



State of Ohio Environmental Protection Agency

FILE COPY

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www.epa.state.oh.us

P.O. Box 1049
Columbus, OH 43216-1049

October 1, 2007

Re: **Safety-Kleen Systems, Inc.**
Hebron Recycle Center
TSD/LQG
OHD980587364/01-45-0518
Licking County, CDO
NOV/RTC

Mr. Stephen Lear, Environmental Compliance Manager
Safety-Kleen Systems, Inc. Hebron Recycle Center
581 Milliken Drive
Hebron, OH 43025

Dear Mr. Lear:

Thank you for accompanying Randy Sheldon and me during Ohio EPA's inspection of Safety-Kleen's Recycle Center (Safety-Kleen) in Hebron, Ohio, on September 19, 2007. We inspected Safety-Kleen to determine its compliance with Ohio's hazardous waste and universal waste laws and rules as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). Safety-Kleen was also inspected for compliance with the terms and conditions of its hazardous waste installation and operation permit renewal issued on June 17, 2005, as modified.

At the time of the inspection, Safety-Kleen was operating the Hebron Recycle Center as a permitted hazardous waste treatment and storage facility. The company also operates as a large quantity generator (LQG) of hazardous waste, a universal waste handler, and a used oil generator at this location.

We found the following violations of Ohio's hazardous waste rules:

1. **OAC Rule 3745-54-15(D), General Inspection Requirements:** The owner or operator must record inspections in an inspection log or summary.

Safety-Kleen must perform daily inspections of the container storage area and tank systems in accordance with the inspection schedule contained in Section 6 of its permit application and in accordance with OAC Rule 3745-54-15. During Ohio EPA's inspection of the facility's operating record, the August 18, 2007, daily inspection sheet for the container storage area and tank systems was not in the inspection log verifying that the required inspections had been completed.

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

During the inspection, Safety-Kleen completed and placed an inspection log sheet for August 18, 2007, in the operating record. The violation was abated at that time.

2. **OAC Rule 3745-273-13(D)(1), Universal Waste Lamps:** A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

Safety-Kleen accumulates spent fluorescent bulbs in the maintenance building. During the inspection, two boxes of spent bulbs were not closed. After the inspection, Safety-Kleen closed the boxes and sent photographic documentation to me via e-mail on September 21, 2007. The violation was abated at that time.

General Comments

1. As discussed during the inspection, Safety-Kleen may wish to clarify what "daily" or "each operating day" means with regard to daily inspections. Safety-Kleen's permit requires daily inspections to be conducted for container storage areas, tank farms, and the facility (security, lighting, warnings). Daily inspections are to be conducted each operating day on hazardous waste tank storage areas and loading and unloading areas (page 6-3). However, neither "daily" nor "each operating day" is defined. Thus, Safety-Kleen may wish to modify its permit in accordance with OAC Rule 3745-50-51 to provide clarification.
2. During the inspection, we also reviewed Safety-Kleen's log books and had questions about the waste status of a methylene chloride stream received from a Clean Harbors facility in Bartow, Florida. This stream is partially reclaimed by Clean Harbors and then further reclaimed by Safety-Kleen. Please submit additional information about the original waste stream (per our e-mail correspondence dated September 25, 2007) to me **within 30 days** of your receipt of this letter. We will then determine the status of the partially reclaimed material and notify you of our findings in a separate letter.

In general, Ohio EPA's position on recycling hazardous waste by reclamation is as follows. The overall reclamation process must produce a useable product but the entire process does not have to occur at one location. Hazardous waste may be partially reclaimed at one location and transported to another location for further or final reclamation. Each step of the process is considered part of the overall reclamation process and is exempt from the permit requirements for hazardous waste treatment. The types of hazardous wastes that may be reclaimed include spent materials, listed sludges, and listed by-products.

Mr. Stephen Lear
Safety-Kleen Systems, Inc.
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However, in order to receive hazardous wastes generated off-site, the reclamation facility must either be permitted as a hazardous waste storage facility or the waste must be placed directly into the reclamation process upon receipt. Hazardous wastes received at the facility must be managed in accordance with all applicable hazardous waste rules. In addition, the material produced from a partial reclamation process is still defined as a hazardous waste. It, also, must be stored, labeled, packaged, and transported according to the hazardous waste rules. This is because it is not yet a useable product. An operator of a facility may seek a variance from classifying the partially processed material as a hazardous waste. The variance criteria is found in OAC rule 3745-50-312.

Enclosed you will find a copy of the checklists that we completed as a result of the inspection. Should you have any questions, please feel free to call me at (614) 728-3887. You can find copies of the rules and other information on the division's web page at:
<http://www.epa.state.oh.us/dhwm/>.

Sincerely,



Melissa Musko
Environmental Specialist
Division of Hazardous Waste Management
Central District Office

Enclosures

c: Tammy McConnell, DHWM/CO
Randy Sheldon, DHWM/CDO
< CDO File

MM/nsm SK.NOV letter907

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.



Ohio Environmental Protection Agency
**RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to
tammy.mcconnell@epa.state.oh.us or mail it to Tammy
McCConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OHD980587364								
3. Site Name	Name: Safety-Kleen Systems, Inc.					Website: (Optional)			
4. Site Location Information	Street Address: 581 Milliken Drive, S.E.								
	City, Town, or Village: Hebron					State: OH			
	County Name: Licking					Zip Code: 43025			
5. 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"/>	
6. NAICS code(s) www.census.gov/epcd/www/naics.html	562920								
7. Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Stephen			MI: W		Last Name: Lear			
	Phone Number: 740-929-3532				Phone Number Extension: 114				
	E-Mail Address: slear@safety-kleen.com								
	Fax Number: 740-928-1347				Fax Number Extension:				
	Street or P.O. Box:								
	City, Town or Village:								
	State:			Country:			Zip Code:		
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Safety-Kleen Systems, Inc.					Date Became Owner (mm/dd/yyyy): 9/1/1980			
	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: 5400 Legacy Drive, Cluster II, Building 3								
	City, Town or Village: Plano				Owner Phone #: 972-265-2000				
	State: Texas				Country: USA		Zip Code: 75024		
	Name of Site's Operator: Safety-Kleen Systems, Inc.					Date Became Operator (mm/dd/yyyy): 9/1/1980			
	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: 581 Milliken Drive, S.E.								
	City, Town or Village: Hebron				Operator Phone #: 740-929-3532				
	State: Ohio				Country: USA		Zip Code: 43025		
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input checked="" type="checkbox"/> United States Importer of Hazardous Waste					
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)									
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input checked="" type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input checked="" type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Underground Injection Control Facility									

10B. 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"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	
<input type="checkbox"/> Destination Facility for Universal Waste			
Check all boxes below that apply for each of the three types of facilities above		10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
	Managed	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
11. 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 if more space is needed. 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. Instead just indicate the date of the most recent source record.			
see Part A			
12. 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: Monte Londot, Operations Manager
Tanks	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Other Comments: Facility is also permitted for fuel blending in tanks 97 & 98.
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)	
Melissa Musko, DHWM-CDO	Randy Sheldon, DHWM-CDO	9/19/2007 9:00 am	
14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.			
Signature of Owner, Operator, or an Authorized Representative		Name and Title (Print)	Date (mm/dd/yyyy)

PROCESS DESCRIPTION SECTION

Give a general process description (include all processes at the facility)

At the Hebron Recycle Center, Safety-Kleen Systems, Inc. operates a solvent recycling facility. The company holds a renewal hazardous waste installation and operation permit that was issued by Ohio EPA on June 17, 2005 for the storage of off-site hazardous waste. A Class 3 permit modification was approved on January 5, 2007, which increased the container and tank storage capacity by 818,440 gallons, permitted the facility to receive an additional 25 waste codes, and permitted 2 tanks for treatment (tanks 97 and 98 for fuel blending).

Solvent recycling processes include separation/reclamation in two thin film evaporators (LUWAs) and one distillation column, and reclamation in one washex pot still and four Safety-Therm (cookers). The company receives mostly drycleaning wastes from Safety-Kleen customers and branches, as well as solvents from other industrial customers. Most of this waste is perc, but the facility also processes mineral spirits, and other solvents, such as TCE and methylene chloride. The company receives shipments of hazardous waste in containers of various types and sizes and in bulk via tanker trucks. Additionally, the facility receives hazardous wastewaters from other Safety-Kleen centers. Safety-Kleen has also started to blend certain waste solvent/petroleum materials into fuels in Tank #98 at the facility, which are transported off site and sold as industrial furnace fuels. Finally, the company processes scrap plastics (plastic drums), which are shredded, washed, chipped, and then resold to a plastics manufacturer.

Dry cleaning wastes are processed in the "blues room." The filters are processed in the shredder system prior to being processed in the cookers, and the other drycleaner wastes (e.g., bottoms) are dumped into the jacuzzi tank to separate out the solids, which are then processed in the cookers to recover the solvent by evaporation. The liquid is pumped to a storage tank and eventually processed in the cookers to recover the solvent by evaporation. The solvent distillate and bottoms are fed through a column until Safety-Kleen recovers the product (e.g., industrial perc has a purity specification of 98.5% and the dry cleaning perc specification is 99.5%). The solids from the cookers are discharged to an auger system. Metals are separated out and sent to a metal reclaimer (Wooster Iron and Metal). The other solids are accumulated in a <90-day container (i.e., roll-off box) located near the regenerative fume oxidizer, and then they are exported to a landfill in Ontario, Canada for disposal.

The hazardous wastewaters are sampled, filtered, and then fed to the thin film evaporators where any residual solvents are recovered. The water extracted in the process is treated in the on-site wastewater treatment plant, analyzed for metals and then discharged to the publically owned treatment works. The recovered solvent is blended into fuel in Tank #98.

Several other waste streams are also generated by Safety-Kleen, but much of this waste is able to be reintroduced into the recycling process (e.g., perc trash, wastewater treatment plant sludges, contaminated wipers, filter bags, laboratory and sample waste, media from the air stripper, and some perc solids). Safety-Kleen has various satellite accumulation areas around the facility for accumulation of these wastes prior to reintroducing them into the recycling process. There is a 55-gallon drum for the accumulation of lab sample waste, as well as other satellite areas throughout the lab for wastes from each lab analysis/procedure. Also, there is a satellite accumulation drum for each of the four cookers to collect perc waste from the recycling process. Finally, there is a satellite accumulation drum in the maintenance building for the accumulation of used rags and wipers.

Used oil is generated through equipment and fork truck maintenance, and a continued use solvent parts cleaner is available in the maintenance building. The facility also produces a minimal volume of waste fluorescent tubes as a result of burned out bulb replacement. These spent lamps are accumulated in the maintenance building before being shipped off site as universal waste.

A regenerative fume oxidizer (RFO) systems treats organic vapors from the majority of the facility.

Safety-Kleen is also performing site-wide corrective action because a significant quantity of solvent was released on site due to a fire at the facility in 1985. In addition, ground water contamination due to releases from a hazardous waste underground storage tank (UST) unit was documented when these tanks were closed in the late 1980s, so the unit was closed as a landfill. The company is subject to post-closure care requirements and ground water corrective action for the releases from the UST unit. Safety-Kleen is operating a ground water pump and treat system as well as a water and soil vapor extraction system to treat the contaminated soil and ground water, and semi-annual ground water monitoring and reporting is required by Safety-Kleen's Part B permit.

WASTE ACTIVITIES AND P2 SUMMARY SECTION

For each of the processes listed above that generate a waste give the following information: (1) name of process generating waste, (2) name or description of waste generated (e.g. sludge, solvent, ash, used oil, spent lamps, etc.), (3) EPA waste codes, if applicable, (4) quantity generated per month, (5) type of accumulation (container, tank, etc.) (6) waste accumulation location in facility, (7) type of on-site treatment (if used), (8) name of off-site management facility and type of waste management activity occurring there, (9) Current P2 activities, and (10) P2 opportunities.

In 2006, Safety-Kleen received and processed approximately 15,962 tons of hazardous waste. Solvents were reclaimed from the majority of this waste. Much of the hazardous waste generated in the reclamation processes are accumulated and managed as hazardous waste then reintroduced into the reclamation process. This includes wastewater treatment plant sludges, contaminated wipers, filter bags, laboratory and sample waste, media from air stripper, and some perc solids. These wastes are collected in hoppers or other small containers prior to being recycled. Many satellite accumulation locations are present around the facility for accumulation of these wastes.

Finer solids (thermal set bottoms, ground perc filters, perc muck, other cooker processing waste) are also generated from solvent recycling activities. These "perc fines" are collected in roll-off boxes and mostly shipped to the Clean Harbors facility in Ontario, Canada where they are landfilled. Waste codes that apply to this waste stream include F001, F002, D004, D006, D007, D008, D009, D011, D018, D035, D039, and D040. In 2006, Safety-Kleen shipped approximately 4.4 million pounds of this waste off-site. Safety-Kleen has evaluated waste reduction options for this waste stream and has concluded that the generation of this waste stream is associated entirely with the volume of solvent bearing wastes received that are contained in a solid or sludge matrix.

Bottoms oil is another hazardous waste generated in the recycling process. This waste currently carries waste codes F001, F002, D001, D006, D007, D008, D018, D035, D039, and D040. The waste is stored in tank #98 prior to shipment off-site to facilities in AR, KS, KY, or MO to be burned for energy recovery (Ash Grove Cement Company or Holcim/Energis) or for additional fuel blending (another Safety-Kleen facility). In 2006, the facility shipped approximately 10 million pounds of this waste off site. Safety-Kleen is now also permitted to blend off-site generated waste into fuel in tanks 97 and 98. With regard to P2, in order to maximize the recycling of solvent wastes, this material is shipped to off-site facilities for energy recovery. The Hebron facility maximizes the solvent recovery rate through process monitoring and controls.

In 2006, Safety-Kleen also generated approximately 1.5 million pounds of waste water from solvent recycling activities. This waste water is biologically treated in Safety-Kleen's on-site waste water treatment plant before being discharged to Hebron's publically owned treatment works. Waste codes applicable to this waste stream include F001, F002, F003, F004, F005, D001, D004, D006, D007, D008, D009, D011, D018, D021, D027, D028, D034, D035, D039, and D040. The waste water treatment sludge is reintroduced into the recycling process.

Safety-Kleen is also a small quantity handler of universal waste lamps. The facility produces a minimal volume of waste fluorescent tubes as a result of burned out bulb replacement. These bulbs are sent off-site as universal waste to Cleanlites Recycling, Inc. in Mason, Michigan. As part of the facility's pollution prevention activities, they are using longer life bulbs and energy efficient ballast. Additionally, they have started to use less hazardous bulbs (i.e., green tips). The facility also generates used oil, which is reintroduced into the process.

Metal waste in the recycling process is magnetically separated from the other solids, is collected in a dump truck and sent to a metal reclaimer (currently Wooster Iron and Metal). Unuseable empty metal drums are also shipped to Wooster Iron and Metal while good drums are shipped to Allied in Kentucky for reconditioning or to MCF for reuse.

Parts washer solvent is in Safety-Kleen's continued use program and the unit is serviced by the Groveport branch.

Other non-hazardous wastes generated at Safety-Kleen include plastic, wooden pallets, and cardboard. The plastic stream consists of scrap plastic metal received from other Safety-Kleen facilities. The plastic is shredded and washed prior to shipment to a plastic reprocessor. All wash water is treated on site in the facility wastewater treatment plant. Wooden pallets received with incoming containers are collected by a local company that creates mulch from scrap wood. Cardboard used for packages received by the facility is collected and shipped to a recycler.

Additional P2 remarks and information:

Per Safety-Kleen's 2005 Waste Minimization and Pollution Prevention Program Report, a few of the P2 measures currently in place at the Hebron facility include:

1. Good housekeeping practices to limit releases from container and tank storage.
2. Operation of regenerative fume oxidizer (RFO) to control air emissions that were previously uncontrolled.
3. Re-use of process wastewater to clean empty dry cleaning waste containers.
4. Shredding of plastic drums and other plastics on-site for reuse by plastics manufacturers.
5. Use of shredded office paper in the Safety-Therms to improve solids handling.
6. Shipment of fluorescent bulbs and batteries to recyclers.

Per Safety-Kleen's permit, the next waste minimization report is due January 2008.

Would this facility be interested in a P2 assessment? Yes* No X

*If yes, refer promptly to your district P2 coordinator.

Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html



GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so:
[expiration date - June 17, 2015] Yes___ No X N/A___ RMK#___
- a. Is the permittee continuing any activity regulated by
the permit after the expiration date of the permit? Yes___ No___ N/A X RMK#___
- b. Has the facility submitted an application for a permit
renewal to the director no later than 180 days prior to
the expiration date of the permit? [Condition A.6] Yes___ No N/A X RMK#___
2. Has the permittee submitted the annual permit fee,
payable to "Treasurer, State of Ohio," to Ohio EPA on or
before the anniversary of the date of issuance during the
term of the permit? [Condition A.26] date - June 17th Yes X No N/A ___ RMK#___
3. Is the permittee conducting any hazardous waste
management activities (not otherwise exempt by law)
which are not authorized by the permit? [Conditions
A.1(b) and A.5] Yes No X N/A ___ RMK#___
4. Have any provisions of the permit been identified as
invalid? [Condition A.4] Yes No X N/A ___ RMK#___
5. Has the facility identified any instances of noncompliance
with the permit, ORC Chapter 3734. or the rules adopted
thereunder, which may endanger human health or the
environment? If so: Yes No X N/A ___ RMK#___
- a. Did the facility immediately report the following to
Ohio EPA's Emergency Response Unit? [Condition
A.20]
- i. Information concerning a release of any
hazardous waste that may cause an
endangerment to public drinking water supplies;
and Yes___ No N/A X RMK#___
- ii. Information concerning a release of hazardous
waste, fire or explosion at the facility which could
threaten human health or the environment outside
the facility including a description of:
- A. Name, address and telephone number of
the owner/operator? Yes___ No N/A X RMK#___

- B. Name, address and telephone number of the facility? Yes___ No N/A RMK#___
- C. Name and quantity of material(s) involved? Yes___ No N/A RMK#___
- D. The extent of injuries, if any? Yes___ No N/A RMK#___
- E. An assessment of the actual or potential hazard to the environment and human health outside the facility? Yes___ No N/A RMK#___
- F. Estimated quantity and disposition of recovered material that resulted from the incident? Yes___ No N/A RMK#___

6. Did the permittee provide a written report to Ohio EPA's Emergency Response Unit and DHWM within five days of becoming aware of the circumstances reported in Questions No. 5? If so, did the report contain: [Condition A.21] Yes___ No N/A RMK#___
- a. A description of the noncompliance and its cause (including exact dates and times)? Yes___ No N/A RMK#___
- b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? and Yes___ No N/A RMK#___
- c. Steps taken or planned to minimize the impact on the environment and to reduce, eliminate and prevent recurrence of the noncompliance? Yes___ No N/A RMK#___

NOTE: *The permittee need not comply with the five day written report requirement if the director, upon good cause shown by the permittee, waives that requirement and the permittee submits a written report within 15 days of the time the permittee became aware of the circumstances. [Condition A.21].*

7. Has the permittee identified other instances of noncompliance not provided for in Condition A.22, if so: Yes___ No N/A ___ RMK#___

a. Did the permittee report these instances to Ohio EPA, DHWM? [Condition A.22]? Yes___ No N/A RMK#___

b. Do the reports provided contain the information set forth in Condition A.20? [Condition A.20] Yes___ No N/A RMK#___

c. Has the permittee taken all steps necessary to minimize releases to the environment or prevent any adverse impact on human health or the environment? [Condition A.8] Yes___ No N/A RMK#___

8. Has the permittee planned any changes in the permitted facility or activity which may result in noncompliance with the conditions of the permit?: Yes___ No N/A___ RMK#___

a. If so, has the facility provided Ohio EPA with advance notice of such changes? [Condition A.17] Yes___ No N/A RMK#___

NOTE: Such notification does not waive the permittee's duty to comply with the permit. [Condition A.17]

PERMIT MODIFICATION, REVISION, REVOCATION

10. Has the permittee filed a request for a permit modification, revision or revocation since permit issuance? [Condition A.2] Yes No___ N/A___ RMK#___

11. Has the permit, been transferred to a new owner/operator? If so: Yes___ No N/A___ RMK#___

a. Has the transfer been conducted in accordance with ORC Chapter 3734. and the rules adopted thereunder which includes the permittee notifying the new owner in writing of the requirements of ORC Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules before transferring ownership? [Condition A.18] Yes___ No N/A RMK#___

12. Has the permittee submitted reports in any compliance schedule of the permit to Ohio EPA no later than 14 days following each scheduled date, unless otherwise specified? [Condition A.19] Yes No N/A ___ RMK# ___
13. Has the permittee furnished relevant information which Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, to determine compliance with the permit? [Condition A.10] Yes No N/A ___ RMK# ___
14. Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10] Yes No N/A ___ RMK# ___
15. Is the permittee maintaining records of all data used to complete the application and any amendments, revisions or modifications to the application? [Condition A.14(c)] Yes No N/A ___ RMK# ___
16. Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14(c)] Yes No N/A ___ RMK# ___
17. Is the permittee planning any physical alterations or additions to any permitted portions of the facility? If so: Yes ___ No N/A ___ RMK# ___
- a. Has the permittee given notice to the director of such alterations/additions? [Condition A.15] Yes ___ No N/A RMK# ___

SITE ENTRY - AVAILABILITY OF RECORDS

18. As specified in Condition A.11, has the permittee allowed the director or an authorized representative, upon proper identification to:
- a. Enter at reasonable times upon the premises where a regulated activity is located or where records are kept under the conditions of the permit? Yes No N/A ___ RMK# ___
- b. Have access to and copy, at reasonable times, any records required to be kept under the conditions of the permit? Yes No N/A ___ RMK# ___

c. Inspect, at any time, facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit?

Yes No N/A ___ RMK# ___

d. Sample, document, photograph or monitor, at reasonable times, any substances or parameter at the location of the facility to assure compliance with the permit or as otherwise authorized by ORC Chapter 3734. and the rules adopted thereunder?

Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM PART B APPLICATION

Note: The inspector or permit writer may add questions pertaining to the permittee's application, as appropriate.

REMARKS

RECORDKEEPING/OPERATING REQUIREMENTS

OPERATING RECORD

1. In accordance with OAC rules 3745-54-73 and 3745-54-74 and Condition B.22 of the permit, does the permittee maintain an Operating Record which contains the following information:

a. A description of the quantity of each hazardous waste and the method(s) and date(s) of its treatment or storage?

Yes No N/A ___ RMK# ___

b. The location of each hazardous waste and quantity at each location including cross-reference to specific manifest numbers?

Yes No N/A ___ RMK# ___

c. Records and results of required waste analysis?

Yes No ___ N/A ___ RMK# ___

d. Summary reports and details of all incidents that required implementation of the contingency plan?

Yes ___ No N/A RMK# ___

- e. Records and results of required inspections? Yes ___ No N/A ___ RMK# 1
- f. Documents required to be maintained by LDR requirements of OAC Chapter 3745-270? Yes No N/A ___ RMK# ___
- g. Monitoring, testing, or analytical data, and corrective action where required, from groundwater monitoring and required monitoring of surface impoundments, landfills, waste piles and land treatment units? [3745-54-73(B)(6)] Yes No N/A ___ RMK# ___

DOCUMENTS TO BE MAINTAINED AT FACILITY

- 2. In accordance with Condition A.28 of the permit, is the permittee maintaining the following documents at the facility:
 - a. Waste analysis plan in accordance with OAC rule 3745-54-13? Yes No N/A ___ RMK# ___
 - b. Contingency plan in accordance with OAC rule 3745-54-53? Yes No N/A ___ RMK# ___
 - c. Closure plan in accordance with OAC rule 3745-55-12? Yes No N/A ___ RMK# ___
 - d. Cost estimate for facility closure in accordance with OAC rule 3745-55-42? (Estimate only - adequacy will be evaluated by CO financial assurance personnel) [Condition B.36] Yes No N/A ___ RMK# ___
 - e. Personnel training plan and records required by OAC rule 3745-54-16? [Condition B.6] Yes No N/A ___ RMK# ___
 - f. Inspection schedules developed in accordance with OAC rules 3745-54-15, 3745-55-74 and 3745-55-95? [Condition B.5] Yes No N/A ___ RMK# ___
 - g. Operating record in accordance with OAC rule 3745-54-73? [Condition B.22] Yes No N/A ___ RMK# ___

- h. Post-closure plan, as required by OAC rule 3745-55-18(A)? [Condition A.28(a)(viii)] Yes No N/A ___ RMK# ___
- i. Annually-adjusted cost estimate for facility closure and post-closure, as required by OAC rules 3745-55-42 and 3745-55-44? [Condition A.28(a)(ix)] Yes No N/A ___ RMK# ___
3. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from date of inspection? [Condition B.5] Yes No N/A ___ RMK# ___
4. Have any of the documents in Question No. 2 been revised? [Condition A.15] If so: Yes No ___ N/A ___ RMK# ___
- a. Has the permittee submitted the revisions to Ohio EPA in accordance with OAC rule 3745-50-51? Yes No N/A ___ RMK# ___
- b. Have all requirements of OAC rule 3745-50-51 been met, including, where required, Ohio EPA approval? Yes No N/A ___ RMK# ___

ANNUAL REPORT REQUIREMENT

5. Is the permittee complying with annual report requirements set forth in OAC rule 3745-54-75 and the additional report requirements set forth in OAC rule 3745-54-77? [Condition B.25] Yes No N/A ___ RMK# ___

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

6. In compliance with Condition A.12(b) of the permit, do the permittee's records of monitoring information specify the:
- a. Date(s), exact place(s), time(s) and method(s) of sampling or measurement? Yes No N/A ___ RMK# ___
- b. Individual(s) who performed the sampling or measurement? Yes No N/A ___ RMK# ___
- c. Date(s) analyses were performed? Yes No N/A ___ RMK# ___

- d. Individual(s) who performed the analyses? Yes No N/A ___ RMK# ___
- e. Analytical technique(s) or method(s) used? Yes No N/A ___ RMK# ___
- f. Results of such analyses? Yes No N/A ___ RMK# ___
7. Have the methods used to obtain a representative sample of the waste to be analyzed included the appropriate SW-846 method or an equivalent method specified in the approved waste analysis plan? [Condition A.12(a)] Yes No N/A ___ RMK# ___
8. In accordance with Condition A.14 of the permit, is the permittee retaining records of monitoring information as required by the permit for at least three years from the date of sampling, including:
- a. All calibration and maintenance records. Yes No N/A ___ RMK# ___
9. Has Ohio EPA requested submittal of any reports or other information from the permittee? If so: Yes No ___ N/A ___ RMK# ___
- a. Have the submittals been signed and certified according to OAC rule 3745-50-42? [Condition A.13] Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: *The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.*

REMARKS

1. Safety-Kleen must perform daily inspections of the container storage area and tank systems in accordance with the inspection schedule contained in Section 6 of its permit application and in accordance with OAC Rule 3745-54-15. During Ohio EPA's inspection of the facility's operating record, the August 18, 2007 daily inspection sheet for the container storage area and tank systems was not in the inspection log verifying that the required inspections had been completed.

During the inspection, Safety-Kleen completed and placed an inspection log sheet for August 18, 2007, in the operating record. The violation was abated at that time.

WASTE MINIMIZATION REQUIREMENTS

1. Does the permittee certify at least once every year that a program is in place to reduce the volume and toxicity of hazardous waste generated in accordance with Condition A.29(a) and OAC rule 3745-54-73? Yes No N/A ___ RMK# ___
2. Did the permittee submit the waste minimization report to Ohio EPA, Office of Pollution Prevention and Central District Office within 228 days of journalization of this permit? and updates biennially thereafter? [Condition A.29(b)] **NOTE:** The next report is due in January 2008. Yes No N/A ___ RMK# ___
3. Has the permittee reduced the amount of waste (hazardous waste, solid waste, air emission, waste water discharges, etc.) this year generated at their facility by implementing pollution prevention/waste minimization? Yes ___ No ___ N/A ___ RMK# 2
- If so, what amount of waste has the permittee reduced this year? _____
4. Has the permittee's company saved much money this year by implementing pollution prevention (reducing raw material usage, disposal fees, energy savings, etc.)? Yes ___ No ___ N/A ___ RMK# 2
- If so, how much money has the permittee's company saved this year? _____

NOTE: If this facility is inspected two times a year, the information obtained in questions 3 & 4 only needs to be collected one time for the calendar year.

REMARKS

2. Since Safety-Kleen is a TSD that receives and recycles solvents from different customers, much of the waste that is generated from the recycling process is associated entirely with the amount of solvent bearing wastes received at the facility for reclamation (i.e., related to their business). See the "Waste Activities and P2 Summary Section" for additional discussion.

GROUND WATER MONITORING

1. Has the permittee conducted semi-annual sampling of their monitoring wells? Yes No N/A ___ RMK# 3

2. Have they reported the results in the Annual Report to the director by March 1st as required by Condition B.25?

Yes No N/A ___ RMK# 3

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REMARKS

3. See additional ground water monitoring inspection items on the attached ground water monitoring checklist.

WASTE ACCEPTANCE AND GENERATION

1. Is the permittee storing any containers of hazardous waste received from any off-site source that permittee is not permitted to store? [Condition A.1.]

Yes No N/A ___ RMK# ___

2. Has the permittee arranged to receive hazardous waste from a foreign or off-site source that the permittee is not permitted to store? [Condition A.1.]

Yes No N/A ___ RMK# ___

3. Has the permittee notified the director at least four weeks prior to the date the permittee expects to receive hazardous waste from a foreign source, as required by OAC rule 3745-54-12(A)? [Condition B.2(a)]

Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

4. Has the permittee accepted more than 162,129 tons of hazardous waste in any one calendar year from off-site sources? This is a facility wide limitation and includes all units. [Condition B.1(b)]

Yes ___ No N/A ___ RMK# ___

REMARKS

OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS

1. Is the permittee complying with the following manifest requirements set forth in OAC Chapter 3745-52 and OAC rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76: [Condition B.24]

a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, U.S. EPA Form 8700-22 and, if necessary, U.S. EPA Form 8700-22A in compliance with OAC rule 3745-52-20(A)?

Yes No N/A RMK#

b. The manifest form used contains all information required by OAC rule 3745-52-20 and the minimum number of copies required by OAC rule 3745-52-22?

Yes No N/A RMK#

c. The permittee has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with OAC rule 3745-52-20(B)(C)(D)?

Yes No N/A RMK#

d. Prepared manifests have been signed by the permittee and initial transporter in compliance with OAC rule 3745-52-23?

Yes No N/A RMK#

2. As a permittee that generates hazardous waste, are signed copies of all hazardous waste manifests and any documentation required for exception reports retained for at least three years at the facility as required by OAC rules 3745-52-40 and 3745-54-71(A)(5)?

Yes No N/A RMK#

NOTE: If the permittee is generating hazardous waste, remember to attach a complete generator checklist.

3. Does the permittee use only properly registered transporters when removing hazardous wastes? [Condition A.16]

Yes No N/A RMK#

Transporters:

4. Does the permittee give one copy of the manifest to the transporter, send one copy to the generator within 30 days, and keep one copy for at least three years? [3745-54-71(A)]
 Yes No N/A RMK#
- a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met? [3745-54-71(B)]
 Yes No N/A RMK#
- b. Are any significant discrepancies in the manifest, as defined in 3745-54-72(A) noted in writing on the manifest document?
 Yes No N/A RMK#
5. Have any manifest discrepancies been reconciled within 15 days as required by 3745-54-72(B)? If not:
 Yes No N/A RMK#
- a. Has the owner/operator submitted the required information to the director?
 Yes No N/A RMK#
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-54-76(A) been submitted to the director within 15 days?
 Yes No N/A RMK# 4

WASTE ANALYSIS/WASTE ANALYSIS PLAN

1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information of the waste in accordance with OAC Chapters 3745-54 to 3745-57, 3745-218 and 3745-270 and the terms and conditions of the permit? [Condition B.3(a)]
 Yes No N/A RMK#
2. Does the permittee follow the procedures described in the WAP (Section 3 of the permit application)? [Condition B.3(b)]
 Yes No N/A RMK#
3. In accordance with OAC rule 3745-54-13(A)(3), does the permittee repeat the waste analysis when the process or operation generating the hazardous waste has changed, or at least annually? [Condition B.3]
 Yes No N/A RMK#

4. Are the sampling methods and procedures specified in the permittee's WAP that will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identification of the waste on the manifest [3745-54-13(C)]? Yes No N/A ___ RMK# ___
5. **Where applicable:** The methods which will be used to meet additional waste analysis requirements for specific waste management methods specified in rules 3745-54-17, 3745-57-14, 3745-57-41 and 3745-270-07 of the OAC? [3745-54-13(B)(6)] Yes No N/A ___ RMK# ___
6. Does the permittee place the results of all waste analyses in the facility operating record in accordance with OAC rule 3745-54-73? Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: *The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.*

REMARKS

4. During the inspection, we reviewed Safety-Kleen's log books and had questions about the waste status of a methylene chloride stream received from a Clean Harbors facility in Bartow, Florida. This stream is partially reclaimed by Clean Harbors and then further reclaimed by Safety-Kleen. Safety-Kleen is to submit additional information about the original waste stream to Ohio EPA within 30 days of its receipt of this NOV/RTC letter. Ohio EPA will then determine the status of the partially reclaimed material and Safety-Kleen's compliance with OAC Rule 3745-54-76. Ohio EPA will notify Safety-Kleen of its findings in a separate letter.

GENERAL INSPECTION REQUIREMENTS

NOTE: *Inspector may attach a copy of the inspection procedures and schedules.*

1. Is the permittee following the inspection procedures and schedules as set forth in the permit (Section 6.2 of the approved Part B permit application) and the requirements of OAC rules 3745-54-15(A), (C) and (D)? [Condition B.5] Yes ___ No N/A ___ RMK# 5

2. Is the permittee following the approved inspection schedule for inspecting: monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment as specified in OAC rule 3745-54-15(B)? Yes No N/A ___ RMK# ___
- a. Is the schedule kept at the facility? [OAC rule 3745-54-15(B)(2)] Yes No N/A ___ RMK# ___
3. Does the permittee remedy deterioration or any malfunctions discovered by an inspection as required by OAC rule 3745-54-15(C)? [Condition B.5] Yes No N/A ___ RMK# ___
4. In accordance with OAC rule 3745-54-15(D) and Condition B.5 of the permit, do inspection records contain the following information:
- a. Date and time of inspection? Yes No N/A ___ RMK# ___
- b. Name of inspector? Yes No N/A ___ RMK# ___
- c. Notation of observations made? Yes No N/A ___ RMK# ___
- d. Date and nature of any repairs or other remedial actions? Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: *The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.*

REMARKS

5. OAC Rule 3745-54-15(D) requires an owner or operator to record inspections in an inspection log or summary. During Ohio EPA's inspection of the facility's operating record, the August 18, 2007 daily inspection sheet for the container storage area and tank systems was not in the inspection log verifying that the required inspections had been completed.

During the inspection, Safety-Kleen completed and placed an inspection log sheet for August 18, 2007, in the operating record. The violation was abated at that time.

SECURITY REQUIREMENTS

1. Is the permittee complying with the following security provisions of OAC rule 3745-54-14 and Condition B.4 of the permit: [Section 6.1 of the Part B permit application]
- a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility? Yes No N/A ___ RMK# ___
- b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility? Yes No N/A ___ RMK# ___
- c. A means to control entry, at all times, through gates or other entrances, to the active portion of the facility? Yes No N/A ___ RMK# ___
2. In accordance with OAC rule 3745-54-14(C), does the permittee have signs reading "Danger - Unauthorized Personnel Keep Out" posted at entrances of the hazardous waste container storage building number ___? Yes No N/A ___ RMK# ___

FACILITY OPERATIONS

3. Is construction, maintenance and operation of the facility being conducted to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, ground or surface water? [OAC rule 3745-54-31; Condition B.1] Yes No N/A ___ RMK# ___
4. Does the permittee properly maintain and operate the facility to achieve compliance with the terms and conditions of the permit including: [Condition A.9]
- a. Effective management practices? Yes No N/A ___ RMK# ___
- b. Adequate funding? Yes No N/A ___ RMK# ___

c. Adequate operator staffing and training?

Yes No N/A ___ RMK# ___

d. Adequate laboratory and process controls?

Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REMARKS

PERSONNEL TRAINING

1. Is the permittee conducting personnel training in accordance with the conditions of the permit and with the following requirements of OAC rule 3745-54-16? [Condition B.6]

Yes No N/A ___ RMK# ___

a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC rule 3745-54-16(A)(B)(C)]

Yes No N/A ___ RMK# ___

b. The facility provides personnel training to new employees within six months after their date of employment as required by OAC rule 3745-54-16(B)?

Yes No N/A ___ RMK# ___

c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(C)?

Yes No N/A ___ RMK# ___

2. Is the permittee maintaining personnel training records as required by OAC rule 3745-54-16(D) and of the approved application, including: written job titles, job descriptions and documented employee training records? [Condition B.6]

Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REMARKS

REQUIRED EQUIPMENT

NOTE: *Inspector may attach a list of emergency equipment.*

1. Has the permittee equipped the facility with the following emergency equipment as required by OAC rule 3745-54-32 and Condition B.9 of the permit:
- a. An internal communications or alarm system? Yes No N/A ___ RMK# ___
 - b. A device such as a telephone which is capable of summoning emergency assistance from local emergency authorities? Yes No N/A ___ RMK# ___
 - c. Portable fire extinguishes and/or fire control equipment, spill control and decontamination equipment? Yes No N/A ___ RMK# ___
 - d. Water in adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers or water spray systems? Yes No N/A ___ RMK# ___
2. Is the permittee inspecting, testing and maintaining the equipment specified in Question No. 1 to ensure its proper operating in accordance with OAC rule 3745-54-33 and Condition B.10 of the permit? Yes No N/A ___ RMK# ___
3. Whenever hazardous waste is being managed at the facility, has the permittee provided all personnel involved in the operation with immediate access to an internal alarm or emergency communication device as required by OAC rule 3745-54-34 and Condition B.11 of the permit? Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: *The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.*

REMARKS

CONTINGENCY PLAN - EMERGENCY PROCEDURES

1. In compliance with Condition B.13 of the permit and OAC rule 3745-54-37(A) and (B), does the permittee:
- a. Familiarize emergency response agencies with the layout of the facility, associated hazards, places where personnel will normally be working, entrances and possible evacuation routes? Yes No N/A RMK#
 - b. Inform such agencies of safety equipment, supplies, proper emergency safety procedures that are applicable to the facility? Yes No N/A RMK#
 - c. Familiarize the local hospital listed in the approved application with the properties of hazardous waste handled at the facility and the types of injuries or illness that could result from fires, explosions or releases at the facility? Yes No N/A RMK#
2. Has a state or local agency declined to enter into the arrangements set forth in OAC rule 3745-54-37(A)? If so:
- a. Has the permittee documented the refusal in the operating record as required by OAC rule 3745-54-37(B)? [Condition B.13(b)] Yes No N/A RMK#
3. Has the permittee, in accordance with OAC rule 3745-54-53 submitted a copy of the approved contingency plan (including amendments, revisions or changes) to all local authorities, agencies and response contractors designated in the approved contingency plan? [Condition B.18(b)] Yes No N/A RMK#
4. Has the permittee notified all parties identified in the contingency plan in writing of amendments, modifications, or revisions to the plan within ten days of the effective date of the change in the plan? [Condition B.18(b)] Yes No N/A RMK#

5. Has the permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to the Ohio EPA, Division of Emergency and Remedial Response (DERR) in accordance with OAC rule 3745-54-53? [Condition B.18(c)] Yes No N/A ___ RMK# ___
6. Is the permittee reviewing the approved contingency plan at least annually and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17] Yes No N/A ___ RMK# ___

NOTE: Also see Question No. 4 of Recordkeeping Requirements to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.

EMERGENCY COORDINATOR

7. In accordance with OAC rule 3745-54-55 and Condition B.19 of the permit, is an emergency coordinator on premises or on call at all times? Yes No N/A ___ RMK# ___
8. In accordance with OAC rule 3745-54-55 and Condition B.19 of the permit, is/are the emergency coordinator(s) at the facility familiar with the following:
- a. Contingency plan? Yes No N/A ___ RMK# ___
 - b. Facility operations/activities? Yes No N/A ___ RMK# ___
 - c. Waste characterization and location? Yes No N/A ___ RMK# ___
 - d. Location of all records in the facility? Yes No N/A ___ RMK# ___
 - e. Facility layout? Yes No N/A ___ RMK# ___
9. In accordance with OAC rule 3745-54-55, does/do the emergency coordinator(s) have the authority to commit the resources needed to carry out the contingency plan? [Condition B.19] Yes No N/A ___ RMK# ___

10. Does the permittee have a contingency plan for the facility that: [Condition B.19]

a. Describes the actions facility shall take to comply with OAC rules 3745-54-51 through 3745-54-56 in response to fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil or surface water at the facility?

Yes No N/A ___ RMK# ___

b. Describes arrangements agreed to by local police, fire departments, hospitals, contractors and Ohio EPA and the local emergency response team to coordinate emergency services?

Yes No N/A ___ RMK# ___

c. Includes an up-to-date list of names, addresses and phone numbers (office and home) for all persons qualified to act as emergency coordinator in the order that they will assume responsibility for coordination of emergency response?

Yes No N/A ___ RMK# ___

d. Includes a list of all emergency equipment, including fire extinguishing systems, spill control equipment, communications and alarm systems and decontamination equipment?

Yes No N/A ___ RMK# ___

e. Includes the location and a physical description of each item on the list referenced in Question No. 10(d), and a brief outline of its capabilities?

Yes No N/A ___ RMK# ___

f. Includes an evaluation plan for facility personnel describing signals to be used to begin evacuation, evacuation routes, and alternate evacuation routes, in situations where the primary routes could be blocked by releases of hazardous waste?

Yes No N/A ___ RMK# ___

IMPLEMENTATION OF CONTINGENCY PLAN

11. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility including spill or release of hazardous waste or hazardous waste constituents greater than or equal to 55 gallons; any spill or release of hazardous waste or hazardous waste constituents less than 55 gallons may result in a fire or explosion hazard as determined by the Emergency Coordinator; or any spill on-site that may potentially cause on or off-site soil and/or ground or surface water contamination; any spill or release of hazardous waste or hazardous waste constituents that is reported to the National Response Center or local (city or county) emergency response center because the spill exceeded the "RQ" limits; any fire involving hazardous waste; any explosion involving hazardous waste; since the date of the last inspection? If so: Yes ___ No N/A ___ RMK# 6
- a. Did the permittee immediately implement the approved contingency plan and follow the emergency procedures described in OAC rule 3745-54-56? [Conditions B.14 and B.20] Yes ___ No N/A RMK# ___
- b. Did the permittee immediately notify Ohio EPA's emergency response team using the 24-hour toll free number (800)282-9378 providing the following information: [OAC rule 3745-54-56(D)(2)]
- i. Name and telephone number of the reporter? Yes ___ No N/A RMK# ___
- ii. Name and address of the facility? Yes ___ No N/A RMK# ___
- iii. Time and type of incident? Yes ___ No N/A RMK# ___
- iv. Name and quantity of materials involved? Yes ___ No N/A RMK# ___
- v. The extent of injuries? Yes ___ No N/A RMK# ___
- vi. The possible hazards to human health or the environment outside the facility? Yes ___ No N/A RMK# ___

c. Did the permittee collect and manage as hazardous waste all liquid or solid material resulting from fire, explosion, released material or emergency response materials until such time as the permittee can demonstrate to Ohio EPA that such waste are not hazardous wastes? [Condition B.16]

Yes___ No N/A RMK#___

d. Within 15 days of the incident did the permittee submit to the director a written report of the incident? If so:

Yes___ No N/A RMK#___

I. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23]

Yes___ No N/A RMK#___

e. Did the permittee note in the operating record the time, date and details of any incident that required the implementation of the approved contingency plan as required by OAC rule 3745-54-56(J)? [Condition B.23]

Yes___ No N/A RMK#___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REMARKS

6. A small fire occurred in the water and soil vapor extraction building due to equipment malfunction (i.e., the heater melted plastic and exposed wire). However, this fire did not trigger the implementation of the contingency plan.

CLOSURE REQUIREMENTS

1. Does the permittee maintain the approved closure plan at the facility? [Condition B.29]

Yes No N/A ___ RMK#___

2. Is the permittee keeping at the facility and submitting annually to Ohio EPA, the latest closure cost estimate as required by OAC rule 3745-55-42(D) [Condition B.36]

Yes No N/A ___ RMK#___

3. Has the permittee amended the closure plan? If so:

Yes___ No N/A ___ RMK#___

a. Has the plan been amended in accordance with OAC rule 3745-55-18(D)? [Condition B.28] Yes___ No N/A RMK#___

NOTE: Also see Recordkeeping Requirements (Question #4) in order to verify that any changes to the closure plan were submitted in accordance with OAC rule 3745-50-51.

4. Has the permittee closed the facility? If so: Yes___ No N/A___ RMK#___

a. Did the permittee complete closure of the facility 180 days after receiving the final volume of hazardous waste, as required by Condition B.31 of the permit? Yes___ No N/A RMK#___

b. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26] Yes___ No N/A RMK#___

c. Did the permittee carry out the approved closure plan as set found in Section 9 of the approved permit application? [Condition B.27] Yes___ No N/A RMK#___

d. After receiving the final volume of hazardous waste, did the permittee remove all hazardous waste and complete closure activities in accordance with the schedule specified in the approved closure plan and as required by OAC rule 3745-55-13? [Condition B.31] Yes___ No N/A RMK#___

e. Has the permittee decontaminated and/or disposed of all facility equipment, structures and soils as required by OAC rule 3745-55-14 and the approved closure plan? [Condition B.32] Yes___ No N/A RMK#___

f. Has the permittee certified that the facility has been closed in accordance with the specifications in the approved closure plan as required by OAC rule 3745-55-15? [Condition B.33] Yes___ No N/A RMK#___

g. Has the permittee submitted a survey plat to the director and local zoning authority no later than the submission of certification of closure of each hazardous waste disposal unit? [Condition B.34] Yes No N/A ___ RMK# 7

REMARKS

7. The Underground Storage Tank (UST) area (former location of tank #s 18, 19, 20, and 21) was closed in accordance with Safety-Kleen's interim standards closure/post-closure plan approved by Ohio EPA on September 30, 1992. Safety-Kleen had to close this unit as a landfill due to residual waste constituents found in the tank cavity (soil and ground water) that could not be removed at the time closure occurred. The post-closure care period for the unit began on March 29, 1993, the date that Safety-Kleen completed closure of the unit. The notices required to be filed pursuant to OAC Rules 3745-55-16 and 3745-55-19 were completed prior to Ohio EPA's acceptance of Safety-Kleen's closure certification for the UST area.

POST-CLOSURE MAINTENANCE

NOTE: Inspector may attach a post-closure maintenance inspection schedule.

1. Has the permittee inspected the components, structures, and equipment at the site in accordance with the inspection schedule [Section 9.7 of the permit application references the UST post-closure plan] on a quarterly basis? [OAC rule 3745-55-17(A)(1)(b)] [Condition B.35] Yes___ No N/A ___ RMK# 8
2. Has the permittee conducted and recorded an inspection of at least the following? [Condition B.35] Yes___ No N/A ___ RMK# 8
- a. Security control devices (gates, locks, fences and signs);
 - b. Erosion control;
 - c. Cover settlement, subsidence and displacement;
 - d. Vegetative cover conditions;
 - e. Integrity of run-on/run-off control measures;
 - f. Cover drainage system functioning;
 - g. Monitor well conditions; and
 - h. Benchmark integrity.
3. Is the permittee using the inspection forms found in the approved Part B permit application? [Section 9.7 of the approved permit application references the post-closure care plan] Yes___ No N/A ___ RMK# 8
4. Have suitable repairs been made within a reasonable amount of time? [Condition B.35] Yes___ No N/A ___ RMK# 8
5. Have repairs been indicated on the Notification Repair Form? [Condition B.35] Yes___ No N/A ___ RMK# 8

6. Was the Notification of Repair Form submitted to Ohio EPA within one week after determining that repairs are necessary? [Condition B.35] Yes ___ No N/A ___ RMK# 8

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: *The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.*

REMARKS

8. The Underground Storage Tank (UST) area (former location of tank #s 18, 19, 20, and 21) was closed in accordance with Safety-Kleen's interim standards closure/post-closure plan approved by Ohio EPA on September 30, 1992. Safety-Kleen had to close this unit as a landfill due to residual waste constituents found in the tank cavity (soil and ground water) that could not be removed at the time closure occurred. The area is currently in the post-closure care period which includes groundwater monitoring and corrective action. See the attached Post-Closure Care checklist for inspection items applicable to the former UST area.

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

NOTE: *The requirements of Condition C do not apply to the permittee's activities as a generator accumulating hazardous waste for <90 days per OAC rule 3745-52-34(A). Please complete the applicable sections of the Generator Requirements checklist to document compliance with activities associated with <90 day accumulation of wastes.*

CONDITION OF CONTAINERS

1. Are containers holding hazardous wastes in good condition as required by OAC 3745-55-71? [Condition C.4] If not: Yes No N/A ___ RMK# ___
- a. Did the permittee transfer the hazardous waste from such a container to one that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit? [Condition C.4] Yes No N/A ___ RMK# ___
2. Does the permittee ensure that all containers used at the facility are compatible with the hazardous waste to be stored in them as required by OAC rule 3745-55-72? [Condition C.5] Yes No N/A ___ RMK# ___

3. Does the permittee keep all containers closed during storage except when it is necessary to add or remove waste as required by OAC rule 3745-55-73? [Condition C.6(a)]

Yes No N/A ___ RMK# ___

4. Does the permittee store all containerized hazardous waste on the container storage containment system as described in Condition C.7 of the permit? [Condition C.7]

Yes No N/A ___ RMK# ___

INSPECTIONS

NOTE: Inspector may attach a container inspection checklist.

5. Is the permittee inspecting the container area weekly in accordance with OAC rule 3745-55-74 and the approved inspection schedule in Section 6.2 of the Part B permit application to detect leaking containers and deterioration of containers and the containment system? [Condition C.9]

Yes No N/A ___ RMK# ___

a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken as required by OAC rule 3745-54-15(D)?

Yes ___ No N/A ___ RMK# 1&5

CONTAINMENT SYSTEM

6. Does the permittee maintain the containment system as described in the approved permit application, Section 4.2.3, including: [Condition C.7]

Yes No N/A ___ RMK# ___

a. Sufficient capacity to hold 10% of the total volume of containers or the volume of the largest container, whichever is greater.

Yes No N/A ___ RMK# ___

b. A system which is free of gaps and sufficiently impervious to contain leaks and spills?

Yes No N/A ___ RMK# ___

7. Has the permittee had a spill or leak of wastes? If so:

Yes ___ No N/A ___ RMK# ___

a. Was spilled or leaked waste removed in a timely manner? [Condition C.7(e)]

Yes ___ No N/A RMK# ___

NOTE: This time period is not to exceed 24 hours. [Condition C.7(e)]

AISLE SPACE

8. Is the permittee maintaining adequate aisle space to allow unobstructed movement of personnel and equipment in the event of an emergency as required by OAC rule 3745-54-35 and Condition B.12 of the permit?

Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

9. Does the Permittee limit the total quantity of containerized waste in the permitted container storage areas (Container Storage Areas No. 1, No.2B, No. 2E, Truck Station No. 1 and Truck Station No. 2) to 199,020 gallons at any given time? [Condition C.1.]

Yes No ___ N/A ___ RMK# ___

10. Is the Permittee storing in containers, only those waste codes identified in approved permit? [Condition C.3.]

Yes No ___ N/A ___ RMK# ___

REMARKS

LAND DISPOSAL RESTRICTION REQUIREMENTS

NOTE: In order to determine compliance with all applicable LDR requirements the inspector may need to complete the separate LDR checklist:

1. Does the permittee comply with all applicable regulations regarding land disposal prohibitions and restrictions as required by OAC Chapter 3745-270?

Yes No N/A ___ RMK# ___

2. Does the permittee comply with the notification and certification requirements of OAC rule 3745-270-07(A)? Yes No N/A ___ RMK# ___
3. Does the permittee comply with the requirements of OAC rule 3745-270-03 and does not in any way dilute a restricted waste or treatment residue as a substitute for adequate treatment? Yes No N/A ___ RMK# ___
4. Does the permittee retain supporting data used to determine if wastes managed at the facility are restricted from land disposal in the facility files as required by OAC rule 3745-270-07(A)(5)?
- a. Are copies of all notices, certifications, demonstrations, waste analysis and other documentation produced pursuant to OAC Chapter 3745-270 retained for a period of three years as required by OAC rule 3745-270-07(A)? Yes No N/A ___ RMK# ___
5. Is the permittee in compliance with the requirements of OAC rule 3745-270-50 regarding the storage of wastes restricted or prohibited from land disposal under OAC rule 3745-270-50? Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REMARKS

CORRECTIVE ACTION

1. Has the permittee submitted the monthly progress report for all corrective action activities? (This report is due by the 15th of the month following the reporting period.) [Condition ___] Yes ___ No N/A RMK# 9
2. Has the permittee identified any new WMUs or releases at the facility? [Condition E.10]? If so: Yes ___ No N/A ___ RMK# ___

- a. Did the permittee follow the steps indicated in Conditions E.10(a) and (b) and E.11?

Yes ___ No N/A RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REMARKS

9. See the attached Corrective Action checklist for additional inspection items that are applicable to the Hebron Recycle Center.

TANK REQUIREMENTS

1. Did the permittee limit the storage of hazardous waste to the following tanks in Tank Farms 1, 2, 4, and 6 and to a total volume of 1,237,500 gallons as required by Condition D.1(a) of the permit:
- Tank Farm 1 (30 tanks) 32-37, 39-45, 50-53, 56-61, 63, and 65-69
-ignitable waste
-595,000 gallons
Yes No ___ N/A ___ RMK# ___
- Tank Farm 2 (37 tanks) 80-82, 83a, 83b, 84a, 84b, 85-88, 89a, 89b, 90-91, 92a, 92b, 93, 94a, 94b, 95, 100-101, 102a, 102b, and 103-114
-chlorinated solvents
-525,000 gallons
Yes No ___ N/A ___ RMK# ___
- Tank Farm 4 (4 tanks) 203-205 and 209
-chlorinated solvents
-60,000 gallons
Yes No ___ N/A ___ RMK# ___
- Tank Farm 6 (4 tanks) 96-98 and Bin #2
-chlorinated solvents and mineral spirits
-57,500 gallons
Yes No ___ N/A ___ RMK# ___
2. Did the permittee only treat hazardous waste in tanks 97 and 98 as authorized in the permit application and Condition D.2?
Yes No ___ N/A ___ RMK# ___
3. Did the permittee store or treat in tanks only those waste codes identified in the permit application and Condition D.1(c)?
Yes No ___ N/A ___ RMK# ___

4. Has the permittee designed, constructed, and operated the secondary containment system, in accordance with the detailed design plans and descriptions contained in Section 4 of the permit application? [Condition D.4] Yes X No ___ N/A ___ RMK# ___
5. If needed, did the permittee repair the secondary containment as soon as concrete surface temperatures exceeded 38 degrees F for the applicable curing period? Yes X No ___ N/A ___ RMK# ___
6. Did the permittee place hazardous wastes or treatment reagents in the tank system if they could cause the tank, its ancillary equipment, or a containment system to rupture, leak, corrode, or otherwise fail? [Condition D.5a] Yes ___ No X N/A ___ RMK# ___
7. Did the permittee prevent spills and overflows from the tank or containment systems using the methods described in the permit application? Yes X No ___ N/A ___ RMK# ___
8. Did the permittee inspect the tank systems, in accordance with the Inspection Schedule found in Section 6.2 of the permit application and Condition D.6 of the permit? Yes X No ___ N/A ___ RMK# 1&5
9. For all permitted hazardous waste storage tanks, did the permittee perform ultrasonic thickness testing using the procedures in Section 4.3.1 of the permit application? [Condition D.6(d)] - every three years Yes X No ___ N/A ___ RMK# ___
10. Did the permittee have on file at the facility the written assessment of each tank system's integrity? Yes X No ___ N/A ___ RMK# ___
11. Did the permittee maintain at the facility a record of the results of the ultrasonic tank tests conducted in accordance with Condition D.6(d)? Yes X No ___ N/A ___ RMK# ___
12. Did the permittee place ignitable or reactive waste in the tank system or in the secondary containment system? If so, did the permittee follow the procedures specified in the permit and document compliance with Condition D.10 and place it in the operating record? Yes X No ___ N/A ___ RMK# ___
Yes X No ___ N/A ___ RMK# ___
13. Did the permittee comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon, as required by the National Fire Protection Association's Yes X No ___ N/A ___ RMK# ___

"Flammable and Combustible Liquids Code"?

REMARKS



• • •

CORRECTIVE ACTION

- 1. Has the permittee identified any new WMUs or releases at the facility? [Condition E.10]? If so: Yes ___ No X N/A ___ RMK#
 - a. Did the permittee follow the steps indicated in Conditions E.10(a) and (b) and E.11? Yes ___ No ___ N/A X RMK#
- 2. Did the permittee institute Corrective Action as necessary to protect human health and the environment for all releases of hazardous waste or hazardous constituents from any waste management units (WMUs) at the facility? [Condition E.1] Yes X No ___ N/A ___ RMK#
- 3. Did the permittee implement corrective action beyond the facility boundary when necessary to protect human health and the environment, unless the permittee was unable to obtain permission to undertake such actions (if permission is denied on-site measures will be required on a case-by-case basis)? [Condition E.2] Yes ___ No ___ N/A ___ RMK# 1
- 4. Has the permittee implemented and continued to operate the following to address site-wide contamination [Condition E.9(a)]:
 - a. the ground water recovery system Yes X No ___ N/A ___ RMK#
 - b. the water and soil vapor extraction system Yes X No ___ N/A ___ RMK#
 - c. the Health and Safety Public Involvement Plans Yes X No ___ N/A ___ RMK#
 - d. semiannual ground water monitoring and reporting in accordance with the approved permit and plans. Yes X No ___ N/A ___ RMK#
- 5. Has the permittee provided financial assurance in the amount specified in Section 9 of the permit application as necessary to implement the selected remedy described in Condition E.9(a), including current and future operation and maintenance costs? [Condition E.9(b)] Yes ___ No X N/A ___ RMK# 2

REMARKS

- 1. Safety-Kleen and Ohio EPA are not in agreement as to whether the contaminated groundwater is migrating beyond the downgradient facility boundary. Safety-Kleen has been and will continue to conduct additional investigations to determine the extent of groundwater contamination at this site and whether additional corrective measures are necessary.
- 2. Safety-Kleen currently does not have financial assurance (FA) for post-closure care of the UST unit or site-wide corrective action, but is currently required to provide FA and update its financial assurance mechanism within 60 days of Ohio EPA's approval of the risk assessment report referenced in Permit Condition A.27(a)(ii)(b) [per Permit Condition A.27(c)].

POST-CLOSURE CARE

Note: This module is required for the UST area that was closed as a landfill. The contamination resulting from the UST area is being addressed under the site-wide RCRA corrective action.

- | | | | | |
|---|---|--|---|--------|
| 1. Did the permittee maintain and monitor the ground water and comply with all other ground water monitoring requirements during the post-closure care period? [Condition F.2(b)] | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> | RMK# 3 |
| 2. Did the permittee implement the post-closure plan and conduct all post-closure care activities in accordance with the approved Post-Closure Plan? [Condition F.2(c)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> | RMK# |
| 3. Did the permittee inspect components, structures, and equipment at the site in accordance with the inspection schedule found in the post-closure plan? [Condition F.3] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> | RMK# |
| 4. Did the permittee close any units other than the UST area as a landfill? If so, | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> | RMK# |
| (a) Did the permittee submit to the Director and to the local zoning authority records of the type, location, and quantity of hazardous waste disposed within each cell or disposal unit within 60 days of certification of closure? [Condition F.4(a)] | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> | RMK# |
| (b) Did the permittee, within 60 days of certifying closure of the first disposal unit and within 60 days of certifying closure of the last unit: [Condition F.4(b)] | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> | RMK# |
| (i) record a notation on the deed to the facility that the land has been used to manage hazardous waste and is restricted? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> | RMK# |
| (ii) file a survey plat and record as required by Condition F.4(a)? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> | RMK# |
| (iii) submit to the director certification that the notation has been filed and a copy of the document in which the notation has been recorded? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> | RMK# |
| 5. If hazardous waste, hazardous waste residues, liners, or contaminated soil is to be removed during post-closure, was a permit modification requested and received? [Condition F.4(c)] | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> | RMK# |
| 6. Did the permittee, within 60 days of completion of the established post-closure care period, certify that the post-closure activities were performed in accordance with the specifications in the approved post-closure plan? [Condition F.4(d)] | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> | RMK# |
| 7. Is the permittee maintaining financial assurance for post-closure care in accordance with the applicable requirements of OAC Rules 3745-55-40 through 3745-55-51? [Condition F.5] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> | RMK# 2 |
| 8. Has the permittee amended the post-closure plan? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> | RMK# |
| If so, has a permit modification request been submitted in accordance with OAC Rules 3745-50-40 to 3745-50-62 and 3745-55-18? [Condition F.6] | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> | RMK# |

REMARKS

3. After reviewing Safety-Kleen's ground water monitoring data and reports from 2006, Ohio EPA issued a notice of violation (NOV), dated June 7, 2007, to the facility for specific violations of the facility's permit with regard to ground water sampling and confirmation sampling. Safety-Kleen responded to the NOV

in a letter dated July 12, 2007. Ohio EPA plans to meet with Safety-Kleen to discuss these issues prior to the next ground water sampling event planned for December 2007.

Ohio EPA's Division of Drinking and Ground Water (DDAGW) is currently reviewing Safety-Kleen's ground water monitoring report from January to June 2007. This review, including any notices of violations, will be discussed under separate cover at a later date.

GROUND WATER MONITORING

- | | | | | |
|---|--------------|--------|---------|--------|
| 1. Did the permittee comply with the application requirements in OAC Rules 3745-54-90 through 3745-54-100 for the purpose of detecting and characterizing releases to the uppermost aquifer, and evaluating the effectiveness of the corrective action program for the UST area (former location of tank #s 18, 19, 20, and 21)? [Condition G.1(a)] | Yes ___ | No ___ | N/A ___ | RMK# 3 |
| 2. Did the permittee monitor the ground water to determine whether regulated units are in compliance with the ground water protection standard under OAC Rule 3745-54-92? [Condition G.2(a)]? | Yes ___ | No ___ | N/A ___ | RMK# 3 |
| 3. Did the permittee monitor well H-10S at the point of compliance and wells H-9S, H-15S, and H-15D as required? [Condition G.2(b)] | Yes ___ | No ___ | N/A ___ | RMK# 3 |
| 4. Does the permittee's monitoring system consist of the ground water wells as specified in Figure 5.1 in the permit application and in conformance with Condition G.3? [Condition G.3] | Yes <u>X</u> | No ___ | N/A ___ | RMK# |
| 5. Are the wells cased in a manner that maintains the integrity of the monitoring well bore holes and complies with the detailed plans and specification presented in Section 5.6 of the permit application and presented in the 1993 RFI report? | Yes <u>X</u> | No ___ | N/A ___ | RMK# |
| 5. Did the permittee implement a ground water monitoring program in accordance with Sections 2 through 5 of Appendix 5-1 of the permit application? [Condition G.4] | Yes ___ | No ___ | N/A ___ | RMK# 3 |
| 6. Were field and analytical data validated in accordance with the procedures specified in Section 5 of Appendix 5-1 of the permit application? [Condition G.4(c)] | Yes ___ | No ___ | N/A ___ | RMK# 3 |
| 7. Did the permittee determine the ground water surface elevation at each monitoring well each time the ground water was sampled? [Condition G.5] | Yes ___ | No ___ | N/A ___ | RMK# 3 |
| 8. Did the permittee follow the sampling procedure and interval for each constituent as described in Section 2.3 of Appendix 5-1 of the permit application? [Condition G.6] | Yes ___ | No ___ | N/A ___ | RMK# 3 |
| 9. Did the permittee sample the ground water semi-annually during the compliance period? [Condition G.7] | Yes <u>X</u> | No ___ | N/A ___ | RMK# |
| 10. Did the permittee conduct statistical procedures as presented in Section 5.7 of the permit application? [Condition G.7(b)] | Yes ___ | No ___ | N/A ___ | RMK# 3 |

11. Did the permittee enter all of the information specified in Permit Condition G.8(a) in the operating record?

Yes X No ___ N/A ___ RMK# 3

12. Did the permittee report, in writing, semi-annually to the director on the effectiveness of the corrective action program? These reports must be submitted on March 1 and September 1 of each year until the corrective action program has been completed. [Condition G.8(b)(i)]

Yes X No ___ N/A ___ RMK#

13. Did the permittee submit an annual report to the director by March 1st of the following year or first business day thereafter if this falls on a weekend? [Condition G.8(b)(ii)]

Yes X No ___ N/A ___ RMK#

LDR CHECKLIST

GENERAL LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] If so:
- Yes No N/A RMK#
- a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)]
- Yes No N/A RMK#
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)]
- Yes No N/A RMK#
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1]
- Yes No N/A RMK#
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1]
- Yes No N/A RMK#
4. Does the generator generate a characteristic hazardous waste? If so:
- Yes No N/A RMK#
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)]
- Yes No N/A RMK#

NOTE: If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so:
- Yes No N/A RMK#
- a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)]
- Yes No N/A RMK#

NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]

6. Has the generator correctly determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)]
- Yes No N/A RMK#

NOTE: Wastes with EPA hazardous waste numbers K174 and K175 (chlorinated aliphatic wastes) have specific requirements in rule 3745-270-33. Waste with EPA hazardous waste numbers K176, K177 and K178 (inorganic chemical wastes) have specific requirements in rule 3745-270-36.

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] Yes No N/A RMK# _____

NOTE: A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (§402 of CWA), that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater.[3745-270-03(B)]

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] Yes No N/A RMK# _____

NOTE: In other words, is combustion a legitimate treatment method.

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes No N/A RMK# _____

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] If so: Yes No N/A RMK# _____

- a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05] Yes No N/A RMK# _____

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] If so: Yes No N/A RMK# _____

- a. The facility can land dispose of the waste. [3745-270-06] Yes No N/A RMK# _____

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? If so: Yes ___ No N/A ___ RMK# ___

a. Has the facility complied with 3745-270-04? Yes ___ No N/A RMK# ___

REMARKS

NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)] Yes No N/A ___ RMK# ___

14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)] Yes ___ No N/A RMK# ___

15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)] Yes ___ No N/A RMK# ___

16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)] Yes ___ No N/A RMK# ___

17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so: Yes No ___ N/A ___ RMK# ___

a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes No N/A ___ RMK# ___

NOTE: Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit.(See 270-07(A)(7))

18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)] Yes No N/A ___ RMK# ___

REMARKS

GENERATORS TREATING HAZARDOUS WASTE - This section is N/A.

HAZARDOUS DEBRIS - This section is N/A.

TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS - This section is N/A.

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

CESQG: ≤ 100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

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 st ? [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 other 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 on-site without a permit or at another facility other 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 type="checkbox"/> | No | <input type="checkbox"/> | N/A | <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"/> | 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 checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| b. Has the generator complied with special manifest requirements? [3745-52-54] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input 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 checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| e. Are export related documents being maintained on-site? [3745-52-57(A)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

MANIFEST REQUIREMENTS

- | | | | | | | |
|--|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| 12. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] | 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)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <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 completed. [3745-52-20(A)]

- | | | | | | | |
|--|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| 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"/> |
|--|-----|-------------------------------------|----|--------------------------|-----|--------------------------|

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)].

- | | | | | | | |
|---|-----|-------------------------------------|----|--------------------------|-----|-------------------------------------|
| 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"/> |

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.

17. 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 No N/A
18. 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 No N/A
19. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes No N/A

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.

PERSONNEL TRAINING

20. 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 No N/A
21. 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)(a-f)] Yes No N/A
22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A
23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes No N/A
24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A
25. Does the generator keep records and documentation of:
- a. Job titles [3745-65-16D(1)]? Yes No N/A
 - b. Job descriptions [3745-65-16D(2)]? Yes No N/A
 - c. Type and amount of training given to each person [3745-65-16D(3)]? Yes No N/A
 - d. Completed training or job experience required [3745-65-16D(4)]? Yes No N/A
26. 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 No N/A

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.

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date Trained</u>

CONTINGENCY PLAN

27. 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 No N/A
28. 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 No N/A
 - b. Arrangements with emergency authorities [3745-65-52(C)]. Yes No N/A
 - 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 No N/A
 - d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes No N/A

- e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes No N/A

NOTE: If the facility already has a "Spill Prevention, Control and Counter measures Plan" under CFR Part 112 or 40 CFR Part 1510, 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. [3745-65-52(B)]

29. 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 No N/A
30. 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 No N/A
31. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes No N/A

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

32. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes No N/A
A small fire occurred in the water and soil vapor extraction building due to equipment malfunction (i.e., the heater melted plastic and exposed wire). However, this fire did not trigger the implementation of the contingency plan.
- a. Was the contingency plan implemented? [3745-65-51(B)] Yes No N/A
- b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes No N/A
- c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes No N/A

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

33. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes No N/A
34. 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 No N/A
- b. Emergency communication device? [3745-65-32(B)] Yes No N/A
- c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes No N/A
- d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes No N/A

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

35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes No N/A
36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A
37. 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 No N/A
38. 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 No N/A
39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes No N/A
41. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes No N/A

SATELLITE ACCUMULATION AREA REQUIREMENTS

42. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes No N/A

- b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes No N/A
- c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A
- d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes No N/A
- e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes No N/A
- f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes No N/A
- 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 No N/A
- 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 No N/A

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

44. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes No N/A
45. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No N/A
46. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A
- b. In good condition? [3745-66-71] Yes No N/A
- c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. Yes No N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes No N/A
49. 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 No N/A
50. 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 No N/A
51. 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 No N/A

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.

52. 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 No N/A

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 <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]

PRE-TRANSPORT REQUIREMENTS

53. 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 No N/A
54. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A
55. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes No N/A

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

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes ___ No N/A RMK# 1
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes ___ No N/A RMK# ___
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes ___ No N/A ___ RMK# ___
- b. Mix battery types in one container? Yes ___ No N/A ___ RMK# ___
- c. Discharge batteries to remove the electric charge? Yes ___ No N/A ___ RMK# ___
- d. Regenerated used batteries? Yes ___ No N/A ___ RMK# ___
- e. Disassemble them into individual batteries or cells? Yes ___ No N/A ___ RMK# ___
- f. Remove batteries from consumer products? Yes ___ No N/A ___ RMK# ___
- g. Remove the electrolyte from the battery? Yes ___ No N/A ___ RMK# ___
- If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] Yes No ___ N/A RMK# ___

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] Yes ___ No N/A RMK# ___
- a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] Yes ___ No N/A RMK# ___
- b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] Yes ___ No N/A RMK# ___
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 ___ No N/A RMK# ___

UNIVERSAL WASTE LAMPS

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] Yes ___ No N/A ___ RMK# 2
9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes ___ No N/A RMK# ___
10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)] Yes No N/A ___ RMK# ___

NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of

generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

11. Is the waste accumulated for less than one year? Yes No N/A RMK#
[3745-273-15(A)] If not:
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes No N/A RMK#

NOTE: *Accumulation is defined as date generated or date received from another handler.*

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes No N/A RMK#
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes No N/A RMK#
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes No N/A RMK#
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes No N/A RMK#
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes No N/A RMK#
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes No N/A RMK#
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes No N/A RMK#

EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]

Yes No N/A RMK#

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]

Yes No N/A RMK#

15. Is the material released characterized? [3745-273-17(B)]

Yes No N/A RMK#

16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)]

Yes No N/A RMK#

OFF-SITE SHIPMENTS

NOTE: *If a SQUWH self-transport waste, then they must comply with the Universal Waste transporter requirements.*

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]

Yes No N/A RMK#

NOTE: *SQUWHs are prohibited to send waste to any other facility.*

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)]

Yes No N/A RMK#

19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)]

Yes No N/A RMK#

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

a. Receive the waste back? [3745-273-18(E)(1)]

Yes No N/A RMK#

b. Agree to where the shipment will be sent? [3745-273-18(E)(2)]

Yes No N/A RMK#

21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
 Yes ___ No N/A RMK# ___
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)]
 Yes ___ No ___ N/A RMK# ___
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)]
 Yes ___ No ___ N/A RMK# ___
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]
 Yes ___ No N/A RMK# ___
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)]
 Yes ___ No N/A RMK# ___

EXPORTS

24. Is waste being sent to a foreign destination? If so:
 Yes ___ No N/A ___ RMK# ___
- a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]
 Yes ___ No N/A RMK# ___
- b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)]
 Yes ___ No N/A RMK# ___
- c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]
 Yes ___ No N/A RMK# ___

REMARKS

- The facility was not accumulating any universal waste batteries on site.
- Safety-Kleen accumulates spent fluorescent bulbs in the maintenance building. During the inspection, two boxes of spent bulbs were not closed. After the inspection, Safety-Kleen closed the boxes and sent photographic documentation to me via e-mail on September 21, 2007. The violation was abated at that time.

