Ohio | Environmental Protection Agency

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

May 31, 2011

FILE COPY

Mr. Steven E. McCorry
Manager, Environmental, Health & Safety
PPG Industries, Inc.
559 Pittsburgh Road
Circleville, OH 43113

Re: PPG Industries Ohio, Inc.
LQG/TSD
U.S. EPA ID#: OHD004304689
Pickaway County, COD
NOV

Dear Mr. McCorry:

On May 17 and 19, 2011, Andy Maneff and I inspected the PPG Industries Ohio, Inc. (PPG) facility in Circleville, Ohio, to determine PPG's compliance with Ohio's hazardous waste laws and rules as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). PPG was also inspected for compliance with the terms and conditions of its hazardous waste installation and operation permit renewal issued on December 29, 2006, as modified. Our inspection included a review of company operations and written documentation.

PPG operates a resin manufacturing plant and a rotary kiln hazardous waste incinerator (Energy Recovery Unit or ERU) at this location. At the time of the inspection, PPG was operating as a permitted hazardous waste treatment and storage facility, a large quantity generator (LQG) of hazardous waste, a small quantity handler of universal waste, and a used oil generator.

During the inspection, 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 3745-50-58(A), Failure to operate in accordance with the hazardous waste permit application Section F:*** PPG is to inspect Tank Storage at the Manufacturing Plant in accordance with the frequencies specified in Table C(2) of Attachment 1 to Section F of the permit application. Table C(2) requires tanks to be inspected daily when the plant is normally staffed.

   Per review of the Weekly PMs of Waste Storage (E-List-005/W inspection lists), there were no documented inspections of the Resin Plant tanks from January 3 to January 9, 2011, even though the plant was normally staffed.

Central District Office
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

614 | 728 3778
614 | 728 3898 (fax)
www.epa.ohio.gov

To abate this violation, PPG must send a description of what steps the facility will take in the future to comply with the inspection frequencies specified in Table C(2) of Attachment 1 to Section F of the permit application for tank storage. The description should include what training PPG will provide to ensure that the facility personnel responsible for performing tank inspections are familiar with the inspection procedures.

2. ***OAC Rule 3745-66-74, Inspections:*** The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The owner or operator must record inspections in an inspection log or summary.

   Per review of the Weekly PMs of Waste Storage (E-List-005/W inspection lists), there were no documented inspections of the Resin Plant less than 90-day container accumulation areas for the week of January 3 to January 9, 2011.

   To abate this violation, PPG must send a description of what steps the facility will take in the future to comply with the container accumulation area inspection requirements specified in OAC Rule 3745-66-74. The description should include what training PPG will provide to ensure that the facility personnel responsible for performing container area inspections are familiar with the inspection procedures.

3. ***OAC Rule 3745-52-34(A)(2), Accumulation time of hazardous waste:*** A generator may, for 90 days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without a permit, provided that each container is marked with the date each period of accumulation and/or treatment begins.

   At the time of the inspection, one drum being used to accumulate fly ash at the ERU (located in the box trailer) was not labeled with an accumulation start date.

   During the inspection, PPG marked the drum of ash with the correct accumulation start date. The violation was abated at that time.

General Comments

1. As discussed during the inspection, please make sure personnel responsible for performing facility and spill cart inspections and completing the corresponding inspection checklists are correctly dating the inspection checklists. Inspections need to be completed within the scheduled dates noted at the top of each inspection checklist and dated as such.
2. The RCRA Daily List (E-List-002) for the ERU includes a "Comments" section for each area. This section can be used to identify what is being inspected in each area of the ERU and memorialize it in the operating record. As discussed during the inspection, the Comments section should be used to record events that may occur outside the normal scope of the permit that need to be documented. For example, in January 2011, PPG moved a skid of reactive drums out of the permitted container storage area to the south side of the warehouse building and taped off the area. PPG performed daily inspections of the drums, but did not describe the incident or document the inspections on the RCRA Daily List. In the future, if something similar happens, please use this form to document the event and any associated inspections.

If you would like a free, non-regulatory on-site pollution prevention assessment or if you would like more information about pollution prevention, please contact Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) at 1 (800) 329-7518 or visit the following web address: http://www.epa.ohio.gov/ocapp/.

In addition, Ohio EPA's Division of Materials and Waste Management (DMWM) has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link: http://ohioepa.custhelp.com/ci/documents/detail/2/subscriptionpage.

Enclosed is a copy of the checklists that we completed as a result of the inspection. You can find Ohio's hazardous waste rules and other information on the division's web page at: http://www.epa.ohio.gov/dhwm/.

Should you have any questions, please feel free to call me at (614) 728-3887.

Sincerely,

Melissa M. Storch

Melissa M. Storch
Environmental Specialist
Division of Materials and Waste Management
Central District Office

Enclosure

c: Andy Maneff, DMWM/CDO
CDO File

MMS/nsm PPG NOV Ltr May 2011

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

Send to Central Office ☐	Ohio Environmental Protection Agency **RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM**	For Ohio EPA use only

Completed verification forms required to be submitted to CO should be e-mailed to brad.hauser@epa.state.oh.us.

Site EPA ID No.	EPA ID Number: **OHD004304689**							
Site Name	Name: **PPG Industries Ohio, Inc.**				Website: (Optional)			
Site Location Information	Street Address: **559 Pittsburgh Road**							
	City, Town, or Village: **Circleville**				State: OH			
	County Name: **Pickaway**				Zip Code: **43113**			
Site Land Type (check only one)	Private ☒	County ☐	District ☐	Federal ☐	Indian ☐	Municipal ☐	State ☐	Other ☐
NAICS code(s) www.census.gov/epcd/www/naics.html	**325211**		**562211**					

Facility Representative	First Name: **Steven**	MI: **E.**	Last Name: **McCorry**
Additional names can be recorded in number 12	Title: **Manager, Environmental Health & Safety**		
	Phone Number: **(740) 420-6622**	Phone Number Extension:	
	E-Mail Address: **smccorry@ppg.com**		
Only provide address information if it is different than the site address	Fax Number: **(740) 420-6658**	Fax Number Extension:	
	Street or P.O. Box:		
	City, Town or Village:		
	State:	Zip Code:	

Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: **PPG Industries Ohio, Inc.**				Date Became Owner (mm/dd/yyyy): **01/01/1999**			
	Owner Type:	Private ☒	County ☐	District ☐	Federal ☐	Indian ☐	Municipal ☐	State ☐	Other ☐
	Street or P.O. Box: **559 Pittsburgh Road**							
	City, Town or Village: **Circleville**				Owner Phone #:			
	State: **OH**				Country: **USA**		Zip Code: **43113**	
	Name of Site's Operator: **PPG Industries, Inc. and PPG Industries Ohio, Inc.**				Date Became Operator (mm/dd/yyyy): **01/01/1999**			
	Operator Type:	Private ☒	County ☐	District ☐	Federal ☐	Indian ☐	Municipal ☐	State ☐	Other ☐
	Street or P.O. Box: **559 Pittsburgh Road**							
	City, Town or Village: **Circleville**				Operator Phone #:			
	State: **OH**				Country**USA**		Zip Code: **43113**	

VIOLATIONS CITED?	☒ Yes ☐ No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

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

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

- ☐ Hazardous Waste Transporter
- ☐ Hazardous Waste Transfer Facility
- ☒ Treater, Storer or Disposer of Hazardous Waste
- ☐ Recycler of Hazardous Waste
- ☐ 72-Hour Recycler
- ☐ Exempt Boiler and/or Industrial Furnace
  - ☐ Small Quantity On-Site Burner Exemption
  - ☐ Smelting, Melting, Refining Furnace Exemption
- ☐ Underground Injection Control Facility
- ☐ Receives Hazardous Waste from Off-site

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY)

- ☒ Small Quantity Handler of Universal Waste
- ☐ Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)
- ☐ Destination Facility for Universal Waste

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

- ☒ Batteries
- ☐ Pesticides
- ☐ Mercury containing equipment
- ☒ Lamps

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

- ☒ Used Oil Generator
- ☐ Used Oil Transporter
- ☐ Used Oil Transfer Facility
- ☐ Used Oil Processor
- ☐ Used Oil Re-refiner
- ☒ Off-Specification Used Oil Burner
- ☐ Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil
- ☐ Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

- ☐ College or University
- ☐ Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
- ☐ Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

See Part A

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

Announced ☐ Yes ☒ No

Tanks ☒ Yes ☐ No

Containers ☒ Yes ☐ No

Additional Facility Representatives: **Joe Pohlman, Jacki Landau, and Francisco Ortiz**

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Melissa Storch, DMWM/CDO	**Andy Maneff, DMWM/CDO**	**5/17/2011 10:00am**
		5/19/2011 9:30am

Comments:

Revised 09.05.10

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PROCESS DESCRIPTION SECTION

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

PPG Industries Ohio, Inc. (PPG) operates a resin manufacturing plant and a rotary kiln hazardous waste incinerator (Energy Recovery Unit or ERU) in Circleville, Ohio. PPG operates as a large quantity generator (LQG) and holds a renewal hazardous waste installation and operation permit that was issued by Ohio EPA on December 29, 2006, for the storage of hazardous waste in tanks and containers and for the treatment of hazardous waste (blending in tanks and rotary kiln incineration).

The manufacturing plant produces approximately 400 formulations of synthetic organic resins, including alkyds, epoxies, polyester, acrylics, elastomerics, thermoplastic, and thermosetting resins. These resins are used by PPG's customers to manufacture paints and coatings. The company receives raw materials in containers of various types and sizes and in bulk (via tanker truck and rail car). Raw material containers are stored in the raw material warehouse then moved to either Building 1 or Building 2 for processing. Bulk raw material is stored in a series of aboveground storage tanks.

There are eight reactors in Building #1 (K1, K4-K6, K8-K11) and three reactors in Building #2, C-line, D-line, and a continuous reactor (CR-1). The reactors are used to produce various types of resins. Each reactor has condensers, decanters, drop tanks and weigh tanks associated with them. The finished product is sampled and filtered prior to being packaged for shipment to PPG's customers in containers of various sizes and types or in bulk. Tank storage of finished product also occurs in Building 1. Support facilities for the manufacturing plant include QC laboratories, a maintenance shop, a wastewater treatment facility, a still house (for reclaiming solvents) with two pot stills and a thin film evaporator, and a stripper building where the MIBK recovery system is housed. Five permitted hazardous waste storage tanks are used at the resin plant to accumulate bulk liquid waste. Four of them are used for the accumulation of solvent waste and one is used to accumulate aqueous waste.

The ERU was constructed to thermally treat the wastes generated by the Circleville manufacturing plant and other PPG-owned coatings and resins operations. Hazardous waste in liquid and solid form, and other solid wastes from coatings and resins manufacturing, are treated in this unit. Incoming wastes are stored in permitted hazardous waste storage tanks and/or treatment tanks and the permitted container storage warehouse. There are 16 liquid waste storage tanks for blending and storing bulk organic and aqueous wastes, 3 drum pumpout tanks, 2 control liquid tanks to provide a high BTU waste liquid to the kiln, and 2 (unpermitted) overflow tanks. Support facilities for the incinerator include a waste analysis laboratory and a water treatment area.

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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.

Manufacturing Plant:

Hazardous wastes generated at the manufacturing plant include wastes from cleaning of process equipment, filtering of products, samples taken from in-process tanks throughout the process, byproducts of reactions, waste from solvent recovery, and unusable finished products. The wastes are accumulated in containers, many of which serve as satellite areas prior to placement of the waste into the <90 day storage areas, or in the permitted hazardous waste storage tanks. The hazardous wastes generated by PPG are identified as being in one of 32 waste families, and these families are given specific codes. These wastes, their waste families, and the applicable waste codes (based on the Annual Report) include:

- Off-spec resin and paint waste and samples (ODR, ODP, ADR, ADP, DRS, DPS); D001, D007, D008, D035, D038, F003, and F005
- Contaminated soil and spill cleanup (CSX); D008
- Dirty cleanup solvent (DCS); D001, F003, F005
- Flush water (DWW); D001
- Contaminated trash and debris (HTS); D001, D035, F003, F005
- Aqueous decanter waste (OCW); D001, D035
- Aqueous acidic and/or corrosive waste; D001, D002
- Solvent distillate from resin production (OML); D001, D018, D035
- Defective/obsolete raw materials (RML, RMS); D001, D002, U113, U140, U159, U161, U162, U220, U239
- Still sludge from solvent recovery system (SSL, SSS); D001, D035, F003, F005
- Ignitable skimmer sludge (WSL); D001
- Waste sump sludge (WSS); D006, D007, D008

The manufacturing plant maintains four <90-day accumulation areas for storage of containerized waste. These areas are outside west of the manufacturing area (south of raw material warehouse) on a large pad with racks, in the southeast corner of the 1st floor of Building #1, in the warehouse of Building #2 (west wall), and outside of the still building on a pad (still building west pad).

Aqueous decanter waste is accumulated in the largest of five manufacturing plant permitted storage tanks, and this tank is directly hard-piped to the ERU. The tanks and the long stretch of pipe are inspected daily for condition and leaks. All other waste is transported at least weekly (unless the ERU is shutdown) to the ERU by tank truck or box trailers through a gate separating the two portions of the facility. There is no transportation of this waste over public roads so as of 2004, pursuant to a Class 1 permit modification, no manifests are used for these on-site shipments. There is still a paper form with these shipments. Once this waste is received at the ERU, PPG uses the same waste analysis and tracking procedures that it uses for shipments of waste from off-site PPG facilities.

Non-hazardous wastes generated include used oil, wastewater treatment bio-sludge and post-filtration sludge, batteries, and spent fluorescent lamps. Most of the above wastes are sent to the ERU for treatment, except for batteries and intact fluorescent bulbs, which are managed as universal wastes. They are shipped to AERC Recycling Services in Allentown, Pennsylvania. Broken fluorescent bulbs are collected in a satellite drum and shipped as hazardous waste.

Also, in some circumstances, waste isocyanate solution (D003, U223) is sent off site as hazardous waste because PPG does not want to burn unreacted isocyanates in the ERU (they gel up equipment). In the past, PPG has sent isocyanate waste (D001) to Clean Harbors El Dorado LLC for incineration (H040).

ERU:

The incineration system consists of a rotary kiln incinerator, secondary combustion chamber, slag and ash collection systems, heat recovery boiler, electrostatic precipitator (ESP), primary and supplemental induced draft fans, packed bed wet scrubber, carbon adsorption system, and a stack.

Hazardous wastes are generated by the ERU in the waste analysis and thermal treatment processes. The wastes and their associated waste codes (based on the Annual Report) include:

- Kiln slag; F002, F003, F005 and any U-codes associated with the incinerated waste
- Secondary combustion chamber ash; D006, D008, D010, F002, F003, F005 and any U-codes associated with the incinerated waste
- Flyash from the heat recovery boilers and electrostatic precipitator; D006, D008, D010, F002, F003, F005 and any U-codes associated with the incinerated waste
- Scrubber/evaporator blowdown; D008, D010, F002, F003, F005 and any U-codes associated with the incinerated waste
- Organic laboratory wastes; D001, D006, D007, D008, F003, F005
- Manifold drippings; D001, D005, D007, D008, D035
- ERU solvent flush; D001, F003, F005
- Strainer cleanout solids; D001, D005, D006, D007, D008, D035
- Aqueous wash water; D001, D008
- Refractory brick; D006, D008, D010, F002, F003
- Spent carbon and scrubber packing
- U-coded debris and discarded materials from shutdown; D005, D006, D007, D008, D010, F002, F003, F005, U113, U140, U159, U161, U162, U220, U239
- Waste flammable TKU resin solution; D001 (sent to Clean Harbors El Dorado for incineration)
- Contaminated duct work; D008, D009, D010, F002, F003, F005 (ultimately sent to Clean Harbors Canada, Inc. for disposal)

In order to limit the waste codes applicable to waste generated by the ERU, U- and P- wastes are stockpiled and burned in campaigns at certain times of the year. A variety of U- and P-codes are assigned to the ERU waste when that type of waste is incinerated.

The kiln slag and ashes are shipped to either Michigan Disposal Waste Treatment or Wayne Disposal, Inc. Site #2 Landfill in Belleville, Michigan, for either H075 (chemical oxidation), H111 (stabilization or chemical fixation prior to disposal at another site), or H132 (landfilling). At PPG, the slag is accumulated in a dump trailer, the secondary combustion chamber ash is collected in steel drums, and the ESP and boiler flyash are collected in heavy gauge plastic "supersacs". Shipments occur at least once every 7 to 10 days. The scrubber blowdown is collected in a less than 90-day fiberglass accumulation tank and is shipped to Heritage Environmental Services in Indiana for H077 (other chemical precipitation with or without pretreatment). Approximately, two tankers are sent off site per week.

When generated, the refractory brick removed from the kiln is accumulated on site (with the slag) and shipped to Michigan. Spent carbon is sent to Clean Harbors Canada, Inc. for disposal

via Clean Harbors' Burton, Michigan, facility. All of the other wastes are treated on-site in the ERU. PPG sends its empty drums to American ContainerNet.

In 2010, approximately 35,729,438 pounds of waste (including both hazardous and solid waste) were treated in the ERU via incineration. Of the total burned, 31,782,407 pounds were hazardous waste.

Additional P2 remarks and information:

Per PPG's most recent Waste Minimization Report (dated June 25, 2009):

PPG Circleville achieved the following results in 2007/2008:
- 2007 Actual Material Utilization (AMU): 98.2% AMU, a 0.5% year over year increase
- 2008 Actual Material Utilization (AMU): 97.7% AMU, a 0.5% year over year decrease

- 2007 Out of Specification (OOS): 1.74% of all batches were classified as OSS, above the goal of 0.90%
- 2008 Out of Specification (OOS): 2.09% of all batches were classified as OSS, above the goal of 0.90%

- 2007 5S: 100% of 5S areas were active by November, 2007
- 2008 5S: Average score of all areas at the end of the year was a 65. This exceeded the goal of an average score of 41.

PPG Circleville fully implemented a Global 5S program to help identify areas of waste generation and develop corrective actions to address the root cause of the waste (i.e., leaking equipment, housekeeping practices, etc.). They recovered energy from the incineration of waste at the Energy Recovery Unit (ERU) in the form of steam. The steam was utilized in the resin manufacturing facility. Used cleaning solvent was reclaimed through a closed loop still and reused in further process equipment cleaning. The process cooling water used in Building 2 was re-circulated to minimize the overall volume of waster consumed. These are just a few actions that PPG Circleville took to develop their waste minimization program.

GENERAL PERMIT COMPLIANCE AND ACTIVITIES					
1.	Has the expiration date of the permit passed? If so:				Yes ☐ No ☒ N/A ☐
	a.	Is the permittee continuing any activity regulated by the permit after the expiration date of the permit?			Yes ☐ No ☐ N/A ☒
	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 ☒
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]				Yes ☒ No ☐ N/A ☐
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 ☐
4.	Have any provisions of the permit been identified as invalid? [Condition A.4]				Yes ☐ No ☒ N/A ☐
5.	Has the permittee identified any instances of noncompliance with the permit, ORC Chapter 3734. or the rules adopted thereunder, which may endanger human health or the environment? If so:				Yes ☐ No ☒ N/A ☐
	a.	Did the permittee 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 ☒
		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:		Yes ☐ No ☐ N/A ☒
			A.	Name, address and telephone number of the owner/operator?	Yes ☐ No ☐ N/A ☒
			B.	Name, address and telephone number of the facility?	Yes ☐ No ☐ N/A ☒
			C.	Date, time and type of incident?	Yes ☐ No ☐ N/A ☒
			D.	Name and quantity of material(s) involved?	Yes ☐ No ☐ N/A ☒
			E.	The extent of injuries, if any?	Yes ☐ No ☐ N/A ☒
			F.	An assessment of the actual or potential hazard to the environment and human health outside the facility?	Yes ☐ No ☐ N/A ☒
			G.	Estimated quantity and disposition of recovered material that resulted from the incident?	Yes ☐ No ☐ N/A ☒
6.	Did the permittee provide a written report to Ohio EPA's Emergency Response Unit and DHWM within 5 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 ☒
	a.	A description of the noncompliance and its cause (including exact dates and times)?			Yes ☐ No ☐ N/A ☒
	b.	Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? and			Yes ☐ No ☐ N/A ☒
	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 ☒

NOTE: The permittee need not comply with the five day written report requirement if the director, uppn 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 ☐
	a.	Did the permittee report these instances to Ohio EPA, DHWM? [Condition A.22]	Yes ☐ No ☐ N/A ☒
	b.	Do the reports provided contain the information set forth in Condition A.20? [Condition A.20]	Yes ☐ No ☐ N/A ☒
	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 ☒
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 ☐
	a.	If so, has the permittee provided Ohio EPA with advance notice of such changes? [Condition A.17]	Yes ☐ No ☐ N/A ☒
NOTE: Such notification does not waive the permittee's duty to comply with the permit. [Condition A.17]			
9.	Has the permittee become aware that it failed to submit any relevant facts in the permit or issuance proceedings or that it submitted incorrect or incomplete information in permit issuance proceedings or other submissions to Ohio EPA? If so:		Yes ☐ No ☒ N/A ☐
	a.	Has the permittee properly submitted such facts or corrected information to the appropriate entity? [Condition A.24]	Yes ☐ No ☐ N/A ☒
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 ☐
11.	Has the permit, been transferred to a new owner/operator? If so:		Yes ☐ No ☒ N/A ☐
	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 ☒
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 ☐
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 ☐
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 ☐
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.14c]		Yes ☒ No ☐ N/A ☐
16.	Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14c]		Yes ☒ No ☐ N/A ☐
17.	Is the permittee planning any physical alterations or additions to any permitted portions of the facility? If so:		Yes ☐ No ☒ N/A ☐
	a.	Has the permittee given notice to the director of such alterations/additions? [Condition A.15]	Yes ☐ No ☐ N/A ☒

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 ☐
	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 ☐
	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 ☐
	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 ☐

INSPECTION ITEMS FROM PART B APPLICATION

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

RECORDKEEPING/OPERATING REQUIREMENTS

OPERATING RECORD

19.	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:		Yes ☒ No ☐ N/A ☐
	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 ☐
	b.	The location of each hazardous waste and quantity at each location including cross-reference to specific manifest numbers?	Yes ☒ No ☐ N/A ☐
	c.	Records and results of required waste analysis?	Yes ☒ No ☐ N/A ☐
	d.	Summary reports and details of all incidents that required implementation of the contingency plan?	Yes ☐ No ☐ N/A ☒
	e.	Records and results of required inspections?	Yes ☒ No ☐ N/A ☐
	f.	Documents required to be maintained by LDR requirements of OAC Chapter 3745-270?	Yes ☒ No ☐ N/A ☐
	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 ☒
	h.	**For disposal facilities,** location and quantity of each hazardous waste record on a facility map and cross-references to manifest document numbers? [3745-54-73(B)(2)]	Yes ☐ No ☐ N/A ☒

DOCUMENTS TO BE MAINTAINED AT FACILITY

20.	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 ☐
	b.	Contingency plan in accordance with OAC rule 3745-54-53?	Yes ☒ No ☐ N/A ☐

	c.	Closure plan in accordance with OAC rule 3745-55-12?	Yes ☒ No ☐ N/A ☐
	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 ☐
	e.	Personnel training plan and records required by OAC rule 3745-54-16(E)? [Condition B.6]	Yes ☒ No ☐ N/A ☐
	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 ☐
	g.	Operating record in accordance with OAC rule 3745-54-73? [Condition B.22]	Yes ☒ No ☐ N/A ☐
	h.	Post-closure plan, as required by OAC rule 3745-55-18(A)? [Condition A.28(a)(viii)]	Yes ☐ No ☐ N/A ☒
	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 ☐
21.	Is the permittee maintaining copies of all inspection logs at the facility for a period of at least 3 years from date of inspection? [Condition B.5]		Yes ☒ No ☐ N/A ☐
22.	Have any of the documents in Question No. 20 been revised? [Condition A.15] If so:		Yes ☒ No ☐ N/A ☐
	a.	Has the permittee submitted the revisions to Ohio EPA in accordance with OAC rule 3745-50-51?	Yes ☒ No ☐ N/A ☐
	b.	Have all requirements of OAC rule 3745-50-51 been met, including, where required, Ohio EPA approval?	Yes ☒ No ☐ N/A ☐
ANNUAL REPORT REQUIREMENT			
23.	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 ☐
SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS			
24.	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 ☐
	b.	Individual(s) who performed the sampling or measurement?	Yes ☒ No ☐ N/A ☐
	c.	Date(s) analyses were performed?	Yes ☒ No ☐ N/A ☐
	d.	Individual(s) who performed the analyses?	Yes ☒ No ☐ N/A ☐
	e.	Analytical technique(s) or method(s) used?	Yes ☒ No ☐ N/A ☐
	f.	Results of such analyses?	Yes ☒ No ☐ N/A ☐
25.	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 ☐
26.	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 3 years from the date of sampling, including:		
	a.	All calibration and maintenance records?	Yes ☒ No ☐ N/A ☐

27.	Has Ohio EPA requested submittal of any reports or other information from the permittee? If so:		Yes ☒ No ☐ N/A ☐
	a.	Have the submittals been signed and certified according to OAC rule 3745-50-42? [Condition A.13]	Yes ☒ No ☐ N/A ☐

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.

WASTE MINIMIZATION REQUIREMENTS

28.	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) of the permit and OAC rule 3745-54-73(B)(9)?	Yes ☒ No ☐ N/A ☐
29.	Did the permittee submit the waste minimization report to Ohio EPA, Office of Compliance Assistance & Pollution Prevention and Central District Office within 180 days of journalization of this permit and updates every five years thereafter? [Condition A.29] **The most recent Waste Minimization Report was received June 2009.**	Yes ☒ No ☐ N/A ☐
30.	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? **See Waste Minimization Report.**	Yes ☐ No ☐ N/A ☐
	If so, what amount of waste has the permittee reduced this year?	
31.	Has the permittee saved money this year by implementing pollution prevention (reducing raw material usage, disposal fees, energy savings, etc.)? **See Waste Minimization Report.**	Yes ☐ No ☐ N/A ☐
	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 28 through 31 only needs to be collected one time for the calendar year.

GROUND WATER MONITORING

32.	Has the permittee conducted sampling of their monitoring wells? [Condition J.9 & J.10]	Yes ☐ No ☐ N/A ☒
33.	Have they reported the results in the Annual Report to the director by March 1st as required by Condition B.25 of the permit?	Yes ☐ No ☐ N/A ☒

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.

WASTE ACCEPTANCE AND GENERATION

34.	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 ☐
35.	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 ☐
36.	Has the permittee notified the regional administrator of U.S. EPA 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(b)]	Yes ☐ No ☐ N/A ☒

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.

OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS

37.		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 ☐
	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 ☐
	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 ☐
	d.	Prepared manifests have been signed by the permittee and initial transporter in compliance with OAC rule 3745-52-23?	Yes ☒ No ☐ N/A ☐
38.		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 3 years at the facility as required by OAC rules 3745-52-40 and 3745-54-71(A)(2)(e)?	Yes ☒ No ☐ N/A ☐
NOTE: If the permittee is generating hazardous waste, remember to attach a complete generator checklist.			
39.		Does the permittee use only properly registered transporters when removing hazardous wastes? [Condition A.16]	Yes ☒ No ☐ N/A ☐
40.		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 3 years? [3745-54-71(A)(2)(c)(d)(e)]	Yes ☒ No ☐ N/A ☐
	a.	If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met? [3745-54-71(B)(3)(4)(5)]	Yes ☐ No ☐ N/A ☒
	b.	Are any significant discrepancies in the manifest, as defined in OAC rule 3745-54-72(A) noted in writing on the manifest or shipping paper? [3745-54-71(A)(2)(b)] & [3745-54-71(B)(2)]	Yes ☐ No ☐ N/A ☒
41.		Have any manifest discrepancies been reconciled within 15 days as required by OAC rule 3745-54-72(C)? [Condition B.24(b)] If not:	Yes ☐ No ☐ N/A ☒
	a.	Has the permittee submitted the required information to the director?	Yes ☐ No ☐ N/A ☒
42.		Has the permittee rejected any hazardous waste load or identified a container residue that exceeds the quantity limits for "empty" containers? [Condition B.24] If so:	Yes ☐ No ☒ N/A ☐
	a.	Did the permittee consult with the generator prior to forwarding the rejected waste to an alternate facility? [3745-54-72(D)(1)]	Yes ☐ No ☐ N/A ☒
	b.	Did the permittee send the rejected waste to an alternate facility or return the rejected waste to the generator within 60 days after the rejection? [3745-54-72(D)(1)]	Yes ☐ No ☐ N/A ☒
	c.	While the permittee is making arrangements for forwarding rejected waste to another facility, did the permittee ensure that either the delivering transporter retained custody of the waste or did the permittee provide for secure, temporary custody of the waste? [3745-54-72(D)(2)]	Yes ☐ No ☐ N/A ☒
	d.	Did the permittee prepare a manifest in accordance with OAC rules 3745-54-71(E)(1) through (7) for rejected waste to be sent to an alternate facility? [3745-54-72(E)]	Yes ☐ No ☐ N/A ☒

	e.	Did the permittee prepare a manifest in accordance with OAC rules 3745-54-72(F)(1) through (7) for rejected waste to be sent back to the generator? [3745-54-72(F)]	Yes ☐ No ☐ N/A ☒
43.		If the permittee receives hazardous waste imported from a foreign source, has the permittee mailed a copy of the manifest to U.S. EPA within 30 days after a delivery? [3745-54-71(A)(3)]	Yes ☒ No ☐ N/A ☐
44.		Does the permittee send a hazardous waste shipment to a consignment state (*i.e.*, the state in which the hazardous waste shipment will be transported and subsequently managed)? If so:	Yes ☒ No ☐ N/A ☐
	a.	Has the permittee determined whether the consignment state for a shipment regulates any additional wastes (beyond those regulated federally) as hazardous wastes under its state hazardous waste program? [3745-54-71(E)]	Yes ☒ No ☐ N/A ☐
	b.	Has the permittee determined whether the consignment state requires the permittee to submit any copies of the manifest to the state? [3745-54-71(E)]	Yes ☒ No ☐ N/A ☐
45.		If the permittee 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 OAC rule 3745-54-76(A) been submitted to the director within 15 days?	Yes ☐ No ☐ N/A ☒
WASTE ANALYSIS/WASTE ANALYSIS PLAN			
46.		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, 3745-205 and 3745-270 and the terms and conditions of the permit? [Condition B.3(a)]	Yes ☒ No ☐ N/A ☐
47.		Does the permittee follow the procedures described in the WAP (Section C of the approved permit application)? [Condition B.3(b)]	Yes ☒ No ☐ N/A ☐
48.		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 ☐
49.		**FOR OFF-SITE FACILITIES:** 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 ☐
50.		**FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER OAC rule 3745-270-04(A):**	
		Does the waste analysis plan include procedures and schedules for:	
	a.	The sampling of impoundment contents? [3745-54-13(B)(7)]	Yes ☐ No ☐ N/A ☒
	b.	The analysis of test data? [3745-65-13(B)(7)]	Yes ☐ No ☐ N/A ☒
	c.	The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either do not meet treatment standards (OAC rules 3745-270-40 to 3745-270-49) or where no treatment standards have been established? [3745-54-13(B)(7)]	Yes ☐ No ☐ N/A ☒
51.		**Where applicable:** The methods which will be used to meet additional waste analysis requirements for specific waste management methods specified in OAC rules 3745-54-17, 3745-57-14, 3745-57-41 and 3745-270-07? [3745-54-13(B)(6)]	Yes ☒ No ☐ N/A ☐
52.		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 ☐

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.

GENERAL INSPECTION REQUIREMENTS

NOTE: Inspector may attach a copy of the inspection procedures and schedules. If so, the attached document is referenced as Appendix ____.

53.	Is the permittee following the inspection procedures and schedules as set forth in the permit (Section F of the approved permit application) and the requirements of OAC rules 3745-54-15(A),(C) and (D)? [Condition B.5] **PPG is to inspect Tank Storage at the Manufacturing Plant in accordance with the frequencies specified in Table C(2) of Attachment 1 to Section F of the permit application. Table C(2) requires tanks to be inspected daily when the plant is normally staffed. Per review of the Weekly PMs of Waste Storage (E-List-005/W inspection list), there were no documented inspections of the Resin plant tanks from January 3 to January 9, 2011, even though the plant was normally staffed.**		Yes ☐ No ☒ N/A ☐
54.	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 ☐
	a.	Is the schedule kept at the facility? [3745-54-15(B)(2)]	Yes ☒ No ☐ N/A ☐
55.	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 ☐
56.	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 ☐
	b.	Name of inspector?	Yes ☒ No ☐ N/A ☐
	c.	Notation of observations made?	Yes ☒ No ☐ N/A ☐
	d.	Date and nature of any repairs or other remedial actions?	Yes ☒ No ☐ N/A ☐

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

SECURITY REQUIREMENTS

57.	Is the permittee complying with the following security provisions of OAC rule 3745-54-14 and Condition B.4 of the permit: [Section F of the approved 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 ☐
	b.	An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility?	Yes ☒ No ☐ N/A ☐
	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 ☐
58.	In accordance with OAC rule 3745-54-14(C), does the permittee have signs reading "Danger - Unauthorized Personnel Keep Out" posted at entrances		Yes ☒ No ☐ N/A ☐

	of the hazardous waste co...ner storage building number _____?		
FACILITY OPERATIONS			
59.	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? [3745-54-31 and Condition B.1]		Yes ☒ No ☐ N/A ☐
60.	Does the permittee properly maintain and operate the facility to achieve compliance with the terms and conditions of the permit including: [Condition A.9]		Yes ☒ No ☐ N/A ☐
	a.	Effective management practices?	Yes ☒ No ☐ N/A ☐
	b.	Adequate funding?	Yes ☒ No ☐ N/A ☐
	c.	Adequate operator staffing and training?	Yes ☒ No ☐ N/A ☐
	d.	Adequate laboratory and process controls?	Yes ☒ No ☐ N/A ☐
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.			
PERSONNEL TRAINING			
61.	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 ☐
	a.	Does the permittee provide personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [3745-54-16(A)(B)(C)]	Yes ☒ No ☐ N/A ☐
	b.	Does the permittee provide 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 ☐
	c.	Does the permittee provide an annual refresher training course as required by OAC rule 3745-54-16(C)?	Yes ☒ No ☐ N/A ☐
62.	Is the permittee maintaining personnel training records as required by OAC rule 3745-54-16(D) and Section ___ of the approved permit application, including: written job titles, job descriptions and documented employee training records? [Condition B.6]		Yes ☒ No ☐ N/A ☐
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.			
REQUIRED EQUIPMENT			
NOTE: Inspector may attach a list of emergency equipment. If so, the attachment document is referenced as Appendix __.			
63.	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 ☐
	b.	A device such as a telephone which is capable of summoning emergency assistance from local emergency authorities?	Yes ☒ No ☐ N/A ☐
	c.	Portable fire extinguishers and/or fire control equipment, spill control and decontamination equipment?	Yes ☒ No ☐ N/A ☐

	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 ☐
64.		Is the permittee inspecting, testing and maintaining the equipment specified in Question No. 63 to ensure its proper operating in accordance with OAC rule 3745-54-33 and Condition B.10 of the permit?	Yes ☒ No ☐ N/A ☐
65.		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 ☐

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.

CONTINGENCY PLAN - EMERGENCY PROCEDURES

66.		In compliance with Condition B.13 of the permit and OAC rule 3745-54-37(A), 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 ☐
	b.	Inform such agencies of safety equipment, supplies, proper emergency safety procedures that are applicable to the facility?	Yes ☒ No ☐ N/A ☐
	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 ☐
67.		Has a state or local agency declined to enter into the arrangements set forth in OAC rule 3745-54-37(A)? If so:	Yes ☐ No ☒ N/A ☐
	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 ☒
68.		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 ☐
69.		Has the permittee notified all parties identified in the contingency plan in writing of amendments, modifications, or revisions to the plan within 10 days of the effective date of the change in the plan? [Condition B.18(b)]	Yes ☒ No ☐ N/A ☐
70.		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 ☐
71.		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 ☐

NOTE: Also see Question 22 to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.

EMERGENCY COORDINATOR

72.		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 ☐
73.		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:	Yes ☒ No ☐ N/A ☐
	a.	Contingency plan?	Yes ☒ No ☐ N/A ☐

	b.	Facility operations/activities?	Yes ☒ No ☐ N/A ☐
	c.	Waste characterization and location?	Yes ☒ No ☐ N/A ☐
	d.	Location of all records in the facility?	Yes ☒ No ☐ N/A ☐
	e.	Facility layout?	Yes ☒ No ☐ N/A ☐
74.	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 ☐
75.	Does the permittee have a contingency plan for the facility that: [Condition B.15]		
	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 ☐
	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 ☐
	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 ☐
	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 ☐
	e.	Includes the location and a physical description of each item on the list referenced in Question No. 75(d), and a brief outline of its capabilities?	Yes ☒ No ☐ N/A ☐
	f.	Includes an evacuation 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 ☐

NOTE: If the permittee already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the permittee can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The permittee may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-54-52(B)]

IMPLEMENTATION OF CONTINGENCY PLAN

76.	Has there been a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment since the date of the last inspection? If so:		Yes ☐ No ☒ N/A ☐

NOTE: Example scenarios that could be threats to human health or the environment are provided in a DHWM guidance document on "Contingency Plan Implementation and Incident Reporting Under Ohio Hazardous Waste Rules" at: http://epa.ohio.gov/portals/32/pdf/Contingency_Plan_and_Incident_Reporting.pdf. Facility specific scenarios are included in the permittee's contingency plan.

	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 ☒
	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: [3745-54-56(D)(2)]	

		i.	Name and telephone number of the reporter?	Yes ☐ No ☐ N/A ☒
		ii.	Name and address of the facility?	Yes ☐ No ☐ N/A ☒
		iii.	Time and type of incident?	Yes ☐ No ☐ N/A ☒
		iv.	Name and quantity of materials involved?	Yes ☐ No ☐ N/A ☒
		v.	The extent of injuries?	Yes ☐ No ☐ N/A ☒
		vi.	The possible hazards to human health or the environment outside the facility?	Yes ☐ No ☐ N/A ☒
	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 ☒
	d.		Within 15 days after the incident did the permittee submit to the director a written report of the incident? If so:	Yes ☐ No ☐ N/A ☒
		i.	Did the report contain the elements set forth in OAC rule 3745-54-56(I)? [Condition B.23]	Yes ☐ No ☐ N/A ☒
	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(I)? [Condition B.23]	Yes ☐ No ☐ N/A ☒

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.

CLOSURE REQUIREMENTS

77.		Does the permittee maintain the approved closure plan at the facility? [Condition B.29]	Yes ☒ No ☐ N/A ☐
78.		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 ☐
79.		Has the permittee amended the closure plan? If so:	
	a.	Has the plan been amended in accordance with OAC rule 3745-55-18(D)? [Condition B.28]	Yes ☐ No ☐ N/A ☒

NOTE: Also see Question 22 to verify that any changes to the closure plan were submitted in accordance with OAC rule 3745-50-51.

80.		Has the permittee closed the facility? If so:	
	a.	Did the permittee complete closure of the facility 180 days after receiving the final volume of hazardous waste? [Condition B.31]	Yes ☐ No ☐ N/A ☒
	b.	Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26]	Yes ☐ No ☐ N/A ☒
	c.	Did the permittee carry out the approved closure plan as set found in Section _____ of the approved permit application? [Condition B.27]	Yes ☐ No ☐ N/A ☒
	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 ☒

	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 ☒
	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 ☒
	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 ☒

POST-CLOSURE MAINTENANCE

NOTE: Inspector may attach a post-closure maintenance inspection schedule. If so, the attached document is referenced as Appendix ____.

81.		Has the permittee inspected the components, structures, and equipment at the site in accordance with the inspection schedule in Section ____ of the approved permit application on a quarterly basis? [OAC rule 3745-55-17(A)(1)(b)] [Condition B.35]	Yes ☐ No ☐ N/A ☒
82.		Has the permittee conducted and recorded an inspection of at least the following? [Condition B.35]	Yes ☐ No ☐ N/A ☒
	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.	
83.		Is the permittee using the inspection forms found in the approved Part B permit application? [Section ____ of the approved permit application]	Yes ☐ No ☐ N/A ☒
84.		Have suitable repairs been made within a reasonable amount of time? [Condition B.35]	Yes ☐ No ☐ N/A ☒
85.		Have repairs been indicated on the Notification Repair Form? [Condition B.35]	Yes ☐ No ☐ N/A ☒
86.		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 ☒

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.

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			
87.	Are containers holding hazardous wastes in good condition as required by OAC 3745-55-71? [Condition C.4] If not:		Yes ☒ No ☐ N/A ☐
	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 ☒
88.	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 ☐
89.	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 ☐
CONTAINERS - INSPECTIONS			
NOTE: Inspector may attach a container inspection checklist. If so, the attached document is referenced as Appendix___.			
90.	Is the permittee inspecting the container area weekly in accordance with OAC rule 3745-55-74 and the approved inspection schedule in Section F of the approved permit application to detect leaking containers and deterioration of containers and the containment system? [Condition C.9]		Yes ☒ No ☐ N/A ☐
	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 ☐
STORAGE OF HAZARDOUS WASTE IN TANK SYSTEMS			
TANK SYSTEMS - CONDITIONS			
91.	Is each tank clearly labeled/marked with the words "Hazardous Waste?" as required by OAC rule 3745-52-34(A)(3)?		Yes ☒ No ☐ N/A ☐
92.	In accordance with OAC rule 3745-55-94 and Condition D.5 of the permit, does the permittee follow the general operating requirements below:		
	a.	Does the permittee prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail?	Yes ☒ No ☐ N/A ☐
	b.	Does the permittee use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)?	Yes ☒ No ☐ N/A ☐
	c.	If a leak or spill has occurred in the tank system, has the permittee complied with OAC rule 3745-55-96?	Yes ☐ No ☐ N/A ☒
TANK SYSTEMS - INSPECTIONS			
93.	In accordance with OAC rule 3745-55-95(A) and Condition D.6(b) of the permit, does the permittee develop and follow a schedule and procedure for inspecting overfill controls?		Yes ☒ No ☐ N/A ☐
94.	Has the permittee documented the inspections required in OAC rules 3745-55-95, in the operating record, including inspection of the following: [Condition D.6(c)] **See #53.**		
	a.	Above ground portion of tank each operating day?	Yes ☐ No ☐ N/A ☐
	b.	Data from leak detection equipment each operating day?	Yes ☐ No ☐ N/A ☐
	c.	Construction materials and area immediately surrounding the tanks	Yes ☐ No ☐ N/A ☐

		for signs of erosion or release of hazardous waste each operating day?	
95.		For ancillary equipment NOT provided with secondary containment, has the permittee documented inspections of such equipment each operating day? [3745-99-95(F)]	Yes ☐ No ☒ N/A ☐
NOTE: "Each operating day" is each day that the tank system is being used to manage (store or treat) hazardous waste.			
NOTE: Ancillary equipment required to be provided with secondary containment are described in OAC 3745-55-93(F).			
96.		For tank systems using leak detection systems to alert facility personnel to leaks or implementing established workplace practices to ensure leaks are promptly identified, has the permittee documented: [3745-55-95(D)]	Yes ☒ No ☐ N/A ☐
	a.	Inspections of above ground portion of tank weekly?	Yes ☒ No ☐ N/A ☐
	b.	Inspections of construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste weekly?	Yes ☒ No ☐ N/A ☐
	c.	Use of the alternate inspection schedule, including a description of the established workplace practices at the facility?	Yes ☐ No ☐ N/A ☒
97.		Where applicable, does the permittee inspect the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter, as required by OAC rule 3745-55-95(G)(1)? [Condition D.6(d)(i)]	Yes ☐ No ☐ N/A ☒
98.		Where applicable, does the permittee inspect all sources of impressed current at least bi-monthly as required by OAC rule 3745-55-95(G)(2)? [Condition D.6(d)(ii)]	Yes ☐ No ☐ N/A ☒
TANK SYSTEMS – CLOSURE REQUIREMENTS			
99.		If the permittee has closed a tank, was closure completed in accordance with OAC rule 3745-55-97? [Condition D.9]	Yes ☐ No ☐ N/A ☒
TANK SYSTEMS – STORING IGNITABLE OR REACTIVE WASTES			
100.		For tanks used to treat or store ignitable or reactive wastes, has the permittee complied with one of the following in accordance with OAC rule 3745-55-98(A)]?: [Condition D.10(a)]	Yes ☒ No ☐ N/A ☐
	a.	Is the waste treated before or immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the permittee has conducted such activities in compliance with OAC rule 3745-54-17(B)?; or	Yes ☐ No ☐ N/A ☒
	b.	Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction?; or	Yes ☒ No ☐ N/A ☐
	c.	Is the tank used solely for emergencies?	Yes ☐ No ☐ N/A ☒
101.		If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (2008)? [Condition D.10(b)]	Yes ☒ No ☐ N/A ☐
102.		In accordance with OAC rules 3745-55-99(A), (B) and Condition D.11 of the permit, has the permittee placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material?	Yes ☐ No ☒ N/A ☐
	a.	**If so,** have the requirements of OAC rule 3745-54-17(B) been met?	Yes ☐ No ☐ N/A ☒

TANK SYSTEMS – WRITTEN ASSESSMENT REQUIREMENTS			
103.	In accordance with OAC rule 3745-55-92(A) and Condition D.3 of the permit, has the permittee obtained and submitted a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)?		Yes ☒ No ☐ N/A ☐
NOTE: Review the file to see if the written assessment has been previously reviewed and what the results were.			
	Does the written assessment include the following items:		
	a.	Certification by a qualified professional engineer?	Yes ☒ No ☐ N/A ☐
	b.	Consideration of the design standards of the system?	Yes ☒ No ☐ N/A ☐
	c.	Consideration of the hazardous characteristics of the waste(s)?	Yes ☒ No ☐ N/A ☐
	d.	An evaluation by a corrosion expert (only if the external system/components are metal and in contact with soil or water)?	Yes ☐ No ☐ N/A ☒
	e.	A determination of design and operational measures that will be needed to protect the tank system from potential damage (only for underground tank components)?	Yes ☐ No ☐ N/A ☒
	f.	Design considerations to ensure that the tank foundations will maintain the load of a full tank?	Yes ☒ No ☐ N/A ☐
	g.	Design considerations for anchoring the unit to prevent floatation (only for tanks situated in a seismic fault zone or saturated zone)?	Yes ☐ No ☐ N/A ☒
	h.	Design considerations to ensure that the tank system will withstand the effects of frost heave (only for underground tank systems)?	Yes ☐ No ☐ N/A ☒
NOTE: CO-DHWM Engineering staff are available to assist you with evaluation of the written assessment.			
104.	In accordance with OAC rule 3745-55-92(G) and Condition D.3(b) of the permit, are there written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed?		Yes ☒ No ☐ N/A ☐
	Do the written statements address all of the following:		
	a.	Inspection for damage and/or inadequate construction and installation was conducted?	Yes ☒ No ☐ N/A ☐
	b.	Statement that deficiencies were corrected before the tank system was covered or put into use?	Yes ☒ No ☐ N/A ☐
	c.	Proper backfilling?	Yes ☐ No ☐ N/A ☒
	d.	Tightness test; if the tank system was found not to be tight, does the statement indicate that proper repairs were made?	Yes ☐ No ☐ N/A ☒
	e.	Proper support and protection of ancillary equipment?	Yes ☒ No ☐ N/A ☐
	f.	Supervision of the installation of field fabricated corrosion protection?	Yes ☐ No ☐ N/A ☒

TANK SYSTEMS – SECONDARY CONTAINMENT		
105.	Has secondary containment been provided as required by OAC rule 3745-55-93(A)? [Condition D.4]	Yes ☒ No ☐ N/A ☐
NOTE: Secondary containment must be provided for tank systems that store or treat materials that become hazardous wastes within two years after the hazardous waste listing, or when the system has reached 15 years of age, whichever comes later. [3745-55-93(A)(2)].		

106.	Has secondary containment been provided?			Yes ☒ No ☐ N/A ☐
	a.	An external liner as described in OAC rule 3745-55-93(E)(1)? If so,		Yes ☒ No ☐ N/A ☐
		i.	Is liner designed or operated to contain 100% of the capacity of the largest tank?	Yes ☒ No ☐ N/A ☐
		ii.	Is liner designed and operated to prevent run-on and infiltration <u>or</u> the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	Yes ☒ No ☐ N/A ☐
		iii.	Is liner free of cracks and gaps?	Yes ☒ No ☐ N/A ☐
		iv.	Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release?	Yes ☒ No ☐ N/A ☐
		v.	Are chemically resistant water stops in place at all points? (concrete liners only)	Yes ☒ No ☐ N/A ☐
		vi.	Is there a compatible interior coating or lining to prevent migration of waste into the concrete? (concrete liners only)	Yes ☒ No ☐ N/A ☐
	b.	Vault system as described in OAC rule 3745-55-93(E)(2)? If so,		Yes ☐ No ☒ N/A ☐
		i.	Is vault system designed to contain 100% of the capacity of the largest tank?	Yes ☐ No ☐ N/A ☒
		ii.	Is liner designed and operated to prevent run-on and infiltration <u>or</u> the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	Yes ☐ No ☐ N/A ☒
		iii.	Are chemically resistant water stops in place at all points?	Yes ☐ No ☐ N/A ☒
		iv.	Is there a compatible interior coating to prevent migration into the concrete?	Yes ☐ No ☐ N/A ☒
		v.	For **ignitable or reactive waste**: Is the vault system provided with means to prevent (or alternatively "protect against") the formation or ignition of vapors?	Yes ☐ No ☐ N/A ☒
		vi.	Is vault system provided with an exterior moisture barrier?	Yes ☐ No ☐ N/A ☒
	c.	Double-walled tank as described in OAC rule 3745-55-93(E)(3)? If so,		Yes ☐ No ☒ N/A ☐
		i.	<u>Is double-walled tank designed as an integral structure to</u> contain any release from the inner tank?	Yes ☐ No ☐ N/A ☒
		ii.	**If metal**, are the primary tank interior and outer shell exterior surfaces protected from corrosion?	Yes ☐ No ☐ N/A ☒
		iii.	Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time?	Yes ☐ No ☐ N/A ☒
	d.	An equivalent device as described in OAC rule 3745-55-93(D)(4) which has been approved by the director?		Yes ☐ No ☐ N/A ☒

TANK SYSTEMS – SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION

107.	In accordance with OAC rules 3745-55-93(B)(1), (2) and Condition D.4 of the permit, has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, groundwater, or surface water and is it capable of <u>detecting</u> and <u>collecting</u> releases and accumulated liquids?	Yes ☒ No ☐ N/A ☐
108.	Does the secondary containment system meet the following minimum requirements of OAC rule 3745-55-93(C)?: [Condition D.4]	

	a.	Constructed or lined with compatible materials of sufficient strength to prevent failure?	Yes ☒ No ☐ N/A ☐
	b.	Placed on a foundation or base capable of providing support?	Yes ☒ No ☐ N/A ☐
	c.	Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at the earliest practicable time?	Yes ☒ No ☐ N/A ☐
	d.	Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation?	Yes ☒ No ☐ N/A ☐
	e.	Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner?	Yes ☒ No ☐ N/A ☐
TANK SYSTEMS – ANCILLARY EQUIPMENT REQUIREMENTS			
109.	In accordance with OAC rule 3745-55-93(F) and Condition D.4 of the permit, is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)?		Yes ☐ No ☒ N/A ☐
	If not, is the ancillary equipment one of the following:		
	a.	Above ground piping (exclusive of flanges, joints, valves and connections) that is inspected daily?	Yes ☒ No ☐ N/A ☐
	b.	Welded flanges, welded joints and/or welded connections that is inspected daily?	Yes ☐ No ☐ N/A ☒
	c.	Sealless or magnetic coupling pumps and/or sealless valves?	Yes ☐ No ☐ N/A ☒
	d.	Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown and/or loss of pressure-actuated shut-off devices) that is inspected daily?	Yes ☐ No ☐ N/A ☒
TANK SYSTEMS – TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE			
110.	Has there been a leak or spill from any tank system or has any tank system been found unfit for use? **If so**, did the permittee take the following actions as required by OAC rules 3745-55-96(A) through (E)?: [Conditions D.7(a), D.8(a) and (b)]:		Yes ☐ No ☒ N/A ☐
NOTE: If the tank is found to be unfit for use, inspector should explain why.			
	a.	Immediately cease flow of material into tank and investigate the cause of the release?	Yes ☐ No ☐ N/A ☒
	b.	Remove waste from tank system to prevent further release within 24 hours of detection or at the earliest practicable time?	Yes ☐ No ☐ N/A ☒
	c.	Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment?	Yes ☐ No ☐ N/A ☒
	d.	For a visible release to the environment, immediately conduct a visual inspection of the release?	Yes ☐ No ☐ N/A ☒
	e.	For a visible release to the environment, prevent further migration of the leak or spill to soils or surface waters?	Yes ☐ No ☐ N/A ☒
	f.	For a visible release to the environment, properly dispose of any visibly contaminated soil or surface water?	Yes ☐ No ☐ N/A ☒
	g.	Report any release to the environment to the director within 24 hours unless it was less than one pound and was cleaned up immediately?	Yes ☐ No ☐ N/A ☒
	h.	For a release to the environment, submit a written report of the incident to the director within 30 days after the release?	Yes ☐ No ☐ N/A ☒

	i.	Remediate the spill and repair the unit prior to returning it to service?	Yes ☐ No ☐ N/A ☒
	j.	For a release from a tank system without secondary containment, did the permittee provide secondary containment meeting the requirements of OAC rule 3745-55-93 for the unit prior to putting it back into service?	Yes ☐ No ☐ N/A ☒
NOTE: The requirements noted in 108.j do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.			
111.	In the event that the repairs to the tank system were major (e.g., replacement of liner, repair of ruptured primary or secondary containment structure), did the permittee obtain a certification from a qualified professional engineer attesting that the repaired unit is capable of handling hazardous waste, as required by OAC rule 3745-55-96(F)? [Condition D.7(c)]		Yes ☐ No ☐ N/A ☒
112.	Was a copy of the certification submitted to the director within seven days after returning the system to use, as required by OAC rule 3745-55-96(F)? [Condition D.7(c)]		Yes ☐ No ☐ N/A ☒
113.	If the permittee was unable to repair and return the unit to service as described in Questions 110.i and 110.j, was the tank system closed in accordance with OAC rule 3745-55-97?		Yes ☐ No ☐ N/A ☒
114.	Does the permittee have a tank system with a variance from secondary containment from which a release has occurred but <u>has not</u> migrated beyond the zone of engineering control? If so, did the permittee take following actions as required by OAC rule 3745-55-93(G)(3)? [Condition D.7(b)]		Yes ☐ No ☒ N/A ☐
	a.	Has the permittee complied with OAC rules 3745-55-96(A) through (F) and decontaminated soils?	Yes ☐ No ☐ N/A ☒
	b.	If soils cannot be decontaminated/removed, has the permittee complied with OAC rule 3745-55-97(B)?	Yes ☐ No ☐ N/A ☒
115.	Does the permittee have a tank system with a variance from secondary containment from which a release occurred and <u>has</u> migrated from the zone of engineering control? If so, did the permittee take following actions as required by OAC rule 3745-55-93(G)(4)? [Condition D.7(b)]		Yes ☐ No ☒ N/A ☐
	a.	Has the permittee complied with OAC rules 3745-55-96(A) through (D), prevented migration, and decontaminated soil?	Yes ☐ No ☐ N/A ☒
	b.	If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the permittee complied with OAC rule 3745-55-97(B)?	Yes ☐ No ☐ N/A ☒
CONTAINMENT SYSTEM			
116.	Does the permittee maintain the containment system as described in Section D of the approved permit application, including: [Condition C.7]		Yes ☒ No ☐ N/A ☐
	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 ☐
	b.	A system which is free of gaps and sufficiently impervious to contain leaks and spills?	Yes ☒ No ☐ N/A ☐
117.	Has the permittee had a spill or leak of wastes? If so:		Yes ☐ No ☒ N/A ☐
	a.	Was spilled or leaked waste removed in a timely manner? [Condition C.7(e)]	Yes ☐ No ☐ N/A ☒
NOTE: This time period is not to exceed 24 hours. [Condition C.7(e)]			
AISLE SPACE			
118.	Is the permittee maintaining adequate aisle space to allow unobstructed movement of personnel and equipment in the event of an emergency as		Yes ☒ No ☐ N/A ☐

	required by OAC rule 3745-54-35 and Condition B.12 of the permit?	

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.

LAND DISPOSAL RESTRICTION REQUIREMENTS

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

119.		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 ☐
120.		Does the permittee comply with the notification and certification requirements of OAC rule 3745-270-07(A)?	Yes ☒ No ☐ N/A ☐
121.		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 ☐
122.		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 ☐
	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 3 years as required by OAC rule 3745-270-07(A)?	Yes ☒ No ☐ N/A ☐
123.		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 ☐

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.

CORRECTIVE ACTION

124.		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 ____] **Corrective action obligations are currently being addressed by Ohio EPA's Division of Emergency and Remedial Response (DERR) through an Administrative Order on Consent (AOC). DERR will continue to oversee the permittee's implementation of corrective measures required by the June 2000 Decision Document. Newly discovered waste management units (WMUs) at the facility or new releases from existing WMUs will be addressed by the conditions in Module E of the hazardous waste permit.**	Yes ☐ No ☐ N/A ☐
125.		Has the permittee identified any new WMUs or releases at the facility? [Condition E.10]? If so:	Yes ☐ No ☐ N/A ☒
	a.	Did the permittee follow the steps indicated in Conditions E.10(a), (b) and E.11?	Yes ☐ No ☐ N/A ☒

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.

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

CESQG: ≤100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or ≤ 1 Kg. of acutely hazardous waste.
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or >1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]		Yes ☒ No ☐ N/A ☐
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]		Yes ☒ No ☐ N/A ☐
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]		Yes ☒ No ☐ N/A ☐
4.	Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)]		Yes ☒ No ☐ N/A ☐
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]		Yes ☒ No ☐ N/A ☐
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 ☐ No ☒ N/A ☐
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 ☐ No ☒ N/A ☐
8.	Does the generator accumulate hazardous waste?		Yes ☒ No ☐ N/A ☐
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 ☐ No ☒ N/A ☐
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 ☐ No ☐ N/A ☒
	b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	Yes ☐ No ☐ N/A ☒
	c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes ☐ No ☐ N/A ☒
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes ☐ No ☐ N/A ☒
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: **Clean Harbors (MIR000014530), in Burton, MI, is acting as the primary exporter on behalf of the generator.**		Yes ☒ No ☐ N/A ☐
	a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes ☒ No ☐ N/A ☐
	b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes ☒ No ☐ N/A ☐
	c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes ☐ No ☐ N/A ☒
	d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes ☒ No ☐ N/A ☐

	e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes ☒ No ☐ N/A ☐
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)(1)]	Yes ☒ No ☐ N/A ☐
13.		Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes ☒ No ☐ N/A ☐
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]			
14.		Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes ☒ No ☐ N/A ☐
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 ☐ No ☐ N/A ☒
16.		Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes ☒ No ☐ N/A ☐
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 received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	Yes ☐ No ☐ N/A ☒
18.		If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes ☐ No ☐ N/A ☒
19.		If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes ☐ No ☐ N/A ☒
20.		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			
21.		Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes ☒ No ☐ N/A ☐
22.		Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]	Yes ☒ No ☐ N/A ☐
NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]			
23.		Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes ☒ No ☐ N/A ☐
24.		Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes ☒ No ☐ N/A ☐
25.		Does the generator provide annual refresher training to employees? [3745-65-16(C)]	Yes ☒ No ☐ N/A ☐

26.	Does the generator keep records and documentation of:		
	a.	Job titles? [3745-65-16(D)(1)]	Yes ☒ No ☐ N/A ☐
	b.	Job descriptions? [3745-65-16(D)(2)]	Yes ☒ No ☐ N/A ☐
	c.	Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes ☒ No ☐ N/A ☐
	d.	Completed training or job experience required? [3745-65-16(D)(4)]	Yes ☒ No ☐ N/A ☐
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]		Yes ☒ No ☐ N/A ☐
CONTINGENCY PLAN			
28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]		Yes ☒ No ☐ N/A ☐
29.	Does the plan describe the following:		
	a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes ☒ 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 Countermeasures Plan" under 40 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. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]			
30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]		Yes ☒ No ☐ N/A ☐
31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]		Yes ☒ No ☐ N/A ☐
32.	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			
33.	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(I)?	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			
34.	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 ☐
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:		
	a.	Internal communications or alarm system? [3745-65-32(A)]	Yes ☒ 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.			
36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]		Yes ☒ No ☐ N/A ☐
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]		Yes ☒ No ☐ N/A ☐
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]		Yes ☒ No ☐ N/A ☐
39.	If there is only one employee on the premises, is there immediate access to a device (e.g., 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 ☐
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]		Yes ☒ No ☐ N/A ☐
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]		Yes ☒ No ☐ N/A ☐
42.	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			
43.	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 ☐
44.	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?	Yes ☒ No ☐ N/A ☐

		[3745-52-34(C)(2)]	
NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.			
USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS			
45.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]		Yes ☒ No ☐ N/A ☐
46.	Is the accumulation date on each container? [3745-52-34(A)(2)] **At the time of the inspection, one drum being used to accumulate fly ash at the ERU (located in the box trailer) was not labeled with an accumulation start date.**		Yes ☐ No ☒ N/A ☐
47.	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.			
48.	Is the container accumulation areas(s) inspected weekly? [3745-66-74]		Yes ☒ No ☐ N/A ☐
	a.	Are inspections recorded in a log or summary? [3745-66-74] **Per review of the Weekly PMs of Waste Storage (E-List-005/W inspection list), there were no documented inspections of the Resin plant less than 90-day container accumulation areas for the week of January 3 to January 9, 2011.**	Yes ☐ No ☒ N/A ☐
NOTE: "Week" means 7 consecutive days per ORC§1.44(A).			
49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]		Yes ☒ No ☐ N/A ☐
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]		Yes ☒ No ☐ N/A ☐
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]		Yes ☒ No ☐ N/A ☐
52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]		Yes ☒ 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.			
53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]		Yes ☐ No ☐ N/A ☒
NOTE: Please provide a description of the unit and documentation provided by the generator to demonstrate 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			
54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]		Yes ☒ No ☐ N/A ☐
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]		Yes ☒ No ☐ N/A ☐

56.	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 ☐

LQG TANK SYSTEM REQUIREMENTS (OAC rule 3745-52-34(A) and OAC rules 3745-66-90 through 3745-66-100)			
(Please refer to the rules before or while completing this checklist.)			
1.	Is each tank clearly labeled/marked with the words "Hazardous Waste?" [3745-52-34(A)(3)]		Yes ☒ No ☐ N/A ☐
TANK SYSTEM – GENERAL OPERATING REQUIREMENTS			
2.	Does the o/o follow the general operating requirements below:		
	a.	Does the o/o prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail? [3745-66-94(A)]	Yes ☒ No ☐ N/A ☐
	b.	Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)? [3745-66-94(B)]	Yes ☒ No ☐ N/A ☐
	c.	If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96? [3745-66-94(C)]	Yes ☐ No ☐ N/A ☒
TANK SYSTEM – INSPECTION REQUIREMENTS			
3.	Has the o/o documented the inspections required in 3745-66-95, in the operating record, including inspection of the following:		
	a.	Data from leak detection equipment each operating day? [3745-66-95(A)]	Yes ☒ No ☐ N/A ☐
	b.	Spill control equipment each operating day? [3745-66-95(B)(1)]	Yes ☒ No ☐ N/A ☐
	c.	Above ground portion of tank each operating day? [3745-66-95(B)(2)]	Yes ☒ No ☐ N/A ☐
	d.	Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste each operating day? [3745-66-95(B)(3)]	Yes ☒ No ☐ N/A ☐
NOTE: "Each operating day" is each day that the tank system is being used to manage (store or treat) hazardous waste.			
4.	For tank systems using leak detection systems to alert facility personnel to leaks or implementing established workplace practices to ensure leaks are promptly identified, has the o/o documented: [3745-66-95(C)]		Yes ☐ No ☐ N/A ☒
	a.	Inspections of spill control equipment weekly?	Yes ☐ No ☐ N/A ☒
	b.	Inspections of above ground portion of tank weekly?	Yes ☒ No ☐ N/A ☐
	c.	Inspections of construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste weekly?	Yes ☒ No ☐ N/A ☐
	d.	Use of the alternate inspection schedule, including a description of the established workplace practices at the facility?	Yes ☐ No ☐ N/A ☒
5.	For ancillary equipment NOT provided with secondary containment, has the o/o documented inspections of such equipment each operating day? [3745-66-95(E)]		Yes ☒ No ☐ N/A ☐
6.	Where applicable, did the o/o inspect the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(F)(1)]		Yes ☐ No ☐ N/A ☒
7.	Where applicable, did the o/o inspect all sources of impressed current at least bi-monthly? [3745-66-95(F)(2)]		Yes ☐ No ☐ N/A ☒
TANK SYSTEM CLOSURE REQUIREMENTS			
8.	If the o/o has closed a <90 day tank, was closure completed in accordance with OAC 3745-66-97 (except for paragraph C)?		Yes ☐ No ☐ N/A ☒

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES			
9.	For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with one of the following: [3745-66-98(A)]		Yes ☒ No ☐ N/A ☐
	a.	Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-66-17(B)? [3745-66-98(A)]; or	Yes ☐ No ☐ N/A ☒
	b.	Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A)]; or	Yes ☒ No ☐ N/A ☐
	c.	The tank is used solely for emergencies? [3745-66-98(A)]	Yes ☐ No ☐ N/A ☒
10.	If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (2008)? [3745-66-98(B)]		Yes ☒ No ☐ N/A ☐
11.	Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material? [3745-66-99(A) and/or (B)]		Yes ☐ No ☒ N/A ☐
	a.	**If so,** have the requirements of 3745-65-17(B) been met? [3745-66-99(A) and/or (B)]	Yes ☐ No ☐ N/A ☒
TANK SYSTEM – WASTE ANALYSIS REQUIREMENTS			
12.	In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-100]		Yes ☐ No ☐ N/A ☒
	a.	Conducted waste analysis and trial treatment or storage tests? [3745-66-100(A)]; **OR**	Yes ☐ No ☐ N/A ☒
	b.	Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-100(B)]	Yes ☐ No ☐ N/A ☒
TANK SYSTEMS REQUIREMENTS			
13.	Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)] **The <90-day hazardous waste storage tank used to accumulate scrubber water at the ERU is considered an existing tank. Ohio EPA used enforcement discretion in not requiring an assessment for this tank or its upgraded containment (which is considered a new tank system component) due to the upgrade of the tank in 2002.**		Yes ☐ No ☐ N/A ☐
NOTE: You should review the file to see if the written assessment has been previously reviewed and what the results were.			
14.	Does the written assessment include the following: [3745-66-92(A)] **See Number 13.**		
	a.	Certification by a qualified professional engineer? [3745-66-92(A)]	Yes ☐ No ☐ N/A ☐
	b.	Consideration of the design standards of the system? [3745-66-92(A)]	Yes ☐ No ☐ N/A ☐
	c.	Consideration of the hazardous characteristics of the waste(s)? [3745-66-92(A)]	Yes ☐ No ☐ N/A ☐
	d.	An evaluation by a corrosion expert (only if the external system/components are metal and in contact with soil or water)? [3745-66-92(A)]	Yes ☐ No ☐ N/A ☐

	e.		A determination of design and operational measures that will be needed to protect the tank system from potential damage (only for underground tank components)? [3745-66-92(A)]	Yes ☐ No ☐ N/A ☐
	f.		Design considerations to ensure that the tank foundations will maintain the load of a full tank? [3745-66-92(A)]	Yes ☐ No ☐ N/A ☐
	g.		Design considerations for anchoring the unit to prevent floatation (only for tanks situated in a seismic fault zone or saturated zone)? [3745-66-92(A)]	Yes ☐ No ☐ N/A ☐
	h.		Design considerations to ensure that the tank system will withstand the effects of frost heave (only for underground tank systems)? [3745-66-92(A)]	Yes ☐ No ☐ N/A ☐
NOTE: CO-DHWM Engineering staff are available to assist you with evaluation of the written assessment.				
15.			Are there written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)] **See Number 13.**	Yes ☐ No ☐ N/A ☐
			Do the written statements address all of the following:	
	a.		Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)]	Yes ☐ No ☐ N/A ☐
	b.		Statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)]	Yes ☐ No ☐ N/A ☐
	c.		Proper backfilling? [3745-66-92(C)]	Yes ☐ No ☐ N/A ☐
	d.		Tightness test; if the tank system was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)]	Yes ☐ No ☐ N/A ☐
	e.		Proper support and protection of ancillary equipment? [3745-66-92(E)]	Yes ☐ No ☐ N/A ☐
	f.		Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)]	Yes ☐ No ☐ N/A ☐
SECONDARY CONTAINMENT				
16.			Has secondary containment been provided? [3745-66-93(A)]	Yes ☒ No ☐ N/A ☐
NOTE: Secondary containment must be provided for tank systems that store or treat materials that become hazardous wastes within two years after the hazardous waste listing, or when the system has reached 15 years of age, whichever comes later. [3745-66-92(A)(2)]				
17.			Is secondary containment one of the following:	Yes ☒ No ☐ N/A ☐
	a.		An **External Liner**? [3745-66-93(E)(1)] If so,	Yes ☒ No ☐ N/A ☐
		i.	Is liner designed or operated to contain 100% of the capacity of the largest tank?	Yes ☒ No ☐ N/A ☐
		ii.	Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	Yes ☒ No ☐ N/A ☐
		iii.	Is liner free of cracks and gaps?	Yes ☒ No ☐ N/A ☐
		iv.	Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release?	Yes ☒ No ☐ N/A ☐
		v.	Are chemically resistant water stops in place at all points? *(concrete liners only)*	Yes ☒ No ☐ N/A ☐
		vi.	Is there a compatible interior coating or lining to prevent migration of waste into the concrete? (concrete liners only)	Yes ☒ No ☐ N/A ☐
	b.		**Vault System?** [3745-66-93(E)(2)] If so,	Yes ☐ No ☒ N/A ☐

		i.	Is vault system designed to contain 100% of the capacity in the largest tank?	Yes ☐ No ☐ N/A ☒
		ii.	Is liner designed and operated to prevent run-on and infiltration <u>or</u> the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	Yes ☐ No ☐ N/A ☒
		iii.	Are chemically resistant water stops in place at all points?	Yes ☐ No ☐ N/A ☒
		iv.	Is there a compatible interior coating to prevent migration into the concrete?	Yes ☐ No ☐ N/A ☒
		v.	For **ignitable or reactive waste**: Is the vault system provided with means to prevent (or alternatively "protect against") the formation or ignition of vapors?	Yes ☐ No ☐ N/A ☒
		vi.	Is vault system provided with an exterior moisture barrier?	Yes ☐ No ☐ N/A ☒
	c.		**<u>Double-Walled Tank?</u>** [3745-66-93(E)(3)] If so,	Yes ☐ No ☒ N/A ☐
		i.	Is double-walled tank designed as an integral structure to contain any release from the inner tank?	Yes ☐ No ☐ N/A ☒
		ii.	**If metal**, are the primary tank interior and outer shell exterior surfaces protected from corrosion?	Yes ☐ No ☐ N/A ☒
		iii.	Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time?	Yes ☐ No ☐ N/A ☒
	d.		**<u>An Equivalent Device?</u>** As described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D)&(E)]	Yes ☐ No ☐ N/A ☒
SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION				
18.			Has each secondary containment system been designed, installed and operated to prevent <u>any</u> migration of wastes or liquid to the soil, groundwater, or surface water and is it capable of <u>detecting</u> and <u>collecting</u> releases and accumulated liquids? [3745-66-93(B)(1)&(2)]	Yes ☒ No ☐ N/A ☐
19.			Does the secondary containment system meet the following minimum requirements of [3745-66-93(C)]:	
	a.		Constructed or lined with compatible materials of sufficient strength to prevent failure? [3745-66-93(C)(1)]	Yes ☒ No ☐ N/A ☐
	b.		Placed on a foundation or base capable of providing support? [3745-66-93(C)(2)]	Yes ☒ No ☐ N/A ☐
	c.		Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time? [3745-66-93(C)(3)]	Yes ☒ No ☐ N/A ☐
	d.		Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? [3745-66-93(C)(4)]	Yes ☒ No ☐ N/A ☐
	e.		Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner? [3745-66-93(C)(4)]	Yes ☒ No ☐ N/A ☐
ANCILLARY EQUIPMENT REQUIREMENTS				
20.			Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)?	Yes ☐ No ☒ N/A ☐
	If not, is the ancillary equipment one of the following: [3745-66-93(F)]			
	a.		Above ground piping (exclusive of flanges, joints, valves and connections) that is inspected daily?	Yes ☒ No ☐ N/A ☐
	b.		Welded flanges, welded joints and/or welded connections that is inspected daily?	Yes ☐ No ☐ N/A ☒
	c.		Sealless or magnetic coupling pumps and/or sealless valves?	Yes ☐ No ☐ N/A ☒

	d.	Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown and/or loss of pressure-actuated shut-off devices) that is inspected daily?	Yes ☐ No ☐ N/A ☒
TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE			
21.		Has there been a leak or spill from any tank system or has any tank system been found unfit for use? **If so**, did the o/o:	Yes ☐ No ☒ N/A ☐
NOTE: If the tank is found to be unfit for use, inspector should explain why.			
	a.	Immediately cease flow of material into tank and investigate the cause of the release? [3745-66-96(A)]	Yes ☐ No ☐ N/A ☒
	b.	Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time? [3745-66-96(B)(1)]	Yes ☐ No ☐ N/A ☒
	c.	Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment? [3745-66-96(B)(2)]	Yes ☐ No ☐ N/A ☒
	d.	For a visible release to the environment, immediately conduct a visual inspection of the release? [3745-66-96(C)]	Yes ☐ No ☐ N/A ☒
	e.	For a visible release to the environment, prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C)]	Yes ☐ No ☐ N/A ☒
	f.	For a visible release to the environment, properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)]	Yes ☐ No ☐ N/A ☒
	g.	Report any release to the environment to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)]	Yes ☐ No ☐ N/A ☒
	h.	For a release to the environment, submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)]	Yes ☐ No ☐ N/A ☒
	i.	Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)(2)]	Yes ☐ No ☐ N/A ☒
	j.	For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)]	Yes ☐ No ☐ N/A ☒
NOTE: The requirements noted in 20.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.			
22.		In the event that the repairs to the tank system were major (e.g., replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from a qualified professional engineer attesting that the repaired unit is capable of handing hazardous waste? [3745-66-96(F)]	Yes ☐ No ☐ N/A ☒
23.		Was a copy of the certification submitted to the director within seven days after returning the system to use? [3745-66-96(F)]	Yes ☐ No ☐ N/A ☒
24.		If the o/o was unable to repair and return the unit to service as described in 20.a through 20.e, was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)]	Yes ☐ No ☐ N/A ☒
25.		Does the o/o have a tank system **with a variance from secondary containment** from which a release has occurred but <u>has not</u> migrated beyond the zone of engineering control? **If so,**	Yes ☐ No ☒ N/A ☐
	a.	Has the o/o complied with 3745-66-96(A) through (F), except (D), and decontaminated soils? [3745-66-93(G)(3)]	Yes ☐ No ☐ N/A ☒
	b.	If soils cannot be decontaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)]	Yes ☐ No ☐ N/A ☒
26.		Does the o/o have a tank system **with a variance from secondary containment** from which a release occurred and <u>has</u> migrated from the zone of engineering control? **If so,**	Yes ☐ No ☒ N/A ☐

	a.	Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)]	Yes ☐ No ☐ N/A ☒
	b.	If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(4)]	Yes ☐ No ☐ N/A ☒

GENERATOR LDR CHECKLIST
DOES NOT APPLY TO CESQGS

GENERAL REQUIREMENTS				
1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07(A)(7)]			Yes ☐ No ☐ N/A ☒
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not,			Yes ☒ No ☐ N/A ☐
	a.	Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)]		Yes ☐ No ☐ N/A ☒
NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).				
3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]			Yes ☒ No ☐ N/A ☐
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]			Yes ☒ No ☐ N/A ☐
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,			Yes ☒ No ☐ N/A ☐
	a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]		Yes ☒ No ☐ N/A ☐
FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.				
6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]			Yes ☒ No ☐ N/A ☐
NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.				
NOTE: Written documentation of this determination is not required.				
7.	Did the generator treat his HW /soil on-site to meet the LDR treatment standard?			Yes ☐ No ☒ N/A ☐
NOTE: If "Yes" see question #16.				
8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)]			Yes ☒ No ☐ N/A ☐
	a.	If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include:		Yes ☐ No ☐ N/A ☒
		i	Applicable HW codes?	Yes ☐ No ☐ N/A ☒
		ii	Manifest number of the first shipment to the TSD?	Yes ☐ No ☐ N/A ☒
		iii	A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination."?	Yes ☐ No ☐ N/A ☒
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]			Yes ☒ No ☐ N/A ☐
10.	Does the generator have a copy of the LDR notification form/notice on file? [3745-270-07(A)(2)]			Yes ☒ No ☐ N/A ☐
	a.	Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)]		Yes ☒ No ☐ N/A ☐

NOTIFICATION FORM				
11.	Does the LDR Notification form contain the following information:			
	a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]		Yes ☒ No ☐ N/A ☐
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]		Yes ☒ No ☐ N/A ☐
	c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]		Yes ☒ No ☐ N/A ☐
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]		Yes ☒ No ☐ N/A ☐
NOTE: A wastewater contains <1% by wt. total suspended solids (TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.				
	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]		Yes ☒ No ☐ N/A ☐
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories				
	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]		Yes ☒ No ☐ N/A ☐
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.				
	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]		Yes ☒ No ☐ N/A ☐
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.				
PROHIBITED DILUTION				
12.	Is the HW treated by burning? If "No" go to #15.			Yes ☒ No ☐ N/A ☐
13.	Is the HW a metal-bearing HW?			Yes ☐ No ☒ N/A ☐
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.				
14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless **one** of the following conditions apply. [3745-270-03(c)]		
		i.	Contains > 1% TOC?	Yes ☐ No ☐ N/A ☒
		ii.	Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes ☐ No ☐ N/A ☒
		iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes ☐ No ☐ N/A ☒
		iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes ☐ No ☐ N/A ☒
		v.	Co-generated with a HW that must be combusted?	Yes ☐ No ☐ N/A ☒
	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?		Yes ☐ No ☒ N/A ☐
15.	Was the HW treated by wastewater treatment?			Yes ☐ No ☒ N/A ☐
	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]		Yes ☐ No ☐ N/A ☒

NOTE: If "Yes", HW is improperly being treated by dilution.				
	b.	Does the waste carry the D001 code and contain ≥10% TOC?		Yes ☐ No ☐ N/A ☒
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?		Yes ☐ No ☐ N/A ☒
NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].				
NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.				
GENERATOR TREATMENT				
16.	Does the generator treat to meet LDRs on-site?			Yes ☐ No ☒ N/A ☐
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?			Yes ☐ No ☒ N/A ☐
	If "Yes"...complete the rest of the checklist. If "No"...stop...you are done.			
	a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]		Yes ☐ No ☐ N/A ☐
	b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]		Yes ☐ No ☐ N/A ☐
NOTE: This is a laboratory analysis but it does not have to be kept by the generator.				
	c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]		Yes ☐ No ☐ N/A ☐
	d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]		Yes ☐ No ☐ N/A ☐
	e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]		Yes ☐ No ☐ N/A ☐
	f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]		Yes ☐ No ☐ N/A ☐
NOTIFICATION FORM FOR GENERATOR TREATMENT				
17.	a.	Contains all information in #11 a-g above and		Yes ☐ No ☐ N/A ☐
	b.	If the treated HW/soil is listed.....notification contains the following certification statement: "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."		Yes ☐ No ☐ N/A ☐
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:		
		i.	Prepare a one-time notification? [3745-270-09 (D)]	Yes ☐ No ☐ N/A ☐
		ii.	Maintain a copy of the notice onsite? [3745-270-09(D)]	Yes ☐ No ☐ N/A ☐
		iii.	Include in the notification: [3745-270-09(D)]	
			1. Name & address of receiving landfill?	Yes ☐ No ☐ N/A ☐
			2. Description of HW when generated?	Yes ☐ No ☐ N/A ☐
			3. HW code when generated?	Yes ☐ No ☐ N/A ☐

			4.	Treatability group when generated?	Yes ☐ No ☐ N/A ☐
			5.	Underlying hazardous constituents present when generated?	Yes ☐ No ☐ N/A ☐
		iv.	Contain the certification statement as required by 3745-270-07(B)(4)?		Yes ☐ No ☐ N/A ☐

SMALL QUANTITY UNIV...SAL WASTE HANDLER REQUIREMENTS – BATTERIES AND LAMPS			
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more			
Small Quantity Universal Waste Handler (SQUWH) = less than 5,000 Kg			
PROHIBITIONS			
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]		Yes ☐ No ☒ N/A ☐
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]		Yes ☐ No ☒ N/A ☐
WASTE MANAGEMENT AND LABELING/MARKING			
UNIVERSAL WASTE BATTERIES			
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]		Yes ☐ No ☐ N/A ☒
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]		Yes ☐ No ☐ N/A ☒
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]		Yes ☐ No ☒ N/A ☐
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]		Yes ☐ No ☐ N/A ☒
	a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes ☐ No ☐ N/A ☒
	b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes ☐ No ☐ N/A ☒
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)]		Yes ☒ No ☐ N/A ☐
UNIVERSAL WASTE LAMPS			
8.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]		Yes ☒ No ☐ N/A ☐
9.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]		Yes ☐ No ☐ N/A ☒
*NOTE: **Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)].** A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.*			
10.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)]		Yes ☒ No ☐ N/A ☐
ACCUMULATION TIME			
11.	Is the waste accumulated for less than one year? [3745-273-15(A)]		Yes ☒ No ☐ N/A ☐
	a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	Yes ☐ No ☐ N/A ☒

NOTE: Accumulation is defined as date generated or date received from another handler.			
12.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below: PPG marks or labels the containers with the earliest date when the universal waste became a waste.		Yes ☒ No ☐ N/A ☐
EMPLOYEE TRAINING			
13.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]		Yes ☒ No ☐ N/A ☐
RESPONSE TO RELEASES			
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]		Yes ☐ No ☐ N/A ☒
15.	Is the material released characterized? [3745-273-17(B)]		Yes ☐ No ☐ N/A ☒
16.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]		Yes ☐ No ☐ N/A ☒
OFF-SITE SHIPMENTS			
NOTE: If a SQUWH self-transports waste, then the handler must comply with the Universal Waste transporter requirements.			
17.	Are universal wastes sent to another handler, destination facility or foreign destination? [3745-273-18(A)]		Yes ☒ No ☐ N/A ☐
18.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.		Yes ☒ No ☐ N/A ☐
19.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]		Yes ☒ No ☐ N/A ☐
20.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?		Yes ☐ No ☒ N/A ☐
	a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes ☐ No ☐ N/A ☒
21.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u>:		Yes ☐ No ☐ N/A ☒
	a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)]	Yes ☐ No ☐ N/A ☒
22.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]		Yes ☐ No ☐ N/A ☒
EXPORTS			
23.	Is waste being sent to a foreign destination? If so:		Yes ☐ No ☒ N/A ☐
	a.	Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes ☐ No ☐ N/A ☒
	b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	Yes ☐ No ☐ N/A ☒
	c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes ☐ No ☐ N/A ☒

USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

NOTE: 1. A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

2. Inspectors can check BUSTR's web-site at https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at: https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp.

PROHIBITIONS			
1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:		Yes ☐ No ☒ N/A ☐
	a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes ☐ No ☐ N/A ☒
NOTE: For example, used oil contaminated scrap metal stored in a pile.			
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]		Yes ☐ No ☒ N/A ☐
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?		Yes ☒ No ☐ N/A ☐
NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).			
GENERATOR STANDARDS			
4.	Does the generator mix hazardous waste with used oil? If so,		Yes ☐ No ☒ N/A ☐
	a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes ☐ No ☐ N/A ☒
NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.			
5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]		Yes ☐ No ☐ N/A ☒
NOTE: If used oil contains greater than 1000 ppm total halogens; it is presumed to be listed hazardous waste until the presumption is successfully rebutted.			
6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]		Yes ☒ No ☐ N/A ☐
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]		Yes ☒ No ☐ N/A ☐
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]		Yes ☒ No ☐ N/A ☐
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]		Yes ☐ No ☐ N/A ☒
	a.	Stopped the release?	Yes ☐ No ☐ N/A ☒
	b.	Contained the release?	Yes ☐ No ☐ N/A ☒
	c.	Cleaned up and properly managed the used oil and other materials?	Yes ☐ No ☐ N/A ☒
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes ☐ No ☐ N/A ☒
ON-SITE BURNING IN SPACE HEATER			
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-		

	23] If so:		
	a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes ☐ No ☐ N/A ☒
	b.	Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour?	Yes ☐ No ☐ N/A ☒
	c.	Are the combustion gases from heater vented to the ambient air?	Yes ☐ No ☐ N/A ☒
NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).			
GENERATOR TRANSPORTATION			
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]		Yes ☐ No ☐ N/A ☒
12.	If the generator self-transports used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]		
	a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes ☐ No ☐ N/A ☒
	b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes ☐ No ☐ N/A ☒
NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).			
COLLECTION CENTERS AND AGGREGATION POINTS			
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]		Yes ☐ No ☐ N/A ☒
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]		Yes ☐ No ☐ N/A ☒
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]		Yes ☐ No ☐ N/A ☒
NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.			