming their receipt of the waste.				
17.	Are signed copies of all manifests being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
SOMC has retained copies of all manifests for three years; however, they are not completed copies that have been signed by the destination facility (TSDf).				
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 <90 days or <180 days depending on the amount of hazardous waste on-site in that calendar month. [3745-52-34(M)]				
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.				

PREPAREDNESS AND PREVENTION

18.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
19.	Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]			
	a. Name and telephone number of emergency coordinator?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	b. Location of fire and spill control equipment, and, if present, fire alarm(s)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	c. Telephone number of local fire department?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
20.	Are employees familiar with waste handling and emergency procedures? [3745-52-34(D)(5)(c)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
21.	Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
22.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

23.	Does the generator have the following equipment at the facility (if it is required due to actual hazards associated with the waste):			
a.	Internal alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
c.	Portable fire control, spill control and decontamination equipment? [3745-65-32(C)]?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <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"/>	NA <input type="checkbox"/>
24.	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"/>	NA <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-65-33]?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
25.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
26.	If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance? (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
27.	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"/>	NA <input type="checkbox"/>
28.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
29.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

SATELLITE ACCUMULATION AREA REQUIREMENTS

30.	Does the generator ensure that satellite accumulation area(s):			
a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)].	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
f.	Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
31.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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 checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
b.	Did the generator mark the container(s) holding the 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 checked="" type="checkbox"/>	NA <input type="checkbox"/>

SOMC had not marked the hazardous waste containers with the accumulation date when the 55 gallon (or one quart of acute hazardous waste) limit was exceeded and the containers were transferred to the hazardous waste storage area.

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

32.	Has the generator marked containers with the words "Hazardous Waste"? [3745-52-34(D)(4)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
33.	Is the accumulation date on each container? [3745-52-34(D)(4)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
<p><i>SOMC had not marked the hazardous waste containers that were in the hazardous waste storage area with their accumulation dates.</i></p>				
34.	Are hazardous wastes stored in containers which are:			
	a. Closed except when adding/removing wastes? [3745-66-73(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	b. In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	c. Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	d. Handled in a manner which prevents rupture or leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
35.	Is the container accumulation area(s) inspected at least once during the period from Sunday to Saturday? [3745-66-74]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	a. Are inspections recorded in a log or summary? [3745-66-74]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
36.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
37.	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"/>	NA <input checked="" type="checkbox"/>
38.	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"/>	NA <input checked="" type="checkbox"/>
<p>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.</p>				

PRE-TRANSPORT REQUIREMENTS

39.	Does each 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"/>	NA <input type="checkbox"/>
40.	Does each container of 100 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
41.	Before off-site transportation, does the generator placard <u>or</u> offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

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

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

GENERATOR STANDARDS

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

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

5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes No N/A

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

6. Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] Yes No N/A
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No N/A
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil"? [3745-279-22(C)] Yes No N/A

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

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

ON-SITE BURNING IN SPACE HEATERS

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] Yes No N/A
If so:
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes No N/A
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A

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

GENERATOR TRANSPORTATION

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

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

COLLECTION CENTERS AND AGGREGATION POINTS

13. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes No N/A
14. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes No N/A
15. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes No N/A

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

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - LAMPS

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

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No NA
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes No NA

LABELING

3. 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
4. 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
5. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamps" or "Waste Lamps" or "Used Lamps"? [3745-273-14(E)] Yes No NA

At the time of the inspection, SOMC was putting their spent fluorescent and CFL lamps, as well as those from other SOMC locations such as the SOMC Cancer Center, into a bulb crusher unit, and then sending the crushed lamps off-site as hazardous waste. SOMC indicated they will cease using the bulb crusher and begin to manage their spent fluorescent and CFL lamps as universal waste that will be recycled. Once SOMC has demonstrated that they are managing the lamps as universal waste, they may accept spent lamps from other SOMC locations such as the SOMC Cancer Center.

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.

6. 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
7. 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

SOMC must follow one of the above methods to document when the spent lamps were generated and how long they were accumulated/stored on-site before sent off-site for recycling. Other SOMC locations should also use one of the above methods to document the length of time they were accumulated at their respective sites prior to being sent to SOMC's Main Campus for off-site shipment to be recycled.

EMPLOYEE TRAINING

8. 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

Once SOMC begins managing spent lamps as universal waste that will be recycled, all employees that will have the responsibility of handling and managing the spent lamps must be trained to appropriately handle (containerize, label, date, etc.) the spent lamps. The training should include emergency procedures to be taken if a spent lamp is broken, etc. SOMC must also maintain documentation showing that employees who have the responsibility of handling and managing the spent lamps are appropriately trained.

RESPONSE TO RELEASES

9. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes No NA

10. Is the material released characterized? [3745-273-17(B)] Yes No NA

11. 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.

12. 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.

At the time of the inspection, SOMC was putting their spent fluorescent and CFL lamps, as well as those from other SOMC locations such as the SOMC Cancer Center, into a bulb crusher unit, and then sending the crushed lamps off-site as hazardous waste. SOMC indicated they will cease using the bulb crusher and begin to manage their spent fluorescent and CFL lamps as universal waste that will be recycled. Once SOMC has demonstrated that they are managing the lamps as universal waste, they may accept spent lamps from other SOMC locations such as the SOMC Cancer Center (since the Main Campus would then be considered another universal waste handler destination) and ship them off-site to a universal waste recycler.

13. 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

14. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No NA
15. 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
16. 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
17. 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
18. 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

19. 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

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