



**Environmental
Protection Agency**

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

June 9, 2010

David G. Lobbestael
General Manager
Envirite of Ohio, Inc.
2050 Central Avenue, Southeast
Canton, OH 44707

RE: ENVIRITE OF OHIO, INC., STARK COUNTY, OHD980568992, PERMIT NO. 02-76-0469, NOTICE OF VIOLATION (NOV)/RETURN TO COMPLIANCE (RTC)

Dear Mr. Lobbestael:

On May 24, 2010, this writer, representing Ohio EPA, Division of Hazardous Waste Management (DHWM), conducted a hazardous waste compliance evaluation inspection (CEI) of Envirite of Ohio, Inc. (Envirite) located at 2050 Central Avenue, Southeast, Canton, Ohio. The CEI included an inspection of the facility's operations and a records review. Tom Yablonski, Anthony Dugan and Ken Nisly represented Envirite during the inspection.

The purpose of the inspection was to determine Envirite's compliance with Ohio's hazardous waste laws and rules as adopted under the Ohio Revised Code (ORC) Chapter 3734, Chapter 3745 of the Ohio Administrative Code (OAC) and compliance with Envirite's Ohio Hazardous Waste Facility Installation and Operation Permit effective January 15, 2003.

Enclosed is a copy of the Ohio Part B Permitted Facility RCRA Inspection Checklist which includes specific information discussed during this inspection and/or other operational information gathered during this inspection. Also enclosed are copies of other checklists that were completed for this inspection.

Also, included is an updated RCRA Subtitle C Site Identification/Verification Form which was completed as part of this inspection.

During this inspection, the following violation of Ohio's hazardous waste regulations and Envirite's Permit Conditions was found.

Permit Condition, C.3, Condition of Containers (OAC Rule 3745-55-71)

During the CEI walk-through it was noted that a 20 CY roll-off container, storing D008 hazardous waste, located in the permitted, hazardous waste solids storage area on the north side of the facility was found to be leaking.

Envirite's immediate response to the spill and its remedial efforts to contain and clean up the spill caused the violation to be abated at the time of the inspection. No further action is needed at this time.

The following is a summary of significant activities that have occurred since the last inspection in October, 2009.

- On May 17, 2010, Envirite submitted a Class 1 A modification for annual financial assurance update and a change in the financial assurance mechanism. This modification is pending at this time.
- On May 19, 2010, Envirite was acquired by EQ-The Environmental Quality Company whose head quarters is located in Wayne, Michigan.

Thank you for your cooperation in this matter. Should you have any questions regarding this letter, please call me at (330) 963-1266.

The DHWM has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link:

[http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscrip
tionpage](http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscrip
tionpage).

Sincerely,



Kris L. Coder
Environmental Specialist II
Division of Hazardous Waste Management

KLC:ddw

Enclosure

ec: Natalie Oryshkewych, NEDO, DHWM
Nyall McKenna, NEDO, DHWM
Ed Lim, CO, DHWM
Harry Sarvis, CO, DHWM

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your facility from its obligation to comply with all applicable regulations.

Send to Central Office



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

For Ohio EPA use only

Completed verification forms required to be submitted to CO should be e-mailed to kristina.durnell@epa.state.oh.us.

Site EPA ID No.	EPA ID Number: OHD980568992	
Site Name	Name: Envirite of Ohio, Inc.	Website: (Optional)
Site Location Information	Street Address: 2050 Central Avenue SE	
	City, Town, or Village: Canton	State: OH
Site Land Type (check only one)	County Name: Stark	
NAICS code(s) www.census.gov/epcd/www/naics.html	Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	Zip Code: 44707
	562211	
Facility Representative	First Name: David MI: G Last Name: Lobbestael	
Additional names can be recorded in number 12	Title: General Manager	
	Phone Number: 330-456-6238	Phone Number Extension: 215
Only provide address information if it is different than the site address	E-Mail Address: Dave.Lobbestael@eqonline.com	
	Fax Number: 330-456-2801	Fax Number Extension:
	Street or P.O. Box: 2050 Central Avenue SE	
	City, Town or Village: Canton	
	State: OH	Zip Code: 44707
Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Envirite of Ohio, Inc.	Date Became Owner (mm/dd/yyyy): 01/01/1997
	Owner Type: Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	
	Street or P.O. Box: 2050 Central Avenue SE	
	City, Town or Village: Canton	Owner Phone #: 330-456-6238
	State: OH	Country: USA Zip Code: 44707
	Name of Site's Operator: Envirite of Ohio, Inc.	Date Became Operator (mm/dd/yyyy): 01/01/1997
	Operator Type: Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	
	Street or P.O. Box: 2050 Central Avenue SE	
	City, Town or Village: Canton	Operator Phone #: 330-456-6238
	State: OH	Country USA Zip Code: 44707

VIOLATIONS CITED? Yes No**TYPE OF HANDLER - MARK "X" AS APPROPRIATE** Not a HW Generator UNKNOWN:

Cited for violation of 3745-52-11

 Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). *Check the box for the applicable generator status and provide a comment.*
 Large Quantity Generator (LQG) Small Quantity Generator (SQG) Conditionally Exempt Small Quantity Generator U.S. Importer of Hazardous Waste Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

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

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED

(CHECK ALL BOXES THAT APPLY)

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

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

- Batteries
- Pesticides
- Mercury containing equipment
- Lamps

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

- Used Oil Generator
- Used Oil Transporter
- Used Oil Transfer Facility
- Used Oil Processor
- Used Oil Re-refiner
- Off-Specification Used Oil Burner
- Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
- Used Oil Fuel Marketer to Off-Specification Used Oil Burner

Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

**See October
7, 2009 RCRA
Subtitle C
Site
Identification/
Verification
Form for list
of Waste
Codes**

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

Announced Yes No Additional Facility Representatives:

**Anthony S. Dugan, S. Thomas
Yablonski and Kenneth Nisly**

Tanks Yes No

Containers Yes No

Name of Inspector(s)
Kris Coder

Name of Inspector(s)
na

Date of Inspection/Time
(mm/dd/yyyy) (hh:mm)
05/24 2010

Comments:

Other information filed with the Secretary of State of Ohio: State of Ohio Certificate, Trade Name/Original Filing: EQ OHIO, Date of First Use, 05/19/2010; Envirite of Ohio, Inc., 36255 Michigan Avenue, Wayne, MI 48184

OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST
Envirite of Ohio, Inc. (Envirite)
May 24, 2010, DHWM Inspection
Conducted By Kris Coder

PERMIT STATUS

Permit Issued: January 15, 2003 LDR Checklist Attached: x Yes No
 Permit Effective Date: January 15, 2003 Used Oil Checklist Attached: x Yes No
 Permit Expiration Date: January 15, 2013 Generator Checklist Attached: x Yes No

Permit Renewal Date: _____

Permit Modification Date(s): _____ See the following General Remarks

AUTHORIZED ACTIVITIES

STORAGE		TREATMENT		DISPOSAL	
x	Containers	x	Tanks		Injection Well
x	Tanks		Incinerator		Landfill
	Waste Pile		Thermal Treatment		Land Application
	Surface Impoundment		Post-Closure		Surface Impoundment

Post-Closure Care Corrective Action

General Remarks

The following information was gathered during the facility inspection on May 24, 2010. The highlights are summarized as follows. Ohio EPA was represented by Kris Coder. Envirite was represented by Tom Yablonski, Anthony (Tony) Dugan. and Ken Nisly. During the "wrap up" portion of the inspection Dave Lobbestael was contacted by telephone at his location in Harvey, Illinois.

-On May 19, 2010, Envirite was acquired by EQ-The Environmental Quality Company. EQ's Corporate Office Headquarters is located at 36255 Michigan Avenue, Wayne, Michigan 48184.

-We discussed the tentative, future permit modifications such as the consolidation/merging of EQ's and Envirite's waste profile information into one form for the customers. It appears this could be considered a Class 1 administrative modification.

-Since the last inspection on October 7, 2009, Envirite has submitted a Class 1A permit modification for the annual financial assurance documents. This information was resubmitted by letter dated May 14, 2010 from Ken Nisly to Ohio EPA. The resubmitted information is pending action by Ohio EPA but should be forth coming.

-There were no issues regarding the results of the monthly daily composite of sets of samples analyzed for the TCLP parameters. These results were submitted by Donna J. Cross with the following letters dated: October 22, 2009, November 16, 2009, December 10, 2009, January 25, 2010, February 23, 2010, March 26, 2010, April 29, 2010 and May 18, 2010.

-By an April 30, 2010, e-mail message to Ken Nisly, Envirite, Mary Ann Silagy, CO EPA, requested additional information for the Envirite's 2009 annual HW report.

-Envirite was performing routine maintenance on the sacrificial metal liners of LPU tanks. Periodically, the outer steel liners need repaired. Also, the crane clam shell was being repaired at this time.

From the conference room Anthony Dugan and Tom Yablonski accompanied Kris Coder on the tour of the facility. The areas observed by Ohio EPA were as follows: the labs and the satellite accumulation containers in the labs including the 55 gallon drum for used solvents generated from the lab test procedures (the contents of this drum was last shipped to Chemtron); the hw permitted liquids unloading area including the hw drums and containers received from offsite for processing onsite or shipment offsite; the staging area where no wastes were accumulating at the time of the inspection; there were drums of solids awaiting processing in the SPU, no other containers were noted in the SPU; in the no free liquids permitted container storage area on the north side were several 20 CY roll-off containers of hw, the roll-off containers in this area were closed and labeled, however, one containers was found leaking (the details are discussed below); the area where

TSD Checklist
May 24, 2010

empty roll-off boxes and containers awaiting confirmation of treatment was viewed, no problems were noted; the new tank in the wastewater treatment area was observed along with filter cake to be recycled to AJYL for nickel recovery. The used oil tote in the service garage was reported to be marked used oil. The property fence line and the attached warning signs were reported by the facility reps to be O.K. Plastic container recycling (empty, clean totes and drums) is still occurring with the shredder operation on the north side of the facility.

Additional Ohio EPA notes from the May 24, 2010, inspection of Envirite:

The following information was gathered on the leaking 20 CY roll-off container. The permitted container storage area on the north side of the facility is used to store roll-off containers and semi-vans of hazardous wastes which are solids with no free liquids. Ohio EPA did not take any photos. The roll-off container was observed covered with a tarp and was considered closed. The liquid leaking from the rear of the container was brown in color. It pooled on the pavement beneath the container to the berm on the north side. The liquid was contained in the area just described and was not released beyond this area and was not released to any storm sewer. There were other roll-off containers parked adjacent to this container. The container was located at about the center of the permitted storage area. The container was properly marked. An Envirite waste identification number of 23252 was noted on the container. Ohio EPA was given the following information regarding the contents of the container: the generator is Ulbrich Precision Flat Wire located in West Minster, SC.; composition-debris; 20 CY one time generation; waste code-D008; process description-lead contaminated debris generated as part of clean up after fire at wire coating operation; TCLP results found >5mg/l Lead and all other TCLP constituents including metals, volatiles and semi-volatiles were found < the TCLP regulatory limits or non-detect; handling notes-lead contaminated debris inspect upon receipt, may require sizing see Dave L. for management options; approved on 5/14/2010 and received by Envirite on 5/14/2010. Following discovery, the area of the leaking roll-off container was cleared of all roll-off containers; the liquid was vacuumed and the area swept and the leaking roll-off container was placed in the SPU Pit 3 for treatment. Once the solids permitted area was cleaned, dried and inspected by Eric Dunlevy, the roll-off containers were returned to the permitted storage area. The origination of the liquid associated with this waste was not readily known. The tarp on the container appeared to be in good condition and the container was closed. It could only be speculated that the liquid may have originated with the waste since the waste consisted of debris from a fire clean up. It was also speculated that the plastic liner within the roll off container may have failed causing any liquid in the waste to leak from the container. Envirite's immediate remedial efforts to contain and clean up this spill appear to have resolved the leaking container issue.

Mike Favor and Dave Lobbestael are the trainers for onsite personnel and the annual 8-Hour Refresher HazWopper training was conducted on February 20, 2010, at the facility location. The annual training file records for Eric S. Dunlevy, Production Supervisor, were reviewed by Ohio EPA. The February 20, 2010, 8-Hour Refresher HazWopper employee training sign in sheet showing the name of the employees trained and their signatures were also reviewed by Ohio EPA.

No changes in the Contingency Plan were noted as of this time.

The inspection logs for November, December, 2009 and January, February, March and April, 2010 were reviewed. Dan McCroskey, Jeffrey Schleappi and Mike McConnell, Envirite employees, were noted as the inspectors on the forms. All appeared O.K.

The following manifest files were reviewed:

The following outbound manifest files were reviewed (Envirite as the Generator):

Yellow file folder and LDR for the 2010 shipments to Vickery Environmental including 4200 gallons of RQ HW Liquid (D007) shipped on 03/12/10; Red file, EQ Michigan Disposal and LDR for 16 drums shipped on 1/11/2010.

The following inbound manifest files were reviewed: Blue file, December, 2009, Q.R.S including Republic Engineered Products, Canton (OHR000110197), LMF Baghouse Dust and Flex Cast Baghouse Dust; Tony informed me that the LDR's for Republic are in the Compliance File for the facility.; LDR's and Manifests for Sharon Tube Company, Wheatland Division, D002, K062, NWW, 11/11/09. All appeared O.K.

-Crushed drums are being recycled offsite for scrap; plastic drums are being shredded and recycled; all drums are cleaned before each process.

-A dust collector has been added to the SPU area to collect fugitive dust per the oversight of the local air authority. The residual dust collected in the unit is treated in the SPU according to onsite treatment protocol.

-The staging area still remains functional and Envirite continues to make minor improvements to prevent the potential for releases such as adding curbing along containment areas and process areas.

TSD Checklist
May 24, 2010

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? [Condition A.26] 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, or the rules adopted there under, which may endanger human health or the environment? If so: Yes No N/A RMK# _____
- a. Did the facility immediately report the following to Ohio EPA's Emergency Response Unit? [Condition A.20]
- i. Information concerning a release of any hazardous waste that may cause an endangerment to 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 and telephone number of the owner/operator? Yes No N/A RMK# _____
- B. Name, address and telephone number of the 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's Emergency Response Unit and DHWM within five days of becoming aware of the circumstances reported in Questions No. 5? If so, did the report contain: [Condition A.21] Yes__ No N/A RMK#___
- a. A description of the noncompliance and its cause (including exact dates and times)? Yes__ No N/A RMK#___
- b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? and Yes__ No N/A RMK#___
- c. Steps taken or planned to minimize the impact on the environment and to reduce, eliminate and prevent recurrence of the noncompliance? Yes__ No N/A RMK#___
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? [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? [Condition A.8] 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#___
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 properly submitted such facts or corrected information to the appropriate entity? [Condition A.24] Yes__ No N/A RMK#___

PERMIT MODIFICATION, REVISION, REVOCATION See General Remarks above for modifications.

- 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# _____
- 11. Has the permit, been transferred to a new owner/operator? If so: Yes No N/A RMK# _____
 - a. Has the transfer been conducted in accordance with ORC Chapter 3734. and the rules adopted there under which includes the permittee notifying the new owner in writing of the requirements of ORC Chapter 3734. and the rules adopted there under and the applicable Ohio hazardous waste rules before transferring ownership? [Condition A.18] Yes No N/A RMK# _____
- 12. Has the permittee submitted reports in any compliance schedule of the permit to Ohio EPA no later than 14 days following each scheduled date, unless otherwise specified? [Condition A.19] Yes No N/A RMK# _____
- 13. Has the permittee furnished relevant information which Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, to determine compliance with 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. Is the permittee maintaining 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. Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14(c)] Yes No N/A RMK# _____
- 17. Is the permittee planning any physical alterations or additions to any permitted portions of the facility? If so: Yes No N/A RMK# _____
 - a. Has the permittee given notice to the director of such alterations/additions? [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 there under? Yes No N/A RMK# _____

REMARKS

RECORDKEEPING/OPERATING REQUIREMENTS

OPERATING RECORD

1. In accordance with OAC rules 3745-54-73 and 3745-54-74 and Conditions B.21 and A.28 of the permit, does the permittee maintain an Operating Record 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 Chapter 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#
 - h. For disposal facilities, location and quantity of each hazardous waste record on a facility map and cross-references to manifest document numbers? [3745-54-73(B)(2)] Yes No N/A RMK#

DOCUMENTS TO BE MAINTAINED AT FACILITY

2. In accordance with Condition A.28 of the permit, is the permittee maintaining the following documents at the facility:
- a. Waste analysis plan in accordance with OAC rule 3745-54-13? Yes No N/A RMK#
 - b. Contingency plan in accordance with OAC rule 3745-54-53? Yes No N/A RMK#
 - c. Closure plan in accordance with OAC rule 3745-55-12? Yes No N/A RMK#
 - d. Cost estimate for facility closure in accordance with OAC rule 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 rule 3745-54-16? [Condition B.6] Yes No N/A RMK# Mike Favor is the Envirite Trainer for all facilities. Dave Lobbestael assists with training also.

- f. Inspection schedules developed in accordance with OAC rules 3745-54-15, 3745-55-74 and 3745-55-95? [Condition B.5] Yes No N/A RMK# _____
- g. Operating record in accordance with OAC rule 3745-54-73? [Condition B.21] Yes No N/A RMK# _____
- h. Post-closure plan, as required by OAC rule 3745-55-18(A)? Yes No N/A RMK# _____
- i. Annually-adjusted cost estimate for facility closure and post-closure, as required by OAC rules 3745-55-42 and 3745-55-44? [Condition A.28(a)(viii)] 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 date of inspection? [Condition B.5] Yes No N/A RMK# _____
4. Have any of the documents in Question No. 2 been revised? [Condition A.15] If so: Yes No N/A RMK# Includes inspections of staging area as part of approved modification.
- a. Has the permittee submitted the revisions to Ohio EPA in accordance with OAC rule 3745-50-51? Yes No N/A RMK# _____
- b. Have all requirements of OAC rule 3745-50-51 been met, including, where required, Ohio EPA approval? Yes No N/A RMK# _____

ANNUAL REPORT REQUIREMENT

5. Is the permittee complying with annual report requirements set forth in OAC rule 3745-54-75 and the additional report requirements set forth in OAC rule 3745-54-77? [Condition B.24] Yes No N/A RMK# Ohio EPA's records show that Kenneth Nisly, Corporate Engineer, signed Envirite's 2009 Annual Report to Ohio EPA on March 5, 2010.
- This writer discussed this issue with Paula Canter, CO, on June 8, 2010 and found that there were extenuating circumstances that may have caused a TSD's submittal of annual report data to be delayed.

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS A detailed review of Envirite's waste analysis plan including sampling and analysis was not conducted during this inspection. On January 23, 2005, Envirite received a Class 1 acknowledgment to the Waste Analysis plan to allow for use of generator knowledge.

6. In compliance with Condition A.12(b) of the permit, do the permittee's records 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. In accordance with 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#
9. Has Ohio EPA requested submittal of any reports or other information from the permittee? If so: Yes No N/A RMK#
- a. Have the submittals been signed and certified according to OAC rule 3745-50-42? [Condition A.13] Yes No N/A RMK#

REMARKS

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 in accordance with Condition A.29 (a) and OAC rule 3745-54-73? Yes No N/A RMK#

2. Did the permittee submit the waste minimization report to Ohio EPA, OCAPP and NE District Office within 180 days of journalization of this permit? And updates biennially thereafter? [Condition A.29(c)] Yes No N/A RMK#

3. Has the permittee reduced the amount of waste (hazardous waste, solid waste, air emission, waste water discharges, etc.) this year generated at their facility by implementing pollution prevention/waste minimization? Yes No N/A RMK#

Envirite's 2009 Annual Report has the following statement: Envirite of Ohio, Inc. has a program in place to reduce the volume and toxicity of hazardous wastes generated to the degree determined to be economically practicable, and the methods of treatment, storage, and disposal utilized are those practicable methods currently available which minimize the present and future threat to human health and the environment.

4. Has the permittee's company saved much money this year by implementing pollution prevention (reducing raw material usage, disposal fees, energy savings, etc.)? Yes No N/A RMK#

Envirite and AJYL continue to operate under the approved variance to recycle metal bearing hazardous wastes and recover valuable metals.

NOTE: If this facility is inspected two times a year, the information obtained in questions 3 & 4 only needs to be collected one time for the calendar year.

REMARKS

GROUND WATER MONITORING Ground water monitoring is not applicable at this time.

1. Has the permittee conducted semi-annual sampling of their monitoring wells? Yes No N/A RMK#

2. Have they reported the results in the Annual Report to the director by March 1st as required by Condition B.24? Yes No N/A RMK#

REMARKS

WASTE ACCEPTANCE AND GENERATION

1. Is the permittee storing any containers of hazardous waste received from any off-site source that permittee is not permitted to store? [Condition A.1.] Yes No N/A RMK#

2. Has the permittee arranged to receive hazardous waste from a foreign or off-site source that the permittee is not permitted to store? [Condition A.1.] 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, as required by OAC rule 3745-54-12(A)? [Condition B.2(a)] Yes No N/A RMK#
According to discussions with Anthony Dugan Envirite submits the appropriate notification information. For specifics, see the May 15, 2009 inspection report.

REMARKS

During this inspection Kris Coder reviewed the outbound and inbound manifests as noted above in the General Remarks discussion.

OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS

1. Is the permittee complying with the following manifest requirements set forth in OAC Chapter 3745-52 and OAC rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76: [Condition B.23]
- a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, U.S. EPA Form 8700-22 and, if necessary, U.S. EPA Form 8700-22A in compliance with OAC rule 3745-52-20(A)? Yes x No N/A ___ RMK# ___
- b. The manifest form used contains all information required by OAC rule 3745-52-20 and the minimum number of copies required by OAC rule 3745-52-22? Yes x No N/A ___ RMK# ___
- c. The permittee has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with OAC rule 3745-52-20(B)(C)(D)? Yes x No N/A ___ RMK# ___
- d. Prepared manifests have been signed by the permittee and initial transporter in compliance with OAC rule 3745-52-23? Yes x 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 rules 3745-52-40 and 3745-54-71(A)(5)? Yes x 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#

Transporters: **Envirite of Ohio, Inc. is a registered transporter of Hazardous Waste.**

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(A)] 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#
- b. Are any significant discrepancies in the manifest, as defined in 3745-54-72(A) noted in writing on the manifest document? 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. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-54-76(A) been submitted to the director within 15 days? Yes No N/A RMK# **None noted during this inspection.**

WASTE ANALYSIS/WASTE ANALYSIS PLAN A detailed review of Envirite's waste analysis plan including sampling and analysis was not conducted during this inspection.

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 3745-57, 3745-218 and 3745-270 and the terms and conditions of the permit? [Condition B.3] Yes No N/A RMK#

2. Does the permittee follow the procedures described in the WAP (Application _ Section 2 ___)? [Condition B.3] Yes No N/A ___ RMK# ___
3. In accordance with OAC rule 3745-54-13(A)(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] Yes No N/A ___ RMK# ___
4. **FOR 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 [3745-54-13(c)]? Yes No N/A ___ RMK# ___
5. **FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER OAC 3745-270-04(A):**
Does the waste analysis plan include procedures and schedules for:
- i. The sampling of impoundment contents? [3745-54-13(B)(7)] Yes ___ No N/A RMK# ___
- ii. The analysis of test data? [3745-65-13(B)(7)] Yes ___ No N/A RMK# ___
- iii. The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either do not meet treatment standards (OAC 3745-270-40 to 3745-270-49) or where no treatment standards have been established? [3745-54-13(B)(7)] Yes ___ No N/A RMK# ___
6. **Where applicable:** The methods which will be used to meet additional waste analysis requirements for specific waste management methods specified in rules 3745-54-17, 3745-57-14, 3745-57-41 and 3745-270-07 of the OAC? [3745-54-13(B)(6)] Yes ___ No N/A RMK# ___
7. Does the permittee place the results of all waste analyses in the facility operating record in accordance with OAC rule 3745-54-73? Yes

REMARKS

GENERAL INSPECTION REQUIREMENTS

1. Is the permittee following the inspection procedures and schedules as set forth in the permit (section 4 of the approved Part B permit application) and the requirements of OAC rules 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 inspecting: monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment as specified in OAC rule 3745-54-15(B)? Yes No N/A RMK#
- a. Is the schedule kept at the facility? [OAC rule 3745-54-15(B)(2)] Yes No N/A RMK#
3. Does the permittee remedy deterioration or any malfunctions discovered by an inspection as required by OAC rule 3745-54-15(C)? [Condition B.5] Yes No N/A RMK#
4. In accordance with OAC rule 3745-54-15(D) and Condition B.5 of the permit, do inspection records contain the following information:
- 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 other remedial actions? Yes No N/A RMK#

REMARKS

As noted in the General Remarks section the inspection logs were reviewed by Ohio EPA.

SECURITY REQUIREMENTS

1. Is the permittee complying with the following security provisions of OAC rule 3745-54-14 and Condition B.4 of the permit: [Section 4 of the Part B permit application]
- 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. In accordance with OAC rule 3745-54-14 (C), does the permittee have signs reading "Danger - Unauthorized Personnel Keep Out" posted at each entrance to the to the active portion of the facility and at other locations as needed. Yes No N/A RMK#

FACILITY OPERATIONS

TSD Checklist
May 24, 2010

3. Are construction, maintenance and operations of the facility being conducted to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, ground or surface water? [OAC rule 3745-54-31; Condition B.1] Yes No N/A RMK#
4. Does the permittee properly maintain and operate the facility to achieve compliance with the terms and conditions of the permit including: [Condition A.9]
- 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#

REMARKS

Envirite has appointed Mike Favor to oversee all of the personnel training both here and at other Envirite facilities. Dave Lobbestael also assists in training of personnel. See the General Remarks about personnel training above.

1. Is the permittee conducting personnel training in accordance with the conditions of the permit and with the following requirements of OAC rule 3745-54-16? [Condition B.6] Yes No N/A RMK#
- a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC rule 3745-54-16(A)(B)(C)] Yes No N/A RMK#
- b. The facility provides personnel training to new employees within six months after their date of employment as required by OAC rule 3745-54-16(B)? Yes No N/A RMK#
- c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(C)? Yes No N/A RMK#
2. Is the permittee maintaining personnel training records as required by OAC rule 3745-54-16(D) and of the approved application, including: written job titles, job descriptions and documented employee training records? [Condition B.6] Yes No N/A RMK#

REMARKS

REQUIRED EQUIPMENT

1. Has the permittee equipped the facility with the following emergency equipment as required by OAC rule 3745-54-32 and Condition B.8 of the permit:
- a. An internal communications or alarm system? Yes No N/A RMK#

- b. A device such as a telephone which is 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 in 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 in Question No. 1 to ensure its proper operating in accordance with OAC rule 3745-54-33 and Condition B.9 of the permit? Yes No N/A RMK#
- 3. Whenever hazardous waste is being managed at the facility, has the permittee provided all personnel involved in the operation with immediate access to an internal alarm or emergency communication device as required by OAC rule 3745-54-34 and Condition B.10 of the permit? Yes No N/A RMK#

REMARKS

CONTINGENCY PLAN - EMERGENCY PROCEDURES

- 1. In compliance with Condition B.12 of the permit and OAC rule 3745-54-37(A) and (B), does the permittee:
 - a. Familiarize emergency response agencies with the layout of the facility, associated hazards, places where personnel will normally be working, entrances and possible 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 listed in the approved application with the properties of hazardous waste handled at the facility and the types of injuries or illness that could result from fires, explosions or releases at the facility? Yes No N/A RMK#
- 2. Has a state or local agency declined to enter into the arrangements set forth in OAC rule 3745-54-37(A)? If so: Yes No N/A RMK#
 - a. Has the permittee documented the refusal in the operating record as required by OAC rule 3745-54-37(B)? [Condition B.12(b)] Yes No N/A RMK#
- 3. Has the permittee, in accordance with OAC rule 3745-54-53 submitted a copy of the approved contingency plan (including amendments, revisions or changes) to all local authorities, agencies and response contractors designated in the approved contingency plan? [Condition B.17(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 ten days of the effective date of the change in the plan? [Condition B.17(b)] Yes No N/A RMK#
- 5. Has the permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to the Ohio EPA, Division of Emergency and Remedial Response (DERR) in accordance with OAC rule 3745-54-53? [Condition B.17(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 in compliance with OAC rule 3745-54-54? [Condition B.16] Yes No N/A RMK#

EMERGENCY COORDINATOR

7. In accordance with OAC rule 3745-54-55 and Condition B.18 of the permit, is an emergency coordinator on premises or on call at all times? Yes No N/A ___ RMK# ___
8. In accordance with OAC rule 3745-54-55 and Condition B.18 of the permit, is/are the emergency coordinator(s) at the facility familiar with the following:
- 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. In accordance with OAC rule 3745-54-55, does/do the emergency coordinator(s) have the authority to commit the resources needed to carry out the contingency plan? [Condition B.18] Yes No N/A ___ RMK# ___
10. Does the permittee have a contingency plan for the facility that: [Condition B.19]
- a. Describes the actions facility shall take to comply with OAC rules 3745-54-51 through 3745-54-56 in response to fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil or surface water at the facility? Yes No N/A ___ RMK# ___
 - b. Describes arrangements agreed to by local police, fire departments, and 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 (office and home) 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 a physical description of each item on the list referenced in Question No. 10(d), and a brief outline of its capabilities? Yes No N/A ___ RMK# ___
 - f. Includes an evacuation plan for 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# ___

REMARKS

IMPLEMENTATION OF CONTINGENCY PLAN

11. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility including spill or release of hazardous waste or hazardous waste constituents greater than or equal to 55 gallons; any spill or release of hazardous waste or hazardous waste constituents less than 55 gallons may result in a fire or explosion hazard as determined by the Emergency Coordinator; or any spill on-site that may potentially cause on or off-site soil and/or ground or surface water contamination; any spill or release of hazardous waste or hazardous waste constituents that is reported to the National Response Center or local (city or county) emergency response center because the spill exceeded the "RQ" limits; any fire involving hazardous waste; any explosion involving hazardous waste; 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 rule 3745-54-56? [Conditions B.13 and B.14] Yes__ No N/A RMK#__
- b. Did the permittee immediately notify Ohio EPA's emergency response team using the 24-hour toll free number (800)282-9378 providing the following information: [OAC rule 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 outside the facility? 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 such waste are not hazardous wastes? [Condition B.15] 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#__
- i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.22] 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 approved contingency plan as required by OAC rule 3745-54-56(J)? [Condition B.22] Yes__ No N/A RMK#__

REMARKS

CLOSURE REQUIREMENTS

- 1. Does the permittee maintain the approved closure plan at the facility? [Condition B.26] Yes No N/A ___ RMK# ___
- 2. Is the permittee keeping at the facility and submitting annually to Ohio EPA, the latest closure cost estimate as required by OAC rule 3745-55-42(D) [Condition B.33] Yes No N/A ___ RMK# ___
- 3. Has the permittee amended the closure plan? If so: Yes ___ No N/A ___ RMK# ___
 - a. Has the plan been amended in accordance with OAC rule 3745-55-18(D)? [Condition B.27] Yes ___ No N/A RMK# ___

NOTE: Also see Recordkeeping Requirements (Question #4) in order to verify that any changes to the closure plan were submitted in accordance with OAC rule 3745-50-51.

- 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 required by Condition B.31 of the permit? Yes ___ No N/A RMK# ___
 - b. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.25] Yes ___ No N/A RMK# ___
 - c. Did the permittee carry out the approved closure plan as set found in Section 7 of the approved permit application? [Condition B.26] 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 in accordance with the schedule specified in the approved closure plan and as required by OAC rule 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 as required by OAC rule 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 in accordance with the specifications in the approved closure plan as required by OAC rule 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# ___

REMARKS

POST-CLOSURE MAINTENANCE Not applicable at this time. See C.11 of the Permit, Closure and Post-closure.

- 1. Has the permittee inspected the components, structures, and equipment at the site in accordance with the inspection schedule in §_____ of the permit application on a quarterly basis? [OAC rule 3745-55-17(A)(1)(b)] [Condition] Yes__ No N/A RMK#_____

- 2. Has the permittee conducted and recorded an inspection of at least the following? [Condition] Yes__ No N/A RMK#_____
 - a. Security control devices (gates, locks, fences and signs);
 - b. Erosion control;
 - c. Cover settlement, subsidence and displacement;
 - d. Vegetative cover conditions;
 - e. Integrity of run-on/run-off control measures;
 - f. Cover drainage system functioning;
 - g. Monitor well conditions; and
 - h. Benchmark integrity.

- 3. Is the permittee using the inspection forms found in the approved Part B permit application? [_____ of the approved permit application] Yes__ No N/A RMK#_____

- 4. Have suitable repairs been made within a reasonable amount of time? [Condition] Yes__ No N/A RMK#_____

- 5. Have repairs been indicated on the Notification Repair Form? [Condition] Yes__ No N/A RMK#_____

- 6. Was the Notification of Repair Form submitted to Ohio EPA within one week after determining that repairs are necessary? [Condition] Yes__ No N/A RMK#_____

REMARKS

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

CONDITION OF CONTAINERS

1. Are containers holding hazardous wastes in good condition as required by OAC 3745-55-71? [Condition C.3] If not: Yes_ No N/A ___ RMK# ___ See the General Remarks above regarding the leaking container.
- 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# ___ See the General Remarks above regarding the leaking container.
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 rule 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 rule 3745-55-73? [Condition C.5(b)] Yes No N/A ___ RMK# ___
4. Does the permittee store all containerized hazardous waste on the container storage containment system as described in Condition C.6 of the permit? [Condition C.6] Yes No N/A ___ RMK# ___
5. Management of Containers (OAC 3745-55-73)
(a) All container storage shall be conducted within the container storage units as described in Condition C.1. of the permit and Section 3 of the approved part B permit application. Including Marking and Label requirements, such as, each container accepted must have a hazardous waste label affixed to its side along with other identifying information. [Condition C.5(a)] Yes No ___ NA ___ RMK# ___
5. Is the permittee inspecting the container area weekly in accordance with OAC rule 3745-55-74 and the approved inspection schedule in Section 4 of the Part B permit application to detect leaking containers and deterioration of containers and the containment system? [Condition C.7] 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 rule 3745-54-15(D)? Yes No N/A ___ RMK# ___

CONTAINMENT SYSTEM

6. Does the permittee maintain the containment system as described in the approved permit application, Section 3, including: [Condition C.6] Yes No N/A ___ RMK# ___
- 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? Yes No N/A ___ RMK# ___
7. Has the permittee had a spill or leak of wastes? If so: Yes No ___ N/A ___ RMK# ___ See the General Remarks above about the leaking container.
- a. Was spilled or leaked waste removed in a timely manner? [Condition C.6(c)] Yes No ___ N/A ___ RMK# ___ See the General Remarks above about the leaking container.

AISLE SPACE See note below about aisle space.

8. Is the permittee maintaining adequate aisle space to allow unobstructed movement of personnel and equipment in the event of an emergency as required by OAC rule 3745-54-35 and Condition B.11 of the permit?

Yes No N/A ___ RMK# No aisle space problems were noted at the liquids unloading area/permitted hw liquids container storage area on the south side or at any other location in the facility, including the SPU, staging area and the permitted solids storage area (roll-off containers) on the north side.

REMARKS

LAND DISPOSAL RESTRICTION REQUIREMENTS LDR's were noted during the manifest inspection of generators sending wastes to Envirite and for wastes shipped offsite by Envirite.

NOTE: In order to determine compliance with all applicable LDR requirements the inspector may need to complete the separate LDR checklist:

1. Does the permittee comply with all applicable regulations regarding land disposal prohibitions and restrictions as required by OAC Chapter 3745-270? Yes No N/A ___ RMK# ___
2. Does the permittee comply with the notification and certification requirements of OAC rule 3745-270-07(A)? Yes No N/A ___ RMK# ___
3. Does the permittee comply with the requirements of OAC rule 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 rule 3745-270-07(A)(5)? Yes No N/A ___ RMK# ___
- a. Are copies of all notices, certifications, demonstrations, waste analysis and other documentation produced pursuant to OAC Chapter 3745-270 retained for a period of three years as required by OAC rule 3745-270-07(A)? Yes No N/A ___ RMK# ___
5. Is the permittee in compliance with the requirements of OAC rule 3745-270-50 regarding the storage of wastes restricted or prohibited from land disposal under OAC rule 3745-270-50? Yes No N/A ___ RMK# ___

REMARKS

CORRECTIVE ACTION This is not applicable at this time. See the General Remarks section regarding Envirite's Corrective Action Status in the May 15, 2009 inspection report.

1. Has the permittee submitted the monthly progress report for all corrective action activities? (This report is due by the 15th of the month following the reporting period.) [Condition ____] Yes ___ No N/A RMK# ___
2. Has the permittee identified any new WMUs or releases at the facility? [Condition E.10]? If so: Yes ___ No N/A RMK# ___
- a. Did the permittee follow the steps indicated in Conditions E.10(a) and (b) and E.11? Yes ___ No N/A RMK# ___

**GENERATOR LDR CHECKLIST
DOES NOT APPLY TO CESQGS**

GENERAL REQUIREMENTS

1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07 (A)(7)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		Envirite requires generators whose wastes are subject to LDR and ship their wastes to Envirite to comply with the tracking and record keeping requirements of OAC 3745-270-07. Envirite's personnel and other Analytical Services personnel may provide technical assistance.
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07 (A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).</i></p>		
3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.</i></p>		
6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.</i></p> <p><i>NOTE: Written documentation of this determination is not required.</i></p>		
7.	Did the generator treat his HW /soil on-site <u>to meet</u> the LDR treatment standard?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE If a Yes @ see question #16.</i></p>		
8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility?[3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTIFICATION FORM

11.	Does the LDR Notification form contain the following information:	
-----	---	--

a.	Manifest number of the first waste shipment to the TSD?[3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)].	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.		
e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories		
f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.		
g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for?[3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> F039, only.
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.		
PROHIBITED DILUTION		
12.	Is the HW treated by burning? If <input type="checkbox"/> No, go to #15.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
13.	Is the HW a metal-bearing HW?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.		
14.	a. Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless one of the following conditions apply. [3745-270-03(c)]	
	i. Contains > 1% TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	ii. Contains organic constituents or cyanide at levels greater than the UST levels?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iii. Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iv. Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	v. Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. If all responses to 14 a.i. through 14 a.v. are <input type="checkbox"/> No, HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Was the HW treated by wastewater treatment?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	a. Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: If Yes, HW is improperly being treated by dilution.		

b.	Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: If the answers to b & c are *Yes* and *No*, respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B) and 3745-270-40(A)(3)].

NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.

GENERATOR TREATMENT

16.	Does the generator treat to meet LDRs on-site [3745-270-40(A)]?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	If <i>Yes</i> ...complete the rest of the checklist. If <i>No</i> ...stop...you are done.	
a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: This is a laboratory analysis but it does not have to be kept by the generator.

c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTIFICATION FORM

17.	a.	Contains all information in #11 a-g above and	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	If the treated HW/soil is listed.....notification contains the following certification statement: I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:	
	i.	Send a one-time notification to the director?[3745-270-09(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	ii.	Maintain a copy of the notice onsite?[3745-270-09(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iii.	Include in the notification: [3745-270-09(D)(1)(a)]	
	1.	Name & address of receiving landfill?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	2.	Description of HW when generated?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

		3.	HW code when generated?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
		4.	Treatability group when generated?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
		5.	Underlying hazardous constituents present when generated?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
		iv.	Contain the right certification statement as required by 3745-70-07(b)(4)?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>

TSD LDR CHECKLIST

TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS			
1.	Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13? [3745-270-07(B)]	Yes	x No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745 27 007(B)(3)]	Yes	x No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: No further notification is necessary until such time that the waste changes or the receiving facility changes.</i>			
3.	Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07? [3745-270-07(B)(3)]	Yes	x No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Are wastes or treatment residues being sent to another TSD to be further managed? If so:	Yes	x No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)]	Yes	x
5.	Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? If so:	Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A x
a.	Has the treatment facility (recycler) sent to the director a notice (with information listed in 3745-270-07(B)(3) excluding the manifest number), with each shipment of waste? [3745-270-07(B)(6)]	Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A x
b.	Has the treatment facility (recycler) sent to the director a certification (as described in 3745-270-07(B)(4)), with each shipment of waste? [3745-270-07(B)(6)]	Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A x
6.	Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)]	Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A x
7.	Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have:	Yes	x No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Copies of all notices and certifications required in 3745-270?	Yes	x No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49?	Yes	x No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	The testing frequency specified in the facility's WAP and have they followed the protocol?	Yes	x No <input type="checkbox"/> N/A <input type="checkbox"/>
HAZARDOUS DEBRIS			
8.	Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)?	Yes	x No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49?	Yes	x No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so:	Yes	x No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)]	Yes	x No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: If immobilization has been used in a treatment train, it must be the last treatment technology used.</i>			
11.	Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so:	Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A x
a.	Was immobilization the last treatment technology used? [3745-270-45(A)(3)]	Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A x
12.	Is the waste a PCB waste under 40 CFR Part 761? If so:	Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A x
a.	Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)]	Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A x
13.	Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)]	Yes	x No <input type="checkbox"/> N/A <input type="checkbox"/>
14.	Does the owner/operator of a treatment facility that claims the debris is excluded from regulation as a hazardous waste under 3745-51-03(F)(1) maintain the following information?	Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A x
a.	Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)]	Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A x

	b.	Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
	c.	A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
15.		Does the notification of an owner/operator who first claims the debris is excluded under 3745-51-03(F)(1) have the following information: [3745-270-07(D)(3)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
	a.	Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
	b.	Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
	c.	Technology used from Table 1? [3745-270-07(D)(1)(c)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
16.		Has the above notification been sent to the director? [3745-270-07(D)(1)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>

LARGE QUANTITY GENERATOR REQUIREMENTS

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

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

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

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

Safety
Equipment
Used:

Hardhat, steel toed shoes, safety glasses w/side shields

General Remarks: See previous remarks in TSD checklist (Ohio Part B Permitted Facility RCRA Inspection Checklist) for the May 24, 2010 inspection.

GENERAL REQUIREMENTS

- 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A
- 2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] Yes No N/A
- 3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes No N/A
- 4. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] Yes No N/A
- 5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] Yes No N/A
- Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] Yes No N/A
- 7. Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] Yes No N/A
- 8. Does the generator accumulate hazardous waste? Yes No N/A

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

- 9. Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)? Yes No N/A

NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G) & (H).

- 10. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]
 - a. Container that meets 3745-66-70 to 3745-66-77? Yes No N/A
 - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? Yes No N/A
 - c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A
 - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

11. Does the generator export hazardous waste? If so:
- | | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|--------------------------|---|
| Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| b. Has the generator complied with special manifest requirements? [3745-52-54] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| d. Has an annual report been submitted to U.S. EPA? [3745-52-56] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| e. Are export related documents being maintained on-site? [3745-52-57(A)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |

MANIFEST REQUIREMENTS See comments in the General Remarks Section of the TSD checklist.

12. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)]
- | | | | | | |
|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)]
- | | | | | | |
|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
|-----|-------------------------------------|----|--------------------------|-----|--------------------------|

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]

14. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]
- | | | | | | |
|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
|-----|-------------------------------------|----|--------------------------|-----|--------------------------|

NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].

15. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]
- | | | | | | |
|-----|--------------------------|----|--------------------------|-----|-------------------------------------|
| Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
|-----|--------------------------|----|--------------------------|-----|-------------------------------------|
16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)]
- | | | | | | |
|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
|-----|-------------------------------------|----|--------------------------|-----|--------------------------|

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

17. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]
- | | | | | | |
|-----|--------------------------|----|--------------------------|-----|-------------------------------------|
| Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
|-----|--------------------------|----|--------------------------|-----|-------------------------------------|
18. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]
- | | | | | | |
|-----|--------------------------|----|--------------------------|-----|-------------------------------------|
| Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
|-----|--------------------------|----|--------------------------|-----|-------------------------------------|
19. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]
- | | | | | | |
|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
|-----|-------------------------------------|----|--------------------------|-----|--------------------------|

NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.

PERSONNEL TRAINING See comments in the General Remarks Section of the TSD checklist.

20. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]
- | | | | | | |
|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
21. Does the personnel training program, at a
- | | | | | | |
|-----|-------------------------------------|----|--------------------------|-----|--------------------------|
| Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
|-----|-------------------------------------|----|--------------------------|-----|--------------------------|

minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)]

22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A
23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes No N/A
24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A
25. Does the generator keep records and documentation of:
- a. Job titles [3745-65-16D(1)]? Yes No N/A
- b. Job descriptions [3745-65-16D(2)]? Yes No N/A
- c. Type and amount of training given to each person [3745-65-16D(3)]? Yes No N/A
- d. Completed training or job experience required [3745-65-16D(4)]? Yes No N/A
26. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes No N/A

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date Trained</u>

CONTINGENCY PLAN See comments in the General Remarks section of the TSD checklist.

27. Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes No N/A
28. Does the plan describe the following:
- a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes No N/A
- b. Arrangements with emergency authorities [3745-65-52(C)]. Yes No N/A
- c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes No N/A
- d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes No N/A
- e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes No N/A

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

29. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes No N/A
- Has the generator revised the plan in response to

30 rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] Yes No N/A

31 Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes No N/A

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

EMERGENCY PROCEDURES

32 Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes No N/A

a. Was the contingency plan implemented? [3745-65-51(B)] Yes No N/A

b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes No N/A

c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes No N/A

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

PREPAREDNESS AND PREVENTION

33 Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes No N/A

34 Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:

a. Internal communications or alarm system? [3745-65-32(A)] Yes No N/A

b. Emergency communication device? [3745-65-32(B)] Yes No N/A

c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes No N/A

d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes No N/A

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

35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes No N/A

36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A

37. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] Yes No N/A

38. If there is only one employee on the premises, is there immediate access to a device (ex. phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] Yes No N/A

39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A

40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes No N/A

41. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes No N/A

TELLITE ACCUMULATION AREA REQUIREMENTS One 55 gallon satellite drum is located in the lab for lab solvents, other smaller satellites are located within the other sections of the lab.

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

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

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS No obvious <90 day containers were noted during this inspection. However, standard operating procedures require that the processed residuals from the LPU and SPU are be retained onsite pending verification. Once it is determined that the waste in the container meets the required treatment standards, it is released for offsite disposal.

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

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

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. Yes No N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes No N/A
49. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes No N/A
50. If the generator places incompatible wastes, or incompatible wastes and materials in the same

container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]

A

51. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]
- Yes No N/A

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

52. If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]
- Yes No N/A

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

53. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]
- Yes No N/A
54. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)]
- Yes No N/A
55. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]
- Yes No N/A

TANK SYSTEM REQUIREMENTS (OAC rule 3745-55-92 through OAC rules 3745-55-99 and Permit Module D-Tank Storage, Treatment and Management)						
SECONDARY CONTAINMENT OAC 3745-55-93						
1.	Is secondary containment, in the form of double walled steel tanks for the six SPU tanks and external liner for the two blenders, being provided for all the permitted hazardous waste tanks located in the in the Solids Processing Unit # 1? [3745-55-93 (B) through (F) and Section 3 of the application]	Yes	x	No	<input type="checkbox"/>	N/A <input type="checkbox"/>
2.	Has the permittee operated the secondary containment systems in accordance with the design plans and descriptions in Section 3 of the application? [Condition D. 3]	Yes	x	No	<input type="checkbox"/>	N/A <input type="checkbox"/>
3.	Is the liner system in the tanks secondary containment system compatible with the waste stored or treated?	Yes	x	No	<input type="checkbox"/>	N/A <input type="checkbox"/>
4.	Is the liner system provided with a leak detection system designed/operated to detect failure to the primary or secondary containment or any release of hazardous waste within 24 hours or at the earliest practicable time?	Yes	x	No	<input type="checkbox"/>	N/A <input type="checkbox"/>
TANK SYSTEM – GENERAL OPERATING REQUIREMENTS OAC 3745-55-94						
5.	Does the permittee follow the general operating requirements below:					
a.	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?[3745-55-94(A)]	Yes	x	No	<input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Does the permittee use appropriate controls to prevent spills or overflows from the tank or containment systems using the methods described in the application? [3745-55-94(B)] [Condition D. 4 (a)]	Yes	x	No	<input type="checkbox"/>	N/A <input type="checkbox"/>
c.	If a leak or spill has occurred in the tank system, the permittee will comply with 3745-55-96? [3745-55-96] [Condition D. 4(b)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A x
TANK SYSTEM – INSPECTION REQUIREMENTS OAC 3745-55-95 (A) (B) (C) (D) and 3745-55-96						
6.	Has the permittee conducted and documented the inspections of the tanks system in accordance with the inspection procedures in Sections 3 and 4 and other applicable parts of the application? [Condition D. 5]	Yes	x	No	<input type="checkbox"/>	N/A <input type="checkbox"/>
7.	Has the permittee documented these inspections in the operating recording, including but not limited to the inspections of the following:					
a.	Spill control equipment each operating day, including overfill controls, if applicable?	Yes	x	No	<input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Above ground portion of tank system to detect corrosion or releases of waste, each operating day?	Yes	x	No	<input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Data gathered from monitoring and leak detection equipment to ensure that the tank system is being operated according to its design, each operating day?	Yes	x	No	<input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste, each operating day?	Yes	x	No	<input type="checkbox"/>	N/A <input type="checkbox"/>
e.	Yearly Tank Inspections, Section 3.13.1.3, of the application: The permittee has a written program to thoroughly inspect each hazardous waste tank on an annual basis. Has the permittee inspected each hazardous waste tank on an annual basis?	Yes	x	No	<input type="checkbox"/>	N/A <input type="checkbox"/>
8.	Has the permittee had any leaks, spill or releases from the tank system? [3745-55-96] [Condition D.6]	Yes	<input type="checkbox"/>	No	x	N/A <input type="checkbox"/>
9.	If so, has the permittee responded to the leaks, spills or releases in accordance with Condition D.6? [3745-55-96]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A x
10.	Were all releases from the tank system to the environment (other than those into the secondary containment) reported to the Ohio EPA (Director) within 24 hours? [Condition D.6] [3745-55-96]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A x
11.	Was a written report submitted to the Director within 30 days of detecting the release that addresses the elements in Condition D. 7 (b)? [3745-55-96]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A x
12.	If major repairs to a tank system were required, was a certification submitted to Ohio EPA (Director) within seven (7) days after returning the tank system to use? [3745-55-96]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A x
13.	If the permittee was unable to repair and return the tank to service, was the tank system closed in accordance with 3745-55-97? [Condition D. 6.(b)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A x
14.	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	x	No	<input type="checkbox"/>	N/A <input type="checkbox"/>

15.		Is the permittee following the special provisions for ignitable and reactive wastes specified in Condition D.9?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	reactive waste only, if applicable
16.		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	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	
17.		Is the permittee following the special provisions for incompatible wastes specified in Condition D. 10?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	
18.		Has the permittee placed incompatible waste or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material? a. If so, have the requirements of 3745-55-99 been met? or	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>	
19.		b. The tank is used solely for emergencies? [3745-55-98(A)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>	
20.		If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (1996)? [Condition D.9 (b)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>	
NOTE: "Each operating day" is each day that the tank system is being used to manage (store or treat) hazardous waste.									
21.		Where applicable, the permittee must confirm the proper operation of the cathode protection system within six months of initial installation and annually thereafter? [3745-55-95(C)(1)]	Yes		No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>	
22.		Where applicable, all sources of impressed current must be inspected or tested as appropriate at least bi-monthly? [3745-55-95(C)(2)]	Yes		No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>	
23.		The permittee must document in the operating record the inspection of these items.	Yes		No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>	
TANK SYSTEM CLOSURE and Post-closure Care									
24.		At closure the of the tank system(s), the permittee shall follow the procedures in the Facility Closure Plan Section 7 of the application? [Condition D.8. (a)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>	
25.		If not all contaminated soils can be practically removed or decontaminated in the tank system(s), then post-closure care must be preformed according to the Closure Plan and Post-Closure Plan in the application. [Condition d. 8 (b)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>	
TANK SYSTEM – WASTE ANALYSIS REQUIREMENTS									
26.		In addition to conducting the waste analysis required by 3745-54-13 and the permittee's waste analysis plan, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the permittee done one of the following: [3745-66-100]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	
	a.	Conducted waste analysis and trial treatment or storage tests? [; OR	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>	
	b.	Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-55-94 (General Operating Requirements?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>	
TANK SYSTEMS ASSESSMENTS OF THE PART B									
27.		Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-55-92(A)] The permittee shall construct the tank system in accordance with Section 3 of the application. [Condition D.2.]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	
28.		Prior to operation of the newly constructed tanks system the permittee shall submit the certification of installation of the new tank system in accordance with 3745-55-92 (B). [Condition D. 2.]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	
29.	ii.	If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	
30.	iii.	Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	
SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION									
31.		Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, groundwater, or surface water and is it capable of detecting and collecting releases and accumulated liquids? [3745-55-93] [Condition D.3.]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	
32.		Does the secondary containment system meet the following minimum requirements of [3745-55-93(C)]:							

a.	Constructed or lined with compatible materials of sufficient strength to prevent failure? [3745-55-93(C)(1)]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
b.	Placed on a foundation or base capable of providing support? [3745-55-93(C)(2)]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
c.	Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time? [3745-55-93(C)(3)]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
d.	Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? [3745-55-93(C)(4)]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
e.	Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner? [3745-55-93(C)(4)]	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
ANCILLARY EQUIPMENT REQUIREMENTS 3745-55-93							
33.	Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	If not, is the ancillary equipment one of the following:						
a.	Above ground piping (exclusive of flanges, joints, valves and connections) that is inspected daily?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
b.	Welded flanges, welded joints and/or welded connections that is inspected daily?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
c.	Sealless or magnetic coupling pumps and/or sealless valves?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
d.	Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown and/or loss of pressure-actuated shut-off devices) that is inspected daily?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>

Envirite does treatment and storage operations in the SPU #1 permitted hazardous waste treatment /storage area which consist of six tanks set in the floor of the building within reinforced concrete bins and two blending tanks located above. The six tanks in the floor are open top tanks which allow for mixing of wastes with a track hoe. These steel tanks are provided with secondary containment provided by the use of double walled steel tanks. Electronic leak detection devices are located in the interstitial space between the tanks two steels walls. The leak detection system is inspected daily for leaks or malfunction. The two blender tanks are fabricated vat/agitator stainless steel tanks. The blenders are provided with secondary containment. As noted in the General Remarks of the TSD inspection Checklist, Envirite was doing some minor maintenance on the tanks and the clam shell of the SPU on the day of the inspection.

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

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 generator manage used oil in a surface impoundment or waste pile? If yes:	Yes	<input type="checkbox"/>	No	x	N/A	<input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	x
<i>NOTE: For example, used oil contaminated scrap metal stored in a pile.</i>							
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes	<input type="checkbox"/>	No	x	N/A	<input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes	<input type="checkbox"/>	No	x	N/A	<input type="checkbox"/>

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).

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,	Yes	<input type="checkbox"/>	No	x	N/A	<input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	x
<i>NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.</i>							
5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	x

NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks, or containers, or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes	x	No	<input type="checkbox"/>	N/A	<input type="checkbox"/> See the notes in the General Remarks Section of the TSD checklist.
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes	x	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil"? [3745-279-22(C)]	Yes	x	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	x
a.	Stopped the release?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	x
b.	Contained the release?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	x
c.	Cleaned up and properly managed the used oil and other materials?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	x
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	x

ON-SITE BURNING IN SPACE HEATER

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:						
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	x
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	x
c.	Are the combustion gases from heater vented to the ambient air?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	x

<i>NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).</i>		
GENERATOR TRANSPORTATION		
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).</i>		
COLLECTION CENTERS AND AGGREGATION POINTS		
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.</i>		