



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

August 9, 2010

Mr. Steve Bley
Facility Compliance Manager
Clean Harbors Environmental Services, Inc.
4879 Spring Grove Avenue
Cincinnati, Ohio 45232

**RE: COMPLIANCE EVALUATION INSPECTION – SPRING GROVE RESOURCE
RECOVERY – OHD000816629**

Dear Mr. Bley:

Thank you for assisting Laura Marshall and me on the August 4, 2010, compliance evaluation inspection of Spring Grove Resource Recovery's (SGRR) Cincinnati, Ohio facility. The purpose of the inspection was to determine SGRR's compliance with Ohio's hazardous waste laws and regulations as found in Chapter 3734. of the Ohio Revised and Chapter 3745. of the Ohio Administrative Code and SGRR's Ohio hazardous waste installation and operation permit issued September 30, 2002. Ohio EPA's inspection included an inspection of facility operations and a review of written documentation. Compliance with the Ohio hazardous waste rules and the conditions of SGRR's permit addressing financial requirements and waste analysis were not assessed during this inspection. Based on this inspection, Ohio EPA has determined that SGRR has violated the following state hazardous waste regulations and conditions of its Ohio hazardous waste installation and operation permit.

- 1. Limitation on time of storage, Condition C.4 and OAC 3745-270-50(A)(2)(a):** Each container stored must be clearly marked to identify its contents, and the date each period of storage begins.

SGRR failed to comply with this condition and rule by having several containers labeled as non-hazardous waste while having off-specification stickers denoting the need to add a hazardous waste code. The addition of the waste code signifies the change of the waste from non-hazardous to hazardous waste. **Therefore, SGRR is in violation of Condition C.4 and OAC 3745-270-50(A)(2)(a).**

Mr. Steve Bley
August 9, 2010
Page 2

SGRR personnel corrected the labels on the containers during the inspection. **SGRR is no longer in violation of Condition C.4 and OAC 3745-270-50(A)(2)(a).**

To avoid confusion with tracking ticket information, off specification wastes requiring confirmatory sampling can be kept in the waste acceptance area until the final waste analysis is received. However, if SGRR chooses to move those containers into storage areas, the tracking ticket must reflect the off specification waste code determination (e.g., if the off specification states the waste needs a D001, then the tracking ticket must show the waste to be hazardous).

- 2. Use of manifest system, Condition B.24 and OAC 3745-54-71(A)(2)(a):**
Sign and date, by hand, each copy of the manifest.

SGRR failed to comply with this condition and rule by not properly signing and dating one manifest received on May 11, 2010. **Therefore, SGRR is in violation of Condition B.24 and OAC 3745-54-71(A)(2)(a).**

SGRR corrected the manifest during the inspection and sent a signed copy to the generator. **SGRR is no longer in violation of Condition B.24 and OAC 3745-54-71(A)(2)(a).**

I e-mailed you the checklist completed during the inspection. Should you have any questions, please call me at (937) 285-6093.

Sincerely,



Cathy L. Altman
Division of Hazardous Waste Management

cc: DHWM Data Entry/Facility File

CLA/mab

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

FACILITY	Spring Grove Resource Recovery, Inc.	OHIO PERMIT #	53-31-0012
STREET ADDRESS	4879 Spring Grove Avenue	US EPA ID#	OHD000816629
CITY, STATE AND ZIP CODE	Cincinnati, Ohio 45232	PHONE NUMBER	(513) 681-5738
COUNTY	Hamilton	INSPECTION DATE	August 4, 2010

Was Advance Notice of Inspection Given? Yes No N/A

If So, How Far In Advance?

	NAME	AGENCY/TITLE	PHONE
INSPECTORS	Cathy Altman Laura Marshall	Ohio EPA Ohio EPA	(937) 285-6093 (937) 285-6081
FACILITY REPS	Steve Bley	SGRR	(513) 681-5738 ext. 6362

Is facility operating as a generator? Yes

PERMIT STATUS

Permit Issued:	September 30, 2002	Permit Expiration Date:	September 30, 2012
Permit Effective Date:	September 30, 2002	Permit Renewal Date::	April 3, 2012

AUTHORIZED ACTIVITIES

STORAGE AND TREATMENT

Container storage: 150,000 gallons – 2,727 units

Container treatment: 80,800 gallons/day, 2 short tons/day – compaction in containers, 10 short tons/day – shredder

Tank storage and treatment: 75,450 gallons in 8 tanks

GENERAL COMMENTS:

The violations noted in numbers 6 and 39 below were corrected during the inspection.

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1.	Is SGRR storing hazardous waste only in the 9 permitted container storage areas? [Condition C.1]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Has SGRR exceeded the one year storage limit? [Condition C.4]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Has SGRR sent all High Hazard waste off-site within 6 months in accordance with Section C?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Any hazardous waste onsite with an accumulation date over 6 months? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Has SGRR reviewed and re-evaluated the waste in accordance with Section C of the application?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
5.	Is SGRR storing hazardous wastes only in the types and size of containers specified in Section D of the application? [Condition C.1.a]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	Is each container in storage clearly marked to identify its contents and the date each period of storage began? [Condition C.4]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers holding hazardous waste in good condition? [Condition C.5]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. If not, did SGRR transfer the waste to a container that is in good condition or otherwise manage the waste in compliance with the permit and OAC 3745-55-71? [Condition C.5]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
8.	Does SGRR ensure that all containers used at the facility are compatible with the hazardous waste stored in them? [Condition C.6]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Are incompatible wastes stored separately? [Condition C.13]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	Does SGRR keep all containers closed during storage except when adding or removing waste? [Condition C.7.b]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
11.	Have all lab pack wastes been packaged in drums containing absorbent that is compatible with the waste?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	Is SGRR maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment? (Minimum 2 ft b/w pallets of drums, wider in main aisles) [Condition B.12]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Are containers stacked according to the application? (bulk totes, cu yd boxes – stacked 2 high; drums – not to exceed 3 high, pallet b/w each stack, 4 drums on bottom pallet before 2 nd level added; boxes, cans, pails – variable based on strength and stability) [Condition C.7.a]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
14.	Is the containment system free of cracks and gaps, and sufficiently impervious to contain leaks and spills? [Condition C.8]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	Has there been a spill or leak of wastes or an accumulation of precipitation in the containment system? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Did removal exceed 24 hours from the time the spilled and/or leaked waste was discovered?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	Does SGRR continue to maintain the 24 hour surveillance system according to Section F of the application? [Condition B.4]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
17.	Is the fence surrounding the facility in good condition in accordance with Section F of the application? [Condition B.4]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Are warning signs (Danger – Unauthorized Personnel Keep Out) present at intervals along the fence in accordance with Section F of the application? [Condition B.4]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Is SGRR using pallets that are in good condition? [Condition B.1.a]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

20.	Is SGRR, at a minimum, maintaining the equipment set forth in Section F and G of the application? [Condition B.9]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
21.	Does SGRR store containers of ignitable or reactive wastes greater than 50 feet from the property line? [Condition C.12.a]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
22.	Does SGRR take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and follow the procedures as specified by 3745-54-15 and Section F of the application including: [Condition C.12.b]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Providing electrical grounding? [Condition B.7.b]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Provide and require the use of spark proof tools? [Condition B.7.c]?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Prohibit smoking and open flames and post appropriate signs? [Condition B.7.d]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
GENERATOR STANDARDS				
23.	Does SGRR comply with generator storage (90-days)? [OAC 3745-52-34]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
24.	Does SGRR comply with satellite accumulation for LQG? [OAC 3745-52-34]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
25.	Does SGRR comply with universal waste labelling requirements? [OAC 3745-273-34]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
26.	Does SGRR comply with universal waste management requirements? [OAC 3745-273-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
RECORD KEEPING				
INSPECTIONS				
27.	Is SGRR following the approved inspection procedures and schedule for inspecting: monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment? [Condition B.5]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
28.	Does SGRR remedy deterioration or any malfunctions discovered by an inspection? [Condition B.5]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
29.	Is SGRR maintaining records of all inspections for a minimum of 3 years? [Conditions A.27.c & B.5]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
30.	Do inspection records contain the following information: [Condition B.5]			
a.	Date and time of inspection?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Signature of inspector	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Notation of observations made?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Date and nature of any repairs or other remedial actions?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
31.	Is SGRR inspecting the container area daily for accumulation of waste, leaking or structurally impaired containers, labelling, aisle space, stacking and closed containers in accordance with Section F of the application? [Condition C.10]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
32.	Are the inspections noted in the inspection log along with any remedial action taken? [Condition C.10]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
33.	Is SGRR inspecting the following components of the tank system: [Condition D.5]			
a.	Overfill controls?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

	b.	Above ground portions of the tank system to detect corrosion or leaks?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Construction materials and area immediately surrounding the tank, including secondary containment, to detect erosion or signs of releases?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	Reviewing data gathered from monitoring and leak detection equipment to ensure that the systems are operating according to design specifications?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
34.		Is SGRR maintaining documentation of the tank system inspections in the operating log? [Condition D.5.d]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
35.		Does SGRR prevent the placement of incompatible wastes in the tank and document compliance? [Condition D.10]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
36.		Does SGRR prevent the placement of ignitable or reactive waste in the tank system, unless proper procedures are followed? [Condition D.9]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

MANIFESTS

37.		Is all hazardous waste shipped from the facility by a registered transporter? [Condition A.16]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
38.		Have all hazardous wastes been shipped off-site with a completed manifest? [Condition B.24]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
39.		Do all manifests contain the required information? [Condition B.24]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
40.		Has SGRR received a return copy of each manifest within 35 days? [Condition B.24.b]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	If not, did SGRR submit an exception report?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
41.		Has a significant discrepancy occurred since the last inspection? [Condition B.24.b]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	a.	If not reconciled within 15 days, was a discrepancy report submitted?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
42.		Has SGRR accepted any unmanifested waste? [Condition B.24.c]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	a.	If so, did SGRR submit an unmanifested waste report within 15 days of receipt of the waste?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
43.		Does SGRR maintain copies of manifests and exception reports for at least 3 years? [Condition B.24]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
44.		Has SGRR received any waste from a foreign source without notifying the Director in writing at least 4 weeks in advance? [Condition B.2.a]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
45.		Is SGRR informing generators that the facility has the appropriate permit to accept a waste and maintaining documentation of the notice? [Condition B.2.b]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

PERSONNEL TRAINING

46.		Is SGRR conducting personnel training in accordance with Section H, including instruction in safe equipment operation, emergency procedures, and implementation of the Contingency plan? [Condition B.6]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
47.		Does SGRR provide training to new employees within 6 months from date of employment, along with an annual refresher? [Condition B.6]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
48.		Is SGRR maintaining personnel training records? [Condition B.6]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

CONTINGENCY PLAN

49.		Have there been any changes at SGRR requiring update to the plan?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
-----	--	---	------------------------------	--	------------------------------

[Condition B.17]		
50.	Is SGRR reviewing the plan and updating it as needed? [Condition B.17]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
51.	Is an emergency coordinator available at all times with the authority to commit resources? [Condition B.19]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
52.	Has there been a fire, explosion or release of hazardous waste at the facility since the last inspection? [Condition B.14]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Did SGRR comply with the emergency procedures in the plan? [Condition B.14]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did SGRR submit an incident report to the Director within 15 days?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Did SGRR record the incident in the operating record? [Condition B.22]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
PERMIT MODIFICATION, REVISION, REVOCATION		
53.	Has SGRR made any or plans any changes that would require a modification? [Conditions A.2 & A.15]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
54.	Has there been a change in owner/operator? [Condition A.18]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
55.	Has SGRR identified any instances of noncompliance?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
56.	Is SGRR retaining a complete copy of the approved application on-site? [Condition A.14.c]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
OPERATING RECORD		
57.	Is SGRR maintaining a written operating record at the facility which contains the following element: [Condition B.22]	
a.	A description and the quantity of each hazardous waste received?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Method(s) and date(s) of treatment, storage or disposal at the facility?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	The location of each hazardous waste within the facility and the quantity at each location?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
58.	Is SGRR maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents: [Condition A.28]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Waste analysis plan?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Contingency plan?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Closure plan?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Cost estimate for facility closure?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	Personnel training plan and records?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
f.	Inspection schedules?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
CLOSURE REQUIREMENTS		
59.	Has SGRR closed the facility or any portion of the facility?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

60.	Does SGRR limit the total quantity of containerized waste in the container storage area to 150,000 gallons at any given time? [Condition C.1.a]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
61.	Does SGRR limit the total quantity of waste treated in containers to no more than a maximum of 10,000 gallons per day? [Condition C.1.a]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

TANK SYSTEM REQUIREMENTS

62.	Is SGRR limiting the total volume of waste managed in the tank system to the maximum volume for each tank as authorized by Condition D.1?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
63.	Does SGRR store and treat in tanks only those hazardous waste codes specified in the permit application and as listed on Attachment I of the permit? [Condition D.1.c]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
64.	Has a leak or spill occurred from the tank system?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
65.	Does SGRR conduct annual leak testing? [Condition D.3]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

LAND DISPOSAL RESTRICTIONS

66.	Does SGRR comply with all applicable regulations regarding land disposal prohibitions and restrictions as required by OAC 3745-270?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
67.	Does SGRR comply with the notification and certification requirements as required by OAC 3745-270-07(A)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
68.	Does SGRR comply with OAC 3745-270-03 by not diluting a restricted waste or treatment residue as a substitute for adequate treatment?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
69.	Does SGRR retain supporting data as required by OAC 3745-270-07(A)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>