



State of Ohio Environmental Protection Agency

Northeast District Office

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Ted Strickland, Governor
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December 26, 2007

RE: ROSS INCINERATION SERVICES, INC.
OHD 048 415 665
OHIO ID# 02-47-0295
TSDf/LQG, NOV

Ms. Patricia Lawson, Director
Corporate EHS, Security & Risk Management
Ross Incineration Services, Inc.
36790 Giles Road
Grafton, OH 44044

Dear Ms. Lawson:

On October 23 and 24, 2007, Ohio EPA conducted a Compliance Evaluation Inspection of Ross Incineration Services Inc. (RIS). RIS is located in Eaton Township at 36790 Giles Road in Grafton, Ohio. The purpose of the inspection was to determine RIS's compliance with the Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC), Chapter 3745 of the Ohio Administrative Code (OAC), and with RIS's Ohio Hazardous Waste Facility Installation and Operation Permit effective September 30, 2003. Ohio EPA was represented by Neil Wasilk, Wade Balser and myself, John Paquelet. RIS was represented by you, Jeff Lenchak, Debbie Bishop, Bill Cosgriff, Chad Colman, Susan Kaiser, Nick Maoloni and Ron Birch.

Ohio EPA's inspection report includes findings from the walk-through of the facility on October 23, 2007, and those issues noted during the review of facility records and interviews with facility personnel. The following written documentation was reviewed for compliance with Ohio's hazardous waste laws and regulations: contingency plan implementation reports, operating record retention system, training records, manifests, inspection logs, work orders, incinerator operating logs, and inventory records.

The following violations were identified by Ohio EPA based on the observations made during the inspection:

1. OAC Rule 3745-52-34(A)(2) Accumulation Date Must be Clearly Marked on Containers Used to Accumulate Hazardous Waste.
OAC Rule 3745-52-34(A)(3) Containers Used to Accumulate Hazardous Waste Must be Labeled With The Words Hazardous Waste.

During the CEI walk-through, a metal tote, was found in a roll-off containing scrap steel intended for recycle, was observed in the bone yard. The tote had been processed through the incinerator. It was noted that not all of the ash residue from incineration (the tote was holding approximately 5 gallons of ash) had not been removed from the inside of the tote. RIS incineration ash is a hazardous waste. The container was not marked with the accumulation date and was not labeled with the words "hazardous waste". This violation was abated at the time of the inspection by an RIS employee removing the tote from the roll-off and then removing the ash from the tote for proper disposal.

2. OAC Rule 3745-55-73 Management of Containers.
Condition C.5 (a) of the Operation Permit .

When inspecting the process dock it was observed that a flat bed trailer #124, containing bulk re-packed containers, was located in the south west bay. Ohio EPA asked how long the flat bed had been at that location and it was reported that it had been placed there during the previous night. RIS' scanned documentation for the flat bed's location indicated that the scanned location for the flat bed was the Container Storage Facility (CSF).

The Process Dock is not a permitted storage area for containers of hazardous waste. Hazardous waste can be placed at the Process only for a processing step such as sampling and repacking. This violation was abated at the time of the inspection by moving the flat bed to the CSF.

3. OAC Rule 3745-273-13(D)(1). Small Quantity Handlers of Universal Waste Lamps Must Manage Lamps Appropriately.

When inspecting the storage of RIS-generated universal waste, it was observed that one of the containers that was storing used lamps was not closed. This violation was abated during the inspection by closing the container.

4. OAC Rule 3745-55-96(F). Permittee Must Certify Major Repairs to Hazardous Waste tanks.

While inspecting the closed loop scrubber system, we observed a repair that had been made to the Maintenance Storage Tank (MST) during a shutdown in the spring of this year. The MST is used to store excess scrubber water and precipitated sludge which are hazardous wastes. The MST is a permitted hazardous waste storage tank, and is also known as Tank 75.

The repair was to a fiberglass drain line leading from the MST that began to leak between the tank and the valve. This repair consisted of entombing the line and valve in a large concrete block.

All major repairs to permitted hazardous waste tanks require a Professional Engineer's Certification. Ohio EPA had previously informed RIS that, while a replacement of a leaking length of pipe was not a major repair, and that the short term use of the concrete block to control the leak until the leaking pipe could be expeditiously replaced, was not a major repair. Long term use of the concrete block as part of the tank system was a major repair and is required a Professional Engineer's Certification. No Professional Engineer's Certification had been submitted at the time of the CEI.

During the CEI, RIS presented Ohio EPA with a letter dated October 23, 2007, detailing a compliance schedule for making permanent repairs to the MST by removing the concrete block and replacing the leaking piece of pipe. The date proposed for completing the repairs is January 29, 2008.

To return to compliance, RIS must complete the repairs as outlined and within the schedule proposed in the letter dated October 23, 2007, or submit a Professional Engineer's Certification.

5. OAC Rule 3745-55-73 Management of Containers. Condition C.5 (a) of the Operation Permit.

When inspecting containers on the east pad we found three 55 gallon containers that the RIS computerized container tracking system indicated were located in the CSF. The data on the RIS computerized tracking system also indicated that the containers were in the CSF since October 15, 2007. Consequently the containers had apparently been on the east pad for at least a week.

A similar problem was observed on August 27, 2007, when two containers were observed on the east pad that were improperly scanned and apparently unaccounted for an extended period of time (nearly a month).

The RIS permit application states that the set up and processing of waste in the outdoor area around the incinerator have been established at 48 hours during the weekdays and 72 hours on the weekends. Activities conducted on the east pad (the outdoor area around the incinerator) are exempted from the requirement to obtain a hazardous waste storage permit, only if the time limits identified in the application are complied with.

The problem was partially abated during the CEI when the correct location was scanned in to the RIS computerized container tracking system.

To fully abate this issue RIS must submit a plan 30 days from receipt of this letter detailing how RIS plans to prevent similar problems from occurring in the future.

The following concerns were identified by Ohio EPA based on the observations made during the inspection:

1. When inspecting the containment in tank farm #2, a crack/gap was observed between the concrete slab and concrete wall. This gap was about two feet long and ½ inch wide. RIS is requested to develop a plan to have this crack/gap repaired as soon as weather conditions allow.

Enclosed you will find a copy of the checklists that we completed during the inspection.

A list of Ohio EPA DHWM guidance documents can be found at the following internet site: <http://www.epa.state.oh.us/dhwm/guidancedocuments.html>. You can find copies of Ohio's hazardous waste laws and regulations at our web page at: <http://www.epa.state.oh.us/dhwm/Law&Regs.html>

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign up for this free service. You can find more information at the following Web link: <http://www.epa.state.oh.us/dhwm/listserv.htm>.

ROSS INCINERATION SERVICES, INC.
DECEMBER 26, 2007
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The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes and pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image through pollution prevention. More information about pollution prevention can be found on our website at <http://www.epa.state.oh.us/ocapp/ocapp.html>.

Should you have any questions regarding this letter, please contact me at (330) 963-1246.

Sincerely,



John Paquelet
Environmental Specialist II
Division of Hazardous Waste Management

JP:ddw

Enclosure

cc: Sheila Burrus, U. S. EPA, Region V (with enclosure)
William Damico, U.S. EPA, Region V
Neil Wasilk, Ohio EPA, DHWM, NEDO
ec: Natalie Oryshkewych, Ohio EPA, DHWM, NEDO
Pam McCoy, Ohio EPA, DHWM, CO

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.

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

Facility: Ross Incineration Services

Ohio Permit: 02-47-0295

Address: 36790 Giles Road
Grafton, Ohio 44044

U.S. EPA ID: OHD 048 415 665
Phone: _____

County: Lorain

Inspection Date: 10/23/07

Time: 8:00AM

Was advance notice of the inspection given? _____ YES NO
If so, how far in advance? _____

Inspectors: John Proquelet / Neil Wasilk / Environmental SPT 330-963-1246

Facility Reps: Patricia Lawson - Corporate, EHS, Security 440-366-2070

Is facility operating as a generator? YES _____ NO

If so, complete the applicable sections of the Generator Requirements checklist for wastes being managed under generator status.

PERMIT STATUS

Permit Issued: 9/30/03 LDR Checklist Attached: Yes No

Permit Effective Date: 9/30/03 Used Oil Checklist Attached: Yes No

Permit Expiration Date: 9/30/13 Generator Checklist Attached: Yes No

Permit Renewal Date: _____

Permit Modification Date(s): _____

AUTHORIZED ACTIVITIES

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

Post-Closure Care Corrective Action

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GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so: Yes ___ No N/A ___ RMK# ___
- a. Is the permittee continuing any activity regulated by the permit? Yes No ___ N/A RMK# ___
- b. Was a permit renewal application submitted to OEPA no later than 180 days prior to the expiration date? [Condition A.6] Yes ___ No N/A RMK# ___
2. Was the annual permit fee submitted to Ohio EPA on or before the anniversary of the date 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# ___
5. Has the facility identified any instances of noncompliance with the permit, ORC Chapter 3734. or the rules adopted thereunder, which may endanger human health or the environment? If so: Yes No N/A ___ RMK# ___
- a. Did the facility immediately report the information as specified in Condition A.20? [Condition A.20] Yes ___ No N/A RMK# ___
- Did the facility submit a written report as specified in Condition A.21 within five days of becoming aware of the circumstances reported above? Yes ___ No N/A RMK# ___
7. Has the permittee identified instances of noncompliance not provided for in Condition A.20, 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 contain the information set forth in Condition A.20? [Condition A.20] Yes___ No N/A RMK#___

c. Were all reasonable steps necessary to minimize 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#___

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

9. Has the permittee become aware that it failed to submit any relevant facts 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

10. Has the permittee filed a request for a permit modification, revision or revocation since permit issuance? [Condition A.2] Yes No___ N/A___ RMK#___

a. Were all such requests made in accordance with OAC Rule 3745-50-51 (i.e., followed PMR requirements)? [Condition A.15] Yes No___ N/A___ RMK#___

11. Has the permit, been transferred to a new owner/operator? If so, have the requirements of Condition A.18 been met? Yes___ No N/A___ RMK#___

12. Has the permittee submitted reports for each compliance schedule in the permit by the scheduled date? [Condition A.19] Yes No N/A ___ RMK# ___
13. Has the permittee furnished to Ohio EPA, upon request, relevant information to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10] Yes No N/A ___ RMK# ___
14. Has the facility furnished to Ohio EPA, upon request, copies of records required to be kept by the permit? [Condition A.10] Yes No N/A ___ RMK# ___
15. Has the permittee maintained records of all data used to complete the application and any amendments, revisions or modifications to the application for at least three years? [Condition A.14(a)] Yes No N/A ___ RMK# ___
16. Has the permittee retained a complete copy of the approved application for at least five years from the effective date of the permit? [Condition A.14(c)] Yes No N/A ___ RMK# ___
17. Has the permittee given notice to the director as soon as possible of any physical alterations or additions to the permitted facility? If so: Yes No ___ N/A ___ RMK# ___
- a. Were all such changes made in accordance with OAC Rule 3745-50-51 (i.e., followed PMR requirements)? [Condition A.15] Yes No N/A ___ RMK# ___

SITE ENTRY - AVAILABILITY OF RECORDS

18. Has the permittee allowed Ohio EPA, pursuant to Condition A.11, upon proper identification to:
- a. Enter at reasonable times upon the premises where a regulated activity is located or where records must be kept under the conditions of the permit? Yes No N/A ___ RMK# ___

b. Have access to and copy, at reasonable times, any records must be kept under the conditions of the permit?

Yes No N/A ___ RMK# ___

c. Inspect, at any time, facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit?

Yes No N/A ___ RMK# ___

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

Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM PART B APPLICATION

Note: *The inspector or permit writer may add questions pertaining to the permittee's application, as appropriate.*

REMARKS

RECORDKEEPING/OPERATING REQUIREMENTS

OPERATING RECORD

1. Does the permittee maintain an Operating Record, as required by OAC rules 3745-54-73 and 3745-54-74 and Condition B.22 of the permit, which contains the following information:
- a. A description of the quantity of each hazardous waste and the method(s) and date(s) of its treatment or storage? Yes No N/A ___ RMK# ___
 - b. The location of each hazardous waste and quantity at each location including cross-reference to specific manifest numbers? Yes No N/A ___ RMK# ___
 - c. Records and results of required waste analysis? Yes No N/A ___ RMK# ___
 - d. *No incidents* 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. Notices to generators pursuant to 3745-54-12 that facility has appropriate permits to accept waste and agrees to accept it. 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 or at an off-site location pursuant to Condition B.22:
- a. Waste analysis plan in accordance with OAC rule 3745-54-13 and the permit terms and conditions? Yes No N/A ___ RMK# ___
 - b. Contingency plan in accordance with OAC rule 3745-54-53 and the permit terms and conditions? 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# ___
 - 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.22] Yes No N/A ___ RMK# ___
 - h. Post-closure plan, as required by OAC rule 3745-55-18(A)? [Condition A.28(a)(viii)] 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)(ix)] Yes No N/A ___ RMK# ___

3. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from 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# ___
- 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. Has the permittee submitted:
 -an annual report as required by OAC rule 3745-54-75? Yes No N/A ___ RMK# ___
 -any additional reports required by OAC rule 3745-54-77? [Condition B.25] Yes No N/A ___ RMK# ___

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

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. Are monitoring samples and measurements a representative sample of the waste or parameter to be analyzed? [Condition A.12(a)]

Yes No N/A ___ RMK# ___

8. Does the permittee retain:

- records of monitoring information required by the permit, including all calibration and maintenance records, for at least three years from the date of sampling, measurement, report, certification or application?

Yes No N/A ___ RMK# ___

-Copy of permit application for at least 5 years from the effective date of the permit?

Yes No N/A ___ RMK# ___

-Ground water monitoring records for the active life of the facility and during the post closure care period?[Condition A.14]

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 all applications, reports or information submitted been signed and certified according to OAC rule 3745-50-42? [Condition A.13]

Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: *The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.*

REMARKS

WASTE MINIMIZATION REQUIREMENTS

1. Does the permittee certify at least annually that a program is in place to reduce the volume and toxicity of hazardous waste generated? [Condition A.29(a), OAC rule 3745-54-73] Yes No N/A ___ RMK# ___

2. Did the permittee submit a waste minimization report to the Office of Pollution Prevention and NEDO:
- within 180 days of journalization of this permit?
- and submit updates biennially thereafter? [Condition A.29(b)] Yes No N/A ___ RMK# ___
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# ___

If so, what amount of waste has the permittee reduced this year? Ash / Sludge

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# ___

If so, how much money has the permittee's company saved this year? Not available

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

1. Has the permittee conducted annual sampling of its monitoring wells? Yes ___ No N/A ___ RMK# ___

1. Does the permittee certify at least annually that a program is in place to reduce the volume and toxicity of hazardous waste generated? [Condition A.29(a), OAC rule 3745-54-73] Yes___ No N/A ___ RMK#___

2. Did the permittee submit a waste minimization report to the Office of Pollution Prevention and NEDO:
- within 180 days of journalization of this permit?
- and submit updates biennially thereafter? [Condition A.29(b)] Yes___ No N/A ___ RMK#___
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#___

If so, what amount of waste has the permittee reduced this year? _____

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#___

If so, how much money has the permittee's company saved this year? _____

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

1. Has the permittee conducted annual sampling of its monitoring wells? Yes No N/A ___ RMK#___

2. Has the permittee submitted:
 - the ground water Annual Report by March 1? [Condition J.8.(c)
 - any other reports required by Condition J.10 within the designated timelines? [Condition J.8.(d)]
- Yes No N/A ___ RMK# ___
 Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: *The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.*

REMARKS

WASTE ACCEPTANCE AND GENERATION

1. 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?[Condition B.2(a)]
- Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: *The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.*

REMARKS

OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS for Permittee as Generator

1. Is the permittee complying with the 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.24]

a. Are all hazardous wastes shipped off-site accompanied by a completed hazardous waste manifest? [OAC rule 3745-52-20(A)] Yes No N/A ___ RMK# ___

b. Does the manifest form contain all information required by OAC rule 3745-52-20 and the minimum number of copies required by OAC rule 3745-52-22? Yes No N/A ___ RMK# ___

c. Has the permittee designated at least one permitted disposal facility on the manifest? Yes No N/A ___ RMK# ___

Has the permittee designated an alternate facility, or instructions to return waste, if required by OAC rule 3745-52-20(C),(D)? Yes No N/A ___ RMK# ___

d. Have manifests have been signed by the permittee and initial transporter? [OAC rule 3745-52-23]? Yes No N/A ___ RMK# ___

2. Are signed copies of all hazardous waste manifests from the designated facility, and any documentation required for exception reports, retained for at least three years? [OAC rule 3745-52-40] Yes No N/A ___ RMK# ___

NOTE: If the permittee is generating hazardous waste, remember to attach a complete generator checklist.

3. Does the permittee use only properly registered transporters when removing hazardous wastes? [Condition A.16] Yes No N/A ___ RMK# ___

Transporters:

MANIFEST REQUIREMENTS for Permittee as TSDF receiving hazardous waste

4. Does the permittee sign and date each manifest and give one copy 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. Are significant discrepancies in the manifest, as defined in 3745-54-72(A) noted in writing on each copy of the manifest? Yes No N/A ___ RMK# ___
5. Have any significant 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. Has the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal? Yes No N/A ___ RMK# ___
- If so, has an unmanifested waste report containing all the information required by 3745-54-76(A) been submitted within 15 days? Yes No N/A ___ RMK# ___

WASTE ANALYSIS/WASTE ANALYSIS PLAN

1. Does the permittee have a detailed chemical and physical analysis of all waste streams which contains all the information on 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(a)] Yes ___ No N/A ___ RMK# ___
2. Does the permittee follow the Waste Profile Survey preparation methods and procedures specified in the WAP to ensure that the Permittee has all the information to properly treat, store and dispose of each waste accepted? [3745-54-13(A)] [Condition B.3(a)] Yes ___ No N/A ___ RMK# ___
3. Does the permittee follow the waste prohibitions and restrictions in Table C1-1 of the WAP? [Condition B.3(a)] Yes ___ No N/A ___ RMK# ___

4. Does the permittee sign and date each manifest and give one copy 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. Are significant discrepancies in the manifest, as defined in 3745-54-72(A) noted in writing on each copy of the manifest? Yes___ No N/A ___ RMK#___
5. Have any significant 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. Has the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal? Yes___ No N/A ___ RMK#___
- If so, has an unmanifested waste report containing all the information required by 3745-54-76(A) been submitted within 15 days? Yes___ No N/A ___ RMK#___

WASTE ANALYSIS/WASTE ANALYSIS PLAN

1. Does the permittee have a detailed chemical and physical analysis of all waste streams which contains all the information on 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(a)] Yes No N/A ___ RMK#___
2. Does the permittee follow the Waste Profile Survey preparation methods and procedures specified in the WAP to ensure that the Permittee has all the information to properly treat, store and dispose of each waste accepted? [3745-54-13(A)] [Condition B.3(a)] Yes No N/A ___ RMK#___
3. Does the permittee follow the waste prohibitions and restrictions in Table C1-1 of the WAP? [Condition B.3(a)] Yes No N/A ___ RMK#___

4. Does the permittee properly classify wastes as standard and special wastes as described in the WAP? [Condition B.3(a)] Yes No N/A ___ RMK# ___
5. Does the permittee follow pre-acceptance review procedures for special wastes as described in the WAP? [Condition B.3(a)] Yes No N/A ___ RMK# ___
6. Does the permittee follow the "fingerprinting" sampling methods and procedures specified in the WAP to ensure that each waste shipment matches the identification of the waste on the manifest and the WPS? [3745-54-13(C)] [Condition B.3(a)] Yes No N/A ___ RMK# ___
7. Does the permittee conduct visual inspections in accordance with the procedures described in the WAP? [Condition B.3(a)] Yes No N/A ___ RMK# ___
8. Does the permittee conduct metals and PCBs sampling and analyses in accordance with the procedures described in the WAP? [Condition B.3(a)] Yes No N/A ___ RMK# ___
9. 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# ___
10. Does the permittee conduct residuals sampling and analyses in accordance with Condition B.3(b) and the procedures in the WAP? [Condition B.3(b)] Yes No N/A ___ RMK# ___
11. Does the permittee place the results of all waste analyses in the facility operating record? Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: *The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.*

REMARKS

GENERAL INSPECTION REQUIREMENTS

NOTE: *Inspector may attach a copy of the inspection procedures and schedules. If so, the attached document is referenced as Appendix ____.*

- 1. Is the permittee following the inspection procedures and schedules as set forth in the permit (Sec. F of the application)? [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 Sec. F of the application?
 - 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? [Condition B.5] Yes No N/A ____ RMK# ____

- 4. Do inspection records contain the following information [OAC rule 3745-54-15(D) and Condition B.5]:
 - a. Date and time of inspection? Yes No N/A ____ RMK# ____
 - b. Name of inspector? Yes No N/A ____ RMK# ____
 - c. Notation of observations made? Yes No N/A ____ RMK# ____
 - d. Date and nature of any repairs or other remedial actions? Yes No N/A ____ RMK# ____

SECURITY REQUIREMENTS

1. Does the permittee comply with OAC rule 3745-54-14 and Condition B.4 of the permit: [Sec. F of the application]
Does the permittee have:

a. 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# ___

d. Signs reading "Danger - Unauthorized Personnel Keep Out" posted at entrances to the active portion of the facility and other locations?

Yes No N/A ___ RMK# ___

FACILITY OPERATIONS

2. Is construction, maintenance and operation 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?

Yes No N/A ___ RMK# ___

Does the Permittee operate and maintain the facility in accordance with fire, explosion, or release prevention procedures, practices and design specifications provided in Sections D, F and G of the Part B permit application. [OAC rule 3745-54-31; Condition B.1]

Yes No N/A ___ RMK# ___

3. 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# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: *The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.*

REMARKS

PERSONNEL TRAINING

1. Is the permittee conducting personnel training in accordance with the conditions of the permit and Sec. H of the permit application?[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 Sec. H of the application, including: written job titles, job descriptions and documented employee training records?
[Condition B.6]

Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REMARKS

REQUIRED EQUIPMENT

NOTE: Inspector may attach a list of emergency equipment. If so, the attachment document is referenced as Appendix ____.

1. Has the permittee equipped the facility with the emergency equipment specified in Sec. G of the application, including [OAC rule 3745-54-32, Condition B.9]:

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 Sec. F of the application? [OAC rule 3745-54-33, Condition B.10] Yes No N/A ___ RMK# ___

3. Has the permittee provided all personnel involved in the hazardous waste operation with immediate access to an internal alarm or emergency communication device? [OAC rule 3745-54-34, Condition B.11, Sec. D, F & G of the permit application]? Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REMARKS

CONTINGENCY PLAN - EMERGENCY PROCEDURES

1. In compliance with Condition B.13 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. Is the permittee inspecting, testing and maintaining the equipment specified in Question No. 1 to ensure its proper operating in accordance with Sec. F of the application? [OAC rule 3745-54-33, Condition B.10] Yes___ No N/A ___ RMK#___

3. Has the permittee provided all personnel involved in the hazardous waste operation with immediate access to an internal alarm or emergency communication device? [OAC rule 3745-54-34, Condition B.11, Sec. D, F & G of the permit application]? Yes___ No N/A ___ RMK#___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REMARKS

CONTINGENCY PLAN - EMERGENCY PROCEDURES

1. In compliance with Condition B.13 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.13(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.18(b)] Yes No N/A ___ RMK#___
4. Has the permittee notified all parties identified in the contingency plan in writing of amendments, modifications, or revisions to the plan within ten days of the effective date of the change in the plan? [Condition B.18(b)] Yes No N/A ___ RMK#___
5. Has the permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to the Ohio EPA, Division of Emergency and Remedial Response (DERR) in accordance with OAC rule 3745-54-53? [Condition B.18(c)] Yes No N/A ___ RMK#___
6. Is the permittee reviewing the approved contingency plan at least annually and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17] Yes No N/A ___ RMK#___

NOTE: Also see Question No. 4 of Recordkeeping Requirements to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.

EMERGENCY COORDINATOR

7. In accordance with OAC rule 3745-54-55 and Condition B.19 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.19 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.19] 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, 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 evaluation 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. Since the last inspection has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility which threatened or could have threatened human health and the environment including those situations identified in the facility contingency plan? 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.14 and B.20]

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.16] Yes___ No N/A RMK#___
- d. Within 15 days of the incident did the permittee submit to the director a written report of the incident? If so: Yes___ No N/A RMK#___
- i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23] 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.23] Yes___ No N/A RMK#___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as

appropriate.

REMARKS

CLOSURE REQUIREMENTS

1. Does the permittee maintain the approved closure plan at the facility? [Condition B.29] 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.36] 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.28] 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 a hazardous waste unit or the facility since the last inspection? If so: Yes ___ No N/A ___ RMK# ___

a. Did the permittee complete closure of the unit or the facility in compliance with Condition B.26, Condition B.27, Condition B.30, Condition B.31, Condition B.32, Condition B.33 and Condition B.34 of the permit? (If such a closure has occurred, enter details on a separate page(s) and attach to the checklist.) Yes ___ No N/A RMK# ___

REMARKS

POST-CLOSURE MAINTENANCE

1. Has the permittee inspected the components, structures, and equipment at the site in accordance with the inspection schedule in Section I-4 of the permit application on a semi-annual basis? [OAC rule 3745-55-17(A)(1)(b)] [Condition B.35] Yes No N/A RMK#
2. Has the permittee conducted and recorded an inspection of at least the following? [Condition B.35] 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? [Table I-4 in Section I-4 of the approved permit application] Yes No N/A RMK#
4. Have suitable repairs been made within a reasonable amount of time? [Condition B.35] Yes No N/A RMK#
5. Have repairs been indicated on the Notification Repair Form? [Condition B.35] 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 B.35] Yes No N/A RMK#

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: *The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.*

REMARKS

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

NOTE: The requirements of Condition C do not apply to the permittee's activities as a generator accumulating hazardous waste for <90 days per OAC rule 3745-52-34(A). Please complete the applicable sections of the Generator Requirements checklist to document compliance with activities associated with <90 day accumulation of wastes.

CONDITION OF CONTAINERS

1. Are containers holding hazardous wastes in good condition as required by OAC 3745-55-71? [Condition C.4] If not: Yes No N/A ___ RMK# ___
- a. Did the permittee transfer the hazardous waste from such a container to one that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit? [Condition C.4] Yes No N/A ___ RMK# ___
2. Does the permittee ensure that all containers used at the facility are compatible with the hazardous waste to be stored in them as required by OAC rule 3745-55-72? [Condition C.5] 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.6(a)] 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.7 of the permit? [Condition C.7] Yes No N/A ___ RMK# ___

INSPECTIONS

NOTE: Inspector may attach a container inspection checklist. If so, the attached document is referenced as Appendix _____.

5. Is the permittee inspecting the container area weekly in accordance with OAC rule 3745-55-74 and the approved inspection schedule in Section E of the Part B permit application to detect leaking containers and deterioration of containers and the containment system? [Condition C.9] 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 D, including: [Condition C.7] 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# ___
See a small area in Tank farm #2

7. Has the permittee had a spill or leak of wastes? If so: Yes No ___ N/A ___ RMK# ___

a. Was spilled or leaked waste removed in a timely manner? [Condition C.7(e)] Yes No N/A ___ RMK# ___

NOTE: This time period is not to exceed 24 hours. [Condition C.7(e)]

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.12 of the permit? Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REMARKS

LAND DISPOSAL RESTRICTION REQUIREMENTS

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# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: *The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.*

REMARKS

CORRECTIVE ACTION

1. Has the permittee submitted the monthly progress report for all corrective action activities (or quarterly when workplan is not being implemented)? [Condition E.5.]

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# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: *The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.*

REMARKS

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#___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: *The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.*

REMARKS

CORRECTIVE ACTION

1. Has the permittee submitted the monthly progress report for all corrective action activities (or quarterly when workplan is not being implemented)? [Condition E.5.]

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#___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: *The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.*

REMARKS

Tank storage, Treatment and Management

1. Is secondary containment, in the form of an external liner, being provided for all permitted hazardous waste tanks? [3745-66-93(A)(1) to (A)(5)] Yes___ No___ N/A ___ RMK#___
2. Has the permittee operated the secondary containment systems in accordance with the design plans and descriptions in Sections D and F of the application? [Condition D.3] Yes___ No___ N/A ___ RMK#___
3. Is the liner in the tank secondary containment compatible with the wastes stored? Yes___ No___ N/A ___ RMK#___
4. Is the liner free of cracks and gaps? Yes___ No___ N/A ___ RMK#___
5. Are chemically resistant water stops in place at all joints of the liner? Yes___ No___ N/A ___ RMK#___
6. Is the liner provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time? Yes___ No___ N/A ___ RMK#___
7. Is any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner? Yes___ No___ N/A ___ RMK#___
8. Is ancillary equipment to the tank systems provided with secondary containment (such as double-walled piping, jacketing or a trench)?
If not, is the ancillary equipment:
 Inspected daily? **AND**;
 Is ancillary equipment one of the following:
 Above ground piping (exclusive of flanges, joints, valves and connections)? [e.g., piping from process dock to Tankfarms 1, 2 & 3.]
 Welded flanges, welded joints and/or welded connections?
 Yes___ No___ N/A ___ RMK#___
 Yes___ No___ N/A ___ RMK#___
 Yes___ No___ N/A ___ RMK#___
9. Has the permittee stored or treated wastes in tanks consistent with the restrictions and prohibitions in Table C1-1 of Section C of the application? [Condition D.1(c)] Yes___ No___ N/A ___ RMK#___
10. Does the permittee prevent placement of hazardous waste or treatment reagents in tanks or secondary containment if such placement can cause the system to Yes___ No___ N/A ___ RMK#___

leak, rupture, corrode, or otherwise fail? [3745-66-94(A)]

11. Does the permittee use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)? [3745-66-94(B)] Yes___ No___ N/A ___ RMK#___
12. Has the permittee conducted and documented inspections of the tank systems in accordance with the inspection schedules in Section F of the application? [Condition D.5] Yes___ No___ N/A ___ RMK#___
13. Has the permittee documented these inspections in the operating record, including inspection of the following:
- a. Spill control equipment (daily)? Yes___ No___ N/A ___ RMK#___
 - b. Above ground portion of tank (daily)? Yes___ No___ N/A ___ RMK#___
 - c. Data from leak detection equipment (daily)? Yes___ No___ N/A ___ RMK#___
 - d. Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste (daily)? Yes___ No___ N/A ___ RMK#___
14. Has the permittee monitored and tested the tank systems in accordance with the Tank Corrosion Monitoring Plan? [Condition D.5(e)] Yes___ No___ N/A ___ RMK#___
15. Does any tank have a wall thickness that is less than the minimum design wall thickness? If so, has it been removed from service? [Condition D.5(f)] Yes___ No___ N/A ___ RMK#___
16. Has the permittee had any leaks, spills or releases from the tank systems? Yes___ No___ N/A ___ RMK#___
- If so, has the permittee responded to the leaks, spills or releases in accordance with Condition D.6? Yes___ No___ N/A ___ RMK#___
17. Were all releases from the tank system to the environment (other than those into secondary containment) reported to Ohio EPA within 24 hours of detection? Yes___ No___ N/A ___ RMK#___
18. Was a written report submitted within 30 days of detecting the release that addressed the elements in Condition D.7(b) Yes___ No___ N/A ___ RMK#___
19. If major repairs to a tank system were required, was a

certification submitted to Ohio EPA within 7 days of returning the tank system to use? [Condition D.7(c)]

Yes___ No___ N/A ___ RMK#___

20. If the Permittee was unable to repair and return the tank to service, was the tank system closed in accordance with 3745-66-97? [Condition D.6(b)]

Yes___ No___ N/A ___ RMK#___

21. Does the permittee have on file at the facility written statements by those persons required to certify the design and installation of the tank system? [Condition D.7(d)]

Yes___ No___ N/A ___ RMK#___

22. Is the permittee following the special provisions for ignitable and reactive wastes specified in Condition D.9?

Yes___ No___ N/A ___ RMK#___

23. 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? *N₂ Blanked*

Yes___ No___ N/A ___ RMK#___

24. Is the permittee following the special provisions for incompatible wastes specified in Condition D.10?

Yes___ No___ N/A ___ RMK#___

25. Has the Permittee placed incompatible wastes 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 3745-65-17(B) been met?

Yes___ No___ N/A ___ RMK#___

Yes___ No___ N/A ___ RMK#___

26. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the Permittee done one of the following: [3745-66-991

Yes___ No___ N/A ___ RMK#___

- a. Conducted waste analysis and trial treatment or storage tests? [3745-66-991(A)]; OR
- b. Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-991(B)]

Yes___ No___ N/A ___ RMK#___

Yes___ No___ N/A ___ RMK#___

Miscellaneous Unit

1. Is only scrubber water and scrubber water sludges from blow-down operations of the closed loop scrubber water system treated in the filter press? [Condition F.3] Yes No ___ N/A ___ RMK# ___

2. Is a written statement by a qualified, registered professional engineer that attests that the filter press system was properly designed and installed kept on file at the facility? [Condition F.4] Yes No ___ N/A ___ RMK# ___

General Operating Requirements

3. (a) Were any hazardous wastes or treatment reagents placed in the filter press system that could cause the filter press, its ancillary equipment, or the secondary containment system to rupture, leak, corrode or otherwise fail?. [Condition F.6(a)] Yes No N/A ___ RMK# ___

(b) Does the Permittee use appropriate controls and practices to prevent spills or overflows from the filter press or containment system? [Condition F.6(b)] Yes No ___ N/A ___ RMK# ___

(c) Was the filter press operated in accordance with the procedures and practices in Section D of the Part B permit application, manufacturer's instructions and accepted industry practice. [Condition F.6(c)] Yes No ___ N/A ___ RMK# ___

(d) Was the filter press maintained in accordance with manufacturer's recommendations and accepted industry practices? [Condition F.6(d)] Yes No ___ N/A ___ RMK# ___

4. Has there been a leak or spill from the filter press system? If so, Yes No ___ N/A ___ RMK# ___

5. Did the Permittee comply with the requirements of OAC Rule 3745-55-96 if a leak or spill occurs in the filter press system? [Condition F.6(e)] Yes No ___ N/A ___ RMK# ___

6. Did the Permittee comply with the requirements of condition F.8? Yes No ___ N/A ___ RMK# ___

7. Has the Permittee inspected the filter press system daily in accordance with Pages 21 and 22 of 45 of Appendix F-2 of Section F of the permit application? [Condition F.7]

Yes No___ N/A ___ RMK#___

8. Has the permittee ensured that no ignitable or incompatible wastes were placed in the filter press system? [Condition F.9]

Yes No___ N/A ___ RMK#___

INSPECTION ITEMS FROM THE PART B APPLICATION

REMARKS

INCINERATION SECTION INSPECTION ITEMS ARE ON ATTACHED PAGES

USED OIL INSPECTION CHECKLIST (Short Version)

Waste

NOTE: This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.

No used oil generation - manage as waste (non reg material) for fuel

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes ___ No ___ N/A ___ RMK# ___
Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes ___ No N/A ___ RMK# ___
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No ___ N/A ___ RMK# ___
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes ___ No N/A ___ RMK# ___

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes ___ No N/A ___ RMK# ___
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 ___ No N/A ___ RMK# ___
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes ___ No N/A ___ RMK# ___
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes ___ No N/A ___ RMK# ___
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes ___ No N/A ___ RMK# ___
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes ___ No N/A ___ RMK# ___
- b. Contained the release? Yes ___ No N/A ___ RMK# ___

- c. Cleaned up and properly managed the used oil and other materials? Yes ___ No N/A ___ RMK# ___
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A ___ RMK# ___
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes ___ No ___ N/A ___ RMK# ___
- 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 ___ No N/A ___ RMK# ___
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes ___ No N/A ___ RMK# ___
- c. Are the combustion gases from heater vented to the ambient air? Yes ___ No N/A ___ RMK# ___
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes ___ No N/A ___ RMK# ___

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. 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 ___ No N/A ___ RMK# ___
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes ___ No N/A ___ RMK# ___
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes ___ No N/A ___ RMK# ___

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes ___ No N/A ___ RMK# ___

C:\My Documents\OEPA Forms\USED OIL.SHORT.11.2004.wpd

REMARKS

Wade

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more

Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS

- 1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No N/A RMK#
- 2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes No N/A RMK#

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

- 3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes No N/A RMK#
- 4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes No N/A RMK#
- 5. Does the SQUWH conduct any of the following activities:
 - a. Sort batteries by type? Yes No N/A RMK#
 - b. Mix battery types in one container? Yes No N/A RMK#
 - c. Discharge batteries to remove the electric charge? Yes No N/A RMK#
 - d. Regenerated used batteries? Yes No N/A RMK#
 - e. Disassemble them into individual batteries or cells? Yes No N/A RMK#
 - f. Remove batteries from consumer products? Yes No N/A RMK#
 - g. Remove the electrolyte from the battery? Yes No N/A RMK#

If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)]

Yes No N/A RMK#

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)]

Yes No N/A RMK#

a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]

Yes No N/A RMK#

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]

Yes No N/A RMK#

7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]

Yes No N/A RMK#

UNIVERSAL WASTE PESTICIDES

8. Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]

Yes No N/A RMK#

9. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]

Yes No N/A RMK#

10. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97; 3745-66-100 and -66-101 of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]

Yes No N/A RMK#

11. If pesticides are stored in a transport vehicle, is it closed, structurally sound and compatible with the pesticide(s)? [3745-273-13(B)(4)]

Yes No N/A RMK#

12. Are containers, tanks, or transport vehicles that contain universal waste pesticides, labeled with either "Universal Waste Pesticides" or "Waste Pesticides"? [3745-273-14(B)]

Yes No N/A RMK#

UNIVERSAL WASTE THERMOSTATS

None observed during CEI, Ross Acts as Handler

13. Are thermostats that show evidence of ^{only} leaking, spilling, or damage that could cause leaks, properly contained? [3745-273-13(C)(1)] Yes ___ No N/A RMK# ___
14. If the thermostats are contained, are the containers closed, structurally sound, compatible with contents of the thermostats and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(C)(1)] Yes ___ No N/A RMK# ___
15. If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]
- a. Remove the ampules in a manner to prevent breakage and are they removed over or in a containment device? [3745-273-13(C)(2)(a)(b)] Yes ___ No N/A RMK# ___
- b. Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)(d)] Yes ___ No N/A RMK# ___
- c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)] Yes ___ No N/A RMK# ___
- d. Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)] Yes ___ No N/A RMK# ___
- e. Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)] Yes ___ No N/A RMK# ___
- f. Pack removed ampules in containers with packing material to prevent breaking during storage, handling and transportation? [3745-273-13(C)(2)(h)] Yes ___ No N/A RMK# ___
16. If mercury, clean-up residues, or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-13(C)(3)(a)] Yes ___ No N/A RMK# ___

a. If the waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to Chapter 3745-52.) [3745-273-13]

Yes ___ No N/A RMK# ___

b. If the mercury, residues and/or other wastes are not hazardous, are they managed in compliance with applicable law? [3745-273-13(C)(3)(c)]

Yes ___ No N/A RMK# ___

17. Are thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)?" [3745-273-14(D)]

Yes ___ No N/A RMK# ___

UNIVERSAL WASTE LAMPS

18. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]

Yes ___ No N/A ___ RMK# ___

One open box, closed during CEI

19. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]

Yes ___ No N/A RMK# ___

20. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)]

Yes No N/A ___ RMK# ___

NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

21. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes No N/A RMK#
LAST Shipped 5/14/07 (Lamps)
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes No N/A RMK#

NOTE: Accumulation is defined as date generated or date received from another handler.

22. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes No N/A RMK#
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes No N/A RMK#
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes No N/A RMK#
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes No N/A RMK#
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes No N/A RMK#
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes No N/A RMK#
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes No N/A RMK#

EMPLOYEE TRAINING

23. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] Yes No N/A RMK# 4/14/05

RESPONSE TO RELEASES

Facility stated no releases

24. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes No N/A RMK#
25. Is the material released characterized? [3745-273-17(B)] Yes No N/A RMK#
26. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes No N/A RMK#

OFF-SITE SHIPMENTS

NOTE: If a SQUWH self-transport waste, then they must comply with the Universal Waste transporter requirements.

27. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes No N/A RMK#

*Environmental Recycling.
Recycling bin, etc*

NOTE: SQUWHs are prohibited to send waste to any other facility.

28. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes No N/A RMK#
29. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No N/A RMK#
30. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes No N/A RMK#

- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes___ No___ N/A RMK#___
31. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following: Yes___ No N/A RMK#___
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes___ No___ N/A RMK#___
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes___ No___ N/A RMK#___
33. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes___ No N/A RMK#___
34. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes___ No N/A RMK#___

EXPORTS

35. Is waste being sent to a foreign destination? If so: Yes___ No___ N/A RMK#___
- a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes___ No N/A RMK#___
- b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)] Yes___ No N/A RMK#___
- c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes___ No N/A RMK#___

REMARKS

Wade.

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

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

- 1. Is each tank clearly labeled/marked with the words "Hazardous Waste" [3745-52-34(A)(3)]? Yes No N/A *not required permitted*

TANK SYSTEM – GENERAL OPERATING REQUIREMENTS

- 2. Does the o/o follow the general operating requirements below:
 - a. Does the o/o prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail?[3745-66-94(A)] Yes No N/A
 - b. Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)?[3745-66-94(B)] Yes No N/A
 - c. If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96?[3745-66-94(C)] *→ Cert* Yes No N/A

TANK SYSTEM – INSPECTION REQUIREMENTS

- 3. Has the o/o documented the inspections *Done in accordance w/ Permit* required in 3745-66-95, in the operating record, including inspection of the following:
 - a. Spill control equipment each operating day? [3745-66-95(A)(1)] *Handwritten/Visual* Yes No N/A
 - b. Above ground portion of tank each operating day?[3745-66-95(A)(2)] Yes No N/A
 - c. Data from leak detection equipment each operating day?[3745-66-95(A)(3)] Yes No N/A
 - d. Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste each operating day?[3745-66-95(A)(4)] Yes No N/A

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

- 4. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter?[3745-66-95(B)(1)] Yes No N/A
- 5. Where applicable, all sources of impressed current at least bi-monthly?[3745-66-95(B)(2)] Yes No N/A

TANK SYSTEM CLOSURE REQUIREMENTS

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

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES

- 7. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with **one of the following:** [3745-66-98(A)]
 - a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-66-17(B)?[3745-66-98(A)]; **OR** Yes No N/A
 - b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction?[3745-66-98(A)]; **OR** Yes No N/A
 - c. The tank is used solely for emergencies?[3745-66-98(A)] Yes No N/A
- 8. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (1996)? [3745-66-98(B)] Yes No N/A
- 9. Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material?[3745-66-99(A) and/or (B)] Yes No N/A
- a. **If so**, have the requirements of 3745-65-17(B) been met?[3745-66-99(A) and/or (B)] Yes No N/A

TANK SYSTEM – WASTE ANALYSIS REQUIREMENTS

- 10. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following:[3745-66-100]
 - a. Conducted waste analysis and trial treatment or storage tests?[3745-66-100(A)]; **OR** Yes No N/A
 - b. Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-100(B)] Yes No N/A

TANK SYSTEMS REQUIREMENTS

- 11. Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)?[3745-66-92(A)] Yes No N/A *permitted*

NOTE: You should review the file to see if the written assessment has been previously reviewed and what the results were.

[Facility Name/Inspection Date]

[ID number]

LQG TANK /July 2007

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12. Does the written assessment include the following:[3745-66-92(A)] *Not reviewed - original permit*
- a. Certification by an independent registered, professional engineer?[3745-66-92(A)] Yes No N/A
 - b. Consideration of the design standards of the system?[3745-66-92(A)] Yes No N/A
 - c. Consideration of the hazardous characteristics of the waste(s)?[3745-66-92(A)] Yes No N/A
 - d. An evaluation by a corrosion expert (only if the external system/components are metal and in contact with soil or water)?[3745-66-92(A)] Yes No N/A
 - e. A determination of design and operational measures that will be needed to protect the tank system from potential damage (only for underground tank components)?[3745-66-92(A)] Yes No N/A
 - f. Design considerations to ensure that the tank foundations will maintain the load of a full tank?[3745-66-92(A)] Yes No N/A
 - g. Design considerations for anchoring the unit to prevent floatation (only for tanks situated in a seismic fault zone or saturated zone)?[3745-66-92(A)] Yes No N/A
 - h. Design considerations to ensure that the tank system will withstand the effects of frost heave(only for underground tank systems)?[3745-66-92(A)] Yes No N/A

NOTE: CO-DHWM Engineering staff are available to assist you with evaluation of the written assessment.

13. Are there written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed?[3745-66-92(G)] Yes No N/A

Do the written statements address all of the following:

- a. Inspection for damage and/or inadequate construction and installation was conducted?[3745-66-92(B)] Yes No N/A
- b. Statement that deficiencies were corrected before the tank system was covered or put into use?[3745-66-92(B)] Yes No N/A
- c. Proper backfilling?[3745-66-92(C)] Yes No N/A
- d. Tightness test; if the tank system was found not to be tight, does the statement indicate that proper repairs were made?[3745-66-92(D)] Yes No N/A
- e. Proper support and protection of ancillary equipment?[3745-66-92(E)] Yes No N/A
- f. Supervision of the installation of field fabricated corrosion protection?[3745-66-92(F)] Yes No N/A

SECONDARY CONTAINMENT

14. Has secondary containment been provided? Yes No N/A

NOTE: All tank systems must have secondary containment at this point, except for tank systems that store/treat materials that become hazardous waste after January 12, 1987, must have secondary containment required within the time intervals in [3745-66-92(A)(1)] to (A)(4). The date the material became a hazardous waste must be used in place of January 12, 1987.[3745-66-92(A)(5)]

15. Is secondary containment one of the following:
- a. An **External Liner**? [3745-66-93(E)(1)] If so,
 - i. Is liner designed or operated to contain 100% of the capacity of the largest tank? Yes No N/A
 - ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? *or per permit* Yes No N/A
 - iii. Is liner free of cracks and gaps? *Some caulking needs repaired* Yes No N/A
 - iv. Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release? Yes No N/A
 - v. Are chemically resistant water stops in place at all points? *(concrete liners only)* Yes No N/A
 - vi. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? *(concrete liners only)* Yes No N/A
 - b. **Vault System**? [3745-66-93(E)(2)] If so,
 - i. Is vault system designed to contain 100% of the capacity in the largest tank? Yes No N/A
 - ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? Yes No N/A
 - iii. Are chemically resistant water stops in place at all points? Yes No N/A
 - iv. Is there a compatible interior coating to prevent migration into the concrete? Yes No N/A

- v. For **ignitable or reactive waste**: Is the vault system provided with means to prevent (or alternatively "protect against") the formation or ignition of vapors? Yes No N/A
- vi. Is vault system provided with an exterior moisture barrier? Yes No N/A
- c. **Double-Walled Tank?** [3745-66-93(E)(3)] If so,
 - i. Is double-walled tank designed as an integral structure to contain any release from the inner tank? Yes No N/A
 - ii. **If metal**, are the primary tank interior and outer shell exterior surfaces protected from corrosion? Yes No N/A
 - 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 No N/A
- d. **An Equivalent Device?** As described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D&E)] Yes No N/A

SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION *OK per Permit*

- 16. 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?[3745-66-93(B)(1) and (2)] Yes No N/A
- 17. Does the secondary containment system meet the following minimum requirements of [3745-66-93(C)]:
 - a. Constructed or lined with compatible materials of sufficient strength to prevent failure?[3745-66-93(C)(2)] Yes No N/A
 - b. Placed on a foundation or base capable of providing support?[3745-66-93(C)(2)] Yes No N/A
 - c. Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time?[3745-66-93(C)(3)] Yes No N/A
 - d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation?[3745-66-93(C)(4)] Yes No N/A
 - e. Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner?[3745-66-93(C)(4)] Yes No N/A

ANCILLARY EQUIPMENT REQUIREMENTS

- 18. Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)? *overhead and trench (some)* Yes No N/A
- If not**, is the ancillary equipment one of the following: [3745-66-93(F)]
 - a. Above ground piping (exclusive of flanges, joints, valves and connections) that is inspected daily? Yes No N/A
 - b. Welded flanges, welded joints and/or welded connections that is inspected daily? Yes No N/A
 - c. Sealless or magnetic coupling pumps and/or sealless valves? Yes No N/A
 - 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 No N/A

TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE *MAINTENANCE Storage tank Needs Repaired*

- 19. Has there been a leak or spill from any tank system or has any tank system been found unfit for use? **If so**, did the o/o: Yes No N/A
- NOTE:** *If the tank is found to be unfit for use, inspector should explain why.*
 - a. Immediately cease flow of material into tank and investigate the cause of the release?[3745-66-96(A)] Yes No N/A
 - b. Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time?[3745-66-96(B)(1)] Yes No N/A
 - c. Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment?[3745-66-96(B)(2)] Yes No N/A
 - d. For a visible release to the environment, immediately conduct a visual inspection of the release?[3745-66-96(C)] Yes No N/A
 - e. For a visible release to the environment, prevent further migration of the leak or spill to soils or surface waters?[3745-66-96(C)] Yes No N/A
 - f. For a visible release to the environment, properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)] Yes No N/A
 - g. Report any release to the environment to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)] Yes No N/A

- h. For a release to the environment, submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)] Yes No N/A
- i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)(2)] Yes No N/A
- j. For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)] Yes No N/A

NOTE: The requirements noted in 20.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.

- 20. In the event that the repairs to the tank system were major (e.g., replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from an independent, registered P.E. attesting that the repaired unit is capable of handling hazardous waste? [3745-66-96(F)] Yes No N/A
- 21. Was a copy of the certification submitted to the director within seven days after returning the system to use? [3745-66-96(F)] Yes No N/A
- 22. If the o/o was unable to repair and return the unit to service as described in 20.a through 20.e, was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)] Yes No N/A
- 23. Does the o/o have a tank system **with a variance from secondary containment** from which a release has occurred but has not migrated beyond the zone of engineering control? Yes No N/A
 - If so,
 - a. Has the o/o complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G)(3)] Yes No N/A
 - b. If soils cannot be decontaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)] Yes No N/A
- 24. Does the o/o have a tank system **with a variance from secondary containment** from which a release occurred and has migrated from the zone of engineering control? If so,
 - a. Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)] Yes No N/A
 - b. If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(4)] Yes No N/A

① 9/23/07 Daily inspection missing for Process Dock and Rec/Proc Tank Farm. - Found 10/24, misplaced
 5/12/07 Daily inspection missing for Process Dock

Wade

RCRA HAZARDOUS WASTE GENERATOR
INSPECTION CHECKLIST
Ross Incineration Services

Company: Ross Incineration Services EPA ID#: OHD 048 415 665
Street: 36790 Giles Road City: Grafton
County: Lorain State: Ohio Zip: 44004
Mailing Address: _____
(If different from above)
Telephone: _____ Fax #: _____
Owner/Operator: _____
(If different from above)
Street: _____
City: _____ State: Ohio Zip: _____
Inspection Date(s): October 23, 2007 Time(s): 8:00 AM
Inspection Announced? Yes NO If so, how much advance notice given? _____

	Name	Affiliation	Telephone
Inspectors:	<u>John Paquet</u>	<u>Ohio EPA</u>	<u>330-963-1246</u>
	<u>Nesl Wasilk</u>	<u>Ohio EPA</u>	<u>330-963-1165</u>
Facility Representative:	<u>Patricia Lawson</u>	<u>Ross</u>	<u>440-366-2070</u>

Complete All Other Applicable Checklists	
Generator Classification	Waste Management Activity
<input type="checkbox"/> Conditionally Exempt SQG (CESQG)	<input checked="" type="checkbox"/> Containers
<input type="checkbox"/> Small Quantity Generator (SQG)	<input checked="" type="checkbox"/> Tank(s) [Addressed in TSDf checklist]
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)	<input checked="" type="checkbox"/> Land Disposal Requirements (LDR)
<input type="checkbox"/> No Generation	<input checked="" type="checkbox"/> Used Oil [Short form]
	<input checked="" type="checkbox"/> Universal Waste
	<input type="checkbox"/> Other

CESQG: < 100 Kg. (approximately 25-30 gallons) of waste in a calendar month
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

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

LARGE QUANTITY GENERATOR REQUIREMENTS

(P2 requirements are addressed in TSDf checklist)

GENERAL REQUIREMENTS (ID No. addressed in TSDf checklist)

- 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A RMK# 1, 4
- 3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41] Yes No N/A RMK#

WASTE IMPORT/EXPORT REQUIREMENTS(imports are addressed in TSDf checklist)

- 4. Does the generator export hazardous waste? If so: Yes No N/A RMK#
Stablex - Canada
- a. Has the generator notified U.S. EPA of export activity? [3745-52-53] Yes No N/A RMK#
- b. Has the generator complied with special manifest requirements? [3745-52-54] Yes No N/A RMK#
- c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] Yes No N/A RMK#
2/16/07 WB
- d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes No N/A RMK#
2/16/07
- e. Are export related documents being maintained on-site? [3745-52-57] Yes No N/A RMK#

GENERATOR CLOSURE REQUIREMENTS

- 5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so: Yes No N/A RMK#
- a. Describe the unit(s) which the generator has closed.
- b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] Yes No N/A RMK#

- c. Please provide a description of the documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standards.

NOTE: *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]*

REMARKS

MANIFEST REQUIREMENTS

You must start this part of the inspection by telling the company representative about the certification statement on the hazardous waste manifest using the following question and statement:

Are you aware of what the statement that you sign on the manifest says? Yes No

If the answer is no, show them what the statement says using a signed manifest.

NOTE: *While the statement is a certification that a P2 strategy is in place, signing the statement does not establish any legal obligations with which the company must comply. In other words, there is no violation of the hazardous waste rules if they sign the manifest and they don't have a program in place.*

1. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes No N/A RMK#

2. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Yes No N/A RMK#

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)]*

3. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] Yes No N/A RMK#

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)].*

4. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: Yes No N/A RMK# 3 ^{→ see}

a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes No N/A RMK# 3

5. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] Yes No N/A RMK#

6. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: Yes No N/A RMK#

a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)] Yes No N/A RMK#

b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]

Yes ___ No N/A RMK# ___

7. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]

Yes No N/A ___ RMK# ___

REMARKS

(3) Shrubber waste sent to Vickery, Vickery found high solid content & required higher price to process. Ross decided to have the shipment returned tanker settled solids / Re-Run, then shipped back out.
9/24/07 # 003171102 JSK

(4) Reviewed Kenan Drippings 90181
Inj. Port Dripping 90038

PERSONNEL TRAINING (Addressed in TSDf checklist)

CONTINGENCY PLAN (Addressed in TSDf checklist)

PREPAREDNESS AND PREVENTION (Addressed in TSDf checklist)

GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] Yes No N/A ___ RMK# ___

SATELLITE ACCUMULATION AREA REQUIREMENTS [3745-52-34(C)(1)]

2. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? Yes No N/A ___ RMK# ___
 - b. Are under the control of the operator of the process generating the waste? Yes No N/A ___ RMK# ___
 - c. Do not exceed a total of 55 gallons of hazardous waste? Yes No ___ N/A ___ RMK# ___
 - d. Do not exceed one quart of acutely hazardous waste at any one time? Yes ___ No N/A RMK# ___
 - e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? Yes No N/A ___ RMK# ___

NOTE: *The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to Ohio EPA's November 1994 Guidance on the Location of Satellite Accumulation Areas.*

3. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so: Yes ___ No N/A ___ RMK# ___
- a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? Yes ___ No N/A RMK# ___
 - b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? Yes ___ No N/A RMK# ___

USE AND MANAGEMENT OF CONTAINERS

4. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes No N/A ___ RMK# 1
5. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No N/A ___ RMK# 1
6. Are hazardous wastes accumulated in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A ___ RMK# 1
- b. In good condition? [3745-66-71] Yes No N/A ___ RMK# 1
- c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A ___ RMK# ___
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A ___ RMK# ___
7. Is the container accumulation area(s) inspected weekly? [3745-66-74] (*Note location in general information section of checklist*) Yes No N/A ___ RMK# 2
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A ___ RMK# 2
8. For ignitable and/or reactive hazardous waste(s):
- a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes No N/A ___ RMK# ___
- b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] Yes No N/A ___ RMK# ___

PRE-TRANSPORT REQUIREMENTS

9. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] Yes No N/A ___ RMK# ___
10. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A ___ RMK# ___

11. 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 RMK#

C:\My Documents\Neil_Work\Ross CE\Ross LQG checklist.wpd

REMARKS

① Ash in Tote at Bone yard in question.
other containers appeared to be in compliance.

② reviewed

- Incin/Production Incinerator
- Rec/Process Deck Cont Storage Bldg
- Incin/Prod Caustic/Filterpress Bldg
- Incin/Prod. Air Pollution Control
- Incin/Prod Closed Loop Area Tank 75
- Rec/Process Deck Tank Farms 23-64
- Rec/Process Deck Tank Farms 70, 73, 74

John/Neil

CEI Checklist for Incineration Module of Ross Incineration Services Ohio RCRA Permit		
1.	Has the Permittee limited hazardous wastes incinerated to those meeting the following criteria: [Condition I(A).2]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___
2.	Did all organic hazardous constituents listed in the Appendix to OAC Rule 3745-51-11 and that were present in the waste have a thermal stability Class ranking equal to or less than Class 1? [Condition I(A).2(a)(i)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___
3.	Are all Ohio EPA hazardous waste code numbers carried by incinerated wastes listed in Part A of the permit application under the process code of T03? [Condition I(A).2(a)(ii)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___ <i>Computer verification of codes</i>
4.	Did the permittee ensure that incineration was not inconsistent with the restrictions and prohibitions in Table C1-1 of Section C of the permit application? [Condition I(A).2(a)(iii)] Was the point of injection or feed point for all hazardous waste streams fed into the incinerator consistent with Table C1-1? [Condition I(A).2(d)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___
5.	Did permittee ensure that maximum concentration and annual volume limitations in Table XIV of Part A of the permit application were not exceeded? [Condition I(A).2(a)(iv)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___
6.	Was the ash content of waste fed to the incinerator less than or equal to: - the limits in Table D5-6 of Section D of the permit application? [Condition I(A).2(a)(vi)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___
7.	Was the system total halogen daily average in waste feed not in excess of 2,000 lb./hr? [Condition I(A).2(a)(vii)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___
8.	Was the heating value of waste fed to the incinerator within the range of heating value limitations in Table D5-6 of Section D of the permit application?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___ Yes ___ No <input type="checkbox"/> N/A ___ RMK# ___

9.	Was the viscosity of waste fed to the incinerator burners within the limits in Table D5-6 of Section D of the Part B permit application? <i>J.P.</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___ Yes ___ No <input type="checkbox"/> N/A ___ RMK# ___
10.	Did the Permittee conduct analyses of the incinerator waste feeds at least monthly in accordance with Section C-1e of the application? And, Were the results of these analyses within the physical and chemical limits in Table D5-6 of Section D of the permit application? [Condition I(A).2(b)] Are records of this activity kept at the facility?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___ Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___ Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___
11.	Did all auxiliary fuel or bypass waste fuel used meet the conditions and criteria identified in Section D-5c (1)(f)(ii) of the permit application? [Condition I(A).2(c)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___
12.	Were all waste streams fed to the incinerator within the characteristics in Table D5-6 of Section D of the permit application? [Condition I(A).2(e)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___
13.	Were only waste feed systems specified in Section D-5 of the Part B permit application used to feed wastes to the incinerator? [Condition I(A).2(f)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___
14.	Did the permittee ensure that the second main chamber (i.e., unmodified) aerosol can feeder was not used? [Condition I(A).2(g)] <i>yes / looked at / not installed</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___
15.	Were hazardous wastes fed to the incinerator only if the following permit conditions were met? [Condition I(A).3(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___
16.	Did the Permittee operate and maintain all components of the incineration system in accordance with the design plans, specifications and practices contained in Section D-5 of the permit application? [Condition I(A).3(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___

17.	Did the Permittee install, test, operate and maintain all instrumentation, including all associated instrument loops, monitors, analyzers and the distributed control system, in accordance with the design plans, performance specifications and maintenance practices contained in Section D-5 of the permit application? [Condition I(A).3(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___
18.	Did the Permittee maintain the incinerator so that when operated in accordance with the operating requirements specified in this permit, it should meet all permit performance standards? [Condition I(A).3(c)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___
19.	Does the incinerator achieve a destruction and removal efficiency (DRE) of 99.99 percent for each of the following principal organic hazardous constituents (POHC), carbon tetrachloride and monochlorobenzene? [Condition I(A).3(d)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___
20.	Does the Permittee control hydrogen chloride (HCl) emissions to no greater than the larger of either 4 pounds/hour or one percent of the HCl in the stack gas prior to entering any pollution control equipment? [Condition I(A).3(e)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___
21.	Were incinerator particulate matter emissions less than 180 milligrams per dry standard cubic meter (0.08 grains per dry standard cubic foot), when corrected for the amount of oxygen in the stack gas? [Condition I(A).3(f)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___
22.	Was carbon monoxide concentration in the stack exhaust gas, corrected for the amount of oxygen in the stack gas, not in excess of 100 ppm based on a one hour rolling average? [Condition I(A).3(g)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___ <i>yes CO 6.2 ppm in the system goes into a WFCB.</i>
23.	Were waste feed rates limited to not more than: -24,000 lb/hr for total system? -12,900 lb/hr for liquid waste to the main chamber? -4,850 lb/hr for solid waste to the main chamber? -12,500 lb/hr for solid waste to the kiln? -7,500 lb/hr for liquids to the kiln? -3,000 lb/hr per lance for each main chamber lance? [Condition I(A).3(h)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___
24.	Was combustion temperature maintained within the limits of: - 1,700 - 2,400 F for both main chamber and kiln? [Condition I(A).3(i)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___ <i>yes, when it happens then Ross goes to a WFCB.</i>

25.	Was combustion gas volumetric flow less than or equal to 70,000 acfm at 140 F, saturated? [Condition I(A).3(j)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/>																																											
26.	<p>Were the mass feed rates of toxic metals (on a 24 hour rolling average) to the incinerator less than or equal to the following limits? [Condition I(A).3(k)]</p> <table border="1" data-bbox="251 546 928 798"> <thead> <tr> <th>Metal</th> <th>Kiln (lb/hr)</th> <th>Main Chamber (lb/hr)</th> </tr> </thead> <tbody> <tr> <td>Arsenic</td> <td>9.56</td> <td>1.74</td> </tr> <tr> <td>Beryllium</td> <td>8.02</td> <td>3.59</td> </tr> <tr> <td>Cadmium</td> <td>23.5</td> <td>4.20</td> </tr> <tr> <td>Chromium</td> <td>192.5</td> <td>47.2</td> </tr> </tbody> </table> <p>And was the combined risk effect of arsenic, beryllium, cadmium and chromium less than 1.0×10^{-5}, when calculated using the equation in Attachment A of Module I(A)?</p> <table border="1" data-bbox="251 987 928 1386"> <thead> <tr> <th>Metal</th> <th>Kiln (K) (lb/hr)</th> <th>Main Chamber (MC) (lb/hr)</th> <th>Total K + MC (lb/hr)</th> </tr> </thead> <tbody> <tr> <td>Antimony</td> <td>83.9</td> <td>37.5</td> <td><83.9</td> </tr> <tr> <td>Lead</td> <td>123.1</td> <td>77.2</td> <td><123.1</td> </tr> <tr> <td>Thallium</td> <td>142.5</td> <td>142.5</td> <td><142.5</td> </tr> <tr> <td>Barium</td> <td>219.9</td> <td>219.9</td> <td><219.9</td> </tr> <tr> <td>Silver</td> <td>12.9</td> <td>12.9</td> <td><12.9</td> </tr> <tr> <td>Mercury</td> <td>11.3</td> <td>11.3</td> <td><11.3</td> </tr> </tbody> </table>	Metal	Kiln (lb/hr)	Main Chamber (lb/hr)	Arsenic	9.56	1.74	Beryllium	8.02	3.59	Cadmium	23.5	4.20	Chromium	192.5	47.2	Metal	Kiln (K) (lb/hr)	Main Chamber (MC) (lb/hr)	Total K + MC (lb/hr)	Antimony	83.9	37.5	<83.9	Lead	123.1	77.2	<123.1	Thallium	142.5	142.5	<142.5	Barium	219.9	219.9	<219.9	Silver	12.9	12.9	<12.9	Mercury	11.3	11.3	<11.3	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p>
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27.	<p>Were fuel burner atomization air pressures no less than:</p> <p>-16 osi for the main chamber fuel burner, -90 psig for the kiln fuel burner? [Condition I(A).3(l)]</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p>																																											

*703 Ross house WPC when
1795 happens.*

<p>28.</p>	<p>Was air pollution control equipment operated within the following limits:</p> <ul style="list-style-type: none"> -radial scrubber inlet temperature of 194 F max; -radial scrubber pressure drop of 10 inches WC, min, -radial scrubber water flow rate of 800 gpm, min. -Gas/liquid contactor water flow rate of 2,200 gpm, min. -Gas/liquid contactor scrubber water pH (hourly average) of 6.0, min, -Wet electrostatic precipitators (WESPs) total power of 900 VA min and operated in a manner to maximize particulate removal. <p>[Condition I(A).3(m)]</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p><i>If exceedances occur an WFO happens.</i></p>
<p>29.</p>	<p>Was the draft in the kiln and main chamber maintained at 0.05 inches WC, min? [Condition I(A).3(n)]</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p>
<p>30.</p>	<p>Was bypass waste fuel meeting the conditions and criteria identified in Section D-5c (1)(f)(ii) of the permit application, the only waste fed into the incinerator until the minimum temperatures of 1,700 F were attained? [Condition I(A).3(o)]</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p>
<p>31.</p>	<p>Were the procedures identified in Section D-5c (1)(f)(v) of the permit application followed for all shutdowns of the incinerator? [Condition I(A).3(p)]</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p>
<p>32.</p>	<p>Were 10 activations of the automatic waste feed cut-off system due to the exceedance of either minimum operating temperature or maximum carbon monoxide emissions limits experienced during any rolling 60-day block period? [Condition I(A).3(q)]</p> <p>If so did the permittee submit to the Director of Ohio EPA a written report within 5 calendar days of the 10th exceedance documenting the exceedances and results of the investigation and corrective measures taken?</p>	<p>Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> RMK# <input type="checkbox"/></p> <p><i>J.D.</i></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> RMK# <input type="checkbox"/></p>

33.	<p>Were the feed restrictions for the side door and direct feed locations in Condition I(A).3(r) met, including:?</p> <p>Were procedures for determining the compatibility of waste materials fed through the side door and tanker and container direct feed mechanisms of the Main Chamber followed? [Condition I(A).3(r)]</p> <p>Was the limit on number of containers per side door feed event met?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p>
34.	<p>Did changes in the waste feed, incinerator design or operating conditions cause any permit limits to be exceeded?</p> <p>If so, did the permittee cease operation of the incinerator? [Condition I(A).3(s)]</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> RMK# <input type="checkbox"/></p>
INSPECTIONS		
35.	<p>Did the permittee thoroughly visually inspect the incinerator and associated equipment (including pumps, valves, conveyors, pipes, etc.) for leaks, spills, fugitive emissions, and signs of tampering, as specified in Pages 14 and 15 of 45 in Appendix F-2 of Section F of the permit application? [Condition I(A).4(a)]</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p>
36.	<p>Did the Permittee continuously monitor the distributed control system for proper operation while the incinerator was in operation? [Condition I(A).4(b)]</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p>
37.	<p>Did the permittee test the emergency waste feed cut-off system and associated alarms at least weekly to verify operability, and document the test as specified on Pages 42 and 42.1 of 45 in Appendix F-2 of Section F of the permit application? [Condition I(A).4(c)]</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p>
38.	<p>Did the Permittee conduct all inspections applicable to the incineration unit as specified in Appendix F-2 of Section F of the permit application? [Condition I(A).4(d)]</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/></p>
Monitoring Requirements		

<p>39.</p>	<p>While incinerating hazardous waste, did the Permittee:</p> <p>(i) Maintain and operate each monitoring system listed under "Monitoring System" in Attachment C of Module I(A) for each operating parameter listed under "Parameter and Monitoring Location"; and</p> <p>(ii) Monitor and record data for each operating parameter listed in Attachment C of Module I(A) under "Parameter and Monitoring Location" at the frequency specified under "Monitoring Frequency";</p> <p>(iii) Maintain and operate each backup monitoring system listed under "Backup Monitoring System" in Attachment C of Module I(A), and when utilized, record data from the backup monitoring system at the frequency specified under "Backup Monitoring Frequency".</p> <p>[Condition I(A).5(a)]</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___</p>
<p>40.</p>	<p>Did the Permittee calibrate the monitoring equipment for each operating parameter listed in Attachment C of Module I(A) under "Parameter and Monitoring Location" at the frequency specified under "Calibration Frequency"? [Condition I(A).5(b)]</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___</p>
<p>41.</p>	<p>Did the Permittee maintain and calibrate daily the continuous CO monitoring equipment as specified in Section D of the Part B permit application? [Condition I(A).5(b)]</p> <p>Was the CO monitoring equipment examined by the equipment supplier's representative at least annually and certified by the supplier or an independent, properly trained and certified individual, that the equipment was calibrated in accordance with the manufacturer's recommended procedures and guaranteed accuracy to +/- 10 ppm or +/-2.5% of full scale readings, whichever is greater?</p> <p>Did the permittee document the results of all calibrations required by this permit condition I(A).5?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___</p>

<p>42.</p>	<p><u>Waste Feed Cut-Off Requirements</u></p> <p>Were all monitoring systems listed under “Monitoring System” in Attachment C of Module I(A) and that have a monitoring frequency of “Continuous” or “Continuously” specified under “Monitoring Frequency” on-line, properly operating and continuously monitoring the specified parameters before hazardous wastes were fed to the incinerator? [Condition I(A).6(a)]</p> <p>In case of a malfunction of the automatic waste feed cut-off systems, did the Permittee perform manual shutdowns in accordance with the approved procedures in the permit application and not restart the incinerator until the problem causing the malfunction was located and corrected? [Condition I(A).6(b)]</p> <p>Were the waste feeds to the incinerator automatically cutoff whenever any operating limit identified as a waste feed cutoff limit in Attachment B of Module I(A) was exceeded or if both CO continuous emissions monitoring systems were off-line for any reason? [Condition I(A).6(c)]</p> <p>Did an alarm actuate whenever any operating limit identified as an “Alarm Only” limit in Attachment B of Module I(A) was exceeded? [Condition I(A).6(c)]</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# _____</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# _____</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# _____</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# _____</p>
<p>43.</p>	<p>Did the Permittee test the automatic waste feed cut-off system weekly and document the test using pages 42 and 42.1 of 45 in Appendix F-2 of Section F of the permit application? [Condition I(A).6(c)]</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# _____</p>

<p>44.</p>	<p><u>Recordkeeping</u></p> <p>Did the Permittee record and maintain, in the operating record for this facility, all monitoring and inspection data compiled under the requirements of section I(A) of the permit? [Condition I(A).8(a)]</p> <p>Did the Permittee record in the operating record for this facility the date and time of all automatic waste feed shut-offs, including the triggering parameters, reason for the shut-off, and corrective actions taken? [Condition I(A).8(b)]</p> <p>Did the Permittee also record all failures of the automatic waste feed shut-off systems and corrective actions taken? [Condition I(A).8(c)]</p> <p>Were the daily visual inspections of the incinerator and associated equipment (pumps, valves, conveyors, piping, etc.) for leaks, spills, fugitive emissions and signs of tampering recorded in the daily inspection log and made part of the facility's operating log? [Condition I(A).8(c)]</p> <p>Did the Permittee document all emergency process termination (EPT) incidents at the facility and promptly report the occurrence of the EPT, cause of the EPT and associated emissions to Ohio EPA? [Condition I(A).8(d)]</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# ___</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# ___</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> RMK# ___ <i>No failures occurred</i></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# ___</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# ___</p>
<p>45.</p>	<p>Have all compliance schedule deadlines in Condition I(A).9 been achieved?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# ___</p>