



State of Ohio Environmental Protection Agency

Southwest District Office

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401 E. Fifth St.  
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249  
www.epa.state.oh.us

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

August 21, 2009

Re: **Klor Kleen, Inc.**  
Permitted Storage Facility  
OHD980821862  
Hamilton County, SWDO  
NOV

Mr. Ray Boyle  
Klor Kleen, Inc.  
P.O. Box 25183  
Cincinnati, Ohio 45225

Dear Mr. Boyle:

Thank you for accompanying Pam McCoy and me during Ohio EPA's July 29, 2009 inspection of Klor Kleen's facility in Cincinnati, Ohio. We inspected Klor Kleen (KK) to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC).

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

1. **Personnel Training**  
**OAC Rule 3745-54-16 (C)**

Facility personnel shall take part in an annual review of the initial training required in paragraph (A) of this rule.

Specifically, KK did not follow the procedures described in the approved personnel training program found in Section H of the approved part B permit application and the terms and conditions of their permit. During Ohio EPA's July 29, 2009 inspection, we discovered that G. Wilfong, had not completed annual training since 2006.

On August 11, 2009, you submitted documentation that KK provided annual training to G. Wilfong on August 7, 2009. This action **corrected** the above violation.

2. **General Inspection Requirements-Daily Inspections**  
**OAC Rule 3745-54-15(B)(4)**

Areas subject to spills must be inspected daily when in use.

Specifically, KK did not follow the procedures described in the approved Inspection Schedule found in Section F-2 of the approved part B permit application and the terms and conditions of their permit. During Ohio EPA's July 29, 2009 inspection, we discovered that KK had not performed a complete daily inspection on July 21, 2009. The inspector had not filled out the "containers marked with date received & tracking #" section.

KK resumed complete daily inspections on July 22, 2009. This action **corrected** the above violation.

3. **Anticipated Noncompliance**  
**[OAC Rules 3745-50-51 and 3745-50-58(L)(2)]**

A permittee must give advance notice to the director of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

KK did not retain all of the employees named and have different ones identified in Figure H-2 and Table H-1 of the approved part B permit application and the terms and conditions of their permit.

KK must modify Figure H-2 and Table H-1 to reflect the current employee names and continue to do so as employees change, or KK must modify Figure H-2 and Table H-1 altogether or remove employee names.

### **General Comments**

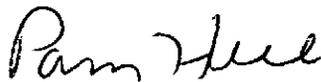
During Ohio EPA's July 29, 2009 inspection, we also noted KlorKleen maintains their permit application with modifications in separate files. This is not a violation, but Ohio EPA is suggesting that KK's application have the modifications incorporated (to better fulfill the requirement of a complete application-refer to term and condition A.14.c. of your permit).

Mr. Ray Boyle  
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Please submit a plan (detailing how KK plans to achieve a more complete application) to me **within 30 days** of your receipt of this letter.

Enclosed you will find a copy of the checklists that I completed during the inspection. Should you have any questions, please feel free to call me at (937)285-6091. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/opp>.

Sincerely,



Pam Hull  
District Representative  
Division of Hazardous Waste Management

Enclosures

cc: Dinah Crawford, SWDO-DHWM/SWDO file  
SWDO-file: Klor Kleen, Inc., Permitted Storage Facility, OHD980821862,  
Hamilton County  
EC: Pam McCoy, DHWM, Engineering and Remediation Assistance Unit

**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.

PH\bp



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

For Ohio EPA use only

E-mail this completed form to [kristina.durnell@epa.state.oh.us](mailto:kristina.durnell@epa.state.oh.us)  
or mail it to Kristina Durnell, Central Office

<b>Site EPA ID No.</b> <b>Site Name</b>  <b>Site Location Information</b>  <b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	EPA ID Number: <b>OHD980821862</b> Name: <b>Klor Kleen</b>  Website: <b>http://www.midwestenvironmentalservices.com/cinci.htm</b> (Optional)  Street Address: <b>3118 Spring Grove Ave.</b> City, Town, or Village: <b>Cincinnati</b> County Name: <b>Hamilton</b> State: <b>OH</b> Zip Code: <b>45225</b>  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"/> <b>562211</b> <b>56292</b> <b>562219</b>
<b>Facility Representative</b>  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: <b>Ray</b> MI: <b>H</b> Last Name: <b>Boyle</b> Phone Number: <b>513-681-9990</b> Phone Number Extension: <b>22</b> E-Mail Address: <b>rboyle@midwestenvironmentalservices.com</b> Fax Number: <b>513-681-1186</b> Fax Number Extension: Street or P.O. Box: <b>P.O. Box 25183</b> City, Town or Village: <b>Cincinnati</b> State: <b>OH</b> Zip Code: <b>45225</b>
<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: <b>Midwest Environmental Services, Inc</b> Owner Private County District Federal Indian Municipal State Other Type: <input checked="" type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: <b>P.O. Box 218</b> City, Town or Village: <b>Brownstone</b> State: <b>IN</b> Date Became Owner (mm/dd/yyyy): <b>11/23/1987</b> Owner Phone #: <b>812-358-5160</b> Country: <b>United States</b> Zip Code: <b>47220</b> Name of Site's Operator: <b>Midwest Environmental Services, Inc.</b> Operator Private County District Federal Indian Municipal State Other Type: <input checked="" type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: <b>P.O. Box 25183</b> City, Town or Village: <b>Cincinnati</b> State: <b>OH</b> Operator Phone #: <b>513-681-9990</b> United States Zip Code: <b>45225</b>

**VIOLATIONS CITED?**  Yes  No

**TYPE OF HANDLER- A MINIMUM OF ONE BOX MUST BE CHECKED**

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input checked="" type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input type="checkbox"/> Conditionally Exempt Small Quantity Generator <input type="checkbox"/> U.S. Importer of Hazardous Waste <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator
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**TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)**

<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Underground Injection Control Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input checked="" type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	

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

<input type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input checked="" type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	

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

<input checked="" type="checkbox"/> Batteries
<input type="checkbox"/> Pesticides
<input type="checkbox"/> Mercury containing equipment
<input checked="" type="checkbox"/> Lamps

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

<input type="checkbox"/> Used Oil Generator
<input type="checkbox"/> Used Oil Transporter
<input type="checkbox"/> Used Oil Transfer Facility
<input checked="" type="checkbox"/> Used Oil Processor
<input type="checkbox"/> Used Oil Re-refiner
<input type="checkbox"/> Off-Specification Used Oil Burner
<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner

**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.

<b>SEE</b>	<b>2008</b>	<b>ANNUAL</b>	<b>REPORT</b>	<b>INFO</b>	<b>FOR</b>	<b>CODES</b>
<b>COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.</b>						
Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:			
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments: <b>Klor Kleen ranges between a conditionally exempt and small quantity generator based on their own waste and is a large quantity generator based on their TSD generation. Klor Kleen is a used oil processor (for purposes of storing for greater than 35 days and was a small quantity universal waste handler on 9/29/08 (even though can be a large quantity universal waste handler). Tanks are used to store used oil.</b>			
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No				

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
<b>Pam Hull</b>	<b>Pam McCoy</b>	<b>7/29/2009 9:15</b>

**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) \_\_\_\_\_

**OHIO PART B PERMITTED FACILITY  
 RCRA INSPECTION CHECKLIST**

Facility: Klor Kleen Ohio Permit: 05-31-0672  
 Address: 3118 Spring Grove Avenue USEPA ID: OHD 980 821 862  
 Cincinnati, Ohio 45225

County: Hamilton  
 Facility Phone: (513)681-9990

Inspection Date: 7 / 29 / 09 Time: 9:15 - 1:00

Advance notice of inspection given? (yes) (no)   
 If so, how far in advance? \_\_\_\_\_

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspector:	Pam Hull	Environmental Specialist	(937)285-6091
	Pam McCoy	Environmental Specialist	(614)644-3846
Facility Representatives:	Ray Boyle	VP of Operations	(513)681-9990

Is facility operating as a generator? (yes)  (no) \_\_\_\_\_  
 If so, complete the applicable sections of the Generator Requirements checklist for wastes being managed under generator status.

**PERMIT STATUS**

Permit Issued: April 28, 1995  
 Permit Effective Date: July 5, 1995  
 Permit Expiration Date: July 5, 2000  
 Permit Revision Date: May 31, 2006  
 Permit Renewal: YES  
 Renewal Effective Date: April 17, 2006  
 Renewal Expiration Date: April 17, 2016

**AUTHORIZED ACTIVITIES**

<b><u>STORAGE</u></b>	<b><u>TREATMENT</u></b>	<b><u>DISPOSAL</u></b>
<input checked="" type="checkbox"/> Container	<input type="checkbox"/> Tank	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Tank	<input type="checkbox"/> Surface Impoundment	<input type="checkbox"/> Landfill
<input type="checkbox"/> Waste Pile	<input type="checkbox"/> Incinerator	<input type="checkbox"/> Land Application
<input type="checkbox"/> Surface Impoundment	<input type="checkbox"/> Thermal Treatment	<input type="checkbox"/> Surface Impoundment

**GENERAL PERMIT COMPLIANCE AND ACTIVITIES**

	Y/N/NA	RMK#
1. Has the expiration date of the permit passed? If so,	N	

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(a) Is the Permittee continuing any activity regulated by the permit after the expiration date of the permit?	NA	
(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? (or upon a later date if the Permittee can demonstrate good cause for late submittal) [Condition A.6.(a)]	NA	
2. Has the Permittee submitted the annual permit fee, payable to Treasurer of the State, to the Ohio EPA on or before the anniversary of the date of issuance (4/17/08) during the term of the permit [Condition A.25.]?	Y	
3. Is the Permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit [Condition A.1.(b) and A.5]?	N	
4. Have any provisions of the permit been identified as invalid? [Condition A.4.]	N	
5. Has the facility identified any instances of noncompliance with the permit, R.C. Chapter 3734 or the Rules adopted thereunder, which may endanger human health or the environment? If so,	N	
(a) Did the facility immediately (within 2 hours) report the following to Ohio EPA Emergency Response Section: [Condition A.20]	NA	
i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and	NA	
ii. Information concerning a release of hazardous waste, fire or explosion at the facility which could threaten human health or the environment, including a description of:	NA	
a. Name, address and telephone number of the owner or operator?	NA	
b. Name, address and telephone number of the facility?	NA	
c. Date, time, type and source of release?	NA	
d. Local weather conditions?	NA	
e. Name and quantity of material(s) involved?	NA	
f. The extent of injuries, if any?	NA	
g. An assessment of the actual or potential	NA	

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	hazard to the environment and human health inside and outside the facility where applicable?		
	h. The response the facility took to contain and monitor the release?	NA	
	i. Who was notified?	NA	
	j. Any monitoring results?	NA	
	k. Estimated quantity and disposition of recovered material that resulted from the incident?	NA	
6.	Did the Permittee provide a written report to the Ohio EPA Emergency Response Section within (5) days of the time the Permittee became aware of the circumstances reported in Question 5? [Condition A.20.] If so, did the report contain:	NA	
	(a) A description of the noncompliance (including exact dates and times)?	NA	
	(b) Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? and;	NA	
	(c) Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance?	NA	
7.	Has the Permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8.]	NA	
8.	Has the Permittee identified any other instances of noncompliance not provided for in Question #5?	N	
	(a) If so, did the Permittee report these instances to the Ohio EPA, DHWM within 5 (15, if 5 day period is waived by the Director) days of becoming aware of the noncompliance? [Condition A.21.]	NA	
	(b) Do the reports provided contain the information set forth in Condition A.19? [Condition A.20.]	NA	
	(c) Has the Permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8.]	NA	
9.	Has the Permittee planned any changes in the permitted facility or activity which may result in noncompliance	N	

with the conditions of the permit?		
(a) If so, has the facility provided Ohio EPA with advance notice of such changes? [Condition A.15.]	NA	
<b>NOTE:</b> Such notification does not waive the Permittee's duty to comply with the permit pursuant to Condition A		

**REMARKS**

**PERMIT MODIFICATION, REVISION, REVOCATION**

1. Has the Permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.]	Y	1
2. Has the permit been transferred to a new owner or operator? [Condition A.18.]	N	
(a) If so, has the transfer been conducted in accordance with R.C. Chapter 3734 and the Rules adopted thereunder? [Condition A.18.(a)] and;	NA	
(b) Before transferring ownership did the Permittee notify the new owner in writing of the requirements of R.C. Chapter 3734 and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.18.(a)]	NA	
3. Has the Permittee submitted reports of compliance or non-compliance with, or any progress reports on the requirements contained in any compliance schedule of the permit to the Ohio EPA no later than (14) days following each scheduled date, unless otherwise specified? [Condition A.19.]	NA	
4. Has the Permittee furnished relevant information which the Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10.]	N	
5. Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10]	Y	
6. 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 HWFB? If so,	NA	
(a) Has the Permittee promptly submitted such facts or		

	corrected information to the appropriate entity? [Condition A.22.]	NA	
7.	Is the Permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application? [Condition A.14.c)]	Y	2
8.	Is the Permittee retaining a complete copy of the approved application on-site? [Condition A.14.c)]	Y	2
9.	Is the Permittee planning any physical alterations or additions to the permitted container storage facility?	N	
	(a) If so, has the Permittee given notice to the Director of such alterations/additions? [Condition A.15.]	NA	
	(b) Have such changes been made in accordance with O.A.C. Rule 3745-50-51? [Condition A.15.]	NA	

**REMARKS**

- 1 A Class I modification was issued on July 1, 2008 and May 1, 2009 to KlorKleen for updates to their closure cost estimate and letter of credit approval.
- 2 KlorKleen maintains their permit application with modifications in separate files. Ohio EPA is suggesting that their application have the modifications incorporated (to fulfill the requirement of a complete application). Also, Ohio EPA is asking KlorKleen to modify their application further by requesting that the list of employee names be removed (to prevent the need for a modification every time there is a personnel change.

**SITE ENTRY - AVAILABILITY OF RECORDS**

1.	As specified in Condition A.11, has the Permittee allowed the Director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, to:	Y	
	(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?	Y	
	(b) Have access to and copy any records required to be kept under the conditions of the permit?	Y	
	(c) Inspect and photograph at reasonable times facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of	Y	

	the permit?		
(d)	Sample or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by R.C. Chapter 3734 and the Rules adopted thereunder?	Y	1

**REMARKS**

- 1 Klor Kleen sampled drum (profile 27167) from St. Bernard Soap during the 7/29/09 inspection. Drum labeled as D002 hazardous corrosive liquid. Klor Kleen's sampling yielded a pH of 13.56 (verified corrosive hazardous waste determination).

**RECORDKEEPING REQUIREMENTS**

**CONFIDENTIALITY**

1.	Has the Permittee requested confidentiality of any information of the permit in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.24.]	N	
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**OPERATING RECORD**

2.	Is the Permittee maintaining a written operating record at the facility as set forth in O.A.C. Rules 3745-54-73 and 3745-54-74 which contains the following elements: [Condition B.20.]	Y	
(a)	A description and the quantity of each hazardous waste received?	Y	
(b)	Method(s) and date(s) of treatment, storage or disposal at the facility?	Y	
(c)	The location of each hazardous waste within the facility and the quantity at each location?	Y	
3.	Is the Permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents: [Condition A.27.]	Y	
(a)	Waste analysis plan in accordance with O.A.C. Rule 3745-54-13 and the conditions of the permit?	Y	
(b)	Contingency plan in accordance with O.A.C. Rule 3745-54-53 and the conditions of the permit?	Y	

(c)	Closure plan in accordance with O.A.C. Rule 3745-55-12 and the conditions of the permit?	Y	
(d)	Cost estimate for facility closure in accordance with O.A.C. Rule 3745-55-42 and the conditions of the permit? (estimate only - adequacy of estimate will be evaluated by C.O. financial assurance personnel)	Y	
(e)	Personnel training plan and records required by O.A.C. Rule 3745-54-16 and the conditions of the permit?	N	1
(f)	Inspection schedules developed in accordance with O.A.C. Rules 3745-54-15 and O.A.C. Rule 3745-55-74 and the conditions of the permit?	N	2
4.	Have any of the documents identified in Question #3 been revised as required by the permit? If so,	Y	3
(a)	Has the Permittee submitted the revisions to the Ohio EPA? [Condition A.27.(b)]	Y	3
(b)	Has the Permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.27.(b)]	Y	3
5.	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 A.27.(g)]	Y	

**ANNUAL REPORT REQUIREMENT**

6.	Is the Permittee complying with annual report requirements set forth in O.A.C. Rule 3745-54-75 and the additional report requirements set forth in O.A.C. Rule 3745-54-77 and the conditions of the permit? [Condition B.23.]	Y	
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**SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS**

7.	In compliance with Condition A.12.(b) of the permit, do the Permittee's records of monitoring information specify the:	Y	
(a)	Date(s), place(s), time(s) and method(s) of sampling or measurement?	Y	
(b)	Individual(s) who performed the sampling or measurement?	Y	
(c)	Date(s) analyses were performed?	Y	

(d)	Individual(s) who performed the analyses?	Y	
(e)	Analytical technique(s) or method(s) used?	Y	
(f)	Results of such analyses?	Y	
8.	Have the methods used to obtain a representative sample of the waste to be analyzed included the appropriate SW-846 method or an equivalent method specified in the approved waste analysis plan? [Condition A.12.(a)]	Y	
9.	Is the Permittee maintaining records of all monitoring information, including calibration and maintenance records for a period of at least (3) years from the date of sample, measurement report, and record? [Condition A.14.(a)]	Y	
10.	Has Ohio EPA requested submittal of any reports or other information required by the conditions of the permit from the Permittee? If so,	N	
(a)	Have the submittals been signed and certified according to O.A.C. Rule 3745-50-42? [Condition A.13.]	NA	

**REMARKS**

1. Personnel training (annual, initial) pertaining to KlorKleen's contingency plan was not performed for 2 employees.
2. Complete daily container inspections lapsed on 7/21/09 & resumed on 7/22/09.
3. A Class 1 permit modification was issued on July 1, 2008 to update closure cost estimate and letter of credit information.

**OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS**

1.	(A) Is all hazardous waste transported from the facility by a properly registered transporter of hazardous waste in accordance with all applicable laws, rules and standards? [Condition A.16(a).]	Y	
	(B) Is a designated individual using a hand-held stop sign controlling cross-traffic on Spring Grove Avenue whenever trucks carrying hazardous wastes enter or leave the facility? [Condition A.16(b)]	Y	1
	(C) The Permittee does not receive tanker shipments containing more than 3,000 gallons of hazardous wastes. [Condition A.16s]]	Y	

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2.	Is the Permittee complying with the following manifest requirements set forth in O.A.C. Chapter 3745-52 and O.A.C. Rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76: [Condition B.22.]	Y	
(a)	All hazardous wastes shipped off-site have been accompanied by a completed manifest, USEPA form 8700-22 and, if necessary, USEPA form 8700-22A in compliance with O.A.C. Rule 3745-52-20(A)?	Y	
(b)	The manifest form used contains all information required by O.A.C. Rule 3745-52-20 and the minimum number of copies required by O.A.C. Rule 3745-52-22?	Y	
(c)	The facility has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with O.A.C. Rule 3745-52-20(C)(D)(E)?	Y	
(d)	Prepared manifests have been signed by the facility and initial transporter in compliance with O.A.C. Rule 3745-52-23?	Y	
3.	Has the Permittee received a return copy of each completed manifest within (35) days of the date the waste was accepted by the initial transporter?	Y	
(a)	If not, has the Permittee complied with the manifest exception reporting requirements of O.A.C. Rule 3745-52-42?	NA	
4.	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 O.A.C. Rule 3745-52-40?	Y	

**WASTE ANALYSIS/WASTE ANALYSIS PLAN**

1.	Does the Permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with O.A.C. Chapters 3745-54 to 3745-57 and Condition B.3 of the permit? [3745-54-13(A)(1)]	Y	
2.	Is the Permittee following the procedures described in the approved waste analysis plan (Section C of approved permit application) and the requirements of O.A.C. Rule 3745-54-13? [Condition B.3.]	Y	
3.	If the Permittee uses a contact laboratory to perform analysis, does the	Y	

Permittee inform the laboratory in writing that it must operate under the waste analysis conditions set forth in its permit? [Condition B.3.]		
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**REMARKS**

1. Observed hand sign used during a delivery that occurred during 7/29/09 inspection.

**GENERAL INSPECTION REQUIREMENTS**

1. Is the Permittee following the inspection procedures and schedules described in Section F of the approved permit application and the requirements of O.A.C. Rule 3745-54-15? [Condition B.5]	Y	
2. Does the Permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [O.A.C. Rule 3745-54-15(A)(1)(2)]	Y	
3. 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 O.A.C. Rule 3745-54-15(1)?	Y	
(a) Is the schedule kept at the facility? [O.A.C. Rule 3745-54-15(B)(2)]	Y	
(b) Does the schedule identify the types of problems which are to be looked for during the inspection? [O.A.C. Rule 3745-54-15(B)(3)]	Y	
(c) Does the schedule include inspection of areas subject to spills daily when in use and according to other applicable regulations when not in use? [O.A.C. Rule 3745-54-15(B)(4)]	Y	
4. Does the Permittee remedy deterioration or any malfunctions discovered by an inspection as required by O.A.C. Rule 3745-54-15(8)? [Condition B.5.]	Y	
5. Is the Permittee maintaining records of inspections for a minimum of three years? [Condition B.5]	Y	
6. In accordance with O.A.C. Rule 3745-54-15(D) and Condition B.5 of the permit, do inspection records contain the following information:	Y	1
(a) Date and time of inspection?	Y	

(b) Signature (name-per reg) of inspector?	Y	
(c) Notation of observations made?	Y	
(d) Date/nature of any repairs or other remedial actions?	Y	

**SECURITY PROVISIONS/FACILITY OPERATION**

1. Is the Permittee complying with the security provisions of O.A.C. Rule 3745-54-14 and Section F of the approved permit application, including the following: [Condition B.4]	Y	
(a) Does the Permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility, or;	Y	
(b) An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility, or;	Y	
(c) A means to control entry, at all times, through gates or other entrances, to the active portion of the facility?	Y	2
2. In accordance with O.A.C. Rule 3745-54-148), does the Permittee have signs reading "Danger-Unauthorized Personnel Keep Out" posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? [Condition B.4.]	Y	
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 waters? [Condition B.1.]	Y	

**REMARKS**

- 1** A checklist element identified in the permit application was not completed during a 7/21/09 inspection. All items were completed on 7/22/09 and all subsequent inspections performed after that.
- 2** A gate was in place before and after a delivery that occurred during the 7/29/09 inspection.

**PERSONNEL TRAINING**

1. Is the facility conducting personnel training in accordance	N	1
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	with Section H of the approved permit application and the following requirements of O.A.C. Rule 3745-54-16: [Condition B.6.]		
(a)	The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [O.A.C. Rule 3745-54-16(A)(B)8]	N	1
(b)	The facility provides personnel training to new employees within 6 months after their date of employment as required by O.A.C. Rule 3745-54-16(B)?	N	1
(c)	The facility provides an annual refresher training course as required by O.A.C. Rule 3745-54-16(B)?	N	1
2.	Is the Permittee maintaining personnel training records as required by O.A.C. Rule 3745-54-16(D) and of the approved application, including; written job titles, job descriptions and documented employee training records? [Condition B.6.]	Y	

**REMARKS**

- 1 Personnel training (annual, initial) pertaining to KlorKleen's contingency plan was not performed for 2 employees.

**REQUIRED EQUIPMENT**

1.	Is the Permittee, at a minimum, maintaining the equipment set forth in the approved permit application (Section G) at the facility? [Condition B.8.]	Y	
2.	Is the Permittee inspecting, testing and maintaining the equipment specified in Question #1 to assure its proper operation as specified in O.A.C. Rule 3745-54-33, the inspection plans and Section F of the approved permit application? [Condition B.8.]	Y	
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 O.A.C. Rule 3745-54-34 and Section F of the approved permit application? [Condition B.9.]	Y	

**REMARKS**

**CONTINGENCY PLAN REQUIREMENTS**

**EMERGENCY PROCEDURES**

1.	In compliance with Condition B.11.(a) of the permit, does the Permittee:	Y	
	(a) Familiarize the emergency response agencies likely to respond to an emergency at the facility with:	Y	
	i. - The layout of the facility?	Y	
	- Properties of hazardous waste managed at the facility and associated hazards?	Y	
	- Places where facility personnel normally work?	Y	
	- Entrances to and roads inside the facility?	Y	
	- Evacuation routes as depicted in Section G of the permit application?	Y	
	(ii) - Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit? and;	Y	
	(iii) - Familiarize local ambulance services, fire depts., hospitals and any other local emergency services with the properties of hazardous waste managed at the facility and the types of injuries or illness which could result from fires, explosions or a release of hazardous wastes at the facility?	Y	

**EMERGENCY AUTHORITIES**

2.	Has a state or local agency declined to enter into the arrangements set forth in O.A.C. Rule 3745-54-37(A)? If so,	N	
	(a) Has the Permittee documented the refusal in the operating record as required by O.A.C. Rule 3745-54-37(B)? [Condition B.11.(b)]	NA	
3.	Has the Permittee, in accordance with O.A.C. 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.16(b)]	Y	

4. Has the Permittee notified the agencies in Question #1, in writing, within (10) days of the effective date of any amendments or revisions to the plan? [Condition B.16(b)]	Y	
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 in accordance with O.A.C. Rule 3745-54-53? [Condition B.168]]	Y	

**EMERGENCY COORDINATOR**

6. At all times is there an individual on-site or on call to act as an emergency coordinator as required by O.A.C. Rule 3745-54-55? [Condition B.17.]	Y	
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**AMENDMENT OF PLAN**

7. Is the Permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with O.A.C. Rule 3745-54-54? [Condition B.15.]	Y	
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**IMPLEMENTATION OF PLAN**

8. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility since date of last inspection as described by Condition B.13. of the permit (Note: the Permittee must implement if a spill equal to or greater than 55 gallons occurs, or a spill less than 55 gallons that may result in a fire or explosion, or any spill that results in the release of a material that exhibits the characteristic of reactivity or results in the release of gases that may threaten human health or the environment, or any spill on site that may cause on or off-site soil and/or ground or surface water, Condition B.12)? If so,	N	
(a) Did the Permittee immediately implement the approved contingency plan and follow the emergency procedures described in O.A.C. Rule 3745-54-56? [Condition B.12; B.18. and B.14.]	NA	
(b) Did the Permittee collect and manage released material, emergency response material and by-products as hazardous waste until making a demonstration to Ohio EPA that such materials are not subject to Ohio hazardous waste rules? [Condition B.14.]	NA	
(c) Within (15) days of the incident did the Permittee submit, to the	NA	

	Director, a written report of the incident? If so,		
i.	Did the report contain the elements set forth in O.A.C. Rule 3745-54-56(J)? [Condition B.21.]	NA	
(d)	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? [Condition B.21.]	NA	

**REMARKS**

**CLOSURE REQUIREMENTS**

**GENERAL CLOSURE REQUIREMENTS**

1.	Is the Permittee maintaining at the facility, the approved closure plan which contains the elements set forth in O.A.C. Rule 3745-55-12? [Condition B.27.]	Y	
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**AMENDMENT OF CLOSURE PLAN**

2.	Has the Permittee amended the closure plan?	N	
(a)	If so, has the plan been amended in accordance with O.A.C. Rule 3745-55-12b)? [Condition B.26.]	NA	

**CLOSURE PROCEDURES**

		Y/N/NA	RMK#
3.	Has the Permittee closed the facility? If so,	N	
(a)	Was closure conducted in accordance with the closure performance standard of O.A.C. Rule 3745-55-11? [Condition B.25.]	NA	
(b)	Did the Permittee carry out the approved closure plan as set forth in the permit application and the conditions of the permit? [Condition B.24.]	NA	
(c)	After receiving the final volume of hazardous waste, did the Permittee remove from the facility all hazardous waste and complete closure activities in accordance with the schedule specified in the approved closure plan and as required by O.A.C. Rule 3745-55-13?	NA	

[Condition B.29.]			
(d)	Has the Permittee decontaminated and/or disposed of all facility equipment, structures and soils as required by O.A.C. Rule 3745-55-14 and the approved closure plan? [Condition B.30.]	NA	
(e)	Has the Permittee certified that the facility has been closed in accordance with the specifications in the approved closure plan as required by O.A.C. Rule 3745-55-15? [Condition B.31.]	NA	

**REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES**

1.	Is the Permittee in compliance with the requirements of O.A.C. Rules 3745-54-17, 3745-55-77 (for incompatible wastes), the approved application and conditions of the permit? [Condition C.9.]	Y	
2.	As required by O.A.C. Rule 3745-55-76 does the Permittee store containers of ignitable or reactive wastes greater than 15 feet (50 feet) from the facility's property line? (Note: the facility is not permitted to accept ignitable or reactive wastes)	NA	
3.	Does the Permittee take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and follow the procedures as specified by O.A.C. Rule 3745-54-15 and in Section F of the permit application? (Note: the facility is not permitted to accept ignitable or reactive wastes.	NA	
4.	Does the Permittee prevent hazardous waste from being placed in an unwashed container that previously held an incompatible waste or material? [OAC 3745-55-77(B)]	Y	1
5.	The permittee does not store hazardous wastes with a flash point less than 140°F or Ohio EPA designations of D001 as part of its in-transit (less than 10 day=s transport) operations at its 3118 Spring Grove Avenue facility. [Condition C.2.(b)]	Y	2

**STORAGE OF HAZARDOUS WASTES IN CONTAINERS**

**GENERAL REQUIREMENTS**

1.	Is the Permittee storing in containers, only those wastes identified in Condition C.2. ?	Y	
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2.	Does the Permittee limit the total quantity of containerized waste in the permitted container storage area to no more than 11,000 gallons of hazardous waste at any given time (maximum container storage inventory of two hundred, fifty-five gallon drums)? [Condition C.1.]	Y	3
3.	Are hazardous wastes subject to regulation by the permit stored only at the designated container storage areas described in the approved permit application (Section D)? [Condition C.5.(a)]	Y	
4.	Does the Permittee limit storage of hazardous waste to no more than one year? [Condition C.5.(a)]	Y	4

**CONTAINER REQUIREMENTS**

5.	Is each container stored clearly marked to identify its contents and the date each period of accumulation/storage begins? [Condition C.5.(a)]	Y	
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**CONDITION OF CONTAINERS**

6.	Are containers holding hazardous wastes in good condition? [Condition C.3.]	Y	
(a)	If not, (e.g. severe rusting, structural defects) did the Permittee transfer the hazardous waste from such a container to a container that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit and O.A.C. Rule 3745-55-71? [Condition C.3.]?	NA	
7.	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 O.A.C. Rule 3745-55-72? [Condition C.4.]	Y	
8.	Does the Permittee keep all containers closed during storage except when it is necessary to add or remove waste as required by O.A.C. Rule 3745-55-73? [Condition C.5. (b)]	Y	
9.	Are lab-pack wastes handled in compliance with the applicable storage requirements? [Condition C.5. 8)]	Y	
10.	Are lab pack wastes packaged in drums containing absorbent material that is compatible with the wastes? [Condition C.5. (d)]	Y	5
11.	Does the Permittee ensure that hazardous waste drums are stacked no more than two high in the permitted storage	Y	6

area? [Condition C.5. (e)]		
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**INSPECTIONS**

12. Is the Permittee inspecting the container area weekly in accordance with O.A.C. Rule 3745-55-74 and the approved inspection schedule (Section F) to detect leaking containers and deterioration of containers and the containment system? [Condition C.7.]	Y	
(a) Does the Permittee note the results of these inspections in the inspection log along with any remedial action taken? [Condition C.7.]	Y	

**CONTAINMENT SYSTEM**

13. Does the Permittee maintain the containment system as described in the plans and specifications contained in the approved permit application (Section D), including: [Condition C.6.(a)]	Y	
(a) Sufficient design to contain ten percent of the total volume of the containers and 7004 gallons? [Condition C.6.]	Y	
(b) A system which is free of gaps and sufficiently impervious to contain leaks and spills? [Condition C.6.(b)]	Y	
(c) Equipped with a coating which is compatible with each waste stored in the area? [Condition C.6. (b)]	Y	
(d) <b>For those wastes which are deemed incompatible with liner material:</b> Has the Permittee installed a separate secondary containment structure within the existing structure which is equipped with a compatible liner? [Condition C.6.(b)]	NA	
14. Has the Permittee had a spill or leak of wastes or an accumulation of precipitation in the containment system? If so,	N	
(a) Are spilled or leaked wastes and accumulated precipitation removed from the sump or collection area in a timely manner? [Condition C.6.(c)]	NA	
(b) Does removal of spilled/leaked wastes and accumulated precipitation occur within (24) hours from the time the spilled or leak waste is discovered? [Condition C.6.(c)]	NA	

**REQUIRED AISLE SPACE**

15. Is the Permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in the event of an emergency to any area of the facility as required by O.A.C. Rule 3745-54-35?	Y	
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**LAND DISPOSAL RESTRICTION REQUIREMENTS**

**PROHIBITION AGAINST DILUTION**

1. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [O.A.C. Rule 3745-59-03;	N	
(a) As a substitute for adequate treatment to achieve compliance with LDR treatment standards?	N	
(b) To circumvent the effective date of a prohibition (e.g. to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)?	N	
(c) To otherwise avoid a prohibition in O.A.C. Rules 3745-59-30 through 3745-59-35?	N	
(d) To otherwise avoid a prohibition imposed by Section 3004 of RCRA?	N	

**NOTE:** If the answer to any of the Questions 1(a) through 1(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of O.A.C. Rule 3745-59-03. Dilution of wastes is permissible under some conditions. See O.A.C. Rule 3745-59-03(B) (40 CFR 268.3) and the Third Third final Rule preamble for additional information.

**GENERATOR REQUIREMENTS**

2. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [O.A.C. Rule 3745-59-07(A);	Y	
(a) <b>For determinations based solely on knowledge of the waste:</b> Is supporting data used to make this determination being retained on-site? [O.A.C. Rule 3745-59-07(A)(5);]	Y	
(b) <b>For determinations based upon analytical testing:</b> Is a	NA	

	copy of waste analysis data being retained on-site? [O.A.C. Rule 3745-59-07(A)(5);		
3.	Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g. wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [O.A.C. Rule 3745-59-07(A);	Y	
4.	Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [O.A.C. Rule 3745-59-07(A);	Y	
5.	Does the entity generate any listed waste(s) which are restricted from land disposal? If so,	Y	
(a)	Do such wastes also exhibit hazardous waste characteristics as identified in O.A.C. Rules 3745-51-20 to 3745-52-24?	N	
(b)	<b>For listed wastes which also exhibit a characteristic:</b> Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [O.A.C. Rule 3745-59-09(A)]	NA	

**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 O.A.C. Rule 3745-59-09(B)]

**NOTIFICATION/CERTIFICATION**

6.	<b>For wastes that do not meet treatment standards:</b> Does the generator notify the treatment/storage facility receiving the wastes, in writing, that wastes being received do not meet treatment standards? [O.A.C. Rule 3745-59-07(A)(1)]  If so, does the notification include the following:	Y	
(a)	EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A)(1)(a)]	Y	
(b)	Appropriate treatment standard for the waste? [O.A.C. Rule 3745-59-07(A)(1)(b)]	Y	
(c)	The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A)(1)(8)]	Y	
(d)	Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(1)(d)]	Y	
8.	<b>For wastes that meet treatment standards:</b> Does the generator submit a written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received	NA	

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meet applicable treatment standards? [O.A.C. Rule 3745-59-07(A)(2)]		
If so, does the notice/certification include the following:		
(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A)(2)(a)(i)]	NA	
(b) The corresponding treatment standards and applicable prohibitions for the waste? [O.A.C. Rule 3745-59-07(A)(2)(a)(ii)]	NA	
(c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A)(2)(a)(iii)]	NA	
(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(2)(a)(iv)]	NA	
(e) Is the certification signed by the generator or an authorized representative? [O.A.C. Rule 3745-59-07(A)(2)(b)]	NA	
9. Is the notification/certification identified in Question #8 submitted with each shipment of waste? [O.A.C. 3745-59-07 (A)(2)]	NA	
10. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five years? [O.A.C. Rule 3745-59-07(A)(6)]	Y	

**REMARKS**

- 1 On 7/29/09, Lance McMullen explained that they Klor Kleen rinses out drums and set them aside for a drum cleaning company, CSI, to pick up.
- 2 On 6/25/09, Klor Keen had a waste shipment sent to them from Stevens Aviation that was flammable. This waste was manifested to EEI on 6/26/09.
- 3 The number of 55 gallon drums tallied during Klor Kleen's daily storage area inspections never exceeded 200.
- 4 None of the drums in storage exceeded the one year limit during the 7/29/09 CEI.
- 5 Klor Kleen opened a lab pack drum (profile 27167) from St. Bernard Soap during the 7/29/09 inspection. The drum contained muriatic acid and had vermiculite as an absorbent material.
- 6 No stacked drums were in Klor Kleen's permitted storage area on 7/29/09.

**STORAGE OF LAND DISPOSAL RESTRICTED WASTES**

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11.	Is the owner/operator storing land disposal restricted wastes in containers? If so, is each container marked with the following information in accordance with O.A.C. Rule 3745-59-50(A)(2)(a) :	Y	
	(a) The identification of the contents?	Y	
	(b) The date which accumulation began?	N	
12.	Are land disposal restricted wastes being stored at the facility for greater than one year? If so,	N	
	(a) Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [O.A.C. Rule 3745-59-50(A)(1)]	NA	
13.	Does the facility's waste analysis plan include analytical procedures to ensure compliance with the LDR requirements of Chapter 3745-59?	NA	1

**REMARKS**

1 Klor Kleen ensures that a copy of the generator's LDR form is kept with the waste's manifest.

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS – BATTERIES AND LAMPS-SEE REMARK #1		
<i>Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more</i>		
<i>Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less</i>		
<b>PROHIBITIONS</b>		
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<b>WASTE MANAGEMENT AND LABELING/MARKING</b>		
<b>UNIVERSAL WASTE BATTERIES</b>		
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] <b>SEE REMARK #2</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>UNIVERSAL WASTE LAMPS</b>		
8.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <b>SEE REMARK #3</b>
<b>NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.</b>		
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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

ACCUMULATION TIME		
11.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Accumulation is defined as date generated or date received from another handler.</i>		
12.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)]  If yes, describe below:  <b>Each line item on incoming manifests are handled individually. Each line item is manifested and put into a database. Also, during Klor Kleen's inspections, they ensure that the incoming date is on each container.</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RESPONSE TO RELEASES		
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)] <b>SEE REMARK #4</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
16.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
OFF-SITE SHIPMENTS		
<i>NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.</i>		
17.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Is the handler aware of DOT requirements for packaging and shipping?  If no, make aware of 49 CFR 171-180.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)] <b>SEE REMARK #5</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility? <b>SEE REMARK #6</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
21.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u> : <b>SEE REMARK #6</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
22.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] <b>SEE REMARK #7</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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

### REMARKS

- 1 Klor Kleen identified on a RCRA Site Identification Report dated 2/7/07 that they are a Large Quantity Universal Waste Handler. However, during the 9/29/08 CEI, Klor Kleen was a Small Quantity Universal Waste Handler.
- 2 If this happens, Klor Kleen contacts the generator and will repack batteries into a poly container or pail/drum. . KlorKleen had some instances in the last year (between last inspection in 9/29/08 & this year's, 7/29/09).
- 3 Small amounts of broken lamps are placed in sealed containers. If large amounts of lamps are broken, the containers are transferred into a hazardous waste drum and placed in Klor Kleen's permitted storage area. If a spill happens, Klor Kleen sweeps up the lamps and transfers swept material into a hazardous waste drum and placed in their permitted storage area.
- 4 Klor Kleen assumes universal waste releases are hazardous for lead, cadmium, chromium and mercury.
- 5 This is achieved through a quotation to accept waste.
- 6 Klor Kleen never rejects loads of universal waste.
- 7 If this were to happen, KlorKleen would place waste in permitted storage area since they are a permitted TSD (not just a universal waste handler).

**USED OIL INSPECTION CHECKLIST  
PROCESSORS AND RE-REFINERS -SEE REMARK 1, ATTACHED**

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

**PROHIBITIONS**

1.	Does the used oil processor or re-refiner manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: For example, scrap metal contaminated with used oil or used oil managed in a surface impoundment (i.e., pond).</i>		
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).</i>		
4.	Has the used oil processor and/or re-refiner notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-51(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Does the owner/operator of a used oil processing or re-refining facility comply with the following:	
a.	Is the facility maintained and operated to minimize the possibility of fire, explosion, or release of used oil? [3745-279-52(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Is the facility equipped with the equipment in 3745-279-52(A)(2), if necessary?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Are all communication systems, alarm systems, fire protection equipment, spill control equipment, and decontamination equipment tested and maintained as required? [3745-279-52(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Is there access to communication or alarm system(s)? [3745-279-52(A)(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	Is the required aisle space being maintained? [3745-279-52(A)(5)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
f.	Are arrangements maintained with local authorities? [3745-279-52(A)(6)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**CONTINGENCY PLAN**

6.	Does the owner/operator of a used oil processing and re-refining facility have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-279-52(B)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <b>SEE REMARK #2, ATTACHED</b>
7.	Does the plan describe the following:	
a.	Actions to be taken to response to fires, explosions or any unplanned release of used oil? [3745-279-52(B)(2)(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Arrangements with emergency authorities? [3745-279-52(B)(2)(c)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-279-52(B)(2)(d)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-279-52(B)(2)(e)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-279-52(B)(2)(f)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate used oil management provisions that are sufficient to comply with OAC requirements. [3745-279-52(B)(2)(b)]*

8.	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? [3745-279-52(B)(3)(a) & (b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the owner or operator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-279-52(B)(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-279-52(B)(5)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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.		
11.	Does the used oil processor/re-refiner determine whether the total halogen content of the used oil being managed at the facility is above or below 1000 ppm? [3745-279-53(A)] If yes, then;	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	How did processor/re-refiner determine halogen level content:	
i.	Testing (approved SW-846 method)?; or <b>SEE REMARK 3, ATTACHED</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
ii.	Applying knowledge of the halogen content of the used oil in light of the materials or processes used?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
NOTE: If determination was not made by one of the two methods, then determination is not valid.		
b.	If halogens are equal to/above 1000 ppm, did the processor/re-refiner successfully rebut the presumption the used oil was mixed with a listed hazardous waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	If yes, what method did processor/re-refiner use to rebut the presumption (e.g., testing, exclusion, generator process information, etc.) (describe below).	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	If no, did the processor/re-refiner manage the material as a hazardous waste? [ORC 3734.02(E)(F)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Once the facility has received the hazardous waste, they are in violation of ORC § 3734.02(E) and (F).		
NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.		
12.	Does/has the used oil processor/re-refiner:	
a.	Only store used oil in tanks, or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-54(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Only store used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-54(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Provide secondary containment for containers as required by 3745-279-54(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Provide secondary containment for existing aboveground tanks as required by 3745-279-54(D)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
e.	Provide secondary containment for new aboveground tanks as required by 3745-279-54(E)? <b>SEE REMARK 4, ATTACHED</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
f.	Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-54(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
g.	Upon detection of a release of used oil, done the following in accordance with 3745-279-54(G):	
i.	Stopped the release? <b>SEE REMARK 5, ATTACHED</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
ii.	Contained the release? <b>SEE REMARK 5, ATTACHED</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
iii.	Cleaned up and managed the used oil and other materials? <b>SEE REMARK 5, ATTACHED</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
iv.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary? <b>SEE REMARK 5, ATTACHED</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

	h.	Performed closure of aboveground tanks and containers in accordance with 3745-279-54(H)? <b>SEE REMARK 6, ATTACHED</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.		Has the owner/operator of the used oil processing/re-refining facility developed, kept on-site, and followed a written waste analysis plan which meets the requirements in 3745-279-53 (how they will determine halogen content and rebut the presumption) and, if applicable 3745-279-72 (how they will determine if the used oil fuel is on-specification)? [3745-279-55(A) and/or (B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <b>SEE REMARK 7, ATTACHED</b>
	a.	Does the rebuttable presumption plan include whether samples or knowledge of the halogen content will be used?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
		If sampling is to be used, does the plan detail	
	i.	the method to be used?	
	ii.	the frequency of sampling and location of analysis?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iii.	methods for analyzing used oil parameters (e.g., halogen constituents)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
		If knowledge is to be used, the type(s) of information that will be used determine halogen content of the used oil?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	Does the on-spec plan (if applicable) include whether samples or knowledge of the halogen content will be used?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
		If sampling is to be used, does the plan detail	
	i.	the sampling method used (must be either method in appendix I to rule 3745-51-20 or one equivalent under sections 40 CFR 260.20 and 260.21)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	ii.	if sampling will be done pre or post processing?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iii.	the frequency of the sampling and the location of the analysis?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iv.	methods for analyzing used oil parameters (e.g., arsenic, cadmium, chromium, lead)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
		If knowledge is to be used, does the plan contain the type(s) of information that will be used to make on specification determination?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.		Does the used oil processor/re-refiner keep a record of each shipment of used oil accepted for processing/re-refining? [3745-279-56(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a.	Does each record include the name and address of the transporter who delivered the used oil to the processor? [3745-279-56(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Does each record include the name and address of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Does each record include the U.S. EPA ID # of the transporter who delivered the used oil to the processor/re-refiner? [3745-279-56(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Does each record include the U.S. EPA ID # (if applicable) of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e.	Does each record include the quantity of used oil accepted? [3745-279-56(A)(5)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	f.	Does each record include the date of acceptance? [3745-279-56(A)(6)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.		Does the used oil processor/re-refiner keep a record of each shipment of used oil that is shipped to a used oil burner, processor/re-refiner, or disposal facility? [3745-279-56(B)]	<b>SEE REMARK 8, ATTACHED FOR 15a-15f</b> <b>SEE REMARK 9, ATTACHED FOR 15d</b>
	a.	Does each record include the name and address of the transporter who delivers the used oil to the burner, processor/re-refiner or disposal facility [3745-279-56(B)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	b.	Does each record include the name and address of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner, processor/re-refiner or disposal facility? [3745-279-56(B)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Does each record include the U.S. EPA ID# of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e.	Does each record include the quantity of used oil shipped? [3745-279-56(B)(5)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	f.	Does each record include the date of shipment? [3745-279-56(B)(6)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
16.		Does the used oil processor/re-refiner retain all records required under 3745-279-56 for at least three years? [3745-279-56(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
17.		Does the owner/operator keep an operating record at the facility? [3745-279-57(A)(1)]	
	a.	Does the operating record include records and results of used oil analysis performed as described in the analysis plan required under 3745-279-55? [3745-279-57(A)(2)(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Are summary reports and details of all incidents that require implementation of the contingency plan as specified in 3745-279-52(B) maintained in the operating record? [3745-279-57(A)(2)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <b>SEE REMARK 5, ATTACHED</b>
18.		Does the used oil processor/re-refiner report to the director in the form of a letter, on a biennial basis by March 1, the following information:	<b>SEE REMARK 10, ATTACHED</b>
	a.	The U.S. EPA ID#, name and address of the processor/re-refiner? [3745-279-57(B)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	The calendar year covered by the report? [3745-279-57(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	The quantities of used oil accepted for processing/re-refining and the manner in which the used oil is processed/re-refined, including the specific processes employed? [3745-279-57(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.		Does the used oil processor/re-refiner, who initiates a shipment of used oil off-site, use a used oil transporter that has a U.S. EPA ID#? [3745-279-58]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.		Does the used oil processor/re-refiner generate residues from the storage, processing or re-refining of used oil? [3745-279-59]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-59] <b>SEE REMARK 11, ATTACHED</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

## ATTACHED USED OIL PROCESSOR REMARKS

- 1 Klor Kleen is a used oil processor only for the purpose of storing used oil at their facility for greater than 35 days. No processing occurs here, only storage.
- 2 Klor Kleen's Used Oil Contingency Plan is separate from Klor Kleen's TSD contingency plan that appears in their permit application.
- 3 Klor Kleen utilizes a BTU, chlorine and halide detector as identified in their Used Oil Contingency Plan.
- 4 The used oil tanks have 5,000 gallon and 6,000 gallon capacities. The secondary containment (diked area) can hold 15,000 gallons. Klor Kleen is currently storing 7,000 gallons because they are holding onto it since the market for used oil is low right now.
- 5 No used oil has been released.
- 6 Klor Kleen has never had to perform used oil closure.
- 7 An Analysis Plan is contained in their Used Oil Contingency Plan.
- 8 This information (Quantity/Date) is included in Klor Kleen's tracking log (for outgoing used oil).
- 9 If Midwest Environmental is the receiving facility, Klor Kleen prepares a non hazardous waste manifest.
- 10 Klor Kleen submitted their first report on 2/20/08 (prior to the 3/1/08 due date). The type of processing indicated was gravity separation (this is just a function of what happens naturally when the used oil is being stored). The next report is due March 1, 2010 (and every even year after).
- 11 Klor Kleen analyzes sludges generated from used oil storage for TCLP metals and ships to the appropriate offsite location (depending on haz or non haz) as indicated on their Used Oil Contingency Plan. The tank has not been cleaned out since the last inspection on 9/29/08.



## PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Klor Kleen Facility Type: LQG/SQG/CESQG/TSD Date of Inspection: 7/29/09 EPA ID#: OHD980821862

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1 TSD activities-storage only,  sample consolidation for those that are held onto for a period of time (versus those that go back into drum being analyzed) & lab clean out	Various industrial activities; D002, D004-D011, D022, D039, D040, F001, F002, F006, U080, U210, U226, U228	37.15 Tons/month, containers, Permitted Storage Area & 90 Day Storage Area (nothing stored in 90 day during 7/29/09 inspection-filled out LQG checklist as a formality)		Giant Resource Recovery-AL Michigan Disposal-MI Detrex-IN EEI-OH EQ Detroit-MI Permafrix-OH		

## REMARKS & GENERAL INFORMATION

### General Process Information:

Klor Kleen is a TSD. They have a permit in place for their hazardous waste storage activities.

### Regulatory/Enforcement History (if applicable):

### Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes\*      No      \*If yes, refer promptly to your district P2 coordinator.

Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or [p2mail@epa.state.oh.us](mailto:p2mail@epa.state.oh.us) or [www.epa.state.oh.us/ocapp/ocapp.html](http://www.epa.state.oh.us/ocapp/ocapp.html)

**Other:**

**LA. QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

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

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

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

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

Safety Equipment Used:

**GENERAL REQUIREMENTS**

- |                                                                                                                                                                                                     |     |                                     |    |                                     |     |                          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-------------------------------------|----|-------------------------------------|-----|--------------------------|
| 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11]                                                                                                                | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/> |
| 2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)]                                                                                                               | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/> |
| 3. Has the generator obtained a U.S. EPA identification number? [3745-52-12]                                                                                                                        | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            | N/A | <input type="checkbox"/> |
| 4. Were annual reports filed with Ohio EPA on or before March 1 <sup>st</sup> ? [3745-52-41(A)] <b>Annual reports were filed for KlorKleen's TSD activities combined with their own generation.</b> | 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 checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input 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? [3745-52-43(A)(1) & (2)] Yes  No  N/A

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

17. If the generator 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 a brief outline of capabilities? [3745-65-52(E)] Yes  No  N/A
- e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes  No  N/A

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

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

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

#### EMERGENCY PROCEDURES

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

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

#### PREPAREDNESS AND PREVENTION

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

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

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

#### SATELLITE ACCUMULATION AREA REQUIREMENTS

42. Does the generator ensure that satellite accumulation area(s): **There were no satellite accumulation areas to inspect during the 9/11/07 CEI**
- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes  No  N/A

- b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes  No  N/A
- c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes  No  N/A
- d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes  No  N/A
- e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes  No  N/A
- f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes  No  N/A
43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes  No  N/A
- a. Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes  No  N/A
- b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded?[3745-52-34(C)(2)] Yes  No  N/A

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

**USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS-): There was no KlorKleen generated hazardous waste stored during the 9/29/08 CEI**

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

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

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. Yes  No  N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes  No  N/A
48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] **Klor Kleen is not permitted to store ignitable waste and has no limit imposed in their TSD permit regarding reactive wastes' location relevant to their property line.** 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 – NO TRANSPORTATION OF KLORKLEEN'S WASTE WAS OCCURRING DURING THE 7/29/09 CEI**

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



1  
2  
3  
4

**LDR CHECKLIST-Evaluated Samtec LDR (manifest # 03238 dated 5/27/09 for F006 waste)**

**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 Atreatability 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# \_\_\_

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**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#

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**REMARKS**

**NOTIFICATION AND CERTIFICATION REQUIREMENTS**

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

14. If a generator's 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 generator's 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#

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**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)]

**REMARKS**

**GENERATORS TREATING HAZARDOUS WASTE**

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

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

6. Has the generator sent a notification and certification with the initial shipment of waste? [3745-270-07(A)(5)(c)] Yes  No  N/A  RMK#
  
7. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] Yes  No  N/A  RMK#

8. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following: Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- a. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- b. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

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

9. Has the process/operation generating the waste or the solid waste landfill facility changed? If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- b. Has the director been notified of such changes? [3745-270-09(D)] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

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

10. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49 (C)] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
11. Does each notification/certification form completed, contain the information found in Table1? [3745-270-07(A)(3)] Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

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

### REMARKS

## HAZARDOUS DEBRIS

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

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

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

(See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)]

Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

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

Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

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

Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

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

Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

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

Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

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

Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

### REMARKS

### TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13? [3745-270-07(B)]

Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)]

Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

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

3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07? [3745-270-07(B)(3)]

Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so:**

a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)]

5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? **If so:**

a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)), excluding the manifest number, with each

shipment of waste? [3745-270-07(B)(6)]

Yes\_\_ No\_\_ N/A  RMK# \_\_

b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4)[3745-270-07(B)(6)]

Yes\_\_ No\_\_ N/A  RMK# \_\_

c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)]

Yes\_\_ No\_\_ N/A  RMK# \_\_

6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)]

Yes\_\_ No\_\_ N/A  RMK# \_\_

7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have:

a. Copies of all notices and certifications required in 3745-270?

Yes\_\_ No\_\_ N/A  RMK# \_\_

b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49?

Yes\_\_ No\_\_ N/A  RMK# \_\_

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

Yes\_\_ No\_\_ N/A  RMK# \_\_

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**REMARKS**