



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

June 30, 2008

RE: THE LUBRIZOL CORPORATION  
OHD 004 172 565/02-43-0177  
LAKE COUNTY  
TSD, LQG, USED OIL, UNIV.  
WASTE - NOV/ATC

Gregory Taylor  
The Lubrizol Corporation  
29400 Lakeland Boulevard  
Wickliffe, Ohio 44092-2298

Dear Gregory Taylor:

On June 12, 2008, Ohio EPA conducted a compliance evaluation inspection of The Lubrizol Corporation facility, referenced above, to determine Lubrizol's compliance with Ohio's hazardous waste laws and regulations as found under the Ohio Administrative Code (OAC) and Ohio Revised Code (ORC). Lubrizol was also evaluated for compliance with the March 6, 2002 Ohio Hazardous Waste Facility Installation and Operation Permit renewal. Ohio EPA was represented by me. You represented Lubrizol.

In addition to the compliance inspection, Ohio EPA was investigating a voluntary disclosure made by Lubrizol in a phone call on May 28, 2008 and then in a letter dated June 2, 2008. The disclosure was to inform Ohio EPA that Lubrizol had unintentionally stored more hazardous waste than is permitted in their container storage building. The facts are Lubrizol stored 292 gallons more than what is permitted to be stored from May 20 to May 29, 2008. On May 29, 2008, Lubrizol manifested 92 hazardous waste drums from the container storage pad offsite.

As a result of Ohio EPA investigation, Lubrizol is in violation of the following:

Process Capacity

OAC Rules 3745-50-43(A)(7) and Permit Condition C.1.

Lubrizol shall not store more than 8,250 gallons of containerized waste at any given time in the permitted container storage area, located in Building #64. Lubrizol stored 292 gallons above this limit from May 20 to May 29, 2008.

Lubrizol abated this violation on May 29, 2008 when 92 drums were manifested offsite from the hazardous waste storage pad. In addition, Lubrizol retrained the employees responsible for the storage pad on the allowable quantity of hazardous waste stored in the container storage area, located in Building #64.

THE LUBRIZOL CORPORATION  
JUNE 30, 2008  
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Enclosed is a copy of the checklist that we completed during the inspection. Should you have any questions, please feel free to call me at (330) 963-1272. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/opp>.

Sincerely,



Nyall McKenna  
Environmental Specialist  
Division of Hazardous Waste Management

NM:ddw

Enclosure

cc: Natalie Oryshkewych, DHWM, NEDO

**NOTICE:**

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

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

For Ohio EPA use only

E-mail this completed form to [tammy.mcconnell@epa.state.oh.us](mailto:tammy.mcconnell@epa.state.oh.us) or mail it to Tammy McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: <i>OH D 004 172 565</i>									
3. Site Name	Name: <i>The Lubrizol Corporation</i>	Website: (Optional)								
4. Site Location	Street Address: <i>29400 Lakeland Blvd.</i>									
5. Site Characteristics	City, Town, or Village: <i>Wickliffe</i>	State: <i>OH</i>								
6. Site History	County Name: <i>Lake</i>	Zip Code: <i>44092</i>								
7. Site Status	<table border="1"> <tr> <td>Private <input checked="" type="checkbox"/></td> <td>County <input type="checkbox"/></td> <td>District <input type="checkbox"/></td> <td>Federal <input type="checkbox"/></td> <td>Indian <input type="checkbox"/></td> <td>Municipal <input type="checkbox"/></td> <td>State <input type="checkbox"/></td> <td>Other <input type="checkbox"/></td> </tr> </table>	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>			
8. Site Contact	First Name: <i>Oreg</i>	MI: _____								
9. Site Address	Last Name: <i>Taylor</i>									
10. Site Phone	Phone Number: <i>(330) 963-1272</i>	Phone Number Extension: _____								
11. Site E-Mail	E-Mail Address: _____									
12. Site Fax	Fax Number: _____	Fax Number Extension: _____								
13. Site Street	Street or P.O. Box: _____									
14. Site City	City, Town or Village: _____									
15. Site State	State: _____	Country: _____								
16. Site Zip	Zip Code: _____									
17. Site Owner	Name of Site's Legal Owner: <i>The Lubrizol Corporation</i>	Date Became Owner (mm/dd/yyyy): _____								
18. Site Owner Type	<table border="1"> <tr> <td>Owner Type: Private <input checked="" type="checkbox"/></td> <td>County <input type="checkbox"/></td> <td>District <input type="checkbox"/></td> <td>Federal <input type="checkbox"/></td> <td>Indian <input type="checkbox"/></td> <td>Municipal <input type="checkbox"/></td> <td>State <input type="checkbox"/></td> <td>Other <input type="checkbox"/></td> </tr> </table>	Owner Type: Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
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19. Site Operator	Street or P.O. Box: _____									
20. Site Operator Contact	City, Town or Village: _____	Owner Phone #: _____								
21. Site Operator State	State: _____	Country: _____								
22. Site Operator Zip	Zip Code: _____									
23. Site Operator Name	Name of Site's Operator: _____	Date Became Operator (mm/dd/yyyy): _____								
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25. Site Operator Street	Street or P.O. Box: _____									
26. Site Operator City	City, Town or Village: _____	Operator Phone #: _____								
27. Site Operator State	State: _____	Country: _____								
28. Site Operator Zip	Zip Code: _____									

9. Will this site be used for:  Yes  No

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

<input type="checkbox"/> Not Regulated	<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> United States Importer of Hazardous Waste
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)	<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input checked="" type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption

10B Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))

Small Quantity Handler of Universal Waste

Large Quantity Handler of Universal Waste

Destination Facility for Universal Waste

Check all boxes below that apply for each of the three types of facilities above

10C Used Oil Activities (Indicate Type(s) of Activity(ies))

Used Oil Generator

Off-Specification Used Oil Burner

Used Oil Transporter

Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil

Used Oil Transfer Facility

Used Oil Fuel Marketer to Off-Specification Used Oil Burner

Batteries

Managed

Pesticides

11. If you are a generator, transporter, or handler of hazardous waste, please describe the site in which the waste is generated, stored, or transported. If more space is needed, attach more sheets. If you are a transporter, please provide source, recipient, and destination information to list them all. Attach a copy of the source record.

*0001* *11/12* *0002* *0003* *0004* *0005*

12. Comments: Use this area to describe whether the inspection was announced, what the waste is, and what the container is.

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Other Comments:
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

13. Name of inspector(s): *N. Hill*

14. SIGNATURE CERTIFICATION: I certify that the information provided in this report is true and correct to the best of my knowledge and belief.

Signature	Name	Date

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

Facility: The Lubrizol Corporation Ohio Permit: 02-43-0177  
 Address: 29400 Lakeland Blvd, U.S. EPA ID: OH10004172565  
Wickliffe, Ohio 44092 Phone: 440-347-2810

County: Lake

Inspection Date: 6/12/2008 Time: 9:30 - 3:30

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

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspectors:	<u>Nyall McKenit</u>	<u>Ohio EPA</u>	<u>(330) 963-1272</u>

Facility Reps: Greg Taylor The Lubrizol Corp. (440) 347-2810

Is facility operating as a generator?  YES  NO

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

**PERMIT STATUS**

Permit Issued: 3-6-02 LDR Checklist Attached:  Yes  No  
 Permit Effective Date: 3-6-02 Used Oil Checklist Attached:  Yes  No  
 Permit Expiration Date: 3-6-2012 Generator Checklist Attached:  Yes  No

Permit Renewal Date: \_\_\_\_\_

Permit Modification Date(s): \_\_\_\_\_

**AUTHORIZED ACTIVITIES**

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

Post-Closure Care  Corrective Action

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**GENERAL PERMIT COMPLIANCE AND ACTIVITIES**

1. Has the expiration date of the permit passed? If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. Is the permittee continuing any activity regulated by the permit after the expiration date of the permit? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_
- b. Has the facility submitted an application for a permit renewal to the director no later than 180 days prior to the expiration date of the permit? [Condition A.6] Yes \_\_\_ No  N/A  RMK# \_\_\_
2. Has the permittee submitted the annual permit fee, payable to "Treasurer, State of Ohio," to Ohio EPA on or before the anniversary of the date of issuance during the term of the permit? [Condition A.25] Yes  No  N/A \_\_\_ RMK# \_\_\_
3. Is the permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit? [Conditions A.1(b) and A.5] Yes  No  N/A \_\_\_ RMK# \_\_\_
4. Have any provisions of the permit been identified as invalid? [Condition A.4] Yes  No  N/A \_\_\_ RMK# \_\_\_
5. Has the facility identified any instances of noncompliance with the permit, ORC Chapter 3734, or the rules adopted thereunder, which may endanger human health or the environment? If so: Yes  No  N/A \_\_\_ RMK# \_\_\_  
OK
- a. Did the facility immediately report the following to Ohio EPA's Emergency Response Unit? [Condition A.20]
- i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and Yes \_\_\_ No  N/A  RMK# \_\_\_

ii. Information concerning a release of hazardous waste, fire or explosion at the facility which could threaten human health or the environment outside the facility including a description of: Yes\_\_\_ No  N/A  RMK#\_\_\_

A. Name, address and telephone number of the owner/operator? Yes\_\_\_ No  N/A  RMK#\_\_\_

B. Name, address and telephone number of the facility? Yes\_\_\_ No  N/A  RMK#\_\_\_

C. Name and quantity of material(s) involved? Yes\_\_\_ No  N/A  RMK#\_\_\_

D. The extent of injuries, if any? Yes\_\_\_ No  N/A  RMK#\_\_\_

E. An assessment of the actual or potential hazard to the environment and human health outside the facility? Yes\_\_\_ No  N/A  RMK#\_\_\_

F. Estimated quantity and disposition of recovered material that resulted from the incident? Yes\_\_\_ No  N/A  RMK#\_\_\_

6. Did the permittee provide a written report to Ohio EPA's Emergency Response Unit and DHWM within five days of becoming aware of the circumstances reported in Questions No. 5? If so, did the report contain: [Condition A.21] Yes\_\_\_ No  N/A  RMK#\_\_\_

a. A description of the noncompliance and its cause (including exact dates and times)? Yes\_\_\_ No  N/A  RMK#\_\_\_

b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? and Yes\_\_\_ No  N/A  RMK#\_\_\_

c. Steps taken or planned to minimize the impact on the environment and to reduce, eliminate and prevent recurrence of the noncompliance? Yes\_\_\_ No  N/A  RMK#\_\_\_

**NOTE:** The permittee need not comply with the five day written report requirement if the director, upon good cause shown by the permittee, waives that requirement and the permittee submits a written report within 15 days of the time the permittee became aware of the circumstances. [Condition A.21].

7. Has the permittee identified other instances of noncompliance not provided for in Condition A.22, if so: Yes  No  N/A \_\_\_ RMK# #1
- a. Did the permittee report these instances to Ohio EPA, DHWM? [Condition A.22]? Yes  No  N/A \_\_\_ RMK# \_\_\_
- b. Do the reports provided contain the information set forth in Condition A.20? [Condition A.20] Yes  No  N/A \_\_\_ RMK# \_\_\_
- c. Has the permittee taken all steps necessary to minimize releases to the environment or prevent any adverse impact on human health or the environment? [Condition A.8] Yes  No  N/A \_\_\_ RMK# \_\_\_
8. Has the permittee planned any changes in the permitted facility or activity which may result in noncompliance with the conditions of the permit?: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. If so, has the facility provided Ohio EPA with advance notice of such changes? [Condition A.17] Yes \_\_\_ No  N/A  RMK# \_\_\_

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

9. Has the permittee become aware that it failed to submit any relevant facts in the permit or issuance proceedings or that it submitted incorrect or incomplete information in permit issuance proceedings or other submissions to Ohio EPA or the Hazardous Waste Facility Board (HWFB)? 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# \_\_\_
11. Has the permit, been transferred to a new owner/operator? If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- a. Has the transfer been conducted in accordance with ORC Chapter 3734. and the rules adopted thereunder which includes the permittee notifying the new owner in writing of the requirements of ORC Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules before transferring ownership? [Condition A.18] Yes \_\_\_ No  N/A  RMK# \_\_\_
12. Has the permittee submitted reports in any compliance schedule of the permit to Ohio EPA no later than 14 days following each scheduled date, unless otherwise specified? [Condition A.19] Yes  No  N/A \_\_\_ RMK# \_\_\_
13. Has the permittee furnished relevant information which Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, to determine compliance with the permit? [Condition A.10] Yes  No  N/A \_\_\_ RMK# \_\_\_
14. Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10] Yes  No  N/A \_\_\_ RMK# \_\_\_
15. Is the permittee maintaining records of all data used to complete the application and any amendments, revisions or modifications to the application? [Condition A.14©] Yes  No  N/A \_\_\_ RMK# \_\_\_
16. Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14©] Yes  No  N/A \_\_\_ RMK# \_\_\_
17. Is the permittee planning any physical alterations or additions to any permitted portions of the facility? If so: Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

a. Has the permittee given notice to the director of such alterations/additions? [Condition A.15]

Yes  No  N/A \_\_\_ RMK# \_\_\_

**SITE ENTRY - AVAILABILITY OF RECORDS**

18. As specified in Condition A.11, has the permittee allowed the director or an authorized representative, upon proper identification to:

a. Enter at reasonable times upon the premises where a regulated activity is located or where records are kept under the conditions of the permit? Yes  No  N/A \_\_\_ RMK# \_\_\_

b. Have access to and copy, at reasonable times, any records required to be kept under the conditions of the permit? Yes  No  N/A \_\_\_ RMK# \_\_\_

c. Inspect, at any time, facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit? Yes  No  N/A \_\_\_ RMK# \_\_\_

d. Sample, document, photograph or monitor, at reasonable times, any substances or parameter at the location of the facility to assure compliance with the permit or as otherwise authorized by ORC Chapter 3734. and the rules adopted thereunder? Yes  No  N/A \_\_\_ RMK# \_\_\_

**INSPECTION ITEMS FROM PART B APPLICATION**

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

**REMARKS**

## RECORDKEEPING/OPERATING REQUIREMENTS

### OPERATING RECORD

1. In accordance with OAC rules 3745-54-73 and 3745-54-74 and Condition B.22 of the permit, does the permittee maintain an Operating Record which contains the following information:
- a. A description of the quantity of each hazardous waste and the method(s) and date(s) of its treatment or storage? Yes  No  N/A \_\_\_ RMK# \_\_\_
  - b. The location of each hazardous waste and quantity at each location including cross-reference to specific manifest numbers? Yes  No  N/A \_\_\_ RMK# \_\_\_
  - c. Records and results of required waste analysis? Yes  No  N/A \_\_\_ RMK# \_\_\_
  - d. Summary reports and details of all incidents that required implementation of the contingency plan? Yes  No  N/A \_\_\_ RMK# \_\_\_
  - e. Records and results of required inspections? Yes  No  N/A \_\_\_ RMK# \_\_\_
  - f. Documents required to be maintained by LDR requirements of OAC Chapter 3745-270? Yes  No  N/A \_\_\_ RMK# \_\_\_
  - g. Monitoring, testing, or analytical data, and corrective action where required, from groundwater monitoring and required monitoring of surface impoundments, landfills, waste piles and land treatment units? [3745-54-73(B)(6)] Yes  No  N/A \_\_\_ RMK# \_\_\_
  - h. **For disposal facilities**, location and quantity of each hazardous waste record on a facility map and cross-references to manifest document numbers? [3745-54-73(B)(2)] Yes  No  N/A \_\_\_ RMK# \_\_\_

**DOCUMENTS TO BE MAINTAINED AT FACILITY**

2. In accordance with Condition A.28 of the permit, is the permittee maintaining the following documents at the facility:

- a. Waste analysis plan in accordance with OAC rule 3745-54-13? Yes  No  N/A  RMK#
- b. Contingency plan in accordance with OAC rule 3745-54-53? Yes  No  N/A  RMK#
- c. Closure plan in accordance with OAC rule 3745-55-12? Yes  No  N/A  RMK#
- d. Cost estimate for facility closure in accordance with OAC rule 3745-55-42? (Estimate only - adequacy will be evaluated by CO financial assurance personnel) [Condition B.36] Yes  No  N/A  RMK#
- e. Personnel training plan and records required by OAC rule 3745-54-16? [Condition B.6] Yes  No  N/A  RMK#
- 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#   
*closure cost estimate*

**ANNUAL REPORT REQUIREMENT**

5. Is the permittee complying with annual report requirements set forth in OAC rule 3745-54-75 and the additional report requirements set forth in OAC rule 3745-54-77? [Condition B.25] Yes  No  N/A  RMK#

**SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS**

6. In compliance with Condition 12(b) of the permit, do the permittee's records of monitoring information specify the:
- a. Date(s), exact place(s), time(s) and method(s) of sampling or measurement? Yes  No  N/A  RMK#
- b. Individual(s) who performed the sampling or measurement? Yes  No  N/A  RMK#
- c. Date(s) analyses were performed? Yes  No  N/A  RMK#
- d. Individual(s) who performed the analyses? Yes  No  N/A  RMK#
- e. Analytical technique(s) or method(s) used? Yes  No  N/A  RMK#
- f. Results of such analyses? Yes  No  N/A  RMK#

7. Have the methods used to obtain a representative sample of the waste to be analyzed included the appropriate SW-846 method or an equivalent method specified in the approved waste analysis plan? [Condition 12(a)] Yes  No  N/A \_\_\_ RMK# \_\_\_

8. In accordance with Condition A.14 of the permit, is the permittee retaining records of monitoring information as required by the permit for at least three years from the date of sampling, including:

a. All calibration and maintenance records. Yes  No  N/A \_\_\_ RMK# \_\_\_

9. Has Ohio EPA requested submittal of any reports or other information from the permittee? If so: Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

a. Have the submittals been signed and certified according to OAC rule 3745-50-42? [Condition A.13] Yes  No  N/A \_\_\_ RMK# \_\_\_

**INSPECTION ITEMS FROM THE PART B APPLICATION**

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

**REMARKS**

**WASTE MINIMIZATION REQUIREMENTS**

1. Does the permittee certify at least once every year that a program is in place to reduce the volume and toxicity of hazardous waste generated in accordance with Condition A.29(a) and OAC rule 3745-54-73? Yes  No  N/A \_\_\_ RMK# \_\_\_

2. Did the permittee submit the waste minimization report to Ohio EPA, Office of Pollution Prevention and \_\_\_\_\_ District Office within 180 days of journalization of this permit? and updates biennially thereafter? [Condition A.29©]] Yes  No  N/A \_\_\_ RMK# \_\_\_

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

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

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

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

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

### REMARKS

### GROUND WATER MONITORING

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

2. Have they reported the results in the Annual Report to the director by March 1<sup>st</sup> as required by Condition B.25? 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. Is the permittee storing any containers of hazardous waste received from any off-site source that permittee is not permitted to store? [Condition A.1.] Yes  No  N/A  RMK#
  
2. Has the permittee arranged to receive hazardous waste from a foreign or off-site source that the permittee is not permitted to store? [Condition A.1.] Yes  No  N/A  RMK#
  
3. Has the permittee notified the director at least four weeks prior to the date the permittee expects to receive hazardous waste from a foreign source, as required by OAC rule 3745-54-12(A)? [Condition B.2(a)] Yes  No  N/A  RMK#

**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**

1. Is the permittee complying with the following manifest requirements set forth in OAC Chapter 3745-52 and OAC rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76: [Condition B.24]

a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, U.S. EPA Form 8700-22 and, if necessary, U.S. EPA Form 8700-22A in compliance with OAC rule 3745-52-20(A)?

Yes  No  N/A \_\_\_ RMK# \_\_\_

b. The manifest form used contains all information required by OAC rule 3745-52-20 and the minimum number of copies required by OAC rule 3745-52-22?

Yes  No  N/A \_\_\_ RMK# \_\_\_

c. The permittee has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with OAC rule 3745-52-20(B)(C)(D)?

Yes  No  N/A \_\_\_ RMK# \_\_\_

d. Prepared manifests have been signed by the permittee and initial transporter in compliance with OAC rule 3745-52-23?

Yes  No  N/A \_\_\_ RMK# \_\_\_

2. As a permittee that generates hazardous waste, are signed copies of all hazardous waste manifests and any documentation required for exception reports retained for at least three years at the facility as required by OAC rules 3745-52-40 and 3745-54-71(A)(5)?

Yes  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# \_\_\_

<b>Transporters:</b>

4. Does the permittee give one copy of the manifest to the transporter, send one copy to the generator within 30 days, and keep one copy for at least three years? [3745-54-71(A)] Yes  No  N/A \_\_\_ RMK# \_\_\_
- a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met? [3745-54-71(B)] Yes  No  N/A \_\_\_ RMK# \_\_\_
- b. Are any significant discrepancies in the manifest, as defined in 3745-54-72(A) noted in writing on the manifest document? Yes  No  N/A \_\_\_ RMK# \_\_\_
5. Have any manifest discrepancies been reconciled within 15 days as required by 3745-54-72(B)? If not: Yes  No  N/A \_\_\_ RMK# \_\_\_
- a. Has the owner/operator submitted the required information to the director? Yes  No  N/A \_\_\_ RMK# \_\_\_
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-54-76(A) been submitted to the director within 15 days? Yes \_\_\_ No  N/A  RMK# \_\_\_

**WASTE ANALYSIS/WASTE ANALYSIS PLAN**

1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information of the waste in accordance with OAC Chapters 3745-54 to 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 procedures described in the WAP (Application \_\_\_)? [Condition B.3(b)] Yes  No  N/A \_\_\_ RMK# \_\_\_
3. In accordance with OAC rule 3745-54-13(A)(3), does the permittee repeat the waste analysis when the process or operation generating the hazardous waste has changed, or at least annually? [Condition B.3] Yes  No  N/A \_\_\_ RMK# \_\_\_

4. **FOR OFF-SITE FACILITIES:** Are the sampling methods and procedures specified in the permittee's WAP that will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identification of the waste on the manifest [3745-54-13©)]? Yes\_\_\_ No N/A  RMK#\_\_\_

5. **FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER OAC 3745-270-04(A):**

Does the waste analysis plan include procedures and schedules for:

i. The sampling of impoundment contents? [3745-54-13(B)(7)] Yes\_\_\_ No N/A  RMK#\_\_\_

ii. The analysis of test data? [3745-65-13(B)(7)] Yes\_\_\_ No N/A  RMK#\_\_\_

iii. The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either do not meet treatment standards (OAC 3745-270-40 to 3745-270-49) or where no treatment standards have been established? [3745-54-13(B)(7)] Yes\_\_\_ No N/A  RMK#\_\_\_

6. **Where applicable:** The methods which will be used to meet additional waste analysis requirements for specific waste management methods specified in rules 3745-54-17, 3745-57-14, 3745-57-41 and 3745-270-07 of the OAC? [3745-54-13(B)(6)] Yes\_\_\_ No N/A  RMK#\_\_\_

7. Does the permittee place the results of all waste analyses in the facility operating record in accordance with OAC rule 3745-54-73? Yes\_\_\_ 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 ( \_\_\_\_ of the approved Part B permit application) and the requirements of OAC rules 3745-54-15(A), (C) and (D)? [Condition B.5] Yes  No  N/A \_\_\_\_ RMK# \_\_\_\_
  
- 2. Is the permittee following the approved inspection schedule for inspecting: monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment as specified in OAC rule 3745-54-15(B)? Yes  No  N/A \_\_\_\_ RMK# \_\_\_\_
  - a. Is the schedule kept at the facility? [OAC rule 3745-54-15(B)(2)] Yes  No  N/A \_\_\_\_ RMK# \_\_\_\_
  
- 3. Does the permittee remedy deterioration or any malfunctions discovered by an inspection as required by OAC rule 3745-54-15(C)? [Condition B.5] Yes  No  N/A \_\_\_\_ RMK# \_\_\_\_
  
- 4. In accordance with OAC rule 3745-54-15(D) and Condition B.5 of the permit, do inspection records contain the following information:
  - a. Date and time of inspection? Yes  No  N/A \_\_\_\_ RMK# \_\_\_\_
  - b. Name of inspector? Yes  No  N/A \_\_\_\_ RMK# \_\_\_\_
  - c. Notation of observations made? Yes  No  N/A \_\_\_\_ RMK# \_\_\_\_

d. Date and nature of any repairs or other remedial actions?

Yes  No  N/A \_\_\_ RMK# \_\_\_

**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. Is the permittee complying with the following security provisions of OAC rule 3745-54-14 and Condition B.4 of the permit: [ \_\_\_\_ of the Part B permit application]
- a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility? Yes  No  N/A \_\_\_\_ RMK# \_\_\_\_
- b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility? Yes  No  N/A \_\_\_\_ RMK# \_\_\_\_
- c. A means to control entry, at all times, through gates or other entrances, to the active portion of the facility? Yes  No  N/A \_\_\_\_ RMK# \_\_\_\_
2. In accordance with OAC rule 3745-54-14©), does the permittee have signs reading "Danger - Unauthorized Personnel Keep Out" posted at entrances of the hazardous waste container storage building number \_\_\_\_? Yes  No  N/A \_\_\_\_ RMK# \_\_\_\_

## FACILITY OPERATIONS

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

d. Adequate laboratory and process controls?

Yes  No  N/A \_\_\_ RMK# \_\_\_

**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 with the following requirements of OAC rule 3745-54-16? [Condition B.6]

Yes  No  N/A \_\_\_ RMK# \_\_\_

a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC rule 3745-54-16(A)(B)©]]

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©)?

Yes  No  N/A \_\_\_ RMK# \_\_\_

2. Is the permittee maintaining personnel training records as required by OAC rule 3745-54-16(D) and of the approved application, including: written job titles, job descriptions and documented employee training records? [Condition B.6]

Yes  No  N/A \_\_\_ RMK# \_\_\_

**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 following emergency equipment as required by OAC rule 3745-54-32 and Condition B.9 of the permit:
  - a. An internal communications or alarm system? Yes  No  N/A \_\_\_\_\_ RMK# \_\_\_\_\_
  - b. A device such as a telephone which is capable of summoning emergency assistance from local emergency authorities? Yes  No  N/A \_\_\_\_\_ RMK# \_\_\_\_\_
  - c. Portable fire extinguishes and/or fire control equipment, spill control and decontamination equipment? Yes  No  N/A \_\_\_\_\_ RMK# \_\_\_\_\_
  - d. Water in adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers or water spray systems? Yes  No  N/A \_\_\_\_\_ RMK# \_\_\_\_\_
2. Is the permittee inspecting, testing and maintaining the equipment specified in Question No. 1, to ensure its proper operating in accordance with OAC rule 3745-54-33 and Condition B.10 of the permit? Yes  No  N/A \_\_\_\_\_ RMK# \_\_\_\_\_
3. Whenever hazardous waste is being managed at the facility, has the permittee provided all personnel involved in the operation with immediate access to an internal alarm or emergency communication device as required by OAC rule 3745-54-34 and Condition B.11 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**

**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:
  - a. Has the permittee documented the refusal in the operating record as required by OAC rule 3745-54-37(B)? [Condition B.13(b)] Yes  No  N/A \_\_\_ RMK# \_\_\_

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

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

**EMERGENCY COORDINATOR**

7. In accordance with OAC rule 3745-54-55 and Condition B.19 of the permit, is an emergency coordinator on premises or on call at all times? Yes  No  N/A \_\_\_ RMK# \_\_\_
8. In accordance with OAC rule 3745-54-55 and Condition B.19 of the permit, is/are the emergency coordinator(s) at the facility familiar with the following:
- a. Contingency plan? Yes  No  N/A \_\_\_ RMK# \_\_\_
- b. Facility operations/activities? Yes  No  N/A \_\_\_ RMK# \_\_\_

- c. Waste characterization and location? Yes  No  N/A \_\_\_ RMK# \_\_\_
- d. Location of all records in the facility? Yes  No  N/A \_\_\_ RMK# \_\_\_
- e. Facility layout? Yes  No  N/A \_\_\_ RMK# \_\_\_
9. In accordance with OAC rule 3745-54-55, does/do the emergency coordinator(s) have the authority to commit the resources needed to carry out the contingency plan? [Condition B.19] Yes  No  N/A \_\_\_ RMK# \_\_\_
10. Does the permittee have a contingency plan for the facility that: [Condition B.19]
- a. Describes the actions facility shall take to comply with OAC rules 3745-54-51 through 3745-54-56 in response to fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil or surface water at the facility? Yes  No  N/A \_\_\_ RMK# \_\_\_
- b. Describes arrangements agreed to by local police, fire departments, hospitals, contractors and Ohio EPA and the local emergency response team to coordinate emergency services? Yes  No  N/A \_\_\_ RMK# \_\_\_
- c. Includes an up-to-date list of names, addresses and phone numbers (office and home) for all persons qualified to act as emergency coordinator in the order that they will assume responsibility for coordination of emergency response? Yes  No  N/A \_\_\_ RMK# \_\_\_
- d. Includes a list of all emergency equipment, including fire extinguishing systems, spill control equipment, communications and alarm systems and decontamination equipment? Yes  No  N/A \_\_\_ RMK# \_\_\_
- e. Includes the location and a physical description of each item on the list referenced in Question No. 10(d), and a brief outline of its capabilities? Yes  No  N/A \_\_\_ RMK# \_\_\_

- f. Includes an evaluation plan for facility personnel describing signals to be used to begin evacuation, evacuation routes, and alternate evacuation routes, in situations where the primary routes could be blocked by releases of hazardous waste?

Yes  No  N/A \_\_\_ RMK# \_\_\_

### REMARKS

### IMPLEMENTATION OF CONTINGENCY PLAN

11. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility including spill or release of hazardous waste or hazardous waste constituents greater than or equal to 55 gallons; any spill or release of hazardous waste or hazardous waste constituents less than 55 gallons may result in a fire or explosion hazard as determined by the Emergency Coordinator; or any spill on-site that may potentially cause on or off-site soil and/or ground or surface water contamination; any spill or release of hazardous waste or hazardous waste constituents that is reported to the National Response Center or local (city or county) emergency response center because the spill exceeded the "RQ" limits; any fire involving hazardous waste; any explosion involving hazardous waste; since the date of the last inspection? If so:

Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_

- a. Did the permittee immediately implement the approved contingency plan and follow the emergency procedures described in OAC rule 3745-54-56? [Conditions B.14 and B.20]

Yes  No  N/A \_\_\_ RMK# \_\_\_

- b. Did the permittee immediately notify Ohio EPA's emergency response team using the 24-hour toll free number (800)282-9378 providing the following information: [OAC rule 3745-54-56(D)(2)]

- i. Name and telephone number of the reporter?

Yes  No  N/A \_\_\_ RMK# \_\_\_

- ii. Name and address of the facility?

Yes  No  N/A \_\_\_ RMK# \_\_\_

- iii. Time and type of incident? Yes  No  N/A \_\_\_ RMK# \_\_\_
- iv. Name and quantity of materials involved? Yes  No  N/A \_\_\_ RMK# \_\_\_
- v. The extent of injuries? Yes  No  N/A \_\_\_ RMK# \_\_\_
- vi. The possible hazards to human health or the environment outside the facility? Yes  No  N/A \_\_\_ RMK# \_\_\_
- c. Did the permittee collect and manage as hazardous waste all liquid or solid material resulting from fire, explosion, released material or emergency response materials until such time as the permittee can demonstrate to Ohio EPA that such waste are not hazardous wastes? [Condition B.16] Yes  No  N/A \_\_\_ RMK# \_\_\_
- d. Within 15 days of the incident did the permittee submit to the director a written report of the incident? If so: Yes  No  N/A \_\_\_ RMK# \_\_\_
  - i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23] Yes  No  N/A \_\_\_ RMK# \_\_\_
  - e. Did the permittee note in the operating record the time, date and details of any incident that required the implementation of the approved contingency plan as required by OAC rule 3745-54-56(J)? [Condition B.23] Yes  No  N/A \_\_\_ RMK# \_\_\_

**INSPECTION ITEMS FROM THE PART B APPLICATION**

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

**REMARKS**

**CLOSURE REQUIREMENTS**

- 1. Does the permittee maintain the approved closure plan at the facility? [Condition B.29] Yes  No  N/A \_\_\_ RMK# \_\_\_
- 2. Is the permittee keeping at the facility and submitting annually to Ohio EPA, the latest closure cost estimate as required by OAC rule 3745-55-42(D) [Condition B.36] Yes  No  N/A \_\_\_ RMK# \_\_\_
- 3. Has the permittee amended the closure plan? If so: Yes  No  N/A \_\_\_ RMK# \_\_\_
  - a. Has the plan been amended in accordance with OAC rule 3745-55-18(D)? [Condition B.28] Yes  No  N/A \_\_\_ RMK# \_\_\_  
*- closed tanks 5/96*

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

- 4. Has the permittee closed the facility? If so: Yes  No  N/A \_\_\_ RMK# \_\_\_
  - a. Did the permittee complete closure of the facility 180 days after receiving the final volume of hazardous waste, as required by Condition B.31 of the permit? Yes \_\_\_ No  N/A  RMK# \_\_\_
  - b. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26] Yes \_\_\_ No  N/A  RMK# \_\_\_
  - c. Did the permittee carry out the approved closure plan as set found in Section \_\_\_ of the approved permit application? [Condition B.27] Yes \_\_\_ No  N/A  RMK# \_\_\_
  - d. After receiving the final volume of hazardous waste, did the permittee remove all hazardous waste and complete closure activities in accordance with the schedule specified in the approved closure plan and as required by OAC rule 3745-55-13? [Condition B.31] Yes \_\_\_ No  N/A  RMK# \_\_\_

e. Has the permittee decontaminated and/or disposed of all facility equipment, structures and soils as required by OAC rule 3745-55-14 and the approved closure plan? [Condition B.32]

Yes  No  N/A  RMK# \_\_\_\_\_

f. Has the permittee certified that the facility has been closed in accordance with the specifications in the approved closure plan as required by OAC rule 3745-55-15? [Condition B.33]

Yes  No  N/A  RMK# \_\_\_\_\_

g. Has the permittee submitted a survey plat to the director and local zoning authority no later than the submission of certification of closure of each hazardous waste disposal unit? [Condition B.34]

Yes  No  N/A  RMK# \_\_\_\_\_

### REMARKS

### POST-CLOSURE MAINTENANCE

**NOTE:** *Inspector may attach a post-closure maintenance inspection schedule. If so, the attached document is referenced as Appendix \_\_\_\_\_.*

1. Has the permittee inspected the components, structures, and equipment at the site in accordance with the inspection schedule in §\_\_\_\_\_ of the permit application on a quarterly basis? [OAC rule 3745-55-17(A)(1)(b)] [Condition 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? [§\_\_\_\_ of the approved permit application] Yes\_\_\_ No  N/A  RMK#\_\_\_
4. Have suitable repairs been made within a reasonable amount of time? [Condition B.35] Yes\_\_\_ No  N/A  RMK#\_\_\_
5. Have repairs been indicated on the Notification Repair Form? [Condition B.35] Yes\_\_\_ No  N/A  RMK#\_\_\_
6. Was the Notification of Repair Form submitted to Ohio EPA within one week after determining that repairs are necessary? [Condition B.35] Yes\_\_\_ No  N/A  RMK#\_\_\_

**INSPECTION ITEMS FROM THE PART B APPLICATION**

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

**REMARKS**

**STORAGE OF HAZARDOUS WASTES IN CONTAINERS**

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

**CONDITION OF CONTAINERS**

- 1. Are containers holding hazardous wastes in good condition as required by OAC 3745-55-71? [Condition C.4] If not: Yes  No  N/A \_\_\_ RMK# \_\_\_
  - a. Did the permittee transfer the hazardous waste from such a container to one that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit? [Condition C.4] Yes  No  N/A \_\_\_ RMK# \_\_\_
- 2. Does the permittee ensure that all containers used at the facility are compatible with the hazardous waste to be stored in them as required by OAC rule 3745-55-72? [Condition C.5] Yes  No  N/A \_\_\_ RMK# \_\_\_
- 3. Does the permittee keep all containers closed during storage except when it is necessary to add or remove waste as required by OAC rule 3745-55-73? [Condition C.6(a)] Yes  No  N/A \_\_\_ RMK# \_\_\_
- 4. Does the permittee store all containerized hazardous waste on the container storage containment system as described in Condition C.7 of the permit? [Condition C.7] Yes  No  N/A \_\_\_ RMK# \_\_\_

**INSPECTIONS**

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

- 5. Is the permittee inspecting the container area weekly in accordance with OAC rule 3745-55-74 and the approved inspection schedule in Section \_\_\_ 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 \_\_\_\_, 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**

- 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)?  
  - 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? (This report is due by the 15<sup>th</sup> of the month following the reporting period.) [Condition \_\_\_\_] Yes\_\_ No N/A  RMK#\_\_
2. Has the permittee identified any new WMUs or releases at the facility? [Condition E.10]? If so: Yes\_\_ No N/A\_\_ RMK#\_\_
- a. Did the permittee follow the steps indicated in Conditions E.10(a) and (b) and E.11? Yes\_\_ No N/A  RMK#\_\_

**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**

## 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)? [3745-279-21(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 that 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\NMckenna\My Documents\iFolder\checklist\USED OIL.SHORT.11.2004.wpd

#### REMARKS

**LARG. QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

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

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

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

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

Safety Equipment Used:

**GENERAL REQUIREMENTS**

- |   |   |                             |                              |
|---|---|-----------------------------|------------------------------|
| 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11]  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)]   | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 3. Has the generator obtained a U.S. EPA identification number? [3745-52-12]  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 4. Were annual reports filed with Ohio EPA on or before March 1 <sup>st</sup> ? [3745-52-41(A)]   | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)]   | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 6. Has the generator transported or caused to be transported hazardous waste to <b>other</b> than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]                                   | Yes <input type="checkbox"/>            | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 7. Has the generator disposed of hazardous waste <b>on-site without a permit</b> or at another facility <b>other than</b> a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] | Yes <input type="checkbox"/>            | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 8. Does the generator accumulate hazardous waste?   | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

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

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

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

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

NOTE: Complete appropriate checklist for each unit.

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

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

**MANIFEST REQUIREMENTS**

- |  |   |                             |                              |
|--|---|-----------------------------|------------------------------|
| 12. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] | Yes <input type="checkbox"/>            | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)]                                       | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 14. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]         | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

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

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

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

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

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

**PERSONNEL TRAINING**

20. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes  No  N/A
21. Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes  No  N/A
22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes  No  N/A
23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes  No  N/A
24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes  No  N/A
25. Does the generator keep records and documentation of:
- a. Job titles [3745-65-16D(1)]? Yes  No  N/A
  - b. Job descriptions [3745-65-16D(2)]? Yes  No  N/A
  - c. Type and amount of training given to each person [3745-65-16D(3)]? Yes  No  N/A
  - d. Completed training or job experience required [3745-65-16D(4)]? Yes  No  N/A
26. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes  No  N/A

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

Job Performed	Name of Employee	Date Trained

**CONTINGENCY PLAN**

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

e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes  No  N/A

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

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

30. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] Yes  No  N/A

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

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

#### EMERGENCY PROCEDURES

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

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

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

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

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

#### PREPAREDNESS AND PREVENTION

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### SATELLITE ACCUMULATION AREA REQUIREMENTS

42. Does the generator ensure that satellite accumulation area(s):

a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes  No  N/A

b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes  No  N/A

c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes  No  N/A

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- d. Do not exceed one quart of acute, hazardous waste at any one time? [3745-5-34(C)(1)] Yes  No  N/A
- e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes  No  N/A
- f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes  No  N/A
43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes  No  N/A
- a. Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes  No  N/A
- b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes  No  N/A

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

#### USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

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

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

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. Yes  No  N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes  No  N/A
48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes  No  N/A
49. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes  No  N/A
50. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] Yes  No  N/A
51. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] Yes  No  N/A

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

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

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

#### PRE-TRANSPORT REQUIREMENTS

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

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**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**

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

**GENERAL REQUIREMENTS**

- |    |  |  |
|----|--|--|
| 1. | If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07 (A)(7)]                  | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>            |
| 2. | Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] | Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> |

*NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07 (A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).*

- |    |  |  |
|----|--|--|
| 3. | Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]           | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 4. | Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 5. | Does the generator generate a listed HW that exhibits a characteristic? If yes,  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

*FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.*

- |    |   |  |
|----|---|--|
| 6. | Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|--|

*NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.*

*NOTE: Written documentation of this determination is not required.*

- |    |  |  |
|----|--|--|
| 7. | Did the generator treat his HW /soil on-site to meet the LDR treatment standard? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|----|--|--|

*NOTE If "Yes" see question #16.*

- |     |  |  |
|-----|--|--|
| 8.  | Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility?[3745-270-07(A)(2)]          | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 9.  | Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 10. | Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)]  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a.  | Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)]  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

**NOTIFICATION FORM**

- |     |   |  |
|-----|---|--|
| 11. | Does the LDR Notification form contain the following information:   |  |
| a.  | Manifest number of the first waste shipment to the TSD?[3745-270-07(A)(2)]  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b.  | Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]                           | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c.  | A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d.  | A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)].  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.

e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories

f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.

g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for?[3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.

**PROHIBITED DILUTION**

12.	Is the HW treated by burning? If "No," go to #15.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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13.	Is the HW a metal-bearing HW?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.

14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless <b>one</b> of the following conditions apply. [3745-270-03(c)]	
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	i.	Contains > 1% TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	ii.	Contains organic constituents or cyanide at levels greater than the UST levels?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	v.	Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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15.	Was the HW treated by wastewater treatment?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: If Yes, HW is improperly being treated by dilution.

	b.	Does the waste carry the D001 code <u>and</u> contain ≥10% TOC?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B) and 3745-270-40(A)(3)].

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

GENERATOR TREATMENT			
16.	Does the generator treat to meet LDRs on-site [3745-270-40(A)]?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to <u>meet</u> the LDR treatment standard?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	If "Yes"...complete the rest of the checklist. If "No"...stop...you are done.		
	a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>NOTE: This is a laboratory analysis but it does not have to be kept by the generator.</b>			
	c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTIFICATION FORM			
17.	a.	Contains all information in #11 a-g above and	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	If the treated HW/soil is listed.....notification contains the following certification statement:  " I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or trough knowledge of the waste, to support this certification that the waste complies with the treatment stands specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:	
	i.	Send a one-time notification to the director?[3745-270- 09 (D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	ii.	Maintain a copy of the notice onsite?[3745-270-09(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iii.	Include in the notification: [3745-270-09(D)(1)(a)]	
		1. Name & address of receiving landfill?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		2. Description of HW when generated?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		3. HW code when generated?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		4. Treatability group when generated?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		5. Underlying hazardous constituents present when generated?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iv.	Contain the right certification statement as required by 3745-70-07(b)(4)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>