



State of Ohio Environmental Protection Agency

Northeast District Office

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

May 13, 2008

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 April 29, 2008, Ohio EPA, represented by Ed D'Amato/DHWM-NEDO, and Robert Almquist/DHWM-NEDO, inspected Chemtron Corporation for compliance with its hazardous waste permit and Ohio's hazardous waste laws found in Chapters 3734 of the Ohio Revised Code (ORC) and 3745 of the Ohio Administrative Code (OAC). Chemtron was represented by you and Jim Williamson.

The following violations were found during the inspection. You must do the following and submit all requested documentation **within 30 days** of the date of this letter:

1. **Condition of Containers**  
**OAC 3645-55-71**

*If a container holding hazardous waste is not in good condition... or if it begins to leak, the owner or operator must transfer the hazardous waste from such container to a container that is in good condition or manage the waste in some other way that complies with the requirements of OAC Chapters 3745-54 to 57 and 3745-205*

There was a pallet of 5-gallon containers in Area 5. One of the containers was leaking. This violation was abated at the time of the inspection when a Chemtron employee overpacked the containers.

2. **Labeling of Containers (Satellite Accumulation)**  
**OAC 3745-52-34 (C)(1)(b)**

*A generator may accumulate...hazardous wastes...at or near any point of generation where wastes initially accumulate, which is under control of the operator of the process generating the wastes...provided he...marks his containers either with the words 'Hazardous Waste' or with other words that identify the contents of the containers.*

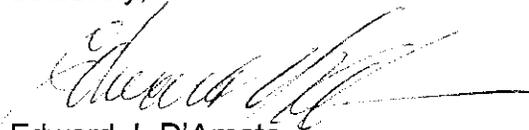
CHEMTRON CORPORATION  
MAY 13, 2008  
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The satellite accumulation container in the laboratory under the counter where the ICP is located, was not labeled per this rule. This violation was abated during the inspection when a Chemtron employee labeled the container with the words "Hazardous Waste". Enclosed is a copy of the checklist 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.

Sincerely,



Edward J. D'Amato  
Environmental Specialist  
Division of Hazardous Waste Management

EJD:ddw

Enclosure

cc: Regional Offsite Admin, DE-9J, USEPA, Region V  
Marie Jarden, DHWM, CO  
ec: Frank Popotnik, DHWM, NEDO  
Robert Almquist, DHWM, NEDO

USED OIL INSPECTION CHECKLIST - MARKETERS

Cheraton 9-29-08

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

PROHIBITIONS

- 1. Does the Used Oil Marketer manage used oil in a surface impoundment or waste pile? If yes: Yes  No  N/A 
  - a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] Yes  No  N/A
- 2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes  No  N/A
- 3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? Yes  No  N/A

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

- 4. Does the used oil fuel marketer initiate shipments of **off-spec** used oil only to a used oil burner that has a U.S. EPA ID# and burns the used oil in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-71] Yes  No  N/A
- 5. Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil meets the specification for used oil fuel under 3745-279-11 keep copies of analyses of the used oil (or other information used to make the determination) for at least three years? [3745-279-72(B)] Yes  No  N/A
- 6. Has the used oil marketer notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-73(A)] Yes  No  N/A
- 7. Does the used oil marketer keep a record of each shipment of **off-spec** used oil directed to a used oil burner? [3745-279-74(A)] Yes  No  N/A 
  - a. Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-74(A)(1)] Yes  No  N/A
  - b. Does each record include the name and address of the burner who receives the oil? [3745-279-74(A)(2)] Yes  No  N/A
  - c. Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-74(A)(3)] Yes  No  N/A
  - d. Does each record include the U.S. EPA ID# of the burner? [3745-279-74(A)(4)] Yes  No  N/A

- e. Does each record include the quantity of the used oil shipped? [3745-279-74(A)(5)] Yes  No  N/A
- f. Does each record include the date of shipment? [3745-279-74(A)(6)] Yes  No  N/A
8. Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil **meets the fuel specifications** under 3745-279-11 keep a record of each shipment of used oil to an on-spec used oil burner? [3745-279-74(B)] Yes  No  N/A
- a. Does each record include the name and address of the facility receiving the shipment? [3745-279-74(B)(1)] Yes  No  N/A
- b. Does each record include quantity of used oil fuel delivered? [3745-279-74(B)(2)] Yes  No  N/A
- c. Does each record include date of shipment or delivery? [3745-279-74(B)(3)] Yes  No  N/A
- d. Does each record include a cross-reference to the record of used oil analysis or other information used to make the determination that the used oil meets the specification as required in 3745-279-72(A)? [3745-279-74(B)(4)] Yes  No  N/A
9. Are the records described in 3745-279-74(A) and (B) maintained for at least three years? [3745-279-74(C)] Yes  No  N/A
10. Before the used oil generator, transporter or processor/re-refiner directs the first shipment of **off-spec** used oil to a burner, does he obtain a one time written and signed notice from the burner certifying that:
- a. The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-279-75(A)(1)] Yes  No  N/A
- b. The burner will burn the off-spec used oil only in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-75(A)(2)] Yes  No  N/A
11. Is the certification maintained for at least three years from the date the last shipment of off-spec used oil was shipped to the burner? [3745-279-75(B)] Yes  No  N/A

Keyword: UsedOilforMarketers.Oct.2007.doc

**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: 4/29/08 Time: \_\_\_\_\_

Was advance notice of the inspection given? \_\_\_\_\_ YES X NO

If so, how far in advance? \_\_\_\_\_

**Name                      Agency/Title                      Phone**

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

Robert Almqvist ES-2

Facility Reps: Ron Drozdowski, Robert Guenther, Ron Guenther

Is facility operating as a generator? X 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**

<b>STORAGE</b>		<b>TREATMENT</b>		<b>DISPOSAL</b>	
<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

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## GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. Is the permittee continuing any activity regulated by the permit after the expiration date of the permit? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- b. Has the facility submitted an application for a permit renewal to the director no later than 180 days prior to the expiration date of the permit? (Condition A.6) Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
2. Has the permittee submitted the annual permit fee, Payable to "Treasurer, State of Ohio", to Ohio EPA on or before the anniversary of the date of issuance during the term of the permit? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
3. Is the permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit? [Conditions A.1(b) and A.5] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
4. Have any provisions of the permit been identified as Invalid? [Condition A.4] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
5. Has the facility identified any instances of noncompliance with the permit (ORC Chapter 3734), which may endanger human health or the environment? If so: Yes \_\_\_ No  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  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  RMK# \_\_\_
- b). Name, address, and telephone number of facility? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- c). Name and quantity of material(s) involved. Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- d). The extent of injuries, if any? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_

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# \_\_\_

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)? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- 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 on 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:
- 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 an 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:

*on container found leaking, Abused during inspection.*  
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)]. N/A
- 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: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- 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# \_\_\_