



State of Ohio Environmental Protection Agency

Northeast District Office

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

July 15, 2008

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 May 19, 20 and 21, 2008, Ohio EPA conducted a Compliance Evaluation Inspection (CEI) 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, Patricia Natali, Michelle Tarka and myself, John Paquelet. RIS was represented by you, Jeff Lenchak, Debbie Bishop, Chad Colman and Susan Kaiser.

Ohio EPA's inspection report includes findings from the walk-through of the facility on May 19, 2008, and those issues noted during the review of facility records and interviews with facility personnel. Written documentation reviewed for compliance with Ohio's hazardous waste laws and regulations included 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 3745-55-71 Condition of containers.

During the CEI walk-through the following containers were observed to be leaking:

- Roll-off No. 33 which contained incinerator ash and located under the ash shaker had a small water leak.
- Roll-off No. 41 which contained incinerator ash and located in the de-watering line had a small water leak at the hose.
- A 55 gallon drum in the Container Storage Facility (CSF) in location H1 N Level 4 B-12 had a leak.

These violations were abated at the time of the inspection.

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

While inspecting the area around Ross Transportation Services (RTS) and the old process dock, it was observed that a van trailer (trailer No. 80275) holding containers of hazardous waste and a roll-off (No.R25372) holding hazardous waste had been placed immediately in front of the old process dock. The apparent intent was for these containers to be placed on RTS transfer facility property. However, these containers were on RIS property, rather than RTS property.

The containers were not located in a permitted container storage unit. Placing containers of hazardous waste in this area is not in compliance with Permit Condition C.5 (a) which requires that "All container storage shall be conducted within the container storage units as described in Condition C.1. of this permit and Section D of the Part B permit application."

The violation was abated at the time of the inspection by moving the trailer and the roll-off to the permitted container storage unit.

3. OAC 3745-66-73(A) A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

Roll-offs No. 33 and No. 36 located on the east pad contained hazardous waste incinerator ash. The tarps on these roll-offs had holes. In addition the tarp on Roll-off No. 36 was not completely covering the container. In the filter press building the tarp on the roll-off under the filter press was ripped.

The violations were abated during the inspection by placing new tarps on the containers.

4. OAC 3745-54-35 Required aisle space.

In Bay O of the CSF there was inadequate aisle space between a tanker and a row of palletized 55 gallon drums. The distance between them was approximately 6 inches at the narrowest point. The distance was clearly insufficient to allow unobstructed movement of personnel, fire protection equipment or spill control equipment in case of an emergency. Failure to provide adequate aisle space in the truck bays of the CSF had been observed on several occasions since the previous CEI and the issue had been discussed with facility representatives.

The violation was abated during the inspection by moving the palletized containers.

5. OAC 3745-55-77(C) Special Requirements for Incompatible Wastes Permit Condition C.11(c)

Section D-15 of the RIS permit application states "Containers holding wastes which are incompatible with other stored materials are separated from them by means of a dike, berm, wall, sufficient aisle space, or other device and stored in a predesignated area of the CSF". Permit Condition C.11(c) requires the facility to follow the practices stated in the application.

In Bay N of the CSF no means of separation were provided between several containers of hazardous waste that were labeled as "water reactive" and waste that contained water. The violation was abated during the inspection by placing a row of absorbent bags to separate the two rows. Please explain what training or operating procedures have been instituted to prevent future violations of this kind.

6. OAC 3745-54-71(A)(1) Use of manifest system.

Manifest No. 000944647FLE had not been signed by a representative of RIS (i.e., the designated facility) at the time it was received. The violation was addressed during the inspection by a designated RIS representative signing and dating the manifest.

7. OAC 3745-54-52 (D) Content of contingency plan.

The emergency coordinator list in the RIS contingency plan had not been updated to reflect a recent change in personnel. One person on the emergency coordinator list is no longer employed by RIS. A Permit Modification Request had been mailed to Ohio EPA on May 16, 2008, the Friday prior to the inspection. The violation was abated with the acknowledgment of the permit modification.

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

1. In the closed loop area a deep crack in the secondary containment concrete was observed between the cooling towers and the agitator tank. RIS is requested to include repair of this crack in its coating maintenance program for 2008 for the secondary containment of the closed loop area. RIS is also requested to inspect the secondary containment of the closed loop area to determine if any additional cracks or gaps exist that require repair or any sections of coating that require repair and to include them in the 2008 coating repair program. RIS is requested to commit to implementing the coating maintenance program for 2008 for the secondary containment of the closed loop area by September 1, 2008.
2. A few small areas in tank farm 3 need to have the coating repaired. RIS is requested to address these areas as part of its coating maintenance program for 2008 for the tankfarms. RIS is requested to commit to implementing the coating maintenance program for 2008 for the tankfarms by September 1, 2008.
3. On several occasions changes had been made to a manifest that were not initialed by the person making the change. Changes to a manifest should be initialed by that person. If manifest changes are made by RIS personnel, please make certain your personnel initial those changes.
4. During the inspection some difficulties were experienced when attempting to review certain sections of the current version of the permit application that are to be maintained at the facility. The problem was that two separate electronic versions of some sections (e.g., the emergency coordinators list in the contingency plan) were presented to Ohio EPA. Clarification is required on what constitutes the official facility permit application maintained at the facility.
5. Concrete in the incinerator area (East Pad) is cracked and needs repair. Two areas present the greatest concerns: one is in front of the transition duct and the other near the shaker where side door skids are placed. please provide me with a plan for how RIS plans to repair the concrete on the east pad.
6. About four containers of repacked non-hazardous waste (WPS 60446) labeled "water reactive" were observed during the inspection with shower caps as the lids and with water pooled in the shower caps. The thin plastic film of the shower cap was the only barrier separating water from the water reactive waste. These shower caps form a depression and when placed outside in the weather and allow precipitation to collect in the depression which increases the possibility of water entering the container. Also some other water reactives are stored in fiber drums that are also exposed to the weather.

Please provide me with RIS's procedures for managing the potential incompatibilities of containers of wastes that are classified as water reactive and that are exposed to rain and or snow.

ROSS INCINERATION SERVICES, INC.
JULY 15, 2008
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7. One partially full satellite accumulation container in the Process Dock had a date of October 23, 2007 on the hazardous waste label. Satellite accumulation containers must be dated within 3 days of accumulating 55 gallons. Including a date on the container prior to the container being full has the potential to create confusion, for example, it could suggest that 55 gallons has been accumulated. Please provide me with a discussion of RIS's procedures for dating of satellite containers.

Please immediately address each of the above violations and concerns and within 30 days of the date of this letter submit to me your response with the requested documentation..
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 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.



LARGE 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

GENERAL REQUIREMENTS

1. Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)]
- Yes No N/A ___ RMK# ___

PROHIBITIONS

2. Did the LQUWH dispose of universal waste? [3845-273-31(A)]
- Yes No N/A ___ RMK# ___
3. Did the LQUWH dilute or treat universal waste, except when responding to releases or by managing specific wastes as provided in OAC 3745-273-33? [3745-273-31(B)]
- Yes No N/A ___ RMK# ___

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES:

4. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)]
- Yes No N/A ___ RMK# ___
5. If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage?
- Yes No N/A ___ RMK# ___
6. *Bass only*
Does the LQUWH 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. Regenerate 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)? [3745-273-33(A)(2)]

Yes No N/A RMK# _____

7. If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)(3)]

Yes _____ No N/A RMK# _____

a. If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)]

Yes _____ No N/A RMK# _____

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)]

Yes _____ No N/A RMK# _____

8. Are the battery(ies) or container(s) of batteries located with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-34(A)]

Yes No N/A _____ RMK# _____

UNIVERSAL WASTE PESTICIDES

No Risk Generated Post-Closure

9. Does the LQUWH 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? [3745-273-33(B)(1)]

Yes _____ No N/A _____ RMK# _____

10. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-33(B)(2)]

Yes _____ No N/A _____ RMK# _____

11. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 66-101, except for paragraph (C) of 3745-66-97; rule 3745-66-100 and 3745-66-101 of the OAC met? [3745-273-33(B)(3)]

Yes _____ No N/A _____ RMK# _____

12. If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-33(B)(4)]

Yes _____ No N/A _____ RMK# _____

13. Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)]

Yes _____ No N/A _____ RMK# _____

14. Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)] Yes No N/A RMK#

UNIVERSAL WASTE THERMOSTATS

Trans-shipped.

15. Are thermostats that show evidence of leakage, spillage or damage that could cause leaks, properly contained? [3745-273-33(C)(1)] Yes No N/A RMK#

16. 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? [3745-273-33(C)(1)] Yes No N/A RMK#

17. If the mercury-containing ampules are removed, does the LQUWH: [3745-273-33(C)(2)] *Boss does not Remove the Hg ampules*

a. Remove the ampules in a manner to prevent breakage and is the removal done over a containment device? [3745-273-33(C)(2)(a)(b)] Yes No N/A RMK#

b. Have a clean-up system readily available to transfer spilled material to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-33(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? [3745-273-33(C)(2)(e)] Yes No N/A RMK#

d. Ensure employees are thoroughly familiar with proper waste handling and emergency procedures? [3745-273-33(C)(2)(f)] Yes No N/A RMK#

e. Ensure removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-33(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? [3745-273-33(C)(2)(h)] Yes No N/A RMK#

If there were 9, 15.

18. If mercury or clean-up residues resulting from spills or leaks or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-33(C)(3)(a)]
Yes No N/A RMK#

a. If the waste is characteristic, was it managed in compliance with 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) [3745-273-33(C)(3)(b)]
Yes No N/A RMK#

b. If the mercury, residues and/or other waste are not hazardous, are they managed in compliance with applicable law? [3745-273-33(C)(3)(c)]
Yes No N/A RMK#

19. Are the thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)" [3745-273-34(D)]
Yes No N/A RMK#

UNIVERSAL WASTE LAMPS

20. Does the LQUHW 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? [3745-273-33(D)(1)]
Yes No N/A RMK#

21. 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 constituents to the environment? [3745-273-33(D)(2)]
Yes No N/A RMK#

22. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamps?" [3745-273-34(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

23. Is the waste accumulated for less than one year? [3745-273-35(A)]

Yes No N/A RMK#

a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on handler to demonstrate) [3745-273-35(B)]

Yes No N/A RMK#

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

24. Has the length of time the universal waste has been accumulated documented by one of the following: [3745-273-35(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? [3745-273-35(C)(1)]

Yes No N/A RMK#

b. Marking or labeling the individual item of universal waste with the date that it became a waste or was received? [3745-273-35(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? [3745-273-35(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? [3745-273-35(C)(4)]

Yes No N/A RMK#

- e. Placing the universal waste in a specific accumulation area and identifying the earliest that any universal waste in the area became a waste or was received? [3745-273-35(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 is received? [3745-273-35(C)(6)] Yes ___ No ___ N/A RMK# ___

EMPLOYEE TRAINING

25. Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36] Yes No N/A ___ RMK# ___

RESPONSE TO RELEASES

26. Were releases of universal waste and other residues immediately contained? [3745-273-37(A)] *If they were to be spilled.* Yes No N/A ___ RMK# ___
27. Was the released material characterized? [3745-273-37(B)] Yes ___ No N/A RMK# ___
28. If the released material was a hazardous waste, was it managed as required in OAC 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) [3745-273-37(C)] Yes ___ No N/A RMK# ___

OFF-SITE SHIPMENTS

NOTE: *If a LQUWH self-transportes wastes, then the handler must comply with the Universal Waste transporter requirements.*

29. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)] Yes No N/A ___ RMK# ___

NOTE: *LQUWHs are prohibited to send waste to any other facility.*

30. 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? [3745-273-38(C)] Yes No N/A ___ RMK# ___

31. Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)] Yes No N/A ___ RMK# ___
32. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following: Yes ___ No N/A ___ RMK# ___
- a. Receive the waste back? [3745-273-38(E)(1)] Yes ___ No ___ N/A ___ RMK# ___
- b. Agree to where shipment will be sent? [3745-273-38(E)(2)] Yes No ___ N/A ___ RMK# ___
If waste was to be Re-jected, it has not happened.
33. If a handler rejects a partial or full load from another handler, does the receiver handler contact the originating handler and discuss one of the following: Yes ___ No N/A ___ RMK# ___
- a. Sending the waste back to originating handler? [3745-273-38(F)(1)] Yes ___ No ___ N/A ___ RMK# ___
- b. Sending the shipment to a destination facility? [3745-273-38(F)(2)] Yes No ___ N/A ___ RMK# ___
If waste (partial) was to be rejected, it has not happened.
34. If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)] Yes No N/A ___ RMK# ___
Has not happened.
35. If the handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-38(H)] Yes No N/A ___ RMK# ___
If it were to happen.

TRACKING UNIVERSAL WASTE SHIPMENTS

36. Are universal waste received from another handler? If so: Yes No N/A RMK#
- a. Is a record of each shipment kept? [3745-273-39(A)] Yes No N/A RMK#

NOTE: *This record can be in the form of a log, invoice, manifest, bill of lading, or other shipping document. This also applies to question No. 35(a).*

37. Does the record include the following:
- a. Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)] Yes No N/A RMK#
- b. Quantity of each type of universal waste? [3745-273-39(A)(2)] Yes No N/A RMK#
- c. Date received? [3745-273-39(A)(3)] Yes No N/A RMK#
38. Is universal waste shipped to another handler? If so: Yes No N/A RMK#
- a. Is a record of each shipment kept? [3745-273-39(B)] Yes No N/A RMK#
39. Does the record include the following?
- a. Name and address of universal waste handler, destination facility or foreign destination? [3745-273-39(B)(1)] Yes No N/A RMK#
- b. Quantity of each type of universal waste? [3745-273-39(B)(2)] Yes No N/A RMK#
- c. Date shipped? [3745-273-39(B)(3)] Yes No N/A RMK#
40. Are records kept for three years? [3745-273-39(C)(1)(2)] Yes No N/A RMK#

EXPORTS

41. Is waste being sent to a foreign destination? If so: Yes No N/A RMK#
- a. Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56 and 3745-52-57? [3745-273-40(A)] Yes No N/A RMK#

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA "Acknowledgment of Consent" 3745-52-50 to -52-57? [3745-273-40(B)]

Yes ___ No N/A RMK# ___

c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)]

Yes ___ No N/A RMK# ___

REMARKS

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# ___
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# ___
- 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# ___
All have been returned to P
- d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes No N/A ___ RMK# ___
- 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.

NA

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#

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#

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

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# _____
Household Hazard Waste Collected & properly placed into storage.

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#___
- 5. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No N/A ___RMK#___
- 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#___
 - b. In good condition? [3745-66-71] Yes No N/A ___RMK#___
 - 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#___
Daily
 - a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A ___RMK#___
- 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# ___

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REMARKS

USED OIL INSPECTION CHECKLIST (Long Version)

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)] *on spec used oil is stored - generated used oil is treated as a waste.* 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)] *if used.* Yes No N/A ___ RMK# ___
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] *If it were to happen.*
- 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-oil 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 a 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# ___
If Transported.

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# ___

REMARKS

USED OIL TRANSPORTER AND TRANSFER FACILITIES

16. Does the used oil transporter process used oil? [3745-279-41(A)] If so: Yes ___ No ___ N/A ___ RMK# ___
Is the used oil transporter in compliance with the requirements for processors/re-refiners in 3745-279-50 to 3745-279-59 (except as provided in 3745-279-41(B) and (C))? [3745-279-41(A)] Yes ___ No N/A ___ RMK# ___
17. Has the used oil transporter notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-42(A)] Yes ___ No N/A ___ RMK# ___
18. Has the used oil transporter delivered all used oil to:
- a. Another used oil transporter that has a U.S. EPA ID#? [3745-279-43(A)(1)] Yes ___ No N/A ___ RMK# ___
 - b. A used oil processing/re-refining facility that has a U.S. EPA ID#? [3745-279-43(A)(2)] Yes ___ No N/A ___ RMK# ___
 - c. An off-spec used oil burning facility that has a U.S. EPA ID#? [3745-279-43(A)(3)] Yes ___ No N/A ___ RMK# ___
 - d. An on-spec used oil burning facility? [3745-279-43(A)(4)] Yes ___ No N/A ___ RMK# ___
19. Has the used oil transporter complied with all applicable USDOT regulations (49 CFR 171 to 180)? [3745-279-43(B)] Yes ___ No N/A ___ RMK# ___
20. Has the used oil transporter had a discharge of used oil? If so: Yes ___ No ___ N/A ___ RMK# ___
Did they take the appropriate action as outlined in 3745-279-43(C)? Yes ___ No N/A ___ RMK# ___
21. Has the used oil transporter determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? [3745-279-44(A)] Yes ___ No N/A ___ RMK# ___
22. Does the transporter retain all records of analyses and information used to comply with 3745-279-44 for at least three years? [3745-279-44(D)] Yes ___ No N/A ___ RMK# ___
23. Does the owner/operator of a used oil transfer facility:
- a. Stored used oil in tanks, containers, or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-45(B)] Yes ___ No N/A ___ RMK# ___

- b. Stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-45(C)] Yes ___ No N/A ___ RMK# ___
- c. Provide secondary containment for containers used to store used oil as required by 3745-279-45(D)? [3745-279-45(D)] Yes ___ No N/A ___ RMK# ___
- d. Provide secondary containment for existing aboveground tanks required by 3745-279-45(E)? [3745-279-45(E)] Yes ___ No N/A ___ RMK# ___
- e. Provide secondary containment for new aboveground tanks as required by 3745-279-45(F)? [3745-279-45(F)] Yes ___ No N/A ___ RMK# ___
- f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-45(G)] Yes ___ No N/A ___ RMK# ___
- g. Upon detection of a release of used oil: [3745-279-45(H)]
 - i. Stopped the release? Yes ___ No N/A ___ RMK# ___
 - ii. Contained the release? Yes ___ No N/A ___ RMK# ___
 - iii. Cleaned up and managed the used oil and other materials? Yes ___ No N/A ___ RMK# ___
 - iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A ___ RMK# ___
- 24. Does the used oil transporter keep a record of each shipment of used oil? [3745-279-46(A)] Yes ___ No N/A ___ RMK# ___
 - a. Does each record include the name and address of the generator, transporter or processor/re-refiner who provides the used oil for transport? [3745-279-46(A)(1)] Yes ___ No N/A ___ RMK# ___
 - b. Does each record include the U.S. EPA ID# of the generator, transporter or processor/re-refiner (if applicable) that provides the used oil for transport? [3745-279-46(A)(2)] Yes ___ No N/A ___ RMK# ___
 - c. Does each record include the quantity of used oil accepted? [3745-2679-46(A)(3)] Yes ___ No N/A ___ RMK# ___

- d. Does each record include the date of acceptance? [3745-279-46(A)(4)] Yes ___ No N/A ___ RMK# ___
- e. Does each record include the signature of a representative of the generator, transporter, processor/re-refiner that provided the used oil for transport? [3745-279-46(A)(5)] Yes ___ No N/A ___ RMK# ___
- 25. Does the used oil transporter keep a record of each shipment of used oil that is delivered to another used oil transporter, burner, processor/re-refiner, or disposal facility? [3745-279-46(B)] Yes ___ No N/A ___ RMK# ___
 - a. Does each record include the name and address of the receiving facility or transporter? [3745-279-46(B)(1)] Yes ___ No N/A ___ RMK# ___
 - b. Does each record include the U.S. EPA ID# of the receiving facility or transporter? [3745-279-46(B)(2)] Yes ___ No N/A ___ RMK# ___
 - c. Does each record include the quantity of used oil delivered? [3745-279-46(B)(3)] Yes ___ No N/A ___ RMK# ___
 - d. Does each record include the date delivered? [3745-279-46] Yes ___ No N/A ___ RMK# ___
 - e. Does each record include the signature of a representative of the receiving facility or transporter (intermediate rail transporters are not required to sign a record of delivery)? [3745-279-46(B)(5)] Yes ___ No N/A ___ RMK# ___
- 26. Does the used oil transporter who exports used oil to a foreign country comply with 3745-279-46(B)(1) to (B)(4)? [3745-279-46(C)] Yes ___ No N/A ___ RMK# ___
- 27. Does the used oil transporter retain all records required under 3745-279-46 for at least three years? [3745-279-46(D)] Yes ___ No N/A ___ RMK# ___
- 28. Does the used oil transporter generate residues from the storage or transportation of used oil? Yes ___ No ___ N/A ___ RMK# ___

If so, are they managed as specified in 3745-279-10(E)? [3745-279-47] Yes ___ No N/A ___ RMK# ___

REMARKS

USED OIL STANDARDS FOR PROCESSORS AND RE-REFINERS

29. Has the used oil processor and/or re-refiner notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-51(A)] Yes ___ No N/A ___ RMK# ___
30. Does the owner/operator of a used oil processing or re-refining facility comply with the following:
- a. Is the facility maintained and operated to minimize the possibility of fire, explosion, or release of used oil? [3745-279-52(A)(1)] Yes ___ No N/A ___ RMK# ___
- b. Is the facility equipped with the equipment in 3745-279-52(A)(2), if necessary? Yes ___ No N/A ___ RMK# ___
- c. Are all communication systems, alarm systems, fire protection equipment, spill control equipment, and decontamination equipment tested and maintained as required? [3745-279-52(A)(3)] Yes ___ No N/A ___ RMK# ___
- d. Is there access to communication or alarm system(s)? [3745-279-52(A)(4)] Yes ___ No N/A ___ RMK# ___
- e. Is the required aisle space being maintained? [3745-279-52(A)(5)] Yes ___ No N/A ___ RMK# ___
- f. Are arrangements maintained with local authorities? [3745-279-52(A)(6)] Yes ___ No N/A ___ RMK# ___
31. Has the owner/operator of a used oil processing and re-refining facility complied with the following requirements:
- a. Has a contingency plan been developed? [3745-279-52(B)(1)] Yes ___ No N/A ___ RMK# ___
- b. Does the contingency plan contain the requirements of 3745-279-52(B)(2)? Yes ___ No N/A ___ RMK# ___
- c. Have copies and revisions been maintained and submitted to all local authorities? [3745-279-52(B)(3)] Yes ___ No N/A ___ RMK# ___
- d. Is the contingency plan reviewed and amended whenever one of the events in 3745-279-52(B)(4) occurs? Yes ___ No N/A ___ RMK# ___
- e. Is an emergency coordinator on the premises or on call at all times to meet the requirements of 3745-279-52(B)(5) and (6)? Yes ___ No N/A ___ RMK# ___

32. Does the used oil processor/re-refiner determine whether the total halogen content of the used oil being managed at the facility is above or below 1000 ppm? [3745-279-53(A)] Yes ___ No N/A ___ RMK# ___
33. Does/has the used oil processor/re-refiner:
- a. Only store used oil in tanks, containers or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-54(A)] Yes ___ No N/A ___ RMK# ___
- b. Only store used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-54(B)] Yes ___ No N/A ___ RMK# ___
- c. Provide secondary containment for containers as required by 3745-279-54(C)? Yes ___ No N/A ___ RMK# ___
- d. Provide secondary containment for existing aboveground tanks as required by 3745-279-54(D)? Yes ___ No N/A ___ RMK# ___
- e. Provide secondary containment for new aboveground tanks as required by 3745-279-54(E)? Yes ___ No N/A ___ RMK# ___
- f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil" [3745-279-54(F)] Yes ___ No N/A ___ RMK# ___
- g. Upon detection of a release of used oil, done the following in accordance with 3745-279-54(G):
- i. Stopped the release? Yes ___ No N/A ___ RMK# ___
- ii. Contained the release? Yes ___ No N/A ___ RMK# ___
- iii. Cleaned up and managed the used oil and other materials? Yes ___ No N/A ___ RMK# ___
- iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A ___ RMK# ___
- h. Performed closure of aboveground tanks and containers in accordance with 3745-279-54(H)? Yes ___ No N/A ___ RMK# ___

34. Has the owner/operator of the used oil processing/re-refining facility developed, kept on-site, and followed a written waste analysis plan which meets the requirements in 3745-279-53 and, if applicable 3745-279-72? [3745-279-55] Yes ___ No N/A ___ RMK# ___
35. Does the used oil processor/re-refiner keep a record of each shipment of used oil accepted for processing/re-refining? [3745-279-56(A)] Yes ___ No N/A ___ RMK# ___
- a. Does each record include the name and address of the transporter who delivered the used oil to the processor? [3745-279-56(A)(1)] Yes ___ No N/A ___ RMK# ___
- b. Does each record include the name and address of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(2)] Yes ___ No N/A ___ RMK# ___
- c. Does each record include the U.S. EPA ID # of the transporter who delivered the used oil to the processor/re-refiner? [3745-279-56(A)(3)] Yes ___ No N/A ___ RMK# ___
- d. Does each record include the U.S. EPA ID # (if applicable) of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(4)] Yes ___ No N/A ___ RMK# ___
- e. Does each record include the quantity of used oil accepted? [3745-279-56(A)(5)] Yes ___ No N/A ___ RMK# ___
- f. Does each record include the date of acceptance? [3745-279-56(A)(6)] Yes ___ No N/A ___ RMK# ___
36. Does the used oil processor/re-refiner keep a record of each shipment of used oil that is shipped to a used oil burner, processor/re-refiner, or disposal facility? [3745-279-56(B)] Yes ___ No N/A ___ RMK# ___
- a. Does each record include the name and address of the transporter who delivers the used oil to the burner, processor/re-refiner or disposal facility [3745-279-56(B)(1)] Yes ___ No N/A ___ RMK# ___
- b. Does each record include the name and address of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(2)] Yes ___ No N/A ___ RMK# ___

- c. Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner, processor/re-refiner or disposal facility? [3745-279-56(B)(3)] Yes ___ No N/A ___ RMK# ___
- d. Does each record include the U.S. EPA ID# of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(4)] Yes ___ No N/A ___ RMK# ___
- e. Does each record include the quantity of used oil shipped? [3745-279-56-(B)(5)] Yes ___ No N/A ___ RMK# ___
- f. Does each record include the date of shipment? [3745-279-56(B)(6)] Yes ___ No N/A ___ RMK# ___
37. Does the used oil processor/re-refiner retain all records required under 3745-279-56 for at least three years? [3745-279-56(C)] Yes ___ No N/A ___ RMK# ___
38. Does the owner/operator keep an operating record at the facility? [3745-279-57(A)(1)] Yes ___ No N/A ___ RMK# ___
- a. Does the operating record include records and results of used oil analysis performed as described in the analysis plan required under 3745-279-55? [3745-279-57(A)(2)(a)] Yes ___ No N/A ___ RMK# ___
- b. Are summary reports and details of all incidents that require implementation of the contingency plan as specified in 3745-279-52(B) maintained in the operating record? [3745-279-57(A)(2)(b)] Yes ___ No N/A ___ RMK# ___
39. Does the used oil processor/re-refiner report to the director in the form of a letter, on a biennial basis by March 1, the following information:
- a. The U.S. EPA ID#, name and address of the processor/re-refiner? [3745-279-57(B)(1)] Yes ___ No N/A ___ RMK# ___
- b. The calendar year covered by the report? [3745-279-57(B)] Yes ___ No N/A ___ RMK# ___
- c. The quantities of used oil accepted for processing/re-refining and the manner in which the used oil is processed/re-refined, including the specific processes employed? [3745-279-57(B)] Yes ___ No N/A ___ RMK# ___
40. Does the used oil processor/re-refiner, who initiates a shipment of used oil off-site, use a used oil transporter that has a U.S. EPA ID#? [3745-279-58] Yes ___ No N/A ___ RMK# ___

41. Does the used oil processor/re-refiner generate residues from the storage, processing or re-refining of used oil? [3745-279-59] Yes ___ No ___ N/A ___ RMK# ___
- If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-59] Yes ___ No N/A ___ RMK# ___

REMARKS

STANDARDS FOR USED OIL BURNERS WHO BURN OFF-SPEC USED OIL FOR ENERGY RECOVERY

42. Is off-spec used oil fuel burned for energy recovery only in industrial furnaces identified in 3745-50-10, or boilers as defined in 3745-50-10 and identified in 3745-279-61(A)(2), or hazardous waste incinerators? [3745-279-61(A)] Yes ___ No N/A ___ RMK# ___
43. Does the used oil burner process used oil? [3745-279-61(B)] Yes ___ No ___ N/A ___ RMK# ___
- If so, have they complied with the requirements for processors in 3745-279-50 to 3745-279-59? [3745-279-61(B)] Yes ___ No N/A ___ RMK# ___
44. Has the used oil burner notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-62(A)] Yes ___ No N/A ___ RMK# ___
45. Does the used oil burner determine whether the total halogen content of the used oil being managed at the facility is above or below 1000 ppm? [3745-279-63(A)] Yes ___ No N/A ___ RMK# ___
46. Does the used oil burner retain records of all analyses conducted or information used to comply with 3745-279-63 for at least three years? [3745-279-63(D)] Yes ___ No N/A ___ RMK# ___
47. Does the used oil burner:
- a. Only store used oil in tanks, containers; or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-64(A)] Yes ___ No N/A ___ RMK# ___
 - b. Only stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-64(B)] Yes ___ No N/A ___ RMK# ___
 - c. Provided secondary containment for containers as required by 3745-279-64(C)? Yes ___ No N/A ___ RMK# ___

- d. Provided secondary containment for existing aboveground tanks as required by 3745-279-64(D)? Yes ___ No N/A ___ RMK# ___
- e. Provided secondary containment for new aboveground tanks as required by 3745-279-64(E)? Yes ___ No N/A ___ RMK# ___
- f. Labeled all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-64(F)] Yes ___ No N/A ___ RMK# ___
- g. Upon detection of a release of used oil, done the following in accordance with 3745-279-64(G):
- i. Stopped the release? Yes ___ No N/A ___ RMK# ___
 - ii. Contained the release? Yes ___ No N/A ___ RMK# ___
 - iii. Cleaned up and managed the used oil and other materials? Yes ___ No N/A ___ RMK# ___
 - iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A ___ RMK# ___
48. Does the used oil burner keep a record of each used oil shipment accepted for burning? [3745-279-65(A)] Yes ___ No N/A ___ RMK# ___
- a. Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-65(A)(1)] Yes ___ No N/A ___ RMK# ___
 - b. Does each record include the name and address of the generator or processor/re-refiner who sent the used oil to the burner? [3745-279-65(A)(2)] Yes ___ No N/A ___ RMK# ___
 - c. Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-65(A)(3)] Yes ___ No N/A ___ RMK# ___
 - d. Does each record include the U.S. EPA ID# (if applicable) of the generator or processor/re-refiner who sent the used oil to the burner? [3745-279-65(A)(4)] Yes ___ No N/A ___ RMK# ___
 - e. Does each record include the quantity of the used oil accepted? [3745-279-65(A)(5)] Yes ___ No N/A ___ RMK# ___
 - f. Does each record include the date of acceptance? [3745-279-65(A)(6)] Yes ___ No N/A ___ RMK# ___

49. Are the records described in 3745-279-65(A) maintained for at least three years? [3745-279-65(B)] Yes ___ No N/A RMK# ___
50. Prior to accepting the first shipment of off-spec used oil fuel from a generator, transporter, or processor/re-refiner, does the used oil fuel burner provide to the generator, transporter, or processor/re-refiner a one-time written and signed notice certifying that:
- a. The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-279-66(A)(1)] Yes ___ No N/A RMK# ___
- b. The burner will burn the used oil only in an industrial furnace or boiler identified in 3745-279-61? Yes ___ No N/A RMK# ___
51. Is the certification maintained for at least three years from the date the burner last received a shipment of off-spec used oil from the generator, transporter, or processor/re-refiner? [3745-279-66(B)] Yes ___ No N/A RMK# ___
52. Does the used oil burner generate residues from the storage or burning of used oil? [3745-279-67] Yes ___ No ___ N/A ___ RMK# ___
- If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-67] Yes ___ No N/A RMK# ___

REMARKS

STANDARDS FOR USED OIL MARKETERS

53. Does the used oil fuel marketer initiate shipments of **off-spec** used oil only to a used oil burner that has an a U.S. EPA ID# and burns the used oil in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-71] Yes ___ No N/A RMK# ___
54. Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil meets the specification for used oil fuel under 3745-279-11 keep copies of analyses of the used oil (or other information used to make the determination) for at least three years? [3745-279-72(B)] Yes ___ No N/A RMK# ___
55. Has the used oil marketer notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-73(A)] Yes ___ No N/A RMK# ___

56. Does the used oil marketer keep a record of each shipment of **off-spec** used oil directed to a used oil burner? [3745-279-74(A)]
- Yes ___ No N/A ___ RMK# ___
- a. Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-74(A)(1)]
- Yes ___ No N/A ___ RMK# ___
- b. Does each record include the name and address of the burner who receives the oil? [3745-279-74(A)(2)]
- Yes ___ No N/A ___ RMK# ___
- c. Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-74(A)(3)]
- Yes ___ No N/A ___ RMK# ___
- d. Does each record include the U.S. EPA ID# of the burner? [3745-279-74(A)(4)]
- Yes ___ No N/A ___ RMK# ___
- e. Does each record include the quantity of the used oil shipped? [3745-279-74(A)(5)]
- Yes ___ No N/A ___ RMK# ___
- f. Does each record include the date of shipment? [3745-279-74(A)(6)]
- Yes ___ No N/A ___ RMK# ___
57. Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil **meets the fuel specifications** under 3745-279-11 keep a record of each shipment of used oil to an on-spec used oil burner? [3745-279-74(B)]
- Yes ___ No N/A ___ RMK# ___
- a. Does each record include the name and address of the facility receiving the shipment? [3745-279-74(B)(1)]
- Yes ___ No N/A ___ RMK# ___
- b. Does each record include quantity of used oil fuel delivered? [3745-279-74(B)(2)]
- Yes ___ No N/A ___ RMK# ___
- c. Does each record include date of shipment or delivery? [3745-279-74(B)(3)]
- Yes ___ No N/A ___ RMK# ___
- d. Does each record include a cross-reference to the record of used oil analysis or other information used to make the determination that the used oil meets the specification as required in 3745-279-72(A)? [3745-279-74(B)(4)]
- Yes ___ No N/A ___ RMK# ___
58. Are the records described in 3745-279-74(A) and (B) maintained for at least three years? [3745-279-74(C)]
- Yes ___ No N/A ___ RMK# ___

59. Before the used oil generator, transporter or processor/re-refiner directs the first shipment of **off-spec** used oil to a burner, does he obtain a one time written and signed notice from the burner certifying that:

a. The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-279-75(A)(1)]

Yes ___ No N/A ___ RMK# ___

b. The burner will burn the off-spec used oil only in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-75(A)(2)]

Yes ___ No N/A ___ RMK# ___

60. Is the certification maintained for at least three years from the date the last shipment of off-spec used oil was shipped to the burner? [3745-279-75(B)]

Yes ___ No N/A ___ RMK# ___

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REMARKS

LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] (possibly also cite 3745-52-11) **If so:** Yes No N/A ___ RMK# ___
- a. **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-270-07(A)(6)] Yes No N/A ___ RMK# ___
- b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes No N/A ___ RMK# ___
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] (possibly also cite 3745-52-11) Yes No N/A ___ RMK# ___
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes No N/A ___ RMK# ___
4. Does the generator generate a characteristic hazardous waste? **If so:** Yes No ___ N/A ___ RMK# ___
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes No N/A ___ RMK# ___

NOTE: *If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] **If so:** Yes No ___ N/A ___ RMK# ___
- a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes No N/A ___ RMK# ___

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*

6. Has the generator **correctly** determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)]

Yes No N/A ___RMK#___

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03]

Yes No N/A ___RMK#___

NOTE: *A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (§402 of CWA), that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater.[3745-270-03(B)]*

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)]

Yes No N/A ___RMK#___

Note: In other words, is combustion a legitimate treatment method

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)]

Yes No N/A ___RMK#___

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] **If so:**

Yes ___ No N/A ___RMK#___

a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05]

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] **If so:**

Yes ___ No N/A ___ RMK# ___

a. The facility can land dispose of the waste. [3745-270-06]

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment?
If so:

Yes ___ No N/A ___ RMK# ___

a. Has the facility complied with 3745-270-04?

Yes ___ No N/A ___ RMK# ___

REMARKS

NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1? [3745-270-07(A)(2)] Yes No N/A RMK#

14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1? [3745-270-07(A)(3)] Yes No N/A RMK#

15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1? [3745-270-07(A)(4)] Yes No N/A RMK#

16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1? [3745-270-07(A)(9)] Yes No N/A RMK#

17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so: Yes No N/A RMK#

a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes No N/A RMK#

NOTE: Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit. (See 270-07(A)(7))

18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)] Yes No N/A RMK#

REMARKS

GENERATORS TREATING HAZARDOUS WASTE - NOT TREATING TO MEET LDR STANDARDS

- 1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? Yes ___ No ___ N/A ___ RMK# ___
- 2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)] Yes ___ No N/A ___ RMK# ___
 - a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] Yes ___ No N/A ___ RMK# ___
 - b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes ___ No N/A ___ RMK# ___
- 3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes ___ No N/A ___ RMK# ___
- 4. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes ___ No N/A ___ RMK# ___

NOTE: If the waste is a characteristic waste, which has been treated to render it non hazardous and subsequently sent to a solid waste landfill, proceed to question 7 & 8.

- 5. Has the generator sent a notification and certification with the initial shipment of waste? [3745-270-07(A)(5)(c)] Yes ___ No N/A ___ RMK# ___
- 6. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] Yes ___ No N/A ___ RMK# ___
- 7. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following:
 - i. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes ___ No N/A ___ RMK# ___
 - ii. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)] Yes ___ No N/A ___ RMK# ___

NOTE: If the waste will be treated and monitored for **all** UHCs then they do not need to be listed on the notice.

- 8. Has the process/operation generating the waste or the solid waste landfill facility changed? If so:
 - a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)]
 - b. Has the director been notified of such changes? [3745-270-09(D)]

Yes ___ No ___ N/A ___ RMK# ___

Yes ___ No N/A ___ RMK# ___

Yes ___ No N/A ___ RMK# ___

Yes ___ No ___ N/A ___ RMK# ___

Yes ___ No N/A ___ RMK# ___

Yes ___ No N/A RMK# ___

NOTE: *The director need only be notified on an annual basis but no later than December 31*

- 9. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so:
 - a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49(C)]
- 10. Does each notification/certification form completed, contain the information found in Table1? [3745-270-07(A)(3)]

NOTE: *If the waste will be treated and monitored for all constituents, there is no need to put them all on the LDR notice.*

REMARKS

HAZARDOUS DEBRIS

- 1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)? Yes___ No___ N/A ___ RMK#

- 2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.) Yes___ No___ N/A ___ RMK#

- 3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so: Yes___ No___ N/A ___ RMK#___
 - a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)] Yes ___ No N/A ___ RMK#___

NOTE: *If immobilization has been used in a treatment train, it must be the last treatment technology used.*

- 4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so: Yes___ No___ N/A ___ RMK#___
 - a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] Yes ___ No N/A ___ RMK#___

- 5. Is the waste a PCB waste under 40 CFR Part 761? If so: Yes___ No___ N/A ___ RMK#___
 - a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)] Yes ___ No N/A ___ RMK#___

- 6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)] Yes ___ No N/A ___ RMK#___

- 7. Does the owner/operator of a treatment facility that claims the debris is excluded under 3745-51-03(F)(1) maintain the following information?
 - a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)] Yes___ No___ N/A ___ RMK#___

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

REMARKS

old
 Metal components from filter press were contaminated with hazardous waste. It was decontaminated by press washing and fragmentation. Then handled as metal. Reports for the press. The treatment methods are debris treatment methods.

TREATING FACILITIES - *Not treating to meet LDRS*

- 1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13?[3745-270-07(B)] Yes ___ No N/A ___ RMK# ___
 - 2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)] Yes ___ No N/A ___ RMK# ___
- Note:** *No further notification is necessary until such time that the waste changes or the receiving facility changes.*
- 3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07?[3745-270-07(B)(3)] Yes ___ No N/A ___ RMK# ___
 - 4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so:** Yes ___ No ___ N/A ___ RMK# ___
 - a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)] Yes ___ No N/A ___ RMK# ___
 - 5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? **If so:** Yes ___ No ___ N/A ___ RMK# ___
 - a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)), excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)] Yes ___ No N/A ___ RMK# ___
 - b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4)[3745-270-07(B)(6)] Yes ___ No N/A ___ RMK# ___
 - c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)] Yes ___ No N/A ___ RMK# ___
 - 6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)] Yes ___ No N/A ___ RMK# ___
 - 7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have: Yes ___ No ___ N/A ___ RMK# ___

- a. Copies of all notices and certifications required in 3745-270? Yes ___ No N/A ___ RMK# ___
- b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49? Yes ___ No N/A ___ RMK# ___
- c. Followed the testing frequency specified in the facility's WAP? Yes ___ No N/A ___ RMK# ___

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REMARKS

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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] *When done.* 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#___

Class 1 PMR's were to be submitted 7 days after implementation.

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# ___ *wrong have been requested.*
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:
- 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?

with permission.

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. Summary reports and details of all incidents that required implementation of the contingency plan? *None occurred.* 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# ___ ~~LDR~~
 - 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# ___

Lab

LAB₅

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

Waste Minimization



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? 3,588,192

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? ~~3,588,192~~ J.P. Does not want to

Release the amount of money

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

3,588,192 lbs of Steel Recycled at the Facility.

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 TSD receiving hazardous waste

0110 Manifest was signed & dated
The signature on the second sheet was a ~~void~~
OK.

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)? Yes No N/A ___ RMK#
If not: EXCEPT FOR A ~~FEW~~, FOR WHICH NOTICES ARE SUBMITTED

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# ___

Permit through 2013

- 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? Yes No N/A ____ RMK# ____
 - a. Is the schedule kept at the facility? [OAC rule 3745-54-15(B)(2)] Yes No N/A ____ RMK# ____

- 3. Does the permittee remedy deterioration or any malfunctions discovered by an inspection? [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# ____

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

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. 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# ___ *DERR DHWM*

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# ___ *Not Sure at Time of Inspection*

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# ___

At time of inspection Jim Craig's name was recognized

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)]

NA X

- | | |
|---|--|
| i. Name and telephone number of the reporter? | Yes__ No <input type="checkbox"/> N/A ___ RMK# ___ |
| ii. Name and address of the facility? | Yes__ No <input type="checkbox"/> N/A ___ RMK# ___ |
| iii. Time and type of incident? | Yes__ No <input type="checkbox"/> N/A ___ RMK# ___ |
| iv. Name and quantity of materials involved? | Yes__ No <input type="checkbox"/> N/A ___ RMK# ___ |
| v. The extent of injuries? | Yes__ No <input type="checkbox"/> N/A ___ RMK# ___ |
| vi. The possible hazards to human health or the environment outside the facility? | Yes__ No <input type="checkbox"/> 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 <input type="checkbox"/> 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 <input type="checkbox"/> N/A ___ RMK# ___ |
| i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23] | Yes__ No <input type="checkbox"/> 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 <input type="checkbox"/> 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

Impoundment 7N
7S

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] *None were needed.* 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# ___ *if leaking.*

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# ___ *Roll-off with Ash on East side and back coverings.*

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 F 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# ___

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

Issues in CSF

- 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

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?
CRACK IN LINER IN CLOSED LOOP NEAR AGITATOR TANK.
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:

Yes No N/A RMK#

- a. Spill control equipment (daily)?
- b. Above ground portion of tank (daily)?
- c. Data from leak detection equipment (daily)?
- d. Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste (daily)?

Yes No N/A RMK#

Yes No N/A RMK#

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? *REPAIRED*

Yes No N/A RMK#
PIN HOLE ON SLUDGE TANK WEST

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?

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?

Yes___ No N/A___ RMK#___

a. **If so**, have the requirements of 3745-65-17(B) been met?

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

Yes___ No___ N/A RMK#___

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#___

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

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# ___
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 checked="" 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?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# _____ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 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 <input type="checkbox"/> RMK# _____ Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# _____ Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 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 <input type="checkbox"/> 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 <input type="checkbox"/> 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 <input type="checkbox"/> 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)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 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 <input type="checkbox"/> 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 <input type="checkbox"/> 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 <input type="checkbox"/> RMK# <input type="checkbox"/>
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 <input type="checkbox"/> RMK# <input type="checkbox"/>
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 <input type="checkbox"/> RMK# <input type="checkbox"/>
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 type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input checked="" type="checkbox"/> COULD BE OUTSIDE DURING WFCES
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 <input type="checkbox"/> RMK# <input checked="" type="checkbox"/> #20
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 <input type="checkbox"/> RMK# <input checked="" type="checkbox"/> #20
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 <input type="checkbox"/> RMK# <input type="checkbox"/>
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 <input type="checkbox"/> RMK# <input checked="" type="checkbox"/> #20

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 ___ RMK# ___																																																					
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="264 552 930 798"> <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="264 1003 930 1381"> <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 ___ RMK# ___</p> <table border="1" data-bbox="938 646 1401 798"> <tbody> <tr> <td>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___</td> </tr> <tr> <td>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___</td> </tr> <tr> <td>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___</td> </tr> <tr> <td>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___</td> </tr> </tbody> </table> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___</p> <table border="1" data-bbox="938 1140 1401 1381"> <tbody> <tr> <td>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___</td> </tr> <tr> <td>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___</td> </tr> <tr> <td>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___</td> </tr> <tr> <td>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___</td> </tr> <tr> <td>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___</td> </tr> <tr> <td>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___</td> </tr> </tbody> </table>	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# ___	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# ___	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# ___	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# ___
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27.	<p>Were fuel burner atomization air pressures no less than: -16 psi 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 ___ RMK# <input checked="" type="checkbox"/> #26</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A ___ RMK# <input checked="" type="checkbox"/> #26</p>																																																					

<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 checked="" type="checkbox"/> #20 Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input checked="" type="checkbox"/> 4 Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input checked="" type="checkbox"/> 4 Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input checked="" type="checkbox"/> 4 Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input checked="" type="checkbox"/> 4 Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input checked="" type="checkbox"/> 4</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 checked="" type="checkbox"/> #20</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"/> SINCER KMSF CRT</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 type="checkbox"/> N/A <input type="checkbox"/> RMK# <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input checked="" type="checkbox"/> Letter dated 2-18-08</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 ___ 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>
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 ___ No <input checked="" type="checkbox"/> N/A ___ RMK# ___</p> <p>Yes ___ No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> RMK# ___</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 ___ RMK# ___</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 ___ RMK# ___</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 ___ RMK# ___</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 ___ RMK# ___</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". [Condition I(A).5(a)]</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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 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 <input type="checkbox"/> 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 <input type="checkbox"/> RMK# _____</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <input checked="" type="checkbox"/> JOHN GRAY & RATA</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 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 ___ RMK# ___</p> <p>Yes ___ No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 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>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 ___ 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# _____</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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> RMK# _____</p>