



State of Ohio Environmental Protection Agency

Southwest District Office

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Ted Strickland, Governor
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Chris Korleski, Director

January 22, 2009

Ms. Lori Wilp, Plant Manager
Witt Galvanizing - Cincinnati
4454 Steel Place
Cincinnati, OH 45209

Re: Witt Galvanizing (OHD004239620) Compliance Evaluation Inspection

Dear Ms. Wilp:

I received your response to my October 27, 2008 Notice of Violation (NOV) letter on November 18, 2008. We also conducted a return to compliance (RTC) inspection on December 18, 2008. Based on your response and the RTC inspection it appears Witt Galvanizing has adequately demonstrated abatement of the following violations discovered during the September 25, 2008 inspection:

1. **OAC Rule 3745-273-13(D)(1): Waste management – standards for small quantity handlers of the universal waste;**
2. **OAC Rule 3745-273-14: Labeling/marketing – standards for small quantity handlers of universal waste(s);**
3. **OAC Rule 3745-273-13(D)(1): Waste management – standards for small quantity handlers of universal waste.**

Tank Issue

On November 14, 2008 Ohio EPA received a response to our questions from the October 27, 2008 NOV concerning the tank used for secondary containment surrounding the process tanks. In your response Witt did not feel the secondary containment met the definition of a tank and was used only for secondary containment for leaks or spills. Witt also stated the plant experienced a spill in CY 2007 which required removal of liquids from the secondary containment. Based on Witt's 2007 hazardous waste annual report approximately 16,000 gallons of hazardous waste were sent off-site from the secondary containment pit. A review of the 2008 hazardous waste manifests indicates there was hazardous waste removed from the secondary containment in February, June, August, September and October equating to approximately 27,000 gallons. It should also be noted that at the time of the December 18, 2008 inspection there were about 6 inches of liquid in the secondary containment. This indicates hazardous waste is being released to the secondary containment on a regular basis.

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Based on this information and the December 18, 2008 inspection it is Ohio EPA's opinion that the secondary containment should be subject to the tank regulations based on how often it is being used. According to OAC 3745-65-01(11)(a)(ii) the tank requirements would not apply to a containment tank used for discharge of material which, when discharged becomes a hazardous waste (Witt's situation), however according to OAC 3745-65-01(C)(11)(c): Any person who continues containment activities after the immediate response is over is subject to all applicable rules. The tank should only be used for immediate responses to discharge events such as ruptured tank, burst pipes, etc.. According to a September 6, 1984 USEPA interpretation, structures used for responding to discharge events which occur periodically or repeatedly, or in which containment extends beyond the immediate response period are subject to the tank requirements. The secondary containment tank in question has had repeated releases though the years.

Based on this information Witt is in violation of the following hazardous waste regulations:

1. **OAC Rule 3745-52-34(A)(3) Accumulation time of hazardous waste:** Witt failed to comply with this rule in that the tank does not have the words "Hazardous Waste" clearly marked or labeled on the tank where hazardous waste is accumulated.
2. **OAC Rule 3745-66-95(A) Inspections:** Witt failed to comply with this rule in that they are not conducting inspections each operating day looking for signs of corrosion and releases of hazardous waste.
3. **OAC Rule 3745-66-93(A)(1) Containment and detection of release:** Witt failed to comply with this rule in that the tank does not have secondary containment which meets the requirements of this rule.
4. **OAC Rule 3745-66-92(A) Design and installation of new tank systems or components:** Witt has failed to comply with this rule in that the tank in question does not have any written assessment attesting that the design, installation and structural integrity of the tank are adequate for the management of hazardous waste.
5. **OAC Rule 3745-66-92(G) Design and installation of new tank systems or components:** Witt failed to comply with this rule in that they do not have on file at the facility a written statement by those persons required to certify the design of the tank systems and supervised the installation of the tank systems in accordance with the requirement of paragraphs (B) to (F) of this rule to attest that the tank systems were properly designed and installed and that repairs, pursuant to paragraphs (B) and (D) of this rule were performed. These written statements must also include the certification statement of required in paragraph (D) of rule 3745-50-42 of the Administrative Code.

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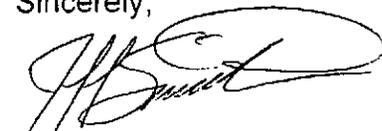
In order to return to compliance Witt has the following options:

1. Witt must first remove all hazardous waste from the system. The secondary containment cannot contain any hazardous waste.
2. Witt must verify that the tank is not leaking. This can be done by a leak test. Witt could fill the tank with clean water and take measurements over 24 hours to determine if the tank is leaking and document this.
3. Witt needs to ensure that this tank is not used on a repeated basis to collect and contain hazardous waste. If this cannot be done then this tank must be up graded to meet the tank standards in OAC 3745-66-90 through 92.
4. Witt could segregate the secondary containment so the liquids accumulated can be reused in the process tanks.
5. Present an alternative option to Ohio EPA for consideration in resolving these violations.

Please submit documentation to this office by March 1, 2009 on how Witt will accomplish the above issues regarding the secondary containment tank surrounding your process tanks.

Should you have any questions, please feel free to call me at (937) 285-6070. Enclosed is a copy of the checklist used to complete this inspection. You can find copies of the rules and other information on the division's web page at: <http://www.epa.state.oh.us/dhwm/>.

Sincerely,



Jeff Smith

District Representative
Division of Hazardous Waste Management

Enclosure

Cc: Dinah Crawford, SWDO-DHWM/SWDO File

JS/mab

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.



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LQG TANK SYSTEM REQUIREMENTS (OAC rule 3745-52-34(A) and OAC rules 3745-66-90 through 3745-66-100)

(Please refer to the rules before or while completing this checklist.)

1. Is each tank clearly labeled/marked with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes No N/A

TANK SYSTEM - GENERAL OPERATING REQUIREMENTS

2. Does the o/o follow the general operating requirements below:

a. Does the o/o prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail? [3745-66-94(A)] Yes No N/A

b. Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)? [3745-66-94(B)] Yes No N/A

c. If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96? [3745-66-94(C)] Yes No N/A

TANK SYSTEM - INSPECTION REQUIREMENTS

3. Has the o/o documented the inspections required in 3745-66-95, in the operating record, including inspection of the following:

a. Spill control equipment each operating day? [3745-66-95(A)(1)] Yes No N/A

b. Above ground portion of tank each operating day? [3745-66-95(A)(2)] Yes No N/A

c. Data from leak detection equipment each operating day? [3745-66-95(A)(3)] Yes No N/A

d. Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste each operating day? [3745-66-95(A)(4)] Yes No N/A

NOTE: "Each operating day" is each day that the tank system is being used to manage (store or treat) hazardous waste.

4. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(B)(1)] Yes No N/A

5. Where applicable, all sources of impressed current at least bi-monthly? [3745-66-95(B)(2)] Yes No N/A

TANK SYSTEM CLOSURE REQUIREMENTS

6. If the generator has closed a <90 day tank, was closure completed in accordance with OAC 3745-66-97 (except for paragraph C)? Yes No N/A

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES

7. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with one of the following: [3745-66-98(A)] Yes No N/A

a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-66-17(B)? [3745-66-98(A)]; or Yes No N/A

b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A)]; or Yes No N/A

c. The tank is used solely for emergencies? [3745-66-98(A)] Yes No N/A

8. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (1996)? [3745-66-98(B)] Yes No N/A

9. Has the o/o placed incompatible wastes or materials into the same tank Yes No N/A

	system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material? [3745-66-99(A) and/or (B)]		
a.	If so, have the requirements of 3745-65-17(B) been met? [3745-66-99(A) and/or (B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
TANK SYSTEM – WASTE ANALYSIS REQUIREMENTS			
10.	In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-100]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Conducted waste analysis and trial treatment or storage tests? [3745-66-100(A)]; OR	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-100(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
TANK SYSTEMS REQUIREMENTS			
11.	Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: You should review the file to see if the written assessment has been previously reviewed and what the results were.</i>			
12.	Does the written assessment include the following: [3745-66-92(A)]		
a.	Certification by an independent registered, professional engineer? [3745-66-92(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
b.	Consideration of the design standards of the system? [3745-66-92(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
c.	Consideration of the hazardous characteristics of the waste(s)? [3745-66-92(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
d.	An evaluation by a corrosion expert (only if the external system/components are metal and in contact with soil or water)? [3745-66-92(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
e.	A determination of design and operational measures that will be needed to protect the tank system from potential damage (only for underground tank components)? [3745-66-92(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
f.	Design considerations to ensure that the tank foundations will maintain the load of a full tank? [3745-66-92(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
g.	Design considerations for anchoring the unit to prevent floatation (only for tanks situated in a seismic fault zone or saturated zone)? [3745-66-92(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
h.	Design considerations to ensure that the tank system will withstand the effects of frost heave(only for underground tank systems)? [3745-66-92(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: CO-DHWM Engineering staff are available to assist you with evaluation of the written assessment.</i>			
13.	Are there written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
Do the written statements address all of the following:			
a.	Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Proper backfilling? [3745-66-92(C)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

d.	Tightness test; if the _____ system was found not to be tight, does _____ statement indicate that proper repairs were made? [3745-66-92(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	Proper support and protection of ancillary equipment? [3745-66-92(E)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
SECONDARY CONTAINMENT					
14.	Has secondary containment been provided?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
NOTE: All tank systems must have secondary containment at this point, except for tank systems that store/treat materials that become hazardous waste after January 12, 1987, must have secondary containment required within the time intervals in 3745-66-92(A)(1) to (A)(4). The date the material became a hazardous waste must be used in place of January 12, 1987. [3745-66-92(A)(5)]					
15.	Is secondary containment one of the following:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
a.	An External Liner ? [3745-66-93(E)(1)] If so,	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
i.	Is liner designed or operated to contain 100% of the capacity of the largest tank?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
ii.	Is liner designed and operated to prevent run-on and infiltration or the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
iii.	Is liner free of cracks and gaps?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
iv.	Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
v.	Are chemically resistant water stops in place at all points? (concrete liners only)	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
vi.	Is there a compatible interior coating or lining to prevent migration of waste into the concrete? (concrete liners only)	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Vault System ? [3745-66-93(E)(2)] If so,	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
i.	Is vault system designed to contain 100% of the capacity in the largest tank?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
ii.	Is liner designed and operated to prevent run-on and infiltration or the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
iii.	Are chemically resistant water stops in place at all points?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
iv.	Is there a compatible interior coating to prevent migration into the concrete?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
v.	For ignitable or reactive waste : Is the vault system provided with means to prevent (or alternatively "protect against") the formation or ignition of vapors?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
vi.	Is vault system provided with an exterior moisture barrier?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	Double-Walled Tank ? [3745-66-93(E)(3)] If so,	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
i.	Is double-walled tank designed as an integral structure to contain any release from the inner tank?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
ii.	If metal , are the primary tank interior and outer shell exterior surfaces protected from corrosion?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
iii.	Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>

		at the earliest practicable time?			
d.	An Equivalent Device? As described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D&E)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION					
16.	Has each secondary containment system been designed, installed and operated to prevent <u>any</u> migration of wastes or liquid to the soil, groundwater, or surface water and is it capable of <u>detecting</u> and <u>collecting</u> releases and accumulated liquids? [3745-66-93(B)(1) and (2)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
17.	Does the secondary containment system meet the following minimum requirements of [3745-66-93(C)]:				
a.	Constructed or lined with compatible materials of sufficient strength to prevent failure? [3745-66-93(C)(2)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Placed on a foundation or base capable of providing support? [3745-66-93(C)(2)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time? [3745-66-93(C)(3)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
d.	Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? [3745-66-93(C)(4)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
e.	Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner? [3745-66-93(C)(4)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
ANCILLARY EQUIPMENT REQUIREMENTS					
18.	Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	If not, is the ancillary equipment one of the following: [3745-66-93(F)]				
a.	Above ground piping (exclusive of flanges, joints, valves and connections) that is inspected daily?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Welded flanges, welded joints and/or welded connections that is inspected daily?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Sealless or magnetic coupling pumps and/or sealless valves?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
d.	Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown and/or loss of pressure-actuated shut-off devices) that is inspected daily?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE					
19.	Has there been a leak or spill from any tank system or has any tank system been found unfit for use? If so, did the o/o:		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<i>NOTE: If the tank is found to be unfit for use, inspector should explain why.</i>					
a.	Immediately cease flow of material into tank and investigate the cause of the release? [3745-66-96(A)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time? [3745-66-96(B)(1)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment? [3745-66-96(B)(2)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
d.	For a visible release to the environment, immediately conduct a visual inspection of the release? [3745-66-96(C)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
e.	For a visible release to the environment, prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
f.	For a visible release to the environment, properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

	g. Report any release to the environment to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	h. For a release to the environment, submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	j. For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: The requirements noted in 20.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.		
20.	In the event that the repairs to the tank system were major (e.g., replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from an independent, registered P.E. attesting that the repaired unit is capable of handling hazardous waste? [3745-66-96(F)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
21.	Was a copy of the certification submitted to the director within seven days after returning the system to use? [3745-66-96(F)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
22.	If the o/o was unable to repair and return the unit to service as described in 20.a through 20.e, was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
23.	Does the o/o have a tank system with a variance from secondary containment from which a release has occurred but <u>has not</u> migrated beyond the zone of engineering control? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Has the o/o complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. If soils cannot be decontaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
24.	Does the o/o have a tank system with a variance from secondary containment from which a release occurred and <u>has</u> migrated from the zone of engineering control? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(4)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

