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State of Ohio Environmental Protection Agency

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

May 1, 2007

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

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, Lundy Adelsberger, Chris Bulinski, Marie Jarden and me during Ohio EPA's inspection of Safety-Kleen's Recycle Center (Safety-Kleen) in Hebron, Ohio on March 5 and 6, March 13, and April 11, 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. The facility inspection involved a review of facility operations and required documentation, and pollution prevention was discussed.

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 and a universal waste and used oil generator at this location.

We found the following violations of Ohio's hazardous waste rules. In order to correct these violations you must do the following and send me the required information **within 30 days** of your receipt of this letter:

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 on March 6, 2007, the February 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

- Safety-Kleen located the missing February 18, 2007 inspection log sheet at a later date. Ohio EPA verified its inclusion in the inspection log on April 11, 2007. Therefore, Safety-Kleen has adequately abated violation of OAC Rule 3745-54-15(D).
- 2. **OAC Rule 3745-54-76, Unmanifested Waste Report:** If a facility accepts for treatment, storage, or disposal any hazardous waste from an off-site source without an accompanying manifest, then the owner or operator must prepare and submit a single copy of an "Unmanifested Waste Report" to the director within 15 days after receiving the waste.
 - (a) On February 20, 2007, Safety-Kleen was notified that a drum was sent in error and may be a hazardous waste. This drum was received by Safety-Kleen on February 19, 2007, and was not accompanied by a hazardous waste manifest. Safety-Kleen was asked to hold the drum until analytical results were obtained. Safety-Kleen did not obtain the analytical results or send an Unmanifested Waste Report to Ohio EPA until March 27, 2007 (36 days after the drum was received at the facility). The analytical results revealed that the waste was ignitable (D001).
 - (b) On April 9, 2007, Safety-Kleen received 32 drums of tetrachloroethylene from Rohm & Haas Chemicals LLC on Manifest number 000189979 CEX. The waste was listed as "RCRA-exempt" and no waste codes were listed on the manifest; however, since the waste is being reclaimed at Safety-Kleen, it is hazardous waste and must be noted as such on the hazardous waste manifest¹. Safety-Kleen did not submit an Unmanifested Waste Report to Ohio EPA for this shipment.
- To demonstrate compliance with this rule, Safety-Kleen must send a description of what steps the facility will take in the future to comply with the unmanifested waste report requirements in OAC Rule 3745-54-76. This description must include how the facility will comply with the 15-day requirement in the event that additional analysis of the material is needed.

General Comments

1. During the April 11, 2007 inspection, we also noted that the secondary containment area for Tank Farm six has some cracks in it. Since the material used to fill cracks found in secondary containment areas can not be applied in cold weather, any cracks found when the weather is not conducive to repair will be filled once the weather is deemed acceptable in accordance with Section 4.3 of the permit application and Permit Condition D.4. Safety-Kleen has initiated a work order for the cracks to be filled once the weather becomes warmer.

¹ On April 11, 2007, while examining manifest records, Ohio EPA noted that the waste was designated on the manifest as "RCRA-exempt." Ohio EPA followed up with the generator and learned that the generator was not aware of Safety-Kleen's introduction of the material into its reclamation process and thought the material was exempt per the use/reuse exemption. However, since the waste is being reclaimed at Safety-Kleen, it is hazardous waste and must be noted as such on the hazardous waste manifest. In addition, this waste must be managed as hazardous waste prior to the reclamation process.

2. While inspecting the tank farms during our inspection on April 11, 2007, we noted that many of the newly permitted tanks do not have "Hazardous Waste" labels on them. Safety-Kleen recently ordered new labels for these newly permitted tanks and will label them once the weather permits. Currently, although permitted, these tanks are not being used to store hazardous waste. It was also noted that other hazardous waste labels on tanks had begun to deteriorate. These labels should also be replaced, as discussed.
3. During the April 11, 2007 inspection, we also discussed re-labeling the ground water monitoring wells. Currently, the monitoring wells that were installed in 2006, can only be identified by unlocking them and looking at the labels on the inside of the surface casing. Safety-Kleen noted our concerns and will add outer labels, so that the monitoring wells are more readily identified.
4. In general, any material that Safety-Kleen receives at its facility and is introduced into the reclamation process, is a waste and is a hazardous waste if it meets a listing description or exhibits a hazardous waste characteristic. As such, it must be noted as a hazardous waste on the manifest and managed as a hazardous waste prior to the reclamation process (i.e., stored in a permitted container storage area or a permitted hazardous waste storage tank).

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.letter.407

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.



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

Ohio Environmental Protection Agency
RCRA SUBCELL C SITE IDENTIFICATION/VERIFICATION FORM

For Ohio EPA use only

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	County	District	Federal	Indian	Municipal	State	Other
<input checked="" type="checkbox"/>							

6. NAICS code(s) www.census.gov/eppd/www/naics.html

A. 562920	B.
C.	D.

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.

A. Name of Site's Legal Owner: Safety-Kleen Systems, Inc. Date Became Owner (mm/dd/yyyy): 09/01/1980

Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
<input checked="" 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

B. Name of Site's Operator: Safety-Kleen Systems, Inc. Date Became Operator (mm/dd/yyyy): 09/01/1980

Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
<input checked="" 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? Yes No

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

Not Regulated

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

A. Hazardous Waste Activities	
(choose only one of the following categories)	<input checked="" type="checkbox"/> 3. Treater, Storer or Disposer of Hazardous Waste
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input checked="" type="checkbox"/> 4. Recycler of Hazardous Waste
<input checked="" type="checkbox"/> a. Large Quantity Generator (LQG):	<input type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> b. Small Quantity Generator (SQG)	<input type="checkbox"/> a. Small Quantity On-site Burner Exemption
<input type="checkbox"/> c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption
<input checked="" type="checkbox"/> d. United States Importer of Hazardous Waste	<input type="checkbox"/> 6. Underground Injection Control Facility
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/> 7. Hazardous Waste Transporter
B. Universal Waste Activities	C. Used Oil Activities
<input checked="" type="checkbox"/> 1. Small Quantity Handler of Universal Waste (Indicate types of universal waste generated and/or accumulated (check all boxes that apply):	<input checked="" type="checkbox"/> 1. Used Oil Generator
<input type="checkbox"/> 2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more).	<input type="checkbox"/> 2. Used Oil Transporter Indicate Type(s) of Activity(ies)
<input type="checkbox"/> 3. Destination Facility for Universal Waste (Check all boxes below that apply for each of the three types of facilities above.)	<input type="checkbox"/> Transporter
	<input type="checkbox"/> Transfer Facility
	<input type="checkbox"/> 3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)
	<input type="checkbox"/> Processor
	<input type="checkbox"/> Re-refiner
	<input type="checkbox"/> 4. Off-Specification Used Oil Burner
	<input type="checkbox"/> 5. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)
	<input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Oil
	<input type="checkbox"/> b. Used Oil to Off-Specification Used Oil Burner

	Generated	Accumulated
A. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
D. Lamps	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, U112). Use an additional page if more space is needed. If there are more than 10 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.

D001	D002	D004	D005	D006	D007	D008
D009	D010	D011	D018	D019	D021	D022
D023	D024	D025	D026	D027	D028	D029
D030	D032	D033	D034	D035	D036	D037
D038	D039	D040	D041	D042	D043	F001
F002	F003	F004	F005	F006	K006	K016
K022	K030	K048	K049	K050	K051	K052
K060	K085	K086	K087	K095	K096	K105
K141	K142	K143	K144	K145	K147	K148
U002	U003	U019	U031	U037	U044	U051
U052	U055	U056	U057	U068	U069	U070
U071	U072	U075	U077	U078	U079	U080
U083	U084	U108	U110	U112	U113	U117
U118	U121	U124	U140	U154	U159	U161
U162	U165	U169	U171	U188	U191	U196
U210	U211	U213	U220	U226	U227	U228
U239						

12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

Y / N	Announced ?	Additional Facility Representatives:	Monte Londot, Operations Manager
Y / N	Tanks?	Other comments: Facility is also permitted for fuel blending in tanks 97 and 98.	
Y / N	Containers?		

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	3/5/2007 (9-2:30) & 3/6/2007 (10-12:00) 3/13/2007 (9-12:00) 4/11/2007 (9-12:00)
	Marie Jarden, DHWM-CO (3/5 & 3/6) Lundy Adelsberger, DHWM-CDO (3/5 only) Chris Bulinski, DHWM-CDO (3/13 only)		

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 shop 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 spent batteries, which are reclaimed through a local supplier, and used oil.

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:

- good housekeeping practices to limit releases from container and tank storage.
- operation of regenerative fune oxidizer (RFO) to control air emissions the were previously uncontrolled.
- re-use of process wastewater to clean empty dry cleaning waste containers.
- shredding of plastic drums and other plastics on-site for reuse by plastics manufacturers.
- use of shredded office paper in the Safety-Therms to improve solids handling.
- shipment of flourescent bulbs and batteries to recyclers.

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 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 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 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 17 Yes 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 N/A ___ RMK# ___
4. Have any provisions of the permit been identified as invalid? [Condition A.4] Yes No 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:
- 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 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 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# 1

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# 1

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

1. On January 12, 2007, Safety-Kleen requested a Class 3 Permit Modification to change the facility ownership from Safety-Kleen Systems, Inc. to Clean Harbors Recycling Services of Ohio, LLC. The anticipated closing on the sale was April 13, 2007. By letter dated April 12, 2007, Safety-Kleen notified Ohio EPA that the transfer of ownership of the facility to Clean Harbors had been terminated as of April 9, 2007, and requested that the Class 3 Modification be withdrawn.

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# 2
- 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

2. Safety-Kleen must inspect the container storage area in accordance with the inspection schedule contained in Section 6 of the permit application and in accordance with OAC Rule 3745-54-15 and note the results of these inspections in the inspection log along with any remedial action taken [Condition C.9].

Safety-Kleen must inspect the tank systems, in accordance with the inspection schedule found in Section 6 of the permit application and must complete the items in Permit Conditions D.6(b) and D.6(c) as part of those inspections and document compliance with Permit Condition D.6 in the operating record of the facility [Condition D.6].

During Ohio EPA's inspection of the facility's operating record on March 6, 2007, the February 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. However, Safety-Kleen located the missing inspection log sheet at a later date, and Ohio EPA verified its inclusion in the inspection log on April 11, 2007.

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 180 days of journalization of this permit? and updates biennially thereafter? [Condition A.29(b)]

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# 3

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# 3

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

3. 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# 4
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# 4

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. 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:
HazMat Environmental Group, Inc.
Triad Transport, Inc.
Safety-Kleen Systems, Inc.
Schneider National, Inc.

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# 5

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

5. As required by OAC Rule 3745-54-76, if a facility accepts for treatment, storage, or disposal any hazardous waste from an off-site source without an accompanying manifest, then the owner or operator must prepare and submit a single copy of an "Unmanifested Waste Report" to the director within 15 days after receiving the waste.

On February 20, 2007, Safety-Kleen was notified that a drum was sent in error and may be a hazardous waste. This drum was received by Safety-Kleen on February 19, 2007, and was not accompanied by a hazardous waste manifest. Safety-Kleen was asked to hold the drum until analytical results were obtained. Safety-Kleen did not obtain the analytical results or send an Unmanifested Waste Report to Ohio EPA until March 27, 2007 (36 days after the drum was received at the facility). The analytical results revealed that the waste was ignitable (D001).

On April 9, 2007, Safety-Kleen received 32 drums of tetrachloroethylene from Rohm & Haas Chemicals LLC on Manifest number 000189979 CEX. The waste was listed as "RCRA-exempt" and no waste codes were listed on the manifest. Since Safety-Kleen subsequently introduces this waste into its reclamation process, Ohio EPA asked Safety-Kleen why the waste was considered "RCRA-exempt" during the inspection visit on April 11, 2007. Ohio EPA also followed up with the generator to learn that the generating facility did not know that Safety-Kleen was running the waste through its reclamation process and thought that the waste was exempt per the use/reuse exemption. Since the waste is being reclaimed at Safety-Kleen, it is hazardous waste and must be noted as such on the hazardous waste manifest. Ohio EPA also considers this an unmanifested shipment of hazardous waste, and in the future, Safety-Kleen would need to send an Unmanifested Waste Report to Ohio EPA to address these types of situations.

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# 6
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# 7

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

6. 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 on March 6, 2007, the February 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. However, Safety-Kleen located the missing inspection log sheet at a later date, and Ohio EPA verified that it was in the inspection log on April 11, 2007.
7. During Ohio EPA's April 11, 2007 inspection, it was noted that the secondary containment area for Tank Farm 6 has some cracks. Since the material used to fill cracks found in secondary containment areas can not be applied in cold weather, any cracks found when the weather is not conducive to repair will be filled once the weather is deemed acceptable in accordance with Section 4.3 of the permit application and Permit Condition D.4. Safety-Kleen has initiated a work order for the cracks to be filled once the weather becomes warmer.

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©), 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# ___

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# ___
- l. 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

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# 8

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 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# 9
2. Has the permittee conducted and recorded an inspection of at least the following? [Condition B.35] Yes ___ No N/A ___ RMK# 9
- 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# 9
4. Have suitable repairs been made within a reasonable amount of time? [Condition B.35] Yes ___ No N/A ___ RMK# 9
5. Have repairs been indicated on the Notification Repair Form? [Condition B.35] Yes ___ No N/A ___ RMK# 9

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# 9

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. 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# 2&6

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)? Yes No N/A ___ RMK# ___
- 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# 10
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

10. 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

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

Tank Farm 4 (4 tanks) 203-205 and 209

-chlorinated solvents
-60,000 gallons

Tank Farm 6 (4 tanks) 96-98 and Bin #2

-chlorinated solvents and mineral spirits
-57,500 gallons

Yes X 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 X 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 X 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# 7

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 ___ No ___ N/A ___ RMK# 7
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# 2&6
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 "Flammable and Combustible Liquids Code"? Yes X No ___ N/A ___ RMK# ___
14. Did the permittee use tanks 101, 111, or 112 for storage of hazardous waste? [Condition D.12] Yes ___ No X N/A ___ RMK# ___

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 ___ | No ___ | N/A ___ | 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 <u>X</u> | No ___ | N/A ___ | 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 <u>X</u> | No ___ | N/A ___ | RMK# |
| 4. Did the permittee close any units other than the UST area as a landfill? If so, | Yes ___ | No <u>X</u> | N/A ___ | 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 ___ | No ___ | N/A <u>X</u> | 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 ___ | No ___ | N/A <u>X</u> | 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 ___ | No ___ | N/A <u>X</u> | RMK# |
| (ii) file a survey plat and record as required by Condition F.4(a)? | Yes ___ | No ___ | N/A <u>X</u> | 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 ___ | No ___ | N/A <u>X</u> | 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 ___ | No ___ | N/A <u>X</u> | 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 ___ | No ___ | N/A <u>X</u> | 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 ___ | No <u>X</u> | N/A ___ | RMK# 2 |
| 8. Has the permittee amended the post-closure plan? | Yes ___ | No <u>X</u> | N/A ___ | 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 ___ | No ___ | N/A <u>X</u> | RMK# |

REMARKS

3. Ohio EPA's Division of Drinking and Ground Waters (DDAGW) is currently reviewing Safety-Kleen's ground water monitoring data and reports from 2006. This review, including any notices of violation, 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 X 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 X 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 X 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:
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# _____
- 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

1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? Yes ___ No N/A ___ RMK# ___
2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)] Yes ___ No N/A RMK# ___
- a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] Yes ___ No N/A RMK# ___
- b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes ___ No N/A RMK# ___
3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes ___ No N/A RMK# ___
4. Has the generator followed their WAP [3745-270-07(A)(5)]? Yes ___ No N/A RMK# ___
5. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes ___ No N/A RMK# ___

NOTE: If the waste is a characteristic waste, which has been treated to render it non hazardous and subsequently sent to a solid waste landfill, proceed to question 7 & 8.

6. Has the generator sent a notification and certification with the initial shipment of waste? [3745-270-07(A)(5)(c)] Yes ___ No N/A RMK# ___
7. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] Yes ___ No N/A RMK# ___
8. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following:
- a. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes ___ No N/A RMK# ___
- b. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)] Yes ___ No N/A RMK# ___

NOTE: If the waste will be treated and monitored for all UHCs then they do not need to be listed on the notice.

9. Has the process/operation generating the waste or the solid waste landfill facility changed? If so:

Yes ___ No ___ N/A RMK# ___

a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)]

Yes ___ No N/A RMK# ___

b. Has the director been notified of such changes? [3745-270-09(D)]

Yes ___ No N/A RMK# ___

NOTE: The director need only be notified on an annual basis but no later than December 31.

10. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so:

Yes ___ No N/A ___ RMK# ___

a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49 (C)]

Yes ___ No N/A RMK# ___

11. Does each notification/certification form completed, contain the information found in Table1? [3745-270-07(A)(3)]

Yes ___ No N/A RMK# ___

NOTE: If the waste will be treated and monitored for all constituents, there is no need to put them all on the LDR notice.

REMARKS

HAZARDOUS DEBRIS

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)?
 Yes ___ No ___ N/A RMK# ___
2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.)
 Yes ___ No ___ N/A RMK# ___
3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so:
 Yes ___ No ___ N/A RMK# ___
- a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)]
 Yes ___ No N/A RMK# ___

NOTE: If immobilization has been used in a treatment train, it must be the last treatment technology used.

4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so:
 Yes ___ No ___ N/A RMK# ___
- a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)]
 Yes ___ No N/A RMK# ___
5. Is the waste a PCB waste under 40 CFR Part 761? If so:
 Yes ___ No ___ N/A RMK# ___
- a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)]
 Yes ___ No N/A RMK# ___
6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)]
 Yes ___ No N/A RMK# ___
7. Does the owner/operator of a treatment facility that claims the debris is excluded from regulation as a hazardous waste under 3745-51-03(F)(1) maintain the following information?
 Yes ___ No ___ N/A RMK# ___
- a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)]
 Yes ___ No N/A RMK# ___
- b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)]
 Yes ___ No N/A RMK# ___
- c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)]
 Yes ___ No N/A RMK# ___

8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F)(1) have the following information? [3745-270-07(D)(3)]

Yes ___ No ___ N/A RMK# ___

a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)]

Yes ___ No N/A RMK# ___

b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)]

Yes ___ No N/A RMK# ___

c. Technology used from Table 1? [3745-270-07(D)(1)(c)]

Yes ___ No N/A RMK# ___

9. Has the above notification been sent to the director? [3745-270-07(D)(1)]

Yes ___ No ___ N/A RMK# ___

REMARKS

TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13? [3745-270-07(B)]
Yes ___ No N/A RMK# ___

2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)]
Yes ___ No N/A RMK# ___

Note: *No further notification is necessary until such time that the waste changes or the receiving facility changes.*

3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07? [3745-270-07(B)(3)]
Yes ___ No N/A RMK# ___

4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so:**
a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)]
Yes ___ No N/A RMK# ___

5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? **If so:**
a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)), excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)]
Yes ___ No N/A RMK# ___

b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4) [3745-270-07(B)(6)]
Yes ___ No N/A RMK# ___

c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)]
Yes ___ No N/A RMK# ___

6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)]
Yes ___ No N/A RMK# ___

7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have:
a. Copies of all notices and certifications required in 3745-270?
Yes ___ No N/A RMK# ___

b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49?
Yes ___ No N/A RMK# ___

c. The testing frequency specified in the facility's WAP and have they followed the protocol?

Yes ___ No N/A RMK# ___

REMARKS

**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. 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