



FILE COPY

State of Ohio Environmental Protection Agency

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

June 26, 2007

Re: PPG Industries Ohio, Inc.
LQG/TSD
OHD004304689
Pickaway County, CDO
NOV

Ms. Maura LaGreca
PPG Industries, Inc.
559 Pittsburgh Road
Circleville, OH 43113

Dear Ms. LaGreca:

On June 18 and 19, 2007, Chris Bulinski and I inspected PPG Industries Ohio, Inc.'s (PPG's) 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.

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 universal waste handler, and a used oil generator.

We found the following violations of Ohio's hazardous waste laws and 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. **ORC Section 3734.02(E) and (F) and Permit Condition A.1, Storage of Hazardous Waste:** The permittee is only authorized to store hazardous waste in accordance with the terms and conditions of its Ohio hazardous waste permit. No person shall store hazardous waste in an area that is not permitted to store hazardous waste.

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

PPG is storing hazardous waste in areas that are not permitted to store hazardous waste. On June 19, 2007, PPG was storing hazardous waste in eight tanker trucks and in two box trucks, which were parked in areas around the tanker truck unloading area (Catch Basin #2) and the ERU office building (Catch Basin #3), because the facility's permitted container storage area and storage tanks were full.

On May 7, 2007, there was an unscheduled emergency shutdown of the ERU, and the ERU did not start burning hazardous waste again until June 17, 2007. During this time period, PPG continued to accept shipments of hazardous waste and the facility's permitted container storage area and storage tanks reached their maximum allowable capacity. Thus, many of these shipments were not off-loaded and/or pumped out of the tanker trucks due to lack of storage capacity. However, PPG did divert 14 tanker trucks by re-manifesting and sending them to another permitted treatment facility.

During the inspection, PPG stated that they should be able to move the hazardous waste into the permitted storage area and tanks within a week since the ERU was now in operation. In the meantime, the trucks were parked in areas with sufficient secondary containment and were being inspected daily for leaks. However, per a June 25, 2007 phone conversation, PPG was still storing hazardous waste (two box trucks and four tanker trucks) in areas that are not permitted to store hazardous waste and has continued accepting additional truckloads of hazardous wastes even though its storage areas are beyond capacity. This violation will remain outstanding until PPG returns to storing hazardous wastes only in areas of the facility permitted for such storage. Ohio EPA has serious concerns with this continuing violation of both the statute and PPG's permit. This matter has been referred to the Division of Hazardous Waste Management's Enforcement Coordinator for enforcement consideration.

Once PPG returns to storing hazardous wastes only in areas of the facility permitted for such storage, PPG must contact Ohio EPA and/or submit photographic documentation to demonstrate compliance with both the statute and the facility's permit.

In addition, PPG must update its permit application to include measures the facility will take in the future to ensure compliance with its permit in the event that another emergency shutdown of the ERU occurs. This plan should include, but is not limited to, a list of parties that will be notified of the ERU shutdown (Ohio EPA, generators); procedures for the acceptance and storage of hazardous waste, so that PPG remains in compliance with its permit; and procedures for accumulating hazardous waste that is generated at the ERU during the shutdown in the event that the

permitted storage area is full (i.e., designate 90-day areas). This plan is to be submitted as a Class 1 modification requiring director's prior approval in accordance with OAC Rule 3745-50-51.

2. **OAC Rule 3745-50-58(L)(10) and Permit Condition A.22, Other Noncompliance:** The permittee must report to the Director all other instances of noncompliance not provided for in Permit Conditions A.19 and A.20. These reports must be submitted within thirty (30) days of the time at which the permittee is aware of such noncompliance.

PPG did not report the illegal storage of hazardous waste in areas that are not permitted to store hazardous waste as cited in Violation Number 1. The ERU was shutdown for approximately 42 days and did not burn any hazardous waste during this time.

- In order to abate this violation, PPG must submit the plan referenced in Violation Number 1 above and include a procedure for reporting noncompliance in such instances.

3. **OAC Rule 3745-52-34(A)(2) and (3), Accumulation Time of Hazardous Waste:** A generator must ensure that the accumulation start date is clearly marked and visible for inspection on each container and that each container and tank is labeled or marked clearly with the words "Hazardous Waste."

On June 19, 2007, during the ERU inspection, PPG was accumulating several drums of spent carbon (approximately 20) and boxes of spent scrubber packing material (about half a trailer full of single and double-stacked boxes) in a box truck south of the ERU material handling warehouse. None of them were labeled with the words "Hazardous Waste" and none of them were marked with an accumulation start date.

- During the inspection, PPG personnel properly marked all of the drums and boxes with the words "Hazardous Waste" and the correct accumulation start date. The violation was abated at that time.

4. **OAC Rule 3745-52-34(C)(1), Satellite Accumulation Area Requirements:** A generator may accumulate as much as fifty-five gallons of hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, provided he complies with OAC Rules 3745-66-71, 3745-66-72, and 3745-66-73(A) and marks his containers either with the words "Hazardous Waste" or with other

words that identify the contents of the containers.

- (a) On June 18, 2007, during the inspection of the resin manufacturing plant, a 55-gallon satellite accumulation drum on the Mezzanine level was not marked with the words "Hazardous Waste" or with other words identifying the contents.
 - During the inspection, PPG personnel properly marked the drum with the words "Hazardous Waste." The violation was abated at that time.
 - (b) PPG accumulates fluorescent bulbs on site in the maintenance building of the resin manufacturing plant prior to crushing them in a bulb crusher and sending them off site as hazardous waste to Lighting Resources in Greenwood, Indiana. On June 18, 2007, PPG was accumulating less than 55 gallons of bulbs in the maintenance building in a container that was not closed and not marked with the words "Hazardous Waste" or with other words that identify the contents.
 - PPG must immediately begin managing the fluorescent bulbs as hazardous waste prior to crushing them and sending them off site as hazardous waste. When applicable, PPG may comply with the satellite accumulation area requirements for fluorescent bulbs in accordance with OAC Rule 3745-52-34(C). To abate the above cited violation, PPG must begin accumulating fluorescent bulbs in a closed container and mark the container with the words "Hazardous Waste" or with other words that identify the contents. Please submit photographic documentation to me to demonstrate compliance with this rule.
5. **OAC Rules 3745-52-34(A)(1)(a) and 3745-66-74, Inspections of Containers:** A generator that accumulates waste on site in containers must comply with the applicable requirements in OAC Rules 3745-66-70 to 3745-66-77. OAC Rule 3745-66-74 requires the owner or operator to 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.

On June 18, 2007, during the inspection of the resin manufacturing plant, three drums of liquid organic defective resin (marked with the words "Hazardous Waste" and an accumulation start date of 6-6-07) were accumulating outside west of the raw material tank area. However, PPG was not inspecting that area in accordance with OAC Rule 3745-66-74.

- During the inspection, PPG personnel moved the three drums into a designated <90-day accumulation area that is being inspected weekly. The violation was abated at that time. To ensure compliance with the <90-day accumulation area requirements in the future, PPG should submit a facility drawing designating all <90-day accumulation areas at the resin manufacturing plant and the ERU. Please submit this documentation to me **within 30 days** of your receipt of this letter.

6. **OAC Rule 3745-50-58(A), Failure to operate in accordance with the hazardous waste permit application section F.2 Inspection Schedule:** PPG is to inspect General Security and Safety Devices in accordance with the frequencies specified in Table G of Attachment 1 of Section F of the permit application. Table G requires spill carts to be inspected weekly.

PPG is not operating in accordance with the hazardous waste permit issued on December 29, 2006, because PPG did not comply with the approved inspection schedule in Table G of Attachment 1 of Section F of the permit application. On June 18, 2007, we reviewed PPG's inspection log for spill cart #5 (Weekly PM of Spill Cart #5). PPG completed an inspection of spill cart #5 on July 6, 2006, but did not complete the next inspection until July 19, 2006 (13 days later). Spill carts are to be inspected weekly.

- To abate this violation, PPG must submit at least one month's worth of completed inspection checklists for spill cart #5.

General Comments

- A. During the inspection, there was some discussion about how to correctly designate underlying hazardous constituents on the land disposal restrictions (LDR) notification certification for outgoing hazardous waste shipments. According to "Table 1: Generator Paperwork Requirements" in OAC Rule 3745-270-07, the generator must list the constituents of concern for F001 to F005, and F039, and underlying hazardous constituents (UHCs) in characteristic wastes, unless the waste will be treated and monitored for all constituents. If all constituents will be treated and monitored, there is no need to put them all on the LDR notice. Thus, with regard to PPG's scrubber water, if Envirite is evaluating the treatment residues for all UHCs after treatment, then you do not need to identify them on the LDR notice.
- B. According to Permit Condition D.6(d)(i), ultrasonic testing of the bottoms of all tanks in the east and west cell rooms is required by 2007 in accordance with Section F.2.2.2.5 of the permit application. In addition, Section F.2.2.2.5 states that "Test data generated from each of the 16 tank bottom tests will be maintained on site as

part of the facility operating record until 12/31/10." As discussed during the inspection, ultrasonic testing has been performed for all of these tanks, except for Tank 1506. Once Tank 1506 is tested, please provide confirmation that the ultrasonic testing has been completed in accordance with Permit Condition D.6(d)(i) and a summary of the results.

- C. According to Permit Condition A.29(b), the permittee must submit a Waste Minimization Report to Ohio EPA's Office of Compliance Assistance and Pollution Prevention within 180 days of the effective date of the permit (December 29, 2006), and must submit updates to this report biennially thereafter. As discussed during the inspection, PPG is working to submit this Report to Ohio EPA and was provided with a few examples and guidance.
- D. During the inspection, we discussed revising both the resin manufacturing plant's and ERU's inspection checklists to better identify what is being inspected in each area of the facility.
- i. The current Waste Storage checklist (E-List-005) for the resin plant does not distinguish between <90-day areas; it only has a "Drum Storage" section. This section should be broken out to distinguish between the outside <90-day area (west of the manufacturing area), the <90-day area in the southeast corner of the 1st floor of Building #1, and any other areas of the facility that are operated as <90-day areas (e.g., Building #2 warehouse). This will help ensure that each separate area is being inspected in accordance with OAC Rule 3745-66-74. Please submit a revised copy of this checklist to me **within 30 days** of your receipt of this letter.
 - ii. The current RCRA Daily List (E-List 002) for the ERU should be updated to include a "comments" section for each area to better identify what is being inspected in each area. For example, if a truck is parked in the "Truck Parking Area" on a certain day and is being inspected for spills, this should be noted as such on the checklist. Currently, there is no space to include these types of comments. Please submit a revised copy of this checklist to me **within 30 days** of your receipt of this letter.
- E. During our inspection of the resin manufacturing plant, there were two satellite accumulation drums in Building #2 that contained hazardous waste. We noted that both wastes were profiled the same. However, their contents were incompatible and if mixed, would react. As a precaution, the one drum (CAT-128 and KQV-9711) was clearly marked with instructions not to mix with the other. Although in compliance with the satellite accumulation area requirements, we recommend that PPG move the drums away from each other in order to reduce the likelihood of a reaction.

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

Sincerely,

Melissa Musko

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

Enclosure

c: Tammy McConnell, DHWM-CO
Chris Bulinski, DHWM-CDO
CDO File

MM/slj PPG.NOVletter.061907

NOTICE:

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



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

For Ohio EPA use only

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

2. Site EPA ID No.	EPA ID Number: OHD004304689								
3. Site Name	Name: PPG Industries Ohio, Inc.				Website: (Optional)				
4. Site Location Information	Street Address: 559 Pittsburgh Road								
	City, Town, or Village: Circleville				State: OH				
	County Name: Pickaway				Zip Code: 43113				
5. Site Land Type (check only one)	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
6. NAICS code(s) www.census.gov/epcd/www/naics.html	325211								
7. Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Maura		MI: C.		Last Name: LaGrecia				
	Phone Number: 740-420-6612				Phone Number Extension:				
	E-Mail Address: mlagrecia@ppg.com								
	Fax Number: 740-420-6662				Fax Number Extension:				
	Street or P.O. Box: P.O. Box 457								
	City, Town or Village: Circleville				State: OH				
	Country: USA			Zip Code: 43113					
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: PPG Industries Ohio, Inc.				Date Became Owner (mm/dd/yyyy): 01/01/1999				
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: 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				
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: same								
	City, Town or Village:				Operator Phone #:				
	State:				Country:		Zip Code:		
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input checked="" type="checkbox"/> United States Importer of Hazardous Waste					
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)									
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input checked="" type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Underground Injection Control Facility									

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))		
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	
<input type="checkbox"/> Destination Facility for Universal Waste		
Check all boxes below that apply for each of the three types of facilities above		
10C. Used Oil Activities (Indicate Type(s) of Activity(ies))		
	<input checked="" type="checkbox"/> Managed	<input checked="" type="checkbox"/> Used Oil Generator
Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner
<input checked="" type="checkbox"/> Off-Specification Used Oil Burner <input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil <input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner		
11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.		
See Part A		
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.		
Announced	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Additional Facility Representatives: Joe Pohlman, Mike Skeens, Jacki Landau, Francisco Ortiz, and Greg Slavka.
Tanks	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Other Comments: At the time of the inspection, Maura was on vacation, so we met with the PPG representatives listed above.
Containers	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Melissa Musko, DHWM-CDO	Chris Bulinski, DHWM-CDO	6/18/2007 9-3:00pm 6/19/2007 8:30-3:00pm
14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.		
Signature of Owner, Operator, or an Authorized Representative	Name and Title (Print)	Date (mm/dd/yyyy)

PROCESS DESCRIPTION SECTION

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

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 two reactors in Building #2 (C-line and D-line). PPG is also planning to install an additional reactor in Building #2 for acrylics. The reactors are used to batch-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.

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 2006 annual report) include:

- Off-spec resin and paint waste and samples (ODR, ODP, ADR, ADP, DRS, DPS); D001, D007, D008, D035, 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
- 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
- Waste sump sludge (WSS); D006, D007, D008

The manufacturing plant maintains three <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, and in the warehouse of Building #2.

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, which are managed as universal wastes and shipped to Lighting Resources in Greenwood, Indiana, and fluorescent bulbs, which are collected in a bulb crusher manufactured by Air Cycle Corp., crushed, and shipped as hazardous waste to Lighting Resources in Greenwood, Indiana.

Waste isocyanate solution (D003, U223) is sent to Ross Incineration to be burned because PPG does not want to burn the unreacted isocyanates since they gel up the equipment.

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 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

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. 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 7-10 days. The scrubber blowdown is collected in a <90-day fiberglass accumulation tank and is shipped to Envirite, Inc. The refractory brick removed from the kiln is also accumulated on site (with the slag) and shipped to Michigan. All of the other wastes are treated on-site in the ERU. PPG sends its empty drums to American ContainerNet.

In 2006, approximately 33,580,048 pounds of waste (including both hazardous and solid waste) was treated in the ERU via incineration. Of the total burned, 25,455,592 pounds were hazardous waste.

Additional P2 remarks and information:

Waste minimization efforts in 2006 included:

1. Monitored Absolute Material Utilization in order to maximize raw material usage and minimize the amount of material entering waste streams.
2. Monitored inventory turns and developed a warehouse inventory management system to

minimize products aging past shelf life and needing disposal.

3. Monitored number of cleanups between batches in order to minimize the number and amount of cleanup material needing to be disposed of as a hazardous waste.
4. Completed root cause analyses and developed corrective actions for off-specification production.
5. Investigated water treatment methods to remove hazardous constituents from the wastewater stream.

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so:
[December 29, 2016] Yes___ No N/A___ RMK#___
- a. Is the permittee continuing any activity regulated by
the permit after the expiration date of the permit? Yes___ No___ N/A RMK#___
- b. Has the facility submitted an application for a permit
renewal to the director no later than 180 days prior to
the expiration date of the permit? [Condition A.6] Yes___ No N/A RMK#___
2. Has the permittee submitted the annual permit fee,
payable to "Treasurer, State of Ohio," to Ohio EPA on or
before the anniversary of the date of issuance during the
term of the permit? [Condition A.25] - December 29 Yes___ No N/A RMK#___
3. Is the permittee conducting any hazardous waste
management activities (not otherwise exempt by law)
which are not authorized by the permit? [Conditions
A.1(b) and A.5] Yes No___ N/A___ RMK# 1
4. Have any provisions of the permit been identified as
invalid? [Condition A.4] Yes No N/A___ RMK#___
5. Has the facility identified any instances of noncompliance
with the permit, ORC Chapter 3734. or the rules adopted
thereunder, which may endanger human health or the
environment? If so: Yes No N/A___ RMK#___
- a. Did the facility immediately report the following to
Ohio EPA's Emergency Response Unit? [Condition
A.20]
- i. Information concerning a release of any
hazardous waste that may cause an
endangerment to public drinking water supplies;
and Yes___ No N/A RMK#___
- ii. Information concerning a release of hazardous
waste, fire or explosion at the facility which could
threaten human health or the environment outside
the facility including a description of: Yes___ No N/A RMK#___
- A. Name, address and telephone number of
the owner/operator? Yes___ No N/A RMK#___

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

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

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

7. Has the permittee identified other instances of noncompliance not provided for in Condition A.22, if so: Yes___ No N/A ___ RMK# 2

a. Did the permittee report these instances to Ohio EPA, DHWM? [Condition A.22]? Yes___ No N/A ___ RMK# 2

b. Do the reports provided contain the information set forth in Condition A.20? [Condition A.20] Yes___ No N/A ___ RMK# 2

c. Has the permittee taken all steps necessary to minimize releases to the environment or prevent any adverse impact on human health or the environment? [Condition A.8] Yes___ No N/A ___ RMK# 1

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

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

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

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 or the Hazardous Waste Facility Board (HWFB)? If so: Yes___ No N/A ___ RMK# ___

a. Has the permittee properly submitted such facts or corrected information to the appropriate entity? [Condition A.24] Yes___ No N/A RMK# ___

PERMIT MODIFICATION, REVISION, REVOCATION

10. Has the permittee filed a request for a permit modification, revision or revocation since permit issuance? [Condition A.2] Yes No ___ N/A ___ RMK# ___

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

a. Has the transfer been conducted in accordance with ORC Chapter 3734. and the rules adopted thereunder which includes the permittee notifying the new owner in writing of the requirements of ORC Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules before transferring ownership? [Condition A.18]

Yes___ No N/A RMK#___

12. Has the permittee submitted reports in any compliance schedule of the permit to Ohio EPA no later than 14 days following each scheduled date, unless otherwise specified? [Condition A.19]

Yes No N/A ___ RMK#___

13. Has the permittee furnished relevant information which Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, to determine compliance with the permit? [Condition A.10]

Yes No N/A ___ RMK#___

14. Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10]

Yes No N/A ___ RMK#___

15. Is the permittee maintaining records of all data used to complete the application and any amendments, revisions or modifications to the application? [Condition A.14(c)]

Yes No N/A ___ RMK#___

16. Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14(c)]

Yes No N/A ___ RMK#___

17. Is the permittee planning any physical alterations or additions to any permitted portions of the facility? If so:

Yes___ No N/A ___ RMK#___

a. Has the permittee given notice to the director of such alterations/additions? [Condition A.15]

Yes___ No N/A RMK#___

SITE ENTRY - AVAILABILITY OF RECORDS

18. As specified in Condition A.11, has the permittee allowed the director or an authorized representative, upon proper identification to:
- a. Enter at reasonable times upon the premises where a regulated activity is located or where records are kept under the conditions of the permit? Yes No N/A ___ RMK# ___
 - b. Have access to and copy, at reasonable times, any records required to be kept under the conditions of the permit? Yes No N/A ___ RMK# ___
 - c. Inspect, at any time, facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit? Yes No N/A ___ RMK# ___
 - d. Sample, document, photograph or monitor, at reasonable times, any substances or parameter at the location of the facility to assure compliance with the permit or as otherwise authorized by ORC Chapter 3734. and the rules adopted thereunder? Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM PART B APPLICATION

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

REMARKS

1. Permit Condition A.1(b) states that any management of hazardous waste not authorized by the permit is prohibited, unless otherwise expressly authorized or specifically exempted by law. PPG was storing hazardous waste in areas that are not permitted to store hazardous waste.

On June 19, 2007, PPG was storing hazardous waste in eight tanker trucks and in two box trucks, which were parked in areas around the tanker truck unloading area (Catch Basin #2) and the ERU office building (Catch Basin #3), because the facility's permitted container storage area and storage tanks were full. On May 7, 2007, there was an unscheduled emergency shutdown of the ERU, and the ERU did not start burning hazardous waste again until June 17, 2007. During this time period, PPG continued to accept shipments of hazardous waste and the facility's permitted container storage area and storage tanks reached their maximum allowable capacity. Thus, many of these shipments were not off-loaded and/or

pumped out of the tanker trucks due to lack of storage capacity. However, PPG did divert 14 tanker trucks by re-manifesting and sending them to another permitted treatment facility.

During the inspection, PPG stated that they should be able to move the hazardous waste into the permitted storage area and tanks within a week since the ERU was now in operation. In the meantime, the trucks were parked in areas with sufficient secondary containment and were being inspected daily for leaks. However, per a June 25, 2007 phone conversation, PPG was still storing hazardous waste (two box trucks and four tanker trucks) in areas that are not permitted to store hazardous waste and has continued accepting additional truckloads of hazardous wastes even though its storage areas are beyond capacity.

2. Permit Condition A.22 requires the permittee to report to the Director all other instances of noncompliance not provided for in Permit Conditions A.19 and A.20. These reports must be submitted within thirty (30) days of the time at which the permittee is aware of such noncompliance.

PPG did not report the illegal storage of hazardous waste in areas that are not permitted to store hazardous waste as cited in Violation Number 1. The ERU was shutdown for approximately 42 days and did not burn any hazardous waste during this time.

RECORDKEEPING/OPERATING REQUIREMENTS

OPERATING RECORD

1. In accordance with OAC rules 3745-54-73 and 3745-54-74 and Condition B.22 of the permit, does the permittee maintain an Operating Record which contains the following information:
 - a. A description of the quantity of each hazardous waste and the method(s) and date(s) of its treatment or storage? Yes No N/A ___ RMK# ___
 - b. The location of each hazardous waste and quantity at each location including cross-reference to specific manifest numbers? Yes No N/A ___ RMK# ___
 - c. Records and results of required waste analysis? Yes No N/A ___ RMK# ___
 - d. Summary reports and details of all incidents that required implementation of the contingency plan? Yes ___ No N/A RMK# ___
 - e. Records and results of required inspections? Yes No N/A ___ RMK# ___

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

DOCUMENTS TO BE MAINTAINED AT FACILITY

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

g. Operating record in accordance with OAC rule 3745-54-73? [Condition B.22]

Yes No N/A ___ RMK# ___

h. Post-closure plan, as required by OAC rule 3745-55-18(A)? [Condition A.28(a)(viii)]

Yes ___ No N/A RMK# ___

i. Annually-adjusted cost estimate for facility closure and post-closure, as required by OAC rules 3745-55-42 and 3745-55-44? [Condition A.28(a)(ix)]

Yes No N/A ___ RMK# ___

3. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from date of inspection? [Condition B.5]

Yes No N/A ___ RMK# ___

4. Have any of the documents in Question No. 2 been revised? [Condition A.15] If so:

Yes No ___ N/A ___ RMK# ___

a. Has the permittee submitted the revisions to Ohio EPA in accordance with OAC rule 3745-50-51?

Yes No N/A ___ RMK# ___

b. Have all requirements of OAC rule 3745-50-51 been met, including, where required, Ohio EPA approval?

Yes No N/A ___ RMK# ___

ANNUAL REPORT REQUIREMENT

5. Is the permittee complying with annual report requirements set forth in OAC rule 3745-54-75 and the additional report requirements set forth in OAC rule 3745-54-77? [Condition B.25]

Yes No N/A ___ RMK# ___

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

6. In compliance with Condition A.12(b) of the permit, do the permittee's records of monitoring information specify the:

a. Date(s), exact place(s), time(s) and method(s) of sampling or measurement?

Yes No N/A ___ RMK# ___

b. Individual(s) who performed the sampling or measurement?

Yes No N/A ___ RMK# ___

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

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

WASTE MINIMIZATION REQUIREMENTS

1. Does the permittee certify at least once every year that a program is in place to reduce the volume and toxicity of hazardous waste generated in accordance with Condition A.29(a) and OAC rule 3745-54-73? Yes No N/A ___ RMK# ___

2. Did the permittee submit the waste minimization report to Ohio EPA, Office of Pollution Prevention and Central District Office within 180 days of journalization of this permit? and updates biennially thereafter? [Condition A.29(c)] - June 27, 2007 Yes ___ No N/A ___ RMK# 3

3. Has the permittee reduced the amount of waste (hazardous waste, solid waste, air emission, waste water discharges, etc.) this year generated at their facility by implementing pollution prevention/waste minimization? Yes ___ No ___ N/A ___ RMK# 3

If so, what amount of waste has the permittee reduced this year?

4. Has the permittee's company saved much money this year by implementing pollution prevention (reducing raw material usage, disposal fees, energy savings, etc.)? Yes ___ No ___ N/A ___ RMK# 3

If so, how much money has the permittee's company saved this year?

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

REMARKS

3. According to Permit Condition A.29(b), the permittee must submit a Waste Minimization Report to Ohio EPA's Office of Compliance Assistance and Pollution Prevention within 180 days of the effective date of the permit (December 29, 2006), and must submit updates to this report biennially thereafter. As discussed during the inspection, PPG is working to submit this Report to Ohio EPA and was provided with a few examples and guidance.

GROUND WATER MONITORING

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

2. Have they reported the results in the Annual Report to the director by March 1st as required by Condition B.25? Yes No N/A RMK#

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

WASTE ACCEPTANCE AND GENERATION

1. Is the permittee storing any containers of hazardous waste received from any off-site source that permittee is not permitted to store? [Condition A.1.] Yes No N/A RMK#
2. Has the permittee arranged to receive hazardous waste from a foreign or off-site source that the permittee is not permitted to store? [Condition A.1.] Yes No N/A RMK#
3. Has the permittee notified the director at least four weeks prior to the date the permittee expects to receive hazardous waste from a foreign source, as required by OAC rule 3745-54-12(A)? [Condition B.2(a)] Yes No N/A RMK#

INSPECTION ITEMS FROM THE PART B APPLICATION

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

4. Does the permittee only accept for storage and treatment waste that is generated by the permittee? Yes No N/A RMK#
5. Does the permittee only accept for storage and treatment waste that is in the process-related waste families portion of the WAP in Section C of the permit application? Yes No N/A RMK#

6. Prior to acceptance of a waste stream, does the permittee obtain and maintain at the facility a signed written certification statement as specified in Permit Condition B.3(d)(iii)? Yes No N/A ___ RMK# ___
7. Has the permittee notified Ohio EPA of all generating locations which begin shipping waste to the facility within 30 days of acceptance of the waste at the facility? Yes No N/A ___ RMK# ___
8. Does the permittee accept more than 34,900 tons of hazardous waste in any one calendar year from off-site sources? Yes No N/A ___ RMK# ___

REMARKS

OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS

1. Is the permittee complying with the following manifest requirements set forth in OAC Chapter 3745-52 and OAC rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76: [Condition B.24]
- a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, U.S. EPA Form 8700-22 and, if necessary, U.S. EPA Form 8700-22A in compliance with OAC rule 3745-52-20(A)? Yes No N/A ___ RMK# ___
- b. The manifest form used contains all information required by OAC rule 3745-52-20 and the minimum number of copies required by OAC rule 3745-52-22? Yes No N/A ___ RMK# ___
- c. The permittee has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with OAC rule 3745-52-20(B)(C)(D)? Yes No N/A ___ RMK# ___
- d. Prepared manifests have been signed by the permittee and initial transporter in compliance with OAC rule 3745-52-23? Yes No N/A ___ RMK# ___

2. As a permittee that generates hazardous waste, are signed copies of all hazardous waste manifests and any documentation required for exception reports retained for at least three years at the facility as required by OAC rules 3745-52-40 and 3745-54-71(A)(5)? Yes No N/A ___ RMK# ___

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

3. Does the permittee use only properly registered transporters when removing hazardous wastes? [Condition A.16] Yes No N/A ___ RMK# ___

Transporters:

4. Does the permittee give one copy of the manifest to the transporter, send one copy to the generator within 30 days, and keep one copy for at least three years? [3745-54-71(A)] Yes No N/A ___ RMK# ___

- a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met? [3745-54-71(B)] Yes ___ No N/A RMK# ___

- b. Are any significant discrepancies in the manifest, as defined in 3745-54-72(A) noted in writing on the manifest document? Yes ___ No N/A RMK# ___

5. Have any manifest discrepancies been reconciled within 15 days as required by 3745-54-72(B)? If not: Yes ___ No N/A RMK# ___

- a. Has the owner/operator submitted the required information to the director? Yes ___ No N/A RMK# ___

6. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-54-76(A) been submitted to the director within 15 days?

Yes ___ No N/A RMK# ___

WASTE ANALYSIS/WASTE ANALYSIS PLAN

1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information of the waste in accordance with OAC Chapters 3745-54 to 3745-57, 3745-218 and 3745-270 and the terms and conditions of the permit? [Condition B.3(a)]

Yes No N/A ___ RMK# ___

2. Does the permittee follow the procedures described in the WAP (Application Section C)? [Condition B.3(b)]

Yes No N/A ___ RMK# ___

3. In accordance with OAC rule 3745-54-13(A)(3), does the permittee repeat the waste analysis when the process or operation generating the hazardous waste has changed, or at least annually? [Condition B.3]

Yes No N/A ___ RMK# ___

4. **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 ___ RMK# ___

5. **FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER OAC 3745-270-04(A):**

Does the waste analysis plan include procedures and schedules for:

i. The sampling of impoundment contents? [3745-54-13(B)(7)]

Yes ___ No N/A RMK# ___

ii. The analysis of test data? [3745-65-13(B)(7)]

Yes ___ No N/A RMK# ___

iii. 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 3745-270-40 to 3745-270-49) or where no treatment standards have been established? [3745-54-13(B)(7)]

Yes ___ No N/A RMK# ___

6. **Where applicable:** The methods which will be used to meet additional waste analysis requirements for specific waste management methods specified in rules 3745-54-17, 3745-57-14, 3745-57-41 and 3745-270-07 of the OAC? [3745-54-13(B)(6)]

Yes No N/A ___ RMK# ___

7. Does the permittee place the results of all waste analyses in the facility operating record in accordance with OAC rule 3745-54-73?

Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

GENERAL INSPECTION REQUIREMENTS

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

1. Is the permittee following the inspection procedures and schedules as set forth in the permit (Section F of the approved Part B permit application) and the requirements of OAC rules 3745-54-15(A), (C) and (D)?
[Condition B.5]

Yes ___ No N/A ___ RMK# 4

2. Is the permittee following the approved inspection schedule for inspecting: monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment as specified in OAC rule 3745-54-15(B)?

Yes ___ No N/A ___ RMK# 4

a. Is the schedule kept at the facility? [OAC rule 3745-54-15(B)(2)]

Yes No N/A ___ RMK# ___

3. Does the permittee remedy deterioration or any malfunctions discovered by an inspection as required by OAC rule 3745-54-15(C)? [Condition B.5] Yes No N/A ___ RMK# ___
4. In accordance with OAC rule 3745-54-15(D) and Condition B.5 of the permit, do inspection records contain the following information:
- a. Date and time of inspection? Yes No N/A ___ RMK# ___
- b. Name of inspector? Yes No N/A ___ RMK# ___
- c. Notation of observations made? Yes ___ No N/A ___ RMK# 5
- d. Date and nature of any repairs or other remedial actions? Yes ___ No N/A ___ RMK# 5

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

4. PPG is to inspect General Security and Safety Devices in accordance with the frequencies specified in Table G of Attachment 1 of Section F of the permit application. Table G requires spill carts to be inspected weekly. PPG did not comply with the approved inspection schedule in Table G of Attachment 1 of Section F of the permit application. On June 18, 2007, we reviewed PPG's inspection log for spill cart #5 (Weekly PM of Spill Cart #5). PPG completed an inspection of spill cart #5 on July 6, 2006, but did not complete the next inspection until July 19, 2006 (13 days later). Spill carts are to be inspected weekly.
5. During the inspection, we discussed revising both the resin manufacturing plant's and ERU's inspection checklists to better identify what is being inspected in each area of the facility.
- i. The current Waste Storage checklist (E-List-005) for the resin plant does not distinguish between <90-day areas; it only has a "Drum Storage" section. This section should be broken out to distinguish between the outside <90-day area (west of the manufacturing area), the <90-day area in the southeast corner of the 1st floor of Building #1, and any other areas of the facility that are operated as <90-day areas (e.g., Building #2 warehouse). This will help ensure that each separate area is being inspected in accordance with OAC Rule 3745-66-74.
- ii. The current RCRA Daily List (E-List 002) for the ERU should be updated to include a "comments"

section for each area to better identify what is being inspected in each area. For example, if a truck is parked in the "Truck Parking Area" on a certain day and is being inspected for spills, this should be noted as such on the checklist. Currently, there is no space to include these types of comments.

GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTES

1. Does the permittee comply with the requirement of OAC Rule 3745-54-17 and follow the procedures for handling ignitable, reactive, and incompatible wastes set forth in Section F of the permit application? [Condition B.7] Yes No N/A ___ RMK# ___
2. Does the permittee provide electrical grounding for all containers and tanks, and transport vehicles during all operations involving the handling of ignitable or reactive wastes? Yes No N/A ___ RMK# ___
3. Does the permittee provide, and require the use of, spark proof tools during all operations involving the handling of all ignitable or reactive wastes? Yes No N/A ___ RMK# ___
4. Does the permittee prohibit smoking and open flames in each area where ignitable, reactive, or incompatible hazardous wastes are managed and provide appropriate signs? Yes No N/A ___ RMK# ___

SECURITY REQUIREMENTS

1. Is the permittee complying with the following security provisions of OAC rule 3745-54-14 and Condition B.4 of the permit: [Section F of the Part B permit application]
 - a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility? Yes No N/A ___ RMK# ___
 - b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility? Yes No N/A ___ RMK# ___
 - c. A means to control entry, at all times, through gates or other entrances, to the active portion of the facility? Yes No N/A ___ RMK# ___

2. In accordance with OAC rule 3745-54-14(C), does the permittee have signs reading "Danger - Unauthorized Personnel Keep Out" posted at entrances of the hazardous waste container storage building number ____.

Yes No N/A ____ RMK# ____

FACILITY OPERATIONS

3. Is construction, maintenance and operation of the facility being conducted to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, ground or surface water? [OAC rule 3745-54-31; Condition B.1]

Yes No N/A ____ RMK# ____

4. Does the permittee properly maintain and operate the facility to achieve compliance with the terms and conditions of the permit including: [Condition A.9]

a. Effective management practices?

Yes No N/A ____ RMK# ____

b. Adequate funding?

Yes No N/A ____ RMK# ____

c. Adequate operator staffing and training?

Yes No N/A ____ RMK# ____

d. Adequate laboratory and process controls?

Yes No N/A ____ RMK# ____

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

PERSONNEL TRAINING

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

Yes No N/A ____ RMK# ____

a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC rule 3745-54-16(A)(B)(C)]
Yes No N/A ___ RMK# ___

b. The facility provides personnel training to new employees within six months after their date of employment as required by OAC rule 3745-54-16(B)?
Yes No N/A ___ RMK# ___

c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(C)?
Yes No N/A ___ RMK# ___

2. Is the permittee maintaining personnel training records as required by OAC rule 3745-54-16(D) and of the approved application, including: written job titles, job descriptions and documented employee training records?
[Condition B.6]
Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

REQUIRED EQUIPMENT

NOTE: Inspector may attach a list of emergency equipment.

1. Has the permittee equipped the facility with the following emergency equipment as required by OAC rule 3745-54-32 and Condition B.9 of the permit:

a. An internal communications or alarm system?
Yes No N/A ___ RMK# ___

b. A device such as a telephone which is capable of summoning emergency assistance from local emergency authorities?
Yes No N/A ___ RMK# ___

c. Portable fire extinguishes and/or fire control equipment, spill control and decontamination equipment?

Yes No N/A ___ RMK# ___

d. Water in adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers or water spray systems?

Yes No N/A ___ RMK# ___

2. Is the permittee inspecting, testing and maintaining the equipment specified in Question No. 1 to ensure its proper operating in accordance with OAC rule 3745-54-33 and Condition B.10 of the permit?

Yes ___ No N/A ___ RMK# 4

3. Whenever hazardous waste is being managed at the facility, has the permittee provided all personnel involved in the operation with immediate access to an internal alarm or emergency communication device as required by OAC rule 3745-54-34 and Condition B.11 of the permit?

Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

CONTINGENCY PLAN - EMERGENCY PROCEDURES

1. In compliance with Condition B.13 of the permit, Section G of the permit application, and OAC rule 3745-54-37(A) and (B), does the permittee:

a. Familiarize emergency response agencies with the layout of the facility, associated hazards, places where personnel will normally be working, entrances and possible evacuation routes?

Yes No N/A ___ RMK# ___

b. Inform such agencies of safety equipment, supplies, proper emergency safety procedures that are applicable to the facility?

Yes No N/A ___ RMK# ___

- c. Familiarize the local hospital listed in the approved application with the properties of hazardous waste handled at the facility and the types of injuries or illness that could result from fires, explosions or releases at the facility? Yes No N/A ___ RMK# ___
2. Has a state or local agency declined to enter into the arrangements set forth in OAC rule 3745-54-37(A)? If so: Yes ___ No N/A ___ RMK# ___
- a. Has the permittee documented the refusal in the operating record as required by OAC rule 3745-54-37(B)? [Condition B.13(b)] Yes ___ No N/A RMK# ___
3. Has the permittee, in accordance with OAC rule 3745-54-53 submitted a copy of the approved contingency plan (including amendments, revisions or changes) to all local authorities, agencies and response contractors designated in the approved contingency plan? [Condition B.18(b)] Yes No N/A ___ RMK# ___
4. Has the permittee notified all parties identified in the contingency plan in writing of amendments, modifications, or revisions to the plan within ten days of the effective date of the change in the plan? [Condition B.18(b)] Yes ___ No N/A RMK# ___
5. Has the permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to the Ohio EPA, Division of Emergency and Remedial Response (DERR) in accordance with OAC rule 3745-54-53? [Condition B.18(c)] Yes No N/A ___ RMK# ___
6. Is the permittee reviewing the approved contingency plan at least annually and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17] Yes No N/A ___ RMK# ___

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

EMERGENCY COORDINATOR

7. In accordance with OAC rule 3745-54-55 and Condition B.19 of the permit, is an emergency coordinator on premises or on call at all times? Yes No N/A ___ RMK# ___
8. In accordance with OAC rule 3745-54-55 and Condition B.19 of the permit, is/are the emergency coordinator(s) at the facility familiar with the following:
- a. Contingency plan? Yes No N/A ___ RMK# ___
- b. Facility operations/activities? Yes No N/A ___ RMK# ___
- c. Waste characterization and location? Yes No N/A ___ RMK# ___
- d. Location of all records in the facility? Yes No N/A ___ RMK# ___
- e. Facility layout? Yes No N/A ___ RMK# ___
9. In accordance with OAC rule 3745-54-55, does/do the emergency coordinator(s) have the authority to commit the resources needed to carry out the contingency plan? [Condition B.19] Yes No N/A ___ RMK# ___
10. Does the permittee have a contingency plan for the facility that: [Condition B.19]
- a. Describes the actions facility shall take to comply with OAC rules 3745-54-51 through 3745-54-56 in response to fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil or surface water at the facility? Yes No N/A ___ RMK# ___
- b. Describes arrangements agreed to by local police, fire departments, hospitals, contractors and Ohio EPA and the local emergency response team to coordinate emergency services? Yes No N/A ___ RMK# ___

- c. Includes an up-to-date list of names, addresses and phone numbers (office and home) for all persons qualified to act as emergency coordinator in the order that they will assume responsibility for coordination of emergency response? Yes No N/A ___ RMK# ___
- d. Includes a list of all emergency equipment, including fire extinguishing systems, spill control equipment, communications and alarm systems and decontamination equipment? Yes No N/A ___ RMK# ___
- e. Includes the location and a physical description of each item on the list referenced in Question No. 10(d), and a brief outline of its capabilities? Yes No N/A ___ RMK# ___
- f. Includes an evaluation plan for facility personnel describing signals to be used to begin evacuation, evacuation routes, and alternate evacuation routes, in situations where the primary routes could be blocked by releases of hazardous waste? Yes No N/A ___ RMK# ___

REMARKS

IMPLEMENTATION OF CONTINGENCY PLAN

11. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility including spill or release of hazardous waste or hazardous waste constituents greater than or equal to 55 gallons; any spill or release of hazardous waste or hazardous waste constituents less than 55 gallons may result in a fire or explosion hazard as determined by the Emergency Coordinator; or any spill on-site that may potentially cause on or off-site soil and/or ground or surface water contamination; any spill or release of hazardous waste or hazardous waste constituents that is reported to the National Response Center or local (city or county) emergency response center because the spill exceeded the "RQ" limits; any fire involving hazardous waste; any explosion involving hazardous waste; since the date of the last inspection? If so: Yes ___ No N/A ___ RMK# ___

- a. Did the permittee immediately implement the approved contingency plan and follow the emergency procedures described in OAC rule 3745-54-56? [Conditions B.14 and B.20] Yes___ No N/A RMK#___
- b. Did the permittee immediately notify Ohio EPA's emergency response team using the 24-hour toll free number (800)282-9378 providing the following information: [OAC rule 3745-54-56(D)(2)]
- i. Name and telephone number of the reporter? Yes___ No N/A RMK#___
- ii. Name and address of the facility? Yes___ No N/A RMK#___
- iii. Time and type of incident? Yes___ No N/A RMK#___
- iv. Name and quantity of materials involved? Yes___ No N/A RMK#___
- v. The extent of injuries? Yes___ No N/A RMK#___
- vi. The possible hazards to human health or the environment outside the facility? Yes___ No N/A RMK#___
- c. Did the permittee collect and manage as hazardous waste all liquid or solid material resulting from fire, explosion, released material or emergency response materials until such time as the permittee can demonstrate to Ohio EPA that such waste are not hazardous wastes? [Condition B.16] Yes___ No N/A RMK#___
- d. Within 15 days of the incident did the permittee submit to the director a written report of the incident? If so: Yes___ No N/A RMK#___
- i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23] Yes___ No N/A RMK#___

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

Yes ___ No N/A RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

CLOSURE REQUIREMENTS

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

Yes No N/A ___ RMK# ___

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

Yes No N/A ___ RMK# ___

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

Yes ___ No N/A RMK# ___

- a. Has the plan been amended in accordance with OAC rule 3745-55-18(D)? [Condition B.28]

Yes ___ No N/A RMK# ___

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

4. Has the permittee closed the facility? If so:

Yes ___ No N/A ___ RMK# ___

- a. Did the permittee complete closure of the facility 180 days after receiving the final volume of hazardous waste, as required by Condition B.31 of the permit?

Yes ___ No N/A RMK# ___

- b. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26]

Yes ___ No N/A RMK# ___

- c. Did the permittee carry out the approved closure plan as set found in Section I of the approved permit application? [Condition B.27] Yes___ No N/A RMK#___
- d. After receiving the final volume of hazardous waste, did the permittee remove all hazardous waste and complete closure activities in accordance with the schedule specified in the approved closure plan and as required by OAC rule 3745-55-13? [Condition B.31] Yes___ No N/A RMK#___
- e. Has the permittee decontaminated and/or disposed of all facility equipment, structures and soils as required by OAC rule 3745-55-14 and the approved closure plan? [Condition B.32] Yes___ No N/A RMK#___
- f. Has the permittee certified that the facility has been closed in accordance with the specifications in the approved closure plan as required by OAC rule 3745-55-15? [Condition B.33] Yes___ No N/A RMK#___
- g. Has the permittee submitted a survey plat to the director and local zoning authority no later than the submission of certification of closure of each hazardous waste disposal unit? [Condition B.34] Yes___ No N/A RMK#___

REMARKS

POST-CLOSURE MAINTENANCE This section is N/A.

REMARKS

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

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

CONDITION OF CONTAINERS

1. Are containers holding hazardous wastes in good condition as required by OAC 3745-55-71? [Condition C.4] If not:
- Yes No N/A ___ RMK# ___
- a. Did the permittee transfer the hazardous waste from such a container to one that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit? [Condition C.4]
- Yes ___ No N/A RMK# ___
2. Does the permittee ensure that all containers used at the facility are compatible with the hazardous waste to be stored in them as required by OAC rule 3745-55-72? [Condition C.5]
- Yes No N/A ___ RMK# ___
3. Does the permittee keep all containers closed during storage except when it is necessary to add or remove waste as required by OAC rule 3745-55-73? [Condition C.6(a)]
- Yes No N/A ___ RMK# ___
4. Does the permittee store all containerized hazardous waste on the container storage containment system as described in Condition C.7 of the permit? [Condition C.7]
- Yes No N/A ___ RMK# ___

INSPECTIONS

NOTE: *Inspector may attach a container inspection checklist.*

5. Is the permittee inspecting the container area weekly in accordance with OAC rule 3745-55-74 and the approved inspection schedule in Section F of the Part B permit application to detect leaking containers and deterioration of containers and the containment system? [Condition C.9]
- Yes No N/A ___ RMK# ___
- a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken as required by OAC rule 3745-54-15(D)?
- Yes No N/A ___ RMK# ___

CONTAINMENT SYSTEM

6. Does the permittee maintain the containment system as described in the approved permit application, Section D, including: [Condition C.7] Yes No N/A ___ RMK# ___

a. Sufficient capacity to hold 10% of the total volume of containers or the volume of the largest container, whichever is greater. Yes No N/A ___ RMK# ___

b. A system which is free of gaps and sufficiently impervious to contain leaks and spills? Yes No N/A ___ RMK# ___

7. Has the permittee had a spill or leak of wastes? If so: Yes ___ No N/A ___ RMK# ___

a. Was spilled or leaked waste removed in a timely manner? [Condition C.7(e)] Yes ___ No N/A RMK# ___

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

AISLE SPACE

8. Is the permittee maintaining adequate aisle space to allow unobstructed movement of personnel and equipment in the event of an emergency as required by OAC rule 3745-54-35 and Condition B.12 of the permit? Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

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

9. Does the permittee store any containers of hazardous waste received from any off-site source that is not owned and/or operated by the permittee? [Condition C.8] Yes ___ No N/A ___ RMK# ___

10. Does the permittee store more than 105,000 gallons of hazardous waste at any given time in the permitted container area located in the ERU warehouse? [Condition C.1(a)] Yes ___ No N/A ___ RMK# ___

11. Does the permittee store hazardous waste in the types of containers (size and type) described in Section D of the permit application? [Condition C.1(a)] Yes No N/A RMK#
12. Does the permittee store in containers only the hazardous waste codes specified in Permit Condition C.3? Yes No N/A RMK#

REMARKS

LAND DISPOSAL RESTRICTION REQUIREMENTS

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

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

5. Is the permittee in compliance with the requirements of OAC rule 3745-270-50 regarding the storage of wastes restricted or prohibited from land disposal under OAC rule 3745-270-50?

Yes No N/A RMK#

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

TANK STORAGE, TREATMENT AND MANAGEMENT

The permittee stores and treats (via blending) hazardous waste in 21 aboveground tanks at the ERU and 5 aboveground tanks at the resin plant (S02, T01).

1 Does the permittee store hazardous waste in accordance with Condition D.1 and in the following 26 tanks subject to the terms of the permit?

Yes No N/A RMK#

Tanks 1501-1506, 1511-1520 (17,000 gallons each)
Tanks 1521-1522 (2,300 gallons each)
Tanks 1523-1525 (1,700 gallons each)
Tanks R-1707-R-1710 (5,250 gallons each)
Tank R-1711 (12,086 gallons)

2 During any calendar year, does the permittee manage through tank storage hazardous waste in excess of 315,000 gallons?

Yes No N/A RMK#

3 Does the permittee store in tanks only the hazardous waste codes specified in Permit Condition D.1(c)?

Yes No N/A RMK#

4 Does the permittee treat (blending) hazardous waste in the tanks specified in Condition D.2(a) at a rate not to exceed 27,400 gallons per day?

Yes No N/A RMK#

5 For new tank systems (R-1707 - R-1711), has the permittee constructed and operated the secondary containment systems in accordance with the requirements of OAC Rule 3745-55-93(B) through (F) and Section D of the permit application?

Yes No N/A RMK#

6. For existing tank systems (Tanks 1501-1506, 1511-1525), has the permittee designed, constructed, and operated the secondary containment system, in accordance with the detailed design plans and descriptions contained in Section D of the permit application? Yes No ___ N/A ___ RMK# ___
7. Did the permittee place hazardous wastes or treatment reagents in the tank system if they could cause the tank, its ancillary equipment, or a containment system to rupture, leak, corrode, or otherwise fail? [Condition D.5a] Yes ___ No N/A ___ RMK# ___
8. Did the permittee prevent spills and overflows from the tank or containment systems using the methods described in the permit application? Yes No ___ N/A ___ RMK# ___
9. Did the permittee inspect the tank systems, in accordance with the Inspection Schedule found in Section F of the permit application and Condition D.6 of the permit? Yes No ___ N/A ___ RMK# ___
10. For all permitted hazardous waste storage tanks, did the permittee perform ultrasonic thickness testing using the procedures in Section F.2.2.2.5 of the permit application? [Condition D.6(d)] - every five years - Ultrasonic testing of the bottoms of all the tanks in the east and west cell rooms is required by 2007. Yes ___ No ___ N/A ___ RMK# 6
11. Did the permittee document compliance with Permit Condition D.6 in the operating record of the facility? Yes No ___ N/A ___ RMK# 6
12. Did the permittee obtain, and keep on file at the facility, the written statements by those persons required to certify the design and installation of the new tank system? Yes No ___ N/A ___ RMK# ___
13. Did the permittee have on file at the facility the written assessment of the existing tank system's integrity? Yes No ___ N/A ___ RMK# ___
14. Did the permittee maintain at the facility a record of the results of leak tests and integrity tests conducted in accordance with Condition D.6(d)? Yes No ___ N/A ___ RMK# ___

15. Did the permittee place ignitable or reactive waste in the tank system or in the secondary containment system? Yes No ___ N/A ___ RMK# ___
- If so, did the permittee follow the procedures specified in the permit application and document compliance with Condition D.10 and place it in the operating record? Yes No ___ N/A ___ RMK# ___
16. Did the permittee comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon, as required by the National Fire Protection Association's "Flammable and Combustible Liquids Code"? Yes No ___ N/A ___ RMK# ___
17. Did the permittee place incompatible wastes or materials in the same tank system or in the same secondary containment system? Yes No ___ N/A ___ RMK# ___
- If so, did the permittee follow the procedures specified in the permit application and document compliance with Condition D.11 and place it in the operating record? Yes No ___ N/A ___ RMK# ___

REMARKS

6. According to Permit Condition D.6(d)(i), ultrasonic testing of the bottoms of all tanks in the east and west cell rooms is required by 2007 in accordance with Section F.2.2.2.5 of the permit application. In addition, Section F.2.2.2.5 states that "Test data generated from each of the 16 tank bottom tests will be maintained on site as part of the facility operating record until 12/31/10." As discussed during the inspection, ultrasonic testing has been performed for all of these tanks, except for Tank 1506. Once Tank 1506 is tested, PPG is to provide confirmation that the ultrasonic testing has been completed in accordance with Permit Condition D.6(d)(i) and a summary of the results.

CORRECTIVE ACTION

1. Has the permittee submitted the monthly progress report for all corrective action activities? (This report is due by the 15th of the month following the reporting period.) [Condition ___] Yes ___ No N/A ___ RMK# 7
2. Has the permittee identified any new WMUs or releases at the facility? [Condition E.10]? If so: Yes ___ No N/A RMK# ___

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

Yes ___ No N/A RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

7. Corrective action obligations are currently being addressed by Ohio EPA's Division of Emergency and Remedial Response (DERR) through the 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 permit.

INCINERATION

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

1. Does the permittee incinerate only hazardous waste received from and generated by on- and off-site PPG facilities? [Condition I.1] Yes No ___ N/A ___ RMK# ___
2. Does the permittee incinerate only waste that is in the liquid, solid, slurry, or sludge state? Compressed gases are prohibited from being fed to the incineration system. Yes No ___ N/A ___ RMK# ___
3. Does the permittee incinerate or treat any State-recognized hazardous waste whose current Ohio EPA hazardous waste code does not appear in the approved Part A permit application? Yes ___ No N/A ___ RMK# ___
4. Does the permittee sample and analyze the treatment residue generated from the incineration system and all ancillary systems in accordance with the procedures outlined in Section C of the permit application? [Condition I.4(a)] Yes No ___ N/A ___ RMK# ___

5. Does the permittee manage the treatment residue generated from the incineration system in accordance with the procedures outlined in Sections C and D of the permit application and all applicable Ohio hazardous waste regulations? [Condition I.4(b)]

Yes ___ No ___ N/A ___ RMK# 8

REMARKS

8. See attached large quantity generator checklist.

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLI AND ATTACH A PROCESS DESCRIPTION SUMMARY

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

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

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

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

Safety Equipment Used:

GENERAL REQUIREMENTS

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

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

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

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

- | | | | | | | |
|---|-----|--------------------------|----|--------------------------|-----|-------------------------------------|
| 10. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)] | | | | | | |
| a. Container that meets 3745-66-70 to 3745-66-77? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| c. Drip pads that meet 3745-69-40 to 3745-69-45? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| d. Containment building that meets 3745-256-100 to 3745-256-102? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |

NOTE: Complete appropriate checklist for each unit.

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

- | | | | | | | |
|---|-----|--------------------------|----|-------------------------------------|-----|-------------------------------------|
| 11. Does the generator export hazardous waste? If so: | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| b. Has the generator complied with special manifest requirements? [3745-52-54] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| d. Has an annual report been submitted to U.S. EPA? [3745-52-56] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| e. Are export related documents being maintained on-site? [3745-52-57(A)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |

MANIFEST REQUIREMENTS

- | | | | | | | |
|--|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| 12. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]

- | | | | | | | |
|--|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| 14. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
|--|-----|-------------------------------------|----|--------------------------|-----|--------------------------|

NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].

- | | | | | | | |
|---|-----|-------------------------------------|----|--------------------------|-----|-------------------------------------|
| 15. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.

17. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes No N/A
18. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes No N/A
19. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes No N/A

NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.

PERSONNEL TRAINING

20. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes No N/A
21. Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes No N/A
22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A
23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes No N/A
24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A
25. Does the generator keep records and documentation of:
- a. Job titles [3745-65-16D(1)]? Yes No N/A
 - b. Job descriptions [3745-65-16D(2)]? Yes No N/A
 - c. Type and amount of training given to each person [3745-65-16D(3)]? Yes No N/A
 - d. Completed training or job experience required [3745-65-16D(4)]? Yes No N/A
26. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes No N/A

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

Job Performed	Name of Employee	Date Trained

CONTINGENCY PLAN

27. Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes No N/A
28. Does the plan describe the following:
- a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes No N/A
 - b. Arrangements with emergency authorities [3745-65-52(C)]. Yes No N/A
 - c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes No N/A
 - d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes No N/A

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

NOTE: If the facility already has a "Spill Prevention, Control and Counter measures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]

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

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

EMERGENCY PROCEDURES

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

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

PREPAREDNESS AND PREVENTION

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

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

35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes No N/A
See remark #4 on TSD checklist.
36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A
37. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] Yes No N/A
38. If there is only one employee on the premises, is there immediate access to a device (ex.phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] Yes No N/A
39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes No N/A
41. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes No N/A

SATELLITE ACCUMULATION AREA REQUIREMENTS

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

- c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A
- d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes No N/A
- e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes No N/A
See letter (f) below.
- f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
(1) On June 18, 2007, during the inspection of the resin manufacturing plant, a 55-gallon satellite accumulation drum on the Mezzanine level was not marked with the words "Hazardous Waste" or with other words identifying the contents.

(2) PPG accumulates fluorescent bulbs on site in the maintenance building of the resin manufacturing plant prior to crushing them in a bulb crusher and sending them off site as hazardous waste to Lighting Resources in Greenwood, Indiana. On June 18, 2007, PPG was accumulating less than 55 gallons of bulbs in the maintenance building in a container that was not closed and not marked with the words "Hazardous Waste" or with other words that identify the contents.

43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes No N/A
- a. Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes No N/A
- b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes No N/A

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

44. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes No N/A
See number 45 below.
45. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No N/A
On June 19, 2007, during the ERU inspection, PPG was accumulating several drums of spent carbon (approximately 20) and boxes of spent scrubber packing material (about half a trailer full of single and double-stacked boxes) in a box truck south of the ERU material handling warehouse. None of them were labeled with the words "Hazardous Waste" and none of them were marked with an accumulation start date.
46. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A
- b. In good condition? [3745-66-71] Yes No N/A
- c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A

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

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. Yes No N/A
On June 18, 2007, during the inspection of the resin manufacturing plant, three drums of liquid organic defective resin (marked with the words "Hazardous Waste" and an accumulation start date of 6-6-07) were accumulating outside west of the raw material tank area. However, PPG was not inspecting that area in accordance with OAC Rule 3745-66-74.
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
The current Waste Storage checklist (E-List-005) for the resin plant does not distinguish between <90-day areas; it only has a "Drum Storage" section. This section should be broken out to distinguish between the outside <90-day area (west of the manufacturing area), the <90-day area in the southeast corner of the 1st floor of Building #1, and any other areas of the facility that are operated as <90-day areas (e.g., Building #2 warehouse). This will help ensure that each separate area is being inspected in accordance with OAC Rule 3745-66-74.

48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-7] Yes No N/A
49. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes No N/A
50. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] Yes No N/A
51. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] Yes No N/A

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

52. If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] Yes No N/A

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

53. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes No N/A
54. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A
55. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes No N/A



LDR CHECKLIST

GENERAL LDR REQUIREMENTS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? Yes___No N/A___RMK# ___
If so:

a. Has the facility complied with 3745-270-04? Yes___No N/A RMK# ___

REMARKS

1. During the inspection, there was some discussion about how to correctly designate underlying hazardous constituents on the land disposal restrictions (LDR) notification certification for outgoing hazardous waste shipments. According to "Table 1: Generator Paperwork Requirements" in OAC Rule 3745-270-07, the generator must list the constituents of concern for F001 to F005, and F039, and underlying hazardous constituents (UHCs) in characteristic wastes, unless the waste will be treated and monitored for all constituents. If all constituents will be treated and monitored, there is no need to put them all on the LDR notice.

NOTIFICATION AND CERTIFICATION REQUIREMENTS

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

14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)] Yes___No N/A RMK# ___

15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)] Yes___No N/A RMK# ___

16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)] Yes___No N/A RMK# ___

17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)]
If so: Yes No___N/A___RMK# ___

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

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

18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)]

Yes No N/A ___ RMK# ___

REMARKS

GENERATORS TREATING HAZARDOUS WASTE

1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40?

Yes ___ No N/A ___ RMK# 2

REMARKS

2. Residuals from the treatment of hazardous waste are still hazardous and do not meet land disposal restrictions standards. These wastes are managed as hazardous and are shipped to permitted TSDs for further treatment prior to disposal.

HAZARDOUS DEBRIS: This section is N/A.

TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS: This section is N/A. See Remark #2.

TANK SYSTEM REQUIREMENTS (OAC rule 3745-52-34(A) and OAC rules 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. Spill control equipment each operating day? [3745-66-95(A)(1)] Yes No N/A
- b. Above ground portion of tank each operating day?[3745-66-95(A)(2)] Yes No N/A
- c. Data from leak detection equipment each operating day?[3745-66-95(A)(3)] 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(A)(4)] 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. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter?[3745-66-95(B)(1)] Yes No N/A
5. Where applicable, all sources of impressed current at least bi-monthly?[3745-66-95(B)(2)] Yes No N/A

TANK SYSTEM CLOSURE REQUIREMENTS

6. 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). Yes No N/A

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES

7. For tanks used or 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
8. 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 (1996)? [3745-66-98(B)] Yes No N/A
9. 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

10. 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]
- 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

11. 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)] Yes No N/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 secondary containment (which is considered a new tank system component) due to the recent upgrade of the tank in 2002.

NOTE: You should review the file to see if the written assessment has been previously reviewed and what the results were.

12. Does the written assessment include the following: [3745-66-92(A)]
See Number 11 above.
- a. Certification by an independent registered, professional engineer? [3745-66-92(A)] Yes No N/A
See Number 11 above.
- b. Consideration of the design standards of the system? [3745-66-92(A)] Yes No N/A
See Number 11 above.
- c. Consideration of the hazardous characteristics of the waste(s)? [3745-66-92(A)] Yes No N/A
See Number 11 above.
- d. An evaluation by a corrosion expert (if the external system/components are metal)? [3745-66-92(A)] Yes No N/A
See Number 11 above.
- e. A determination of design and operational measures that will be needed to protect the tank system from potential damage (for underground tank components)? [3745-66-92(A)] Yes No N/A
See Number 11 above.
- 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
See Number 11 above.
- g. Design considerations for anchoring the unit to prevent floatation (for tanks situated in a seismic fault zone or saturated zone)? [3745-66-92(A)] Yes No N/A
See Number 11 above.
- h. Design considerations to ensure that the tank system will withstand the effects of frost heave (for underground tank systems)? [3745-66-92(A)] Yes No N/A
See Number 11 above.

NOTE: CO-DHWM Engineering staff are available to assist you with evaluation of the written assessment.

13. 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)] Yes No N/A
See Number 11 above.
- 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
See Number 11 above.
- b. Statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)] Yes No N/A
See Number 11 above.
- c. Proper backfilling? [3745-66-92(C)] Yes No N/A
- d. Tightness test; if the tank 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
See Number 11 above.
- f. Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)] Yes No N/A

SECONDARY CONTAINMENT

14. Has secondary containment been provided? Yes No N/A

NOTE: All tank systems must have secondary containment at this point, except for tank systems that store/treat materials that become hazardous waste after January 12, 1987, must have secondary containment required within the time intervals in [3745-66-92(A)(1)] to (A)(4). The date the material became a hazardous waste must be used in place of January 12, 1987. [3745-66-92(A)(5)]

15. 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 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. 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 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?** [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. **An Equivalent Device?** 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

- 16. 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 detecting and collecting releases and accumulated liquids?[3745-66-93(B)(1) and (2)] Yes No N/A
- 17. 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)(2)] 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

- 18. 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

- 19. 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 | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 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 | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 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 | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| d. Immediately conduct a visual inspection of the release?[3745-66-96(C)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| e. Prevent further migration of the leak or spill to soils or surface waters?[3745-66-96(C)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| f. Properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| g. Report the release to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| h. Submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)(2)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 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 | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |

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.

- | | | | | | | |
|---|-----|--------------------------|----|-------------------------------------|-----|-------------------------------------|
| 20. In the event that the repairs to the tank system were major (replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from an independent, registered P.E. attesting that the repaired unit is capable of handling hazardous waste? [3745-66-96(F)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 21. Was a copy of the certification submitted to the director within seven days after returning the system to use? [3745-66-96(F)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 22. 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 | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 23. 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 | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| a. Has the o/o complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G)(3)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| b. If soils cannot be decontaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 24. 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 | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| a. Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| 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 | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |

USED OIL INSPECTION CHECKLIST (Short Version)

NOTE: This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes ___ No N/A ___ RMK# ___
Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes ___ No N/A RMK# ___
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No N/A ___ RMK# ___
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes No N/A ___ RMK# ___

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes ___ No N/A RMK# ___
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 RMK# ___
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes No N/A ___ RMK# ___
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 ___ RMK# ___
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 ___ RMK# ___
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes ___ No N/A RMK# ___
- b. Contained the release? Yes ___ No N/A RMK# ___

- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A RMK#
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A RMK#
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes No N/A RMK#
- 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 RMK#
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A RMK#
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A RMK#
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes No N/A RMK#

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. 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 RMK#
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes No N/A RMK#
14. 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 RMK#

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes No N/A RMK#

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REMARKS

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more

Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS

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

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

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

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] Yes No N/A RMK#
- a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] Yes No N/A RMK#
- b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] Yes No N/A RMK#
7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)] Yes No N/A RMK#

UNIVERSAL WASTE LAMPS

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

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

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

ACCUMULATION TIME

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

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

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

EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] Yes No N/A RMK#

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes No N/A RMK#
15. Is the material released characterized? [3745-273-17(B)] Yes No N/A RMK#
16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes No N/A RMK#

OFF-SITE SHIPMENTS

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

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes No N/A RMK#

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

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes No N/A RMK#
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No N/A RMK#
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes No N/A RMK#
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes No N/A RMK#

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

EXPORTS

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

REMARKS

1. During the inspection, PPG was managing its fluorescent bulbs as hazardous waste. PPG accumulates them on site in the maintenance building of the resin manufacturing plant prior to crushing them in a bulb crusher and sending them off site as hazardous waste to Lighting Resources in Greenwood, Indiana.

