



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

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

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

May 2, 2007

RE: **REPUBLIC ENGINEERED PRODUCTS**
OHD 004 227 708
STARK COUNTY
CEI/NOV

Mr. Marc Carpenter
Environmental Operations Manager
Republic Technologies International
401 Rose Avenue
Massillon, Ohio 44548

Dear Mr. Carpenter:

On April 18, 2007, the Ohio EPA conducted a compliance evaluation inspection of Republic Engineered Products (REP), to determine REP's compliance with Ohio's hazardous waste laws and regulations as found under the Ohio Revised Code and the Ohio Administrative Code ("ORC" and "OAC" respectively). REP was represented by Pat Monnot and you. The Ohio EPA was represented by Rich Stewart and me.

REP does cold drawn steel in the form of bar and wire at this facility. The facility is comprised of two plants (Plant 1 and Plant 2) which both have similar operations, however, the pickling process has closed in Plant 2.

Ohio EPA's inspection included an inspection of the facility operations and a review of written documentation. Based on this inspection, Ohio EPA has determined that REP has violated the following state hazardous waste regulations:

Violations:

1. **Waste Evaluation, OAC rule 3745-52-11:** Any person who generates a waste must evaluate the waste to determine if the waste is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51.

During the inspection, REP could not definitively state if the following wastes were hazardous or non-hazardous waste:

- A. The material that appeared to be scale in the concrete loading area of the former hazardous waste tanks at Plant 2
- B. The contents of the blue 55 gallon poly drum in the secondary containment of the former product tank at Plant 2

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- C. The contents of the 5 gallon bucket outside of the secondary containment of the former product tank at Plant 2.
- D. Lime solids drum in the hazardous waste accumulation area in Plant 2
- E. The drum labeled "contents unknown" in the hazardous waste accumulation area in Plant 2

REP should submit documentation demonstrating how these wastes were evaluated and how they are going to be managed to abate this violation.

2. ***Packaging of Universal Waste Lamps, OAC rule 3745-273-13(D)(1)***: Universal waste lamps must be contained in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with the contents of the lamps. In addition, the containers or packages must be closed, lack evidence of leakage, spillage or damage that could cause leakage.

There was one box of lamps in the universal waste accumulation area that was so dirty it could not be determined if any of the bulbs had broken and caused a release.

REP should repackage that container of bulbs and submit a photograph documenting this action.

3. ***Testing, tracking, and recordkeeping requirements for generators, treaters, and disposal facilities, OAC rule 3745-270-07(A)(2), Column A of Table 1***: The initial shipment of waste to each treatment or storage facility must send a one-time written notice to each facility receiving the waste. The notice must include the information included in Column A of Table 1.

At the time of the inspection, REP could not find the Land Disposal Restriction form for manifest document 18236 for a waste shipped to Envirite on February 3, 2006. When REP contacted Envirite, they could not find an LDR for this waste.

On April 20, 2007, you faxed me a signed copy of the LDR, abating the violation. No further action is required.

4. ***[Tank] Inspections, OAC rule 3745-66-95 (A)(1) through (4)***: States in part that the owner or operator must inspect a tank system at least once each operating day.

REP was not conducting the inspections every day that waste was accumulated in the Plant 1 tanks as required by the rule.

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REP should immediately commence daily inspections of the tank system and submit two weeks of completed logs to document compliance. If additional personnel need to be trained to accomplish this, please submit the documentation they have been trained.

5. **Inspections, OAC rule 3745-66-93 (F):** The owner or operator must inspect the above ground piping, welded flanges, welded joints and/or welded connections, seamless or magnetic coupling pumps and/or seamless valves and pressurized above ground piping systems with automatic shut-off devices (as applicable) at least once each operating day.

Again, REP was not conducting daily inspections.

REP should immediately commence daily inspections of the tank system and submit two weeks of completed logs to document compliance. If additional personnel need to be trained to accomplish this, please submit the documentation they have been trained.

Ohio EPA needs the following information to be submitted to fully evaluate REP's compliance:

6. At the time of the inspection, REP did not have documentation that the following personnel had been trained in 2006: Bill Johnson, Rich Phillips, Tim Tucker and Randy Booth. If REP has documentation that these employees were trained in 2006 please submit it to Ohio EPA. If the employees were not trained, REP will be found to be in violation of the **Personnel Training, OAC rule 3745-65-16(C):** The owner/operator must provide annual refresher training to employees.
7. At the time of the inspection, REP could not find the tank assessment documentation that is required by OAC rule 3745-66-90 through 101. REP should find all the tank assessment documentation available and submit it for review.

Ohio EPA also had the following concerns:

8. There was a trench by the scrap roll-off boxes that was full of debris. REP should clean the trench so that if any oil comes out of the roll-off boxes it can easily be collected.
9. Inside of Plant 2 was a plastic yellow secondary containment full of oil. You stated that the oil was from the product tote, not used oil. REP should clean out the secondary containment so that any future leaks can readily be detected. Ohio EPA has no objections to REP managing the oil along with the used oil.

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10. Ohio EPA noted an area of stained ground near the green roll-off container of oil contaminated debris. While the stain wasn't immediately next to the roll-off, it should be remediated.
11. In the hazardous waste accumulation area in Plant 2, Ohio EPA noted a 55-gallon drum, seven (7) one-gallon containers of spot check solvent and a box of aerosol cans along the southern wall of the area. REP should determine if this material is still usable to them, can be used by another facility or needs to be disposed as a waste.
12. Ohio EPA noted a propane tank on the ground near the former used oil accumulation area near Plant 1. REP should manage this tank appropriately.
13. Ohio EPA noted an area of black material in the C&D erosion fill area next to Plant 1. REP should determine what this material is and whether or not it can remain. REP should be cautious when accepting fill material.
14. REP has a one-gallon satellite container for spent picric acid in the Met Lab. REP employees in the lab indicated that this container and the container for the spent nitric acid had not been emptied in at least five years. Ohio EPA had concerns that the picric acid had the potential to crystallize if allowed to sit that long. You stated in a telephone conversation last week, that it is your intention to empty the containers on a more frequent schedule. Please verify REP's actions.
15. The daily logs for the tank system indicate that two small areas of the containment dike where the liner had been breached were noted on June 30, 2005. The logs indicated that the consultant should be notified. There was no indication in the logs as to what actions were ever taken. Please indicate what corrective actions were taken in regards to this notation.
16. Ohio EPA noted three (3) drums of used oil near the former used oil accumulation area next to Plant 1. These drums should be moved to the accumulation area in Plant 2.

Please document what actions were taken to address each of these concerns.

As a final note, Ohio EPA reviewed the November 2001 generator closure for the hazardous waste tanks at Plant 2. It appears that the closure performance standard as found in OAC rule 3745-66-11 was met in regards to the tanks.

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 (i.e. source reduction). For those wastes and

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pollutants that are generated, the second is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image by implementing pollution prevention programs. The Office of Compliance Assistance and Pollution Prevention provides compliance and pollution prevention assistance on environmental issues related to air, land and water. Their web site is: <http://www.epa.state.oh.us/opp/ocapp.html>.

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. You can find more information at the following Web link <http://www.epa.state.oh.us/dhwm/listserv.html>.

Failure to list specific deficiencies and/or violations in this communication does not relieve Republic Engineered Products from the responsibility of complying with all applicable laws, rules and regulations.

Enclosed you will find a copy of the checklists completed during the inspection. You can find copies of the rules and other information on the Division of Hazardous Waste's web page at <http://www.epa.state.oh.us/dhwm>.

Please submit the requested documentation by June 8, 2007. Should you have any questions please feel free to call me or my supervisor, Frank Popotnik at this office.

Sincerely,



Karen L. Nesbit
Division of Hazardous Waste Management

Enclosure

KLN:cl

ec: Frank Popotnik, DHWM, NEDO
Harry Sarvis, DHWM, CO

cc: Natalie Oryshkewych, DHWM, NEDO

E-mail this completed form to tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM		For Ohio EPA use only																		
2. Site EPA ID No.	EPA ID Number: OHD 004 227 708																				
3. Site Name	Name: REPUBLIC ENGINEERED PRODUCTS INC - MASSILLON		Website (optional):																		
4. Site Location Information	Street Address: 401 ROSE AVE SE																				
	City, Town, or Village: MASSILLON	State: OH																			
	County Name: STARK	Zip Code: 44646																			
5. Site Land Type (check only one)	<table border="1" style="width: 100%; text-align: center;"> <tr> <th>Private</th> <th>County</th> <th>District</th> <th>Federal</th> <th>Indian</th> <th>Municipal</th> <th>State</th> <th>Other</th> </tr> <tr> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	X									
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X																					
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A. 331221		B.																		
C.		D.																			
7. Facility Representative: Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	First Name: MARC		MI: A	Last Name: CARPENTER																	
	Phone Number: 330 837-7026		Phone Number Extension:																		
	E-Mail Address: M Carpenter@REPUBLICENGINEERED.COM																				
	Fax Number: 330-837-7012		Fax Number Extension:																		
	Street or P.O. Box:																				
	City, Town or Village:																				
State:		Country:		Zip Code:																	
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	A. Name of Site's Legal Owner: REPUBLIC ENGINEERED PRODUCTS, INC		Date Became Owner (mm/dd/yyyy):																		
	Owner Type: Mark with an X		<table border="1" style="width: 100%; text-align: center;"> <tr> <th>Priv</th> <th>County</th> <th>District</th> <th>Federal</th> <th>Indian</th> <th>Municipal</th> <th>State</th> <th>Other</th> </tr> <tr> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Priv	County	District	Federal	Indian	Municipal	State	Other	X							
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	X																				
	Street or P.O. Box: 3770 EMBASSY PKWY																				
	City, Town, or Village: AKRON		Owner Phone #: 330 670 3000																		
	State: OH		Country: USA	Zip Code: 44333																	
	B. Name of Site's Operator: REP. ENG. PRODUCTS INC		Date Became Operator (mm/dd/yyyy): 12/19/2003																		
	Operator Type: Mark with an X		<table border="1" style="width: 100%; text-align: center;"> <tr> <th>Private</th> <th>County</th> <th>District</th> <th>Federal</th> <th>Indian</th> <th>Municipal</th> <th>State</th> <th>Other</th> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other								
	Private	County	District	Federal	Indian	Municipal	State	Other													
Street or P.O. Box:																					
City, Town, or Village:		Operator Phone #:																			
State:		Country:		Zip Code:																	
9. Violations Cited: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																					
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.) <input type="checkbox"/> Not Regulated																					

10. Type of Regulated Waste Activity (Mark in all of the appropriate boxes.)

A. Hazardous Waste Activities

(choose only one of the following categories)

<input type="checkbox"/>	UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/>	3. Treater, Storer or Disposer of Hazardous Waste
<input checked="" type="checkbox"/>	a. Large Quantity Generator (LQG):	<input type="checkbox"/>	4. Recycler of Hazardous Waste
<input type="checkbox"/>	b. Small Quantity Generator (SQG)	<input type="checkbox"/>	5. Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/>	c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/>	a. Small Quantity On-site Burner Exemption
<input type="checkbox"/>	d. United States Importer of Hazardous Waste	<input type="checkbox"/>	b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/>	e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/>	6. Underground Injection Control Facility
		<input type="checkbox"/>	7. Hazardous Waste Transporter

B. Universal Waste Activities		C. Used Oil Activities	
<input checked="" type="checkbox"/>	1. Small Quantity Handler of Universal Waste (Indicate types of universal waste generated and/or accumulated (check all boxes that apply):	<input checked="" type="checkbox"/>	1. Used Oil Generator
<input type="checkbox"/>	2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more).	<input type="checkbox"/>	2. Used Oil Transporter Indicate Type(s) of Activity(ies)
<input type="checkbox"/>	3. Destination Facility for Universal Waste (Check all boxes below that apply for each of the three types of facilities above.)	<input type="checkbox"/>	Transporter
		<input type="checkbox"/>	Transfer Facility
		<input type="checkbox"/>	3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)
		<input type="checkbox"/>	Processor
		<input type="checkbox"/>	Re-refiner
		<input type="checkbox"/>	4. Off-Specification Used Oil Burner
		<input type="checkbox"/>	5. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)
		<input type="checkbox"/>	a. Marketer Who Directs Shipment of Off-Specification Oil
		<input type="checkbox"/>	b. Used Oil to Off-Specification Used Oil Burner

	<u>Generated</u>	<u>Accumulated</u>
A. Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
D. Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/>

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRA Info source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

D002	D007	D008	K062			
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12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

Y-1.5 HR	Announced ?	Additional Facility Representatives:	PAT MONNOT, REP CANTON LEN WISNIEWSKI
Y	Tanks?	Other comments:	
Y	Containers?		

13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
KAREN L NESBIT, NEDO	RICH STEWART, SEDO	04/18/07 (9:10 AM - 4:45 pm)

14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of owner, operator, or an authorized representative	Name and Title (Print)	Date (mm-dd-yyyy)

LARGE QUANTITY GENERATOR REQUIREMENTS

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

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

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

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

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

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A RMK#
2. Has the generator obtained a U.S. EPA identification number? [3745-52-12] 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

4. Does the generator import or export hazardous waste? If so: Yes No N/A RMK#
 - a. Has the generator notified U.S. EPA of export/import 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#
 - 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.

Plant 2 tank system

b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]

Yes No N/A RMK#

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

NOTE: *If the generator has closed a <90-day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]*

REMARKS

MANIFEST REQUIREMENTS

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

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

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

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

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

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

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

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

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

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

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)(1)]

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# ___

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

REMARKS

PERSONNEL TRAINING

1. Does the generator keep records required by 3745-65-16(D) including:
- a. Job titles, as they relate to hazardous waste management, and the name of each employee filling each job? Yes No N/A ___RMK#___
- b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? Yes No N/A ___RMK#___
- c. Type and amount of both introductory and continuing training to be given to each person filling a position? Yes No N/A ___RMK#___
- d. Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)? Yes No N/A ___RMK#___

NOTE: If the facility's business practices precludes written job titles/descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.

2. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes No N/A ___RMK#___
3. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]
- a. Emergency procedures? Yes No N/A ___RMK#___
- b. Emergency equipment? Yes No N/A ___RMK#___
- c. Emergency systems? Yes No N/A ___RMK#___
4. Does emergency training described in 3(a), (b) and (c) above include, *where applicable*: [3745-65-16(A)(3)(a-f)]

- a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? Yes No N/A RMK#
- b. Key parameters for automatic waste feed cut-off systems? Yes No N/A RMK#
- c. Communication or alarm system? Yes No N/A RMK#
- d. Response procedures for fire/explosions? Yes No N/A RMK#
- e. Response to groundwater contamination incidents? Yes No N/A RMK#
- f. Shutdown procedures? Yes No N/A RMK#

5. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A RMK#

6. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes No N/A RMK#

7. Does the generator provide annual refresher training to employees? [3745-65-16(C)] *Johnson, Phillips, Tucker + Boettner missed Jan 06 training* Yes No N/A RMK# *couldn't find documentation*

8. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes No N/A RMK#

9. Are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes No N/A RMK#

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

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date(s) Trained</u>

REMARKS

CONTINGENCY PLAN - Reviewed by Rich Stewart

1. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]
- a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? Yes No N/A ___ RMK# ___
- b. Arrangements with emergency authorities? [3745-65-37] Yes No N/A ___ RMK# ___
- c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? Yes No N/A ___ RMK# ___
- d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? Yes No N/A ___ RMK# ___
- e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary? Yes No N/A ___ RMK# ___

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

2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes No N/A ___ RMK# ___
3. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)(B)] Yes No N/A ___ RMK# ___
4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] Yes No N/A ___ RMK# ___

EMERGENCY COORDINATOR

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

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

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes No ___ N/A ___RMK#___
- a. Was the contingency plan implemented? [3745-65-51(B)] Yes No N/A ___RMK#___
- b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes No N/A ___RMK#___
- c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes No N/A ___RMK#___

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

REMARKS

PREPAREDNESS AND PREVENTION [3745-52-34(A)(4)]

1. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes No N/A RMK#
2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]
- a. Internal alarm system? Yes No N/A RMK#
- b. Emergency communication device? Yes No N/A RMK#
- c. Portable fire control, spill control and decon equipment? Yes No N/A RMK#
- d. Water of adequate volume/pressure? *per facility* Yes No N/A RMK#
3. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes No N/A RMK#
4. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33] Yes No N/A RMK#
5. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32*)? [3745-65-34] Yes No N/A RMK#
6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A RMK#
7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes No N/A RMK#
- a. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes No N/A RMK#

REMARKS

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# ___
2. Is the facility a metal finisher that generates waste water treatment sludge with a F006 waste code? If yes: Yes ___ No N/A ___ RMK# ___

NOTE: If yes, they may accumulate F006 waste on-site for up to 180 days; or up to 270 days if they must transport the F006 waste over 200 miles for off-site metals recovery; without an Ohio hazardous waste permit, provided that they meet these special conditions (OAC 3745-52-34(G) and (H)):

- a. The generator has implemented pollution prevention practices that reduce the amount of any hazardous substances, pollutants or contaminants entering F006 or otherwise released to the environment prior to its recycling (see your P2 coordinator for a copy of Federal Register 3/00 for a listing of examples of P2 measures, the facility should be prepared to demonstrate this request); Yes ___ No N/A RMK# ___
- b. The F006 waste is legitimately recycled through metals recovery. Yes ___ No N/A RMK# ___
- c. No more than 20,000 kg. of F006 is accumulated on-site at any one time. Yes ___ No N/A RMK# ___
- d. The facility complies with the applicable management standards for containers, tanks or containment buildings for LQGs. Yes ___ No N/A RMK# ___

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

3. 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 satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation. The inspector should refer to Guidance Document #DHWM-008, Satellite Accumulation Under Ohio Hazardous Waste Rules.

4. 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

5. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes No N/A RMK#
6. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No N/A RMK#
7. Are hazardous wastes stored 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#___
8. Is the container accumulation area(s) inspected weekly? [3745-66-74] (*Note location in general information section of checklist*) Yes No N/A ___RMK#___
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A ___RMK#___
9. 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

10. 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#___
11. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes ___ No N/A RMK#___
12. 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#___

REMARKS

USED OIL INSPECTION CHECKLIST (Short Version)

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

PROHIBITIONS

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

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes ___ No N/A RMK# ___
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes ___ No N/A RMK# ___
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes No N/A ___ RMK# ___
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No N/A ___ RMK# ___
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes No N/A ___ RMK# ___
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes ___ No N/A RMK# ___
- b. Contained the release? Yes ___ No N/A RMK# ___

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

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes ___ No N/A RMK# ___
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes ___ No N/A RMK# ___
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes ___ No N/A RMK# ___

WASTE EVALUATION

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

C:\Documents and Settings\KNesbit\My Documents\Folder\INSPECTION INFO\USED OIL checklist.wpd

REMARKS

- ① Stain near roll-off
- ② 2 rdary containment in Plant 2

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

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

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

PROHIBITIONS

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

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes No N/A RMK#
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes No N/A RMK#
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes No N/A RMK#
 - b. Mix battery types in one container? Yes No N/A RMK#
 - c. Discharge batteries to remove the electric charge? Yes No N/A RMK#
 - d. Regenerated used batteries? Yes No N/A RMK#
 - e. Disassemble them into individual batteries or cells? Yes No N/A RMK#
 - f. Remove batteries from consumer products? Yes No N/A RMK#
 - g. Remove the electrolyte from the battery? Yes No N/A RMK#
- If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] Yes No N/A RMK#

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] Yes ___ No N/A RMK# ___
- a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] Yes ___ No N/A RMK# ___
- b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] Yes ___ No N/A RMK# ___
7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)] Yes ___ No N/A RMK# ___

UNIVERSAL WASTE LAMPS

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] Yes ___ No N/A ___ RMK# ___
9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes ___ No N/A RMK# ___
10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)] Yes No N/A ___ RMK# ___

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

generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

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

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

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

EMPLOYEE TRAINING

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

RESPONSE TO RELEASES

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

OFF-SITE SHIPMENTS

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

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

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

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes No N/A ___RMK#___
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No N/A ___RMK#___
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes ___ No ___ N/A RMK#___
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes ___ No ___ N/A RMK#___

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

EXPORTS

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

REMARKS

LDR CHECKLIST

GENERAL LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] 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] 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# _____
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] Yes No N/A RMK#

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] Yes No N/A RMK#

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# ___

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 of 3745-270-07? [3745-270-07(A)(2)]

Yes ___ No N/A ___ RMK# ___
missing Enviro LDR

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 of 3745-270-07? [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 of 3745-270-07? [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 of 3745-270-07? [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# ___
except missing LDR - never sent

REMARKS

TANK SYSTEM REQUIREMENTS

(OAC rule 3745-52-34(A) and OAC rules 3745-66-100)

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

1. Is each tank clearly labeled/marked with the words "Hazardous Waste" [3745-52-34(A)(3)]? Yes No N/A

TANK SYSTEM – GENERAL OPERATING REQUIREMENTS

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

TANK SYSTEM – INSPECTION REQUIREMENTS

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

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

4. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter?[3745-66-95(B)(1)] Yes No N/A

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5. Where applicable, all sources of compressed current at least bi-monthly?[3745-66-95(B)(2)] Yes No N/A

TANK SYSTEM CLOSURE REQUIREMENTS

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

PLANT 2 tanks

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES

7. For tanks used or treat or store ignitable or reactive wastes, has the o/o complied with **one of the following**: [3745-66-98(A)] Yes No N/A

- a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-66-17(B)?[3745-66-98(A); **OR**

- b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction?[3745-66-98(A)]; **OR**

- c. The tank is used solely for emergencies?[3745-66-98(A)] Yes No N/A

8. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (1996)? Yes No N/A

[3745-66-98(B)]

9. Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material?[3745-66-99(A) and/or (B)] Yes No N/A

- a. **If so**, have the requirements of 3745-65-17(B) been met?[3745-66-99(A) and/or (B)] Yes No N/A

TANK SYSTEM – WASTE ANALYSIS REQUIREMENTS

10. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following:[3745-66-100]

- a. Conducted waste analysis and trial treatment or storage tests?[3745-66-100(A)]; **OR** Yes No N/A

- b. Obtained written documentation on similar waste under similar conditions, rating Yes No N/A conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-100(B)]

TANK SYSTEMS REQUIREMENTS

- 11 Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)?[3745-66-92(A)] Yes No N/A *NOT KNOWN*

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

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

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

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

Do the written statements address all of the following:

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

SECONDARY CONTAINMENT

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

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

15 Is secondary containment one of the following: Yes No N/A

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

- ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? Yes No N/A
- iii. Are chemically resistant water stops in place at all points? Yes No N/A
- iv. Is there a compatible interior coating to prevent migration into the concrete? Yes No N/A
- v. For **ignitable or reactive waste**: Is the vault system provided with means to prevent against the formation or ignition of vapors? Yes No N/A
- vi. Is vault system provided with an exterior moisture barrier? Yes No N/A
- c. **Double-Walled Tank?** [3745-66-93(E)(3)] If so, Yes No N/A
 - i. Is double-walled tank designed as an integral structure to contain any release from the inner tank? Yes No N/A
 - ii. **If metal**, are the primary tank interior and outer shell exterior surfaces protected from corrosion? Yes No N/A
 - iii. Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time? Yes No N/A
- d. **An Equivalent Device?** As described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D&E)] Yes No N/A

SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION

- 16 Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, groundwater, or surface water and is it capable of detecting and collecting releases and accumulated liquids?[3745-66-93(B)(1) and (2)] Yes No N/A
- 17 Does the secondary containment system meet the following minimum requirements of [3745-66-93(C)]:
 - a. Constructed or lined with compatible materials of sufficient strength to prevent failure?[3745-66-93(C)(2)] Yes No N/A
 - b. Placed on a foundation or base capable of providing support?[3745-66-93(C)(2)] Yes No N/A
 - c. Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time?[3745-66-93(C)(3)] Yes No N/A
 - d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation?[3745-66-93(C)(4)] Yes No N/A

- e. Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner?[3745-66-93©)(4)] Yes No N/A

ANCILLARY EQUIPMENT REQUIREMENTS

- 18 Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)? Yes No N/A

If not, is the ancillary equipment one of the following: [3745-66-93(F)]

- a. Above ground piping (exclusive of flanges, joints, valves and connections) that is inspected daily? *NOT INSPECTED DAILY* Yes No N/A

- b. Welded flanges, welded joints and/or welded connections that is inspected daily? Yes No N/A

- c. Sealless or magnetic coupling pumps and/or sealless valves? Yes No N/A

- d. Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown and/or loss of pressure-actuated shut-off devices) that is inspected daily? Yes No N/A

TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE

- 19 Has there been a leak or spill from any tank system or has any tank system been found unfit for use? *If so, did the o/o:* Yes No N/A

NOTE: If the tank is found to be unfit for use, inspector should explain why.

- a. Immediately cease flow of material into tank and investigate the cause of the release?[3745-66-96(A)] Yes No N/A

- b. Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time?[3745-66-96(B)(1)] Yes No N/A

- c. Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment?[3745-66-96(B)(2)] Yes No N/A

- d. Immediately conduct a visual inspection of the release?[3745-66-96(C)] Yes No N/A

- e. Prevent further migration of the leak or spill to soils or surface waters?[3745-66-96(C)] Yes No N/A

- f. Properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)] Yes No N/A

- g. Report the release to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)] Yes No N/A

- h. Submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)] Yes No N/A

- i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)(2)] Yes No N/A

- j. For a release from a tank system without secondary containment did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)] Yes No N/A

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

- 20 In the event that the repairs to the tank system were major (replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from an independent, registered P.E. attesting that the repaired unit is capable of handling hazardous waste? [3745-66-96(F)] Yes No N/A

NOT COMPLETE AT TIME OF INSPECT.

- 21 Was a copy of the certification submitted to the director within seven days after returning the system to use? [3745-66-96(F)] Yes No N/A

- 22 If the o/o was unable to repair and return the unit to service as described in 20.a through 20.e, was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)] Yes No N/A

- 23 Does the o/o have a tank system with a variance from secondary containment from which a release has occurred but has not migrated beyond the zone of engineering control? If so, Yes No N/A

- a. Has the o/o complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G)(3)] Yes No N/A

- b. If soils cannot be decontaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)] Yes No N/A

- 24 Does the o/o have a tank system with a variance from secondary containment from which a release occurred and has migrated from the zone of engineering control? If so, Yes No N/A

- a. Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)] Yes No N/A

- b. If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(4)] Yes No N/A