



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

May 12, 2009

RE: CHEMTRON CORPORATION
OHD 066 060 609 / 02 47 0431
CEI INSPECTION
NOTICE OF VIOLATION/RETURN TO COMPLIANCE

Mr. Ron Drozdowski
Chemtron Corporation
35850 Schneider Ct.
Avon, OH 44011

Dear Mr. Drozdowski:

On May 7, 2009, Ohio EPA conducted a compliance inspection of Chemtron Corporation's Avon Ohio facility to determine Chemtron's compliance with Ohio's hazardous waste laws found in Chapters 3734 of the Ohio Revised Code (ORC) and 3745 of the Ohio Administrative Code (OAC) and regulations as found under its hazardous waste facility operation permit. Chemtron was represented by you.

The following violation was identified:

**1. Universal Waste Management Standards—Containers
OAC 3745-13(D)**

A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage...such containers must be kept closed and must lack evidence of leakage, spillage or damage

There was a crate of fluorescent lamps that was not closed per this rule. This violation was corrected during the inspection when Chemtron employees closed the container with cardboard and shrink wrap.

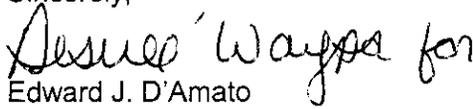
No response to this letter is required.

Enclosed are copies of the checklists used for the inspection.

Failure to list specific deficiencies or violations in this communication does not relieve Chemtron from the responsibility of complying with all applicable Ohio EPA laws and regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Please contact me at (330) 963-1170 if you have any questions about the inspection or this letter.

Sincerely,


Edward J. D'Amato
Division of Hazardous Waste Management

EJD:ddw
Enclosures

cc: Regional Offsite Administrator, DE-9J, USEPA, Region V
Pam McCoy, DHWM, CO
ec: Frank Popotnik, DHWM, NEDO

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

Facility: Chemtron Corp

Ohio Permit: 02-47-0431

Address: 35850 Schneider Court
Avon, OH 44011

U.S. EPA ID: OHD 066 660 609
Phone: (440) 937-6348

County: Lorain

Inspection Date: _____

Time: _____

Was advance notice of the inspection given? _____ YES NO

If so, how far in advance? _____

Name Agency/Title Phone

Inspectors: Edward D'Amato ES-2 (330) 963-1200

Facility Reps: Ron Drozdowski, Robert Guenther, Ron Guenther

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: 12/31/2003 LDR Checklist Attached: Yes No

Permit Effective Date: 12/31/2003 Used Oil Checklist Attached: Yes No

Permit Expiration Date: 12/31/2013 Generator Checklist Attached: Yes No

Permit Renewal Date: _____

Permit Modification Date(s): _____

AUTHORIZED ACTIVITIES

<u>STORAGE</u>		<u>TREATMENT</u>		<u>DISPOSAL</u>	
<input checked="" type="checkbox"/>	Containers	<input checked="" type="checkbox"/>	Tanks		Injection Well
<input checked="" type="checkbox"/>	Tanks		Incinerator		Landfill
	Waste Pile		Thermal Treatment		Land Application
	Surface Impoundment		Post-Closure		Surface Impoundment

_____ Post-Closure Care _____ Corrective Action

GENERAL PERMIT COMPLIANCE AND ACTIVITIES.....	3
Permit Modification, Revision, Revocation.....	4
Site Entry-Availability of Records.....	5
RECORDKEEPING/OPERATING REQUIREMENTS	6
Operating Record.....	6
Documents To Be Maintained At Facility	6
Annual Report Requirement	7
Sampling Monitoring and Recordkeeping Requirements	7
WASTE MINIMIZATION REQUIREMENTS	8
WASTE ACCEPTANCE AND GENERATION	8
OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS.....	9
WASTE ANALYSIS/WASTE ANALYSIS PLAN	9
GENERAL INSPECTION REQUIREMENTS.....	10
Security Requirements	10
Facility Operations.....	11
PERSONNEL TRAINING.....	11
REQUIRED EQUIPMENT	12
CONTINGENCY PLAN – EMERGENCY PROCEDURES.....	12
Emergency Coordinator.....	13
Implementation of Contingency Plan	14
CLOSURE REQUIREMENTS	15
STORAGE OF HAZARDOUS WASTE IN CONTAINERS	16
Condition and Management of Containers.....	16
Containment Systems (Containers).....	17
TANK STORAGE, TREATMENT, AND MAINTENANCE	17
LAND DISPOSAL RESTRICTION REQUIREMENTS.....	20
CORRECTIVE ACTION	20

e). An assessment of the actual or potential hazard to the environment and human health outside the facility? Yes ___ No ___ N/A RMK# ___

f). Estimated quantity and disposition of recovered material that resulted from the incident? Yes ___ No ___ N/A RMK# ___

6. Did the permittee provide a written report to Ohio EPA within five days of becoming aware of the circumstances? Yes ___ No ___ N/A RMK# ___

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

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

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

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

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

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

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

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

9. Has the permittee become aware that it failed to submit any relevant facts in the permit or issuance proceedings or that it submitted incorrect or incomplete information in permit issuance proceedings or other submissions to Ohio EPA? If so: Yes ___ No N/A ___ RMK# ___

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

Permit Modification, Revision, Revocation

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

a. If so, were the changes made per OAC 3745-50-58(F)? [Condition A.2] Yes No ___ N/A ___ RMK# ___

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

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

11. Has the permit been transferred to a new owner/operator? Yes ___ No N/A ___ RMK# ___
- a. If so, was it transferred by modification OAC 3745-50-51? [Condition A.18] Yes ___ No ___ N/A RMK# ___
12. Has the permittee submitted reports to Ohio EPA for each compliance schedule in the permit by the scheduled date, unless otherwise specified? [Condition A.19] Yes ___ No ___ N/A RMK# ___
13. Has the permittee furnished to Ohio EPA upon request relevant information to determine whether cause exists for modifying, revising, revoking, or suspending the permit? [Condition A.10] Yes ___ No ___ N/A RMK# ___
14. Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10] Yes No ___ N/A ___ RMK# ___
15. Has the permittee maintained records of all data used to complete the application and any amendments, revisions or modifications to the application? [Condition A.14(c)] Yes No ___ N/A ___ RMK# ___
16. Has the permittee retained a complete copy of the approved application on-site? [Condition A.14(c)] Yes No ___ N/A ___ RMK# ___
17. Has the permittee given notice to the Director as soon as possible of any physical alterations or additions to any of the permitted portions of the facility? If so: Yes ___ No N/A ___ RMK# ___
- a. Were all such changes made per OAC3745-50-51? [Condition A.15] Yes ___ No ___ N/A RMK# ___

Site Entry-Availability of Records

18. As specified in Condition A.11, has the permittee allowed the director or an authorized representative, upon proper identification to:
- a. Enter at reasonable times upon the premises where a regulated activity is located or where records are kept under the conditions of the permit? Yes No ___ N/A ___ RMK# ___
- b. Have access to and copy, at reasonable times, any records required to be kept under the conditions of the permit? Yes No ___ N/A ___ RMK# ___
- c. Inspect, at any time, facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit? Yes No ___ N/A ___ RMK# ___

- d. Sample, document, photograph or monitor, at reasonable times, any substances or parameter at the location of the facility to assure compliance with the permit or as otherwise authorized by ORC Chapter 3734 and the rules adopted thereunder?

Yes No ___ N/A ___ RMK# ___

RECORDKEEPING/OPERATING REQUIREMENTS

Operating Record

1. Does the permittee maintain an operating record per OAC 3745-54-73 and 3745-54-74 and Condition B.22 of the permit which contains the following information:

- a. A description of the quantity of each hazardous waste and the method(s) and date(s) of its treatment or storage?

Yes No ___ N/A ___ RMK# ___

- b. The location of each hazardous waste and quantity at each location, including cross-reference to specific manifest numbers?

Yes No ___ N/A ___ RMK# ___

- c. Records and results of required waste analysis?

Yes No ___ N/A ___ RMK# ___

- d. Summary reports and details of all incidents that required implementation of the contingency plan?

Yes No ___ N/A ___ RMK# ___

- e. Records and results of required inspections?

Yes No ___ N/A ___ RMK# ___

- f. Documents required to be maintained by LDR requirements of OAC 3745-270?

Yes No ___ N/A ___ RMK# ___

- g. Monitoring, testing, or analytical data, and corrective action where required from groundwater monitoring and required monitoring of surface impoundments, landfills, waste piles and land treatment units? [3745-54-73(B)(6)].

Yes No ___ N/A ___ RMK# ___

Documents To Be Maintained At Facility

2. Is the permittee maintaining the following documents at the facility?:
[Condition A.28]

- a. Waste analysis plan per OAC 3745-54-13?

Yes No ___ N/A ___ RMK# ___

- b. Contingency plan per OAC 3745-54-53?

Yes No ___ N/A ___ RMK# ___

- c. Closure plan in per OAC 3745-55-12? [Condition B.29]

Yes No ___ N/A ___ RMK# ___

- d. Cost estimate for facility closure per OAC 3745-55-42? (Estimate only—adequacy will be evaluated by CO financial assurance personnel)[Condition B.36]

Yes No ___ N/A ___ RMK# ___

- e. Personnel training plan and records required by OAC 3745-54-15

Yes No ___ N/A ___ RMK# ___

- f. Inspection schedules developed per OAC 3745-54-15, 3745-55-74 and 3745-55-95? [Condition B.5] Yes No ___ N/A ___ RMK# ___
- g. Operating record per OAC 3745-54-73? [Condition B.22] Yes No ___ N/A ___ RMK# ___
- h. Annually-adjusted cost estimate for facility closure and post-closure, as required by OAC 3745-55-42 and 3745-55-44? [Condition A.28(a)(ix)] Yes No ___ N/A ___ RMK# ___
3. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from the date of the inspection? [Condition B.5] Yes No ___ N/A ___ RMK# ___
4. Have any plans required by the permit been revised? [Condition A.28(b)] If so, Yes ___ No N/A ___ RMK# ___
- a. Has the permittee submitted the revisions to Ohio EPA per OAC 3745-50-51? Yes ___ No ___ N/A RMK# ___
- b. Have all requirements of OAC 3635-50-51 been met, including Ohio EPA Approval where required? Yes ___ No ___ N/A RMK# ___

Annual Report Requirement

5. Is the permittee in compliance with annual report requirements set forth in OAC 3745-54-75 and the additional report requirements set forth in OAC 3745-54-77? [Condition B.25] Yes No ___ N/A ___ RMK# ___

Sampling Monitoring and Recordkeeping Requirements

6. In compliance with Condition A.12(b) of the permit, do the perimeter's record of monitoring information specify the:
- a. Date(s), exact place(s), time(s) and method(s) of sampling or measurement? Yes No ___ N/A ___ RMK# ___
- b. Individual(s) who performed the sampling or measurement? Yes No ___ N/A ___ RMK# ___
- c. Date(s) analyses were performed? Yes No ___ N/A ___ RMK# ___
- d. Individual(s) who performed the analyses? Yes No ___ N/A ___ RMK# ___
- e. Analytical technique(s) or method(s) used? Yes No ___ N/A ___ RMK# ___
- f. Results of such analyses? Yes No ___ N/A ___ RMK# ___
7. Have the methods used to obtain a representative sample of the waste to be analyzed included the appropriate SW-846 method or an equivalent method specified in the approved waste analysis plan? [Condition A.12(a)] Yes No ___ N/A ___ RMK# ___

8. Per Condition A.14 of the permit, is the permittee retaining records of monitoring information as required by the permit for at least three years from the date of sampling including:
- a. All calibration and maintenance records. Yes No ___ N/A ___ RMK# ___
 - b. Copies of reports and records required by the permit? Yes No ___ N/A ___ RMK# ___
 - c. Records from all groundwater monitoring wells and associated groundwater surface elevations for the active life of the facility? Yes No ___ N/A ___ RMK# ___
 - d. Corrective action records for at least 3 years after all corrective action activities have been completed? Yes No ___ N/A ___ RMK# ___
9. Has Ohio EPA requested submittal of any reports or other information from the permittee? If so:
- a. Have the submittals been signed and certified according to OAC 3745-50-42? [Condition A.13] Yes ___ No N/A ___ RMK# ___

WASTE MINIMIZATION REQUIREMENTS

- 1. Does the permittee certify at least once every year that a program is in place to reduce the volume and toxicity of hazardous waste generated per Condition A.29(a) and OAC 3745-54-73? Yes No ___ N/A ___ RMK# ___
 - 2. Did the permittee submit the waste minimization report to Ohio EPA within 180 days of journalization of this permit and biennially thereafter? [Condition A.29] Yes No ___ N/A ___ RMK# ___
 - 3. Has the permittee reduced the amount of waste (hazardous waste, solid waste, air emissions, waste water discharges, etc) generated at their facility this year by implementing P2/waste minimization? Yes No ___ N/A ___ RMK# ___
 - 4. Has the permittee's company saved much money this year by implementing P2? Yes No ___ N/A ___ RMK# ___
- If so, how much money has the permittee's company saved? Yes ___ No ___ N/A ___ RMK# ___

WASTE ACCEPTANCE AND GENERATION

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

OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS

1. Is the permittee complying with the following manifest requirements set forth in OAC 3745-52, 54-70, 54-71, 54-72, and 54-76 [Condition B.24] Yes No ___ N/A ___ RMK# ___
- a. Have all hazardous wastes shipped off-site been accompanied by a completed manifest in compliance with OAC 3745-52-20(A)?
- b. The manifest form used contains all information required by OAC 3745-52-20 and the minimum number of copies required by OAC 3745-52-22? Yes No ___ N/A ___ RMK# ___
- c. Has the permittee designated at least one permitted disposal facility and has/will designate an alternate facility or return waste in compliance with OAC 3745-52-20(B),(C),and (D)? Yes No ___ N/A ___ RMK# ___
- d. Have prepared manifests been signed by the permittee and initial transporter in compliance with OAC 3745-52-23? Yes No ___ N/A ___ RMK# ___
2. As a permittee that generates hazardous waste, are signed copies of all hazardous waste manifests and any documentation required for exception reports retained for at least three years at the facility as required by OAC 3745-52-40 and 3745-54-71(A)(5) Yes No ___ N/A ___ RMK# ___
3. Does the permittee use only properly registered transporters when removing hazardous wastes? [Condition A.16] Yes No ___ N/A ___ RMK# ___
4. Does the permittee give one copy of the manifest to the transporter, send one copy to the generator within 30-days, and keep one copy for at least three years? [3745-54-71(B)] Yes No ___ N/A ___ RMK# ___
- a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met? [3745-54-71(B)] Yes No ___ N/A ___ RMK# ___
5. Have any manifest discrepancies been reconciled within 15 days as required by 3745-54-72(B)? If not Yes No ___ N/A ___ RMK# ___
- a. Has the owner/operator submitted the required information to the director? Yes No ___ N/A ___ RMK# ___
6. Is the permittee submitting unmanifested waste reports as required by Condition B.24(c)? Yes No ___ N/A ___ RMK# ___

WASTE ANALYSIS/WASTE ANALYSIS PLAN

1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information of the waste in accordance with OAC Chapters 3745-54 to 57, 3745-218 and 3745-270 and the terms and conditions of the permit? [Condition B.3(a)] Yes No ___ N/A ___ RMK# ___

2. Does the permittee follow the procedures described in the WAP? (Section C of the Application)? [Condition B.3(a)] Yes No ___ N/A ___ RMK# ___
3. Does the permittee repeat the waste analysis when the process or operation generating the hazardous waste has changed, or at least annually? [Condition B.3(b)] Yes No ___ N/A ___ RMK# ___
4. **OFF-SITE FACILITIES:** Are the sampling methods and procedures specified in the permittee's WAP that will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identification of the waste on the manifest [OAC 3745-54-13]? Yes No ___ N/A ___ RMK# ___
5. Does the permittee place the results of all waste analyses in the facility operating record in accordance with OAC 3745-54-73? Yes No ___ N/A ___ RMK# ___

GENERAL INSPECTION REQUIREMENTS

1. Is the permittee following the inspection procedures and schedules set forth in the permit (Section F of the application) and the requirements of OAC 3745-54-15(A)(C) and (D)]? [Condition B.5] Yes No ___ N/A ___ RMK# ___
2. Is the permittee following the approved inspection schedule for: monitoring equipment, safety equipment, emergency equipment, security devices, and operating and structural equipment as specified in OAC 3745-54-15(B) [Section F, Condition B.10] Yes No ___ N/A ___ RMK# ___
3. Does the permittee remedy deterioration or any malfunctions discovered by an inspection in a timely manner (OAC 3745-54-15(c))? [Condition B.5] Yes No ___ N/A ___ RMK# ___
4. Do inspection records contain the following information (OAC 3745-54-15(D)) (Condition B.5):
- a. Date and time of inspection? Yes No ___ N/A ___ RMK# ___
 - b. Name of inspector? Yes No ___ N/A ___ RMK# ___
 - c. Notation of observations made? Yes No ___ N/A ___ RMK# ___
 - d. Date and nature of any repairs or remedial actions? Yes No ___ N/A ___ RMK# ___

Security Requirements

1. Is the permittee complying with OAC 3745-54-14 and Condition B.4 of the permit: [Section F, Condition B.4]
- a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility? Yes No ___ N/A ___ RMK# ___

- b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility? Yes No ___ N/A ___ RMK# ___
- c. A means to control entry, at all times, through gates or other entrances to the active portion of the facility? Yes No ___ N/A ___ RMK# ___
2. Per OAC 3745-54-14(c), does the permittee have signs reading "Danger-Unauthorized Personnel Keep Out" posted at the entrances to the active portions of the facility and other locations? Yes No ___ N/A ___ RMK# ___

Facility Operations

3. Is construction, maintenance, and operation of the facility being conducted to minimize the possibility of a fire, explosion or unplanned release of hazardous waste or hazardous waste constituents to air, soil, ground or surface water? [OAC 3745-54-31; Condition B.1] Yes No ___ N/A ___ RMK# ___
4. Does the Permittee operate and maintain the facility in accordance with fire, explosion, or release prevention procedures, practices and design specification provided in Sections D, F, and G, of the Part B permit application [OAC 3745-54-31, Condition B.1] Yes No ___ N/A ___ RMK# ___
5. Does the permittee properly maintain and operate the facility to achieve compliance with the terms and conditions of the permit [Condition A.9] including:
- a. Effective management practices? Yes No ___ N/A ___ RMK# ___
- b. Adequate funding? Yes No ___ N/A ___ RMK# ___
- c. Adequate operator staffing and training? Yes No ___ N/A ___ RMK# ___
- d. Adequate laboratory and process controls? Yes No ___ N/A ___ RMK# ___

PERSONNEL TRAINING

1. Is the permittee conducting personnel training per Section H of the Application and the following requirements of OAC 3745-54-16? [Condition B.6]:
- a. Personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC 3745-54-16(A)(B)(C)] Yes No ___ N/A ___ RMK# ___
- b. Personnel training to new employees within six months after their date of employment [OAC 3745-54-16(B)]? Yes No ___ N/A ___ RMK# ___
- c. Annual refresher training [OAC 3745-54-16(C)] Yes No ___ N/A ___ RMK# ___
2. Is the permittee maintaining personnel training records as per OAC 3745-54-16(D) and Section H, including: written job titles, job descriptions, and documented employee training records? [Condition B.6] Yes No ___ N/A ___ RMK# ___

REQUIRED EQUIPMENT

- 1. Has the permittee equipped the facility with the emergency equipment specified in Section G? [OAC 3745-54-32, Condition B.9]?
Yes No ___ N/A ___ RMK# ___
 - a. An internal communications or alarm system? Yes No ___ N/A ___ RMK# ___
 - b. A device capable of summoning emergency assistance from local emergency authorities? Yes No ___ N/A ___ RMK# ___
 - c. Portable fire extinguishers and/or fire control equipment, spill control and decontamination equipment? Yes No ___ N/A ___ RMK# ___
 - d. Water of adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers or water spray systems? Yes No ___ N/A ___ RMK# ___
- 2. Is the permittee inspecting, testing, and maintaining the equipment specified to ensure its proper operation per OAC 3745-54-33 [Condition B.10]?
Yes No ___ N/A ___ RMK# ___
- 3. Has the permittee provided all personnel involved in the operation with immediate access to an internal alarm or emergency communication device [OAC 3745-54-34, Condition B.11]?
Yes No ___ N/A ___ RMK# ___

CONTINGENCY PLAN – EMERGENCY PROCEDURES

- 1. Per Condition B.13 of the permit and OAC 3745-54-37(A) and (B), does the permittee:
 - a. Familiarize emergency response agencies with the facility layout, associated hazards, places where personnel will normally be working, entrances and evacuation routes? Yes No ___ N/A ___ RMK# ___
 - b. Inform such agencies of safety equipment, supplies, proper emergency safety procedures that are applicable to the facility? Yes No ___ N/A ___ RMK# ___
 - c. Familiarize the local hospital, police, fire dept., and other responders listed in the permit application with the properties of haz waste handled at the facilities and the types of injuries or illness that could result from fires, explosions and releases? Yes No ___ N/A ___ RMK# ___
- 2. Have any response agencies declined to enter into the arrangements set forth in OAC 3745-54-37(A)?, If so:
Yes ___ No N/A ___ RMK# ___
 - a. Has the permittee documented the refusal in the operating record? (OAC 3745-37(B), [Condition B.13(b)])? Yes ___ No ___ N/A RMK# ___

3. Has the permittee 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? [OAC3745-54-53, Condition B.18(b)] Yes No ___ N/A ___ RMK# ___
4. Has the permittee notified all parties identified in the contingency plan, in writing of amendments, modifications, or revisions to the plan within 10 days of the effective date of the change in the plan? [Condition b.18(b)] Yes No ___ N/A ___ RMK# ___
5. Has the permittee submitted a copy of the approved contingency plan and all revisions, amendments, modifications to the Ohio EPA, Division of Emergency and Remedial Response in accordance with OAC 3745-54-53? [Condition B.18(c)] Yes No ___ N/A ___ RMK# ___
6. Is the permittee reviewing the approved contingency plan at least annually and amending the plan immediately if needed as per OAC 3745-54-54 [Condition B.17] Yes No ___ N/A ___ RMK# ___

Emergency Coordinator

7. Is there an emergency coordinator on premises or on call at all times? [OAC 3745-54-55; Condition B.19] Yes No ___ N/A ___ RMK# ___
8. Is/are the emergency coordinator(s) at the facility familiar with the following [OAC 3745-54-55; Condition B.19]:
- a. Contingency Plan? Yes No ___ N/A ___ RMK# ___
- b. Facility operations/activities? Yes No ___ N/A ___ RMK# ___
- c. Waste characterization and location? Yes No ___ N/A ___ RMK# ___
- d. Location of all records in the facility? Yes No ___ N/A ___ RMK# ___
- e. Facility Layout? Yes No ___ N/A ___ RMK# ___
9. Does/do the emergency coordinator(s) have the authority to commit the resources needed to carry out the contingency plan? [OAC 3745-54-55; Condition B.19]? Yes No ___ N/A ___ RMK# ___
10. Does the permittee have a contingency plan for the facility that meets the following: [Condition B.15, Section G]
- a. Describes the actions facility shall take to comply with OAC 3745-54-51 through 3745-54-56 in response to fires, explosions, or any unplanned release of haz waste or haz waste constituents to air, soil, or surface water? Yes No ___ N/A ___ RMK# ___
- b. Describes arrangements agreed to by local police, fire departments, hospitals, contractors, and Ohio EPA and the local emergency response team to coordinate emergency services? Yes No ___ N/A ___ RMK# ___

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

Implementation of Contingency Plan

11. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility since the date of the last inspection? If so: Yes ___ No N/A ___ RMK# ___
- a. Did the permittee immediately implement the approved contingency plan and follow the emergency procedures described in OAC 3745-54-56? Yes ___ No ___ N/A RMK# ___
- b. Did the permittee immediately notify the Ohio EPA's Division of Emergency and Remedial Response providing the following information [OAC 3745-54-56(D)(2)]:
- i. Name and telephone number of the reporter Yes ___ No ___ N/A RMK# ___
- ii. Name and address of the facility? Yes ___ No ___ N/A RMK# ___
- iii. Time and type of incident? Yes ___ No ___ N/A RMK# ___
- iv. Name and quantity of materials involved? Yes ___ No ___ N/A RMK# ___
- v. The extent of injuries? Yes ___ No ___ N/A RMK# ___
- vi. The possible hazards to human health or the environment? Yes ___ No ___ N/A RMK# ___
- c. Did the permittee collect and manage as hazardous waste all liquid or solid material resulting from fire, explosion, released material or emergency response materials until such time as the permittee can demonstrate to Ohio EPA that the wastes are not hazardous wastes? [Condition B.16] Yes ___ No ___ N/A RMK# ___

- d. Within 15-days of the incident, did the permittee submit to the director a written report of the incident?
If so: Yes ___ No ___ N/A RMK# ___
- e. Did the permittee note in the operating record the time, date, and details of any incident that required the implementation of the contingency plan? [OAC 3745-54-56(J); condition B.23]. Yes ___ No ___ N/A RMK# ___

CLOSURE REQUIREMENTS

1. Does the permittee maintain the approved closure plan at the facility? [Condition B.29; Section I] Yes No ___ N/A ___ RMK# ___
2. Is the permittee keeping at the facility and submitting annually to the Ohio EPA, the latest closure cost estimate per OAC 3745-55-42(D)? [Condition B.36] Yes No ___ N/A ___ RMK# ___
3. Has the permittee amended the closure plan?
If so: Yes ___ No N/A ___ RMK# ___
- Has the plan been amended per OAC 3745-55-18(D)? [Condition B.28] Yes ___ No ___ N/A RMK# ___
4. Has the permittee closed the facility?
If so: Yes ___ No N/A ___ RMK# ___
- a. Did the permittee complete closure of the facility 180 days after receiving the final volume of hazardous waste, as per Condition B.31 of the permit? Yes ___ No ___ N/A RMK# ___
- b. Was closure conducted per the closure performance standard of OAC 3745-55-11? [Condition B.26] Yes ___ No ___ N/A RMK# ___
- c. Did the permittee carry out the approved closure plan as set forth in Section I of the approved permit application and OAC 3745-55-10 through 3745-55-20 [Condition B.27]? Yes ___ No ___ N/A RMK# ___
- d. After receiving the final volume of hazardous waste, did the permittee remove all hazardous waste and complete closure activities as per the schedule specified in the approved closure plan? [OAC 3745-55-13; Condition B.31] Yes ___ No ___ N/A RMK# ___
- e. Has the permittee decontaminated and/or disposed of all facility equipment, structures, and soils per OAC 3745-55-14 and the approved closure plan? [Condition B.32] Yes ___ No ___ N/A RMK# ___
- f. Has the permittee certified that the facility has been closed per the specifications in the approved closure plan? [OAC 3745-55-15, Condition B.33] Yes ___ No ___ N/A RMK# ___

- g. Has the permittee submitted a survey plat to the director and local zoning authority no later than the submission of certification of closure of each hazardous waste disposal unit? [Condition B.34]

Yes ___ No ___ N/A RMK# ___

STORAGE OF HAZARDOUS WASTE IN CONTAINERS

Condition and Management of Containers

1. Are containers holding hazardous waste in good condition and not leaking as required by OAC 3745-55-71? [Condition C.3]
If not:

Yes No ___ N/A ___ RMK# ___

- a. Did the permittee transfer the hazardous waste from such a container to one that is in good condition, or otherwise manage the waste in a manner that complies with the conditions of the permit? [Condition C.3]

Yes ___ No ___ N/A RMK# ___

2. Does the permittee ensure that all containers used at the facility are compatible with the hazardous waste to be stored in them as required by OAC 3745-55-72? [Condition C.4]

Yes No ___ N/A ___ RMK# ___

3. Does the permittee keep all containers closed during storage except when it is necessary to add or remove waste as required by OAC 3745-55-73? [Condition C.5(b)]

Yes No ___ N/A ___ RMK# ___

4. Does the permittee store all containerized hazardous waste in the appropriate permitted container storage areas? [Condition C.5(a)]

Yes No ___ N/A ___ RMK# ___

5. Does the permittee store containers in compliance within the following maximum quantity limitations per OAC 3745-50-43(A)(7) (generator activities excluded) [Condition C.1(a)]:

a. Area 2: 16,500 gallons

Yes No ___ N/A ___ RMK# ___

b. Area 3: 10,450 gallons

Yes No ___ N/A ___ RMK# ___

c. Area 4: 56,763 gallons

Yes No ___ N/A ___ RMK# ___

d. Area 5: 39,650 gallons

Yes No ___ N/A ___ RMK# ___

6. Is the permittee inspecting the container area weekly per OAC 3745-55-74 and the approved inspection schedule of the Part B permit application to detect leaking containers and deterioration of containers and the containment system? [Condition C.8]

Yes No ___ N/A ___ RMK# ___

- a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken as required by OAC 3745-54-15(D)? [Condition C.8]

Yes No ___ N/A ___ RMK# ___

7. Is the permittee storing ignitable or reactive wastes within 15 meters (50 ft) of the facility's property line? [Condition C.10(a)]

Yes No ___ N/A ___ RMK# ___

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

Containment Systems (Containers)

10. Does the permittee maintain the containment system as described in the approved permit application, Section C.6, including:
- a. Sufficient capacity to hold 10% of the total volume of containers or the volume of the largest container, whichever is greater. Yes No ___ N/A ___ RMK# ___
 - b. A system which is free of gaps and sufficiently impervious to contain leaks and spills? [Condition C.6(b)] Yes No ___ N/A ___ RMK# ___
11. Has the permittee had a spill or leak of waste? If so: Yes ___ No N/A ___ RMK# ___
- a. Was the spilled or leaked waste removed in a timely manner (within 24 hours of reaching the hazardous waste pad sump [Condition C.6(c)]) Yes ___ No ___ N/A RMK# ___

TANK STORAGE, TREATMENT, AND MAINTENANCE

1. Is secondary containment in the form of an external liner being provided for all permitted hazardous waste tanks? [3745-66-93(A)(1) to (A)(5)] Yes No ___ N/A ___ RMK# ___
2. Has the permittee operated the secondary containment systems per the design plans and descriptions in Sections D and F of the permit application? [Condition D.3] Yes No ___ N/A ___ RMK# ___
3. Is the liner in the secondary containment compatible with the wastes stored in the tank system? Yes No ___ N/A ___ RMK# ___
4. Is the liner free of cracks and gaps? Yes No ___ N/A ___ RMK# ___
5. Is the liner provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at the earliest practical time. Yes No ___ N/A ___ RMK# ___
6. Is the liner proved with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24-hours or at the earliest practicable time? Yes No ___ N/A ___ RMK# ___
7. Is any liquid which accumulates in the containment unit resulting from spills, leaks, or precipitation removed within 24 hours or at earliest practicable time? Yes No ___ N/A ___ RMK# ___

8. Is ancillary equipment to the tank systems provided with secondary containment (such as double-walled piping, jacketing or a trench)?
 Yes No ___ N/A ___ RMK# ___
 If not, is the ancillary equipment inspected daily,
 Yes No ___ N/A ___ RMK# ___
9. Is ancillary equipment to the tank systems provided with secondary containment (such as double-walled piping, jacketing or a trench)?
 Yes No ___ N/A ___ RMK# ___
10. Has the permittee stored or treated wastes in tanks consistent with the restrictions and prohibitions in Conditions D.1(b) and (c)?
 Yes No ___ N/A ___ RMK# ___
11. Has Tank 1 exceeded 6,000 gallons?
 Yes ___ No N/A ___ RMK# ___
 a. If so, did the permittee prevent total storage volume of Area 1 from exceeding 46,600 gallons?
 Yes ___ No ___ N/A RMK# ___
12. Does the permittee prevent placement of hazardous waste or treatment reagents in tanks 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 ___ RMK# ___
13. Does the permittee use methods described in the Part B Permit application to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)? [OAC 3745-66-94(A), Condition D.4(b)]
 Yes No ___ N/A ___ RMK# ___
14. Has the permittee conducted and documented inspections of the tank system per the inspection schedule in Section F of the application? [Condition D.5]
 Yes No ___ N/A ___ RMK# ___
15. Has the permittee documented these inspection in the operating record, including inspection of the following:
 a. Above ground portion of tank system (daily)?
 Yes No ___ N/A ___ RMK# ___
 b. Data from leak detection equipment (daily)?
 Yes No ___ N/A ___ RMK# ___
 c. Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste (daily)?
 Yes No ___ N/A ___ RMK# ___
16. Has the permittee had any leaks, spills or releases from the tank system [Condition D.6]?
 Yes No ___ N/A ___ RMK# ___
17. If so, did the permittee do any of the following?
 a. Immediately stop the flow of hazardous waste into the tank system or secondary containment system and inspect the system to determine the cause of the leak?
 Yes ___ No ___ N/A RMK# ___

- b. Remove the waste within 24 hours or the after detection of the release, or at the earliest practicable time, remove as much of the waste as necessary to prevent further release to the environment and to allow inspection and repair of the tank system to be performed? [Condition D.6(a)(ii)]. Yes ___ No ___ N/A RMK# ___
- c. Immediately conduct a visual inspection of all releases to the environment and, based upon the inspection:
- i. Prevent further migration of the release to soils or surface water and [Condition D.6(a)(iii)]. Yes ___ No ___ N/A RMK# ___
- ii. Remove and properly dispose of any visible contamination? [Condition D.6(a)(iii)]. Yes ___ No ___ N/A RMK# ___
18. Report the release to Ohio EPA within 24 hrs of detection? [Condition D.7(a)]. Yes ___ No ___ N/A RMK# ___
19. Was a written report submitted within 30 days of detecting the release that addressed the elements in Condition D.7(b). Yes ___ No ___ N/A RMK# ___
20. If major repairs to a tank system were required, was a certification submitted to Ohio EPA within 7 days of returning the tank system to use? [Condition D.7(c)] Yes ___ No ___ N/A RMK# ___
21. Does the permittee have on file at the facility written statements by those persons required to certify the design and installation of the tank system? [Condition D.7(d)]. Yes No ___ N/A ___ RMK# ___
22. For tanks used to treat or store ignitable or reactive wastes, is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [Condition D.9] Yes No ___ N/A ___ RMK# ___
23. Is the permittee following the special provisions for incompatible wastes specified in Condition D.9? Yes No ___ N/A ___ RMK# ___
24. Has the permittee placed incompatible wastes or materials into the same tank system? If so:
- a. Did the permittee follow the procedures specified in the Part B application [Condition D.10(a)]? Yes ___ No ___ N/A RMK# ___
- b. Was the tank system decontaminated? [Condition D.10(b)] Yes ___ No ___ N/A RMK# ___

LAND DISPOSAL RESTRICTION REQUIREMENTS

- 1. Does the permittee comply with all applicable regulations regarding land disposal prohibition and restrictions as required by OAC 3745-270? Yes No ___ N/A ___ RMK# ___
- 2. Does the permittee comply with the notification and certification requirements of OAC 3745-270-07(A)? Yes No ___ N/A ___ RMK# ___
- 3. Does the permittee comply with the requirements of OAC 3745-270-03 and does not in any way dilute a restricted waste or treatment residue as a substitute for adequate treatment? Yes No ___ N/A ___ RMK# ___
- 4. Does the permittee retain supporting data used to determine if wastes managed at the facility are restricted from land disposal in the facility files as required by OAC 3745-270-07(A)(5)? Yes No ___ N/A ___ RMK# ___
 - a. Are copies of all notices, certifications, demonstrations waste analyses, and other documentation produced pursuant to OAC 3745-270 retained for a period of three years as required by OAC 3745-270-07(A)? Yes No ___ N/A ___ RMK# ___
- 5. Is the permittee in compliance with the requirements of OAC 3745-270-50 regarding the storage of wastes restricted or prohibited from land disposal under OAC 3745-270-50? Yes No ___ N/A ___ RMK# ___

CORRECTIVE ACTION

- 1. Has the permittee submitted the monthly progress report for all corrective action activities? Yes ___ No ___ N/A RMK# ___
- 2. Has the permittee identified any new WMU's or releases at the facility? [Condition E.3] Yes ___ No N/A ___ RMK# ___
 - a. Did the permittee follow the steps in Condition E.10? Yes ___ No ___ N/A RMK# ___