OhioEPA
State of Ohio Environmental Protection Agency

Northwest District Office

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

RE: Brent Industries, Inc.
OHR 000 019 257
Lucas County
DHWM, NWDO
Partial Return to Compliance

January 14, 2009

Mr. Alan Shepard
Brent Industries, Inc.
2922 South Avenue
Toledo, OH 43609

Dear Mr. Shepard:

Thank you for sending the electronic mail in response to the Ohio Environmental Protection Agency's (Ohio EPA's) Notice of Violation (NOV) dated September 4, 2008. The electronic mail was received by Ohio EPA on October 24, 2008. The documentation submitted includes analytical results from the kettle cooker lint.

Ohio EPA also received information from Shawn Sellers of Ohio EPA's Central Office engineering staff regarding Brent Industries, Inc.'s (BII's) tank certification. This information included a tank checklist that was received by Ohio EPA's Northwest District Office (NWDO) on January 2, 2009, and written comments on January 6, 2009.

The following is a summary of the violations observed during the July 23, 2008, compliance evaluation inspection and the facility's compliance with respect to each violation:

Violations:

1. **Ohio Administrative Code (OAC) Rule 3745-52-11, Hazardous Waste Determination:** "Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste..."

One of the waste streams from the dry cleaning process generated at BII is lint from the kettle cookers. Currently, BII disposes of this lint as a non hazardous waste in the landfill. However, BII failed to have waste evaluation documentation for this waste stream at the facility.

BII removes lint from the laundering process via a lint shaker. The lint is then taken to the kettle cooker where all excess Stoddard solvent is extracted from the lint. The solvent from the lint is then used again for laundering other material. This process is considered recycling the solvent and thus, BII is exempt from the treatment standards for this particular process. For more information, Ohio EPA has enclosed the fact sheet titled Generator Treatment, dated November 2006, and a regulatory interpretation letter titled Re: Beneficial Reuse, dated December 7, 2006.

On October 24, 2008, Ohio EPA received documentation that included the analytical results from the kettle cooker lint. The results showed that the kettle cooker lint is hazardous for lead (D008).

In a phone conversation on October 27, 2008, Ohio EPA explained to BII that each kettle cooker lint batch may have a different toxicity. BII has the option to sample each batch to determine the toxicity or consider all kettle cooker lint hazardous waste. During the phone conversation, BII decided to consider all kettle cooker lint waste as hazardous waste.

On October 30, 2008, Ohio EPA returned to the BII facility to review BII's new less than 90 day storage area. Previously, all of BII's hazardous waste was stored in tanks (except for the kettle cooker lint). Therefore, the storage area for the lint is new. This storage area is located behind the number 6 Wash-X machine, next to the lint shaker. This location has been chosen because this area is an isolated area away from the customers' laundry products and the employees' workspaces.

Ohio EPA would like to remind BII that a broom, shovel, or other clean-up materials should be located close to the new storage area in case of a hazardous waste spill. Due to the addition of this new storage area, BII may also need to update the contingency plan and other facility maps and documents.

At the time of the October 30, 2008, site visit, BII had not sent the kettle cooker lint off site as a hazardous waste. In order to abate this violation, BII should submit the appropriate manifest documents and land disposal restriction forms from the disposal of this waste stream to Ohio EPA within 30 days of receipt of this letter. BII is reminded to use a facility that tests for all underlying hazardous constituents that are applicable to meet the land disposal restrictions. If BII has not yet disposed of this waste stream, then BII should submit the name and address of the treatment, storage, or disposal facility the waste will be sent to.

For more information, Ohio EPA gave you the following fact sheets during the October 30, 2008, site visit: Violations most Frequently Cited by the Division of Hazardous Waste Inspectors, dated October 30, 2008; Land Disposal Restrictions (An Overview); dated September 2003; LQG Container Inspection Log OAC Rule 3745-66-74, dated January 2005; and Large Quantity Generator Requirements Checklist, dated June 2008.

2. **OAC Rule 3745-273-13(D)(1), Waste management-standards for small quantity handlers of universal waste:** "A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions."

   BII failed to store the universal waste lamps in a closed container.

   This violation was abated on July 31, 2008.

3. **OAC Rule 3745-273-14(E), Labeling/marking-standards for small quantity handlers of universal waste:** "Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)."

   BII failed to mark the container holding the spent lamps with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)."

   This violation was abated on July 31, 2008.

4. **OAC Rule 3745-273-15(C), Accumulation time limits-standards for small quantity handlers of universal waste:** "A small quantity handler of universal waste who accumulates universal waste shall be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received."

   BII failed to demonstrate the length of time the universal waste lamps have been accumulated.

   This violation was abated on July 31, 2008.

General Concerns:

A. **Waste Evaluations:** During the inspection, Ohio EPA spoke with BII about periodically evaluating all waste streams.

   No further information needs to be submitted for this general concern. This general concern is considered addressed.

B. **Contingency Plan:** During the inspection, BII explained to Ohio EPA that there are no designated spill kits at the plant. If a spill occurs, the closest pile of clean or dirty laundry will be used to absorb the spill. Then the contaminated pile of laundry will be sent through the dry cleaning system where the excess solvent will be recovered and the laundry will be cleaned for later use.

   No further information needs to be submitted for this general concern. This general concern is considered addressed.

C. <u>Tank Inspections:</u> BII utilizes an inspection form for the hazardous waste tank inspections which includes language at the top of the form indicating that if the form is signed and dated for a certain day, then no problems were found with the tanks and secondary containment.

No further information needs to be submitted for this general concern. This general concern is considered addressed.

D. <u>Tank Certifications:</u> During the inspection, Ohio EPA requested to review the tank certifications. However, BII stated that this information was at the corporate office. Ohio EPA agreed that this information could be submitted at a later date in order for Ohio EPA's Central Office to assist in the review of the certification.

On October 3, 2008, Ohio EPA received information pertaining to the tank certification at BII. This information was reviewed by Ohio EPA's Central Office engineering staff. The following comments outline deficiencies from the review of these documents. BII must submit the requested information within 30 days of receipt of this letter.

BII has two tanks at the facility that were built for hazardous waste storage. It is unclear if the information submitted to Ohio EPA was intended as a tank certification for both tanks or only the tank currently being used for hazardous waste storage. BII must submit a tank certification for both tanks.

Ohio EPA requests the following additional information to assess compliance with the following rule requirements:

<u>OAC Rule 3745-66-93, Secondary Containment System Requirements:</u>

1) **As required by paragraph (E) (1) (b) of OAC Rule 3745-66-93, secondary containment must be designed or operated to prevent run-on or infiltration of precipitation. Otherwise, the secondary containment must be designed with sufficient excess capacity to contain run-on or infiltration from a twenty-five-year, twenty-four-hour rainfall event. The written assessment did not address this requirement. Calculations must be provided to insure adequate capacity is provided.**

2) **The written assessment states that as of March 2001, there were several minor cracks on the floor of the secondary containment area. The assessment states that BII is in the process of repairing, but did not affirm the cracks had been adequately repaired. Pursuant to paragraph (E) (1) (c) of OAC Rule 3745-66-93 and the installation certification requirements of paragraph (B) of OAC Rule 3745-66-92, the written assessment must affirm the secondary containment is free of cracks or gaps.**

3) **Paragraph (E) (1) (e) of OAC Rule 3745-66-93 requires the secondary containment area be "constructed with chemical-resistant water stops in place at all joints." The assessment states that BII is in the process of installing the water stops. An additional assessment must be included to verify that the installation of the chemically-resistant water stops has been completed at all joints.**

4) **The written assessment states that the concrete containment area will be coated with 10 mils of epoxy phenolic sealant that is compatible with the waste solvent. Pursuant to paragraph (C) (1) of OAC Rule 3745-66-93, the secondary containment must be constructed of or lined with materials that are compatible with the waste to be placed in the tank system. The written assessment must address that the secondary containment area is compatible with the waste solvent.**

5) **The written assessment states that all ancillary equipment is above ground piping. As required by paragraph (F) of OAC Rule 3745-66-93, the written assessment must provide secondary containment to all ancillary equipment flanges, joints, valves, and connections of aboveground piping, unless they are welded flanges, joints, or connections. The written assessment must address secondary containment for ancillary equipment.**

OAC Rule 3745-66-92: New Tank System Requirements

6) As required by paragraph (A) of OAC Rule 3745-66-92, the owner or operator must obtain a written assessment reviewed and certified by an independent, qualified, registered professional engineer in accordance with paragraph (D) of rule 3745-50-42. The certification must state "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations." This written assessment was certified by a registered professional engineer but did not include certification statement.

7) As required by paragraph (A) (1) of OAC Rule 3745-66-92, the written assessment must include "Design standard(s) according to which the tank(s) and ancillary equipment is or will be constructed." The written assessment does not list specific design standard(s) according to which the tank and ancillary equipment were constructed. These design standard(s) must be sited in this assessment or detailed calculations (i.e. thickness, loading pressures, corrosion, etc.) should be provided to demonstrate that the system is constructed in accordance with sound engineering principles and will safely contain the hazardous waste.

8) Pursuant to paragraph (G) of OAC Rule 3745-66-92, the owner or operator of a new tank system must obtain and keep on file at the facility written statements by those persons required to supervise the installation of the tank system in accordance with the requirements of paragraphs (B) to (F) of this rule. These written statements must also include the certification statement as required in Paragraph (D) of rule 3745-50-42 of the Administrative Code. The written assessment does not contain the certification statement and must contain such a statement on file.

BII must submit the requested information within 30 days of receipt of this letter. For more information on the tank certification review, Ohio EPA has enclosed the tank certification checklist that was completed by Ohio EPA's Central Office.

Should you have any questions, please feel free to call me at (419) 373-3065. Please send all correspondence **within 30 days of receipt of this letter** to Ohio EPA, Northwest District Office, Attn: Kara Reynolds, 347 North Dunbridge Road, Bowling Green, Ohio 42402.

Sincerely,

Kara Reynolds

Kara Reynolds
Environmental Specialist
Division of Hazardous Waste Management

/csl

cc: Colleen Weaver, DHWM, NWDO
Kara Reynolds, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
DHWM, NWDO Lucas County File: Brent Industries 2004-

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.

TANK SYSTEM REQUIREMENTS (OAC 3745-66-91 TO 3745-66-101)

Facility: *Brent Industries, Inc./ Toledo Ohio (Lucus County)*
Reviewer: *S. Sellers, DHWM/CO*
Review Summary: *Review requested by Kara Reynolds, DHWM/NWDO. There is one above-ground steel tank (9600 gallons). The tank will store a stoddard solvent, a chemical used in their dry cleaning operations. According to Kara, the tank was installed sometime around 1988, although there is not an exact date provided. The tank would be a new tank according to it's installation commencing after July 14, 1986.*

NOTE: New Tank System - Installation commencing after July 14, 1986.
Existing Tank System - Installation or operation commencing on/before July 14, 1986.

1. **For an existing or new tank system(s)** has secondary containment been provided? [3745-66-93(A)(1) to (A)(5)] Yes **X** No___ N/A ___RMK#___

NOTES:

A. Secondary containment must be provided for all new tank systems or components, prior to their being put into service. [3745-66-93(A)(1)]

B. For an existing tank system(s) of **known and documentable age** secondary containment is required to be provided within two years after January 12, 1987, or when the tank system has reached 15 years of age, whichever came later. [3745-66-93(A)(3)]

C. Secondary containment is required for all existing tanks for which the **age cannot be documented**. The tanks were required to have secondary containment within eight years of January 12, 1987 or when the facility turned 15 years of age, whichever came later. [3745-66-93(A)4)]

D. Tank systems that store/treat materials that become hazardous waste after January 12, 1987, must have secondary containment required within the time intervals in OAC 3745-66-93(A)(1) to (A)(4). The date the material became a hazardous waste must be used in place of January 12, 1987. [3745-66-93(A)(5)]

E. If the tank system has no secondary containment, or a variance from secondary containment requirements has been granted, skip to the middle of page 5 of this Tank Systems Checklist; (Tank Systems without secondary containment).

2. Is the secondary containment one of the following:

a. An **External Liner** [3745-66-93(E)(1)(a) - (1)(f)] If so, Yes X No__ N/A __RMK#____

i. Is liner designed or operated to contain 100% of the capacity of the largest tank? Yes X No ___ N/A ___RMK#___
The tank is 9600 gallons and the secondary containment area is 18326 gallons(per my calculation of dimensions given)

ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? Yes_ No ___ N/A ___RMK# 1
The assessment does not speak to this issue. No information was provided for 24 hour 25 year storm event. No drawings are provided to reasonably ascertain the area draining into secondary containment.

iii. Is liner free of cracks and gaps? Yes_ No X N/A ___RMK# 2
The assessment speaks to the fact that at the time of the assessment in March 2001, there were several minor cracks on the floor of the containment area The assessment states that Brent Industries is in the process of repairing, but an additional assessment was not included after installation.

iv. Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release? Yes X No ___ N/A ___RMK#___

v. Are chemically resistant water stops in place at all joints? (concrete liners only) Yes ___ No X N/A ___RMK# 3
The assessment speaks to the fact that in March 2001, chemically resistant water stops were not in place at all joints. The assessment states that Brent Industries is in the process of installing, but an additional assessment was not included after installation.

vi. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? (concrete liners only) — Yes__ No _X_ N/A ___RMK#___

b. **Vault System?** [3745-66-93(E)(2)(a) - (2)(f)] If so, — Yes__ No_X_ N/A __RMK#___

c. **Double-Walled Tank?** [3745-66-93(E)(3)(a) - (3)(c)] If so, — Yes__ No_X_ N/A __RMK#___

i. Designed as an intregral structure (i.e., an inner tank within an outer shell) so that any release from the inner tank is contained by the outer shell) — Yes__ No ___ N/A _X_RMK#__

ii. Protected, if constructed of metal, from both corrosion of the primary tank interior and the external surface of the outer shell? — Yes_ No ___ N/A _X_RMK#___

iii. Provided with a built-in continuous leak detection system capable of detecting a release within twenty-four hours or at the earliest practicable time? (If the owner or operator can demonstrate to the director and the director concurs, that the existing leak detection technology or site conditions will not allow detection of a release within twenty-four hours.) — Yes_ No ___ N/A _X_RMK#___

3. Is the secondary containment system for the tank(s) an equivalent device as described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D)(E)] — Yes__ No__ N/A_X_ RMK#___

SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION (OAC 3745-66-93(B)(C))

4. Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids? [3745-66-93(B)] — Yes_ No_X__ N/A ___RMK#___
See comments below in #5 for specific comments

5. Does the secondary containment system meet the following minimum requirements of 3745-66-93(C):

a. Constructed or lined with compatible materials of sufficient strength to prevent failure? — Yes_ No _X_ N/A ___RMK#_4__
See above remark #2 and also the assessment states that Brent Industries will install an epoxy phenolic sealer within the containment area. An additional assessment is not provided to verify the installation of the sealer.

b. Placed on a foundation or base capable of providing support? — Yes_X_ No __ N/A ___RMK#___
Poured in place concrete foundation with a pressure rating of the concrete is 3000 psi. The concrete floor is 6" thick. The concrete walls are 8" thick. Calculations are provided for support capacity of fully loaded tank.

c.	Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time?	Yes X No __ N/A ___RMK#___ *Leak detection not provided. Brent Industries provided an inspection form verifying that inspections for leaks are performed daily on primary and secondary containment. Visual inspections are adequate for above ground tank systems.*
d.	Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation?	Yes X No __ N/A ___RMK#___
e.	Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner?	Yes X No __ N/A ___RMK#___

ANCILLARY EQUIPMENT REQUIREMENTS (OAC 3745-66-93(F))

6.	Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)? **If not**, is the ancillary equipment:	Yes__ No X N/A __RMK#___
a.	Inspected daily? **AND**;	Yes X No__ N/A _RMK#___
b.	Is ancillary equipment one of the following:	
i.	Above ground piping (exclusive of flanges, joints, valves and connections)?	Yes ___ No X N/A _RMK# 5 *Adequate description or drawings of ancillary equipment is not provided. Flanges, joints, valves & connections must be provided with full secondary containment.*
ii.	Welded flanges, welded joints and/or welded connections?	Yes ___ No___ N/A X RMK#___ *Already meets above ground piping*
iii.	Sealless or magnetic coupling pumps and/or sealless valves?	Yes ___ No___ N/A X RMK#___ *Already meets above ground piping*
iv.	Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown, and/or loss of pressure-actuated shut-off devices)?	Yes ___ No___ N/A X RMK#___ *Already meets above ground piping*

NEW TANK SYSTEM REQUIREMENTS (OAC 3745-66-92)

1.	Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)]	Yes X No___ N/A ___RMK#___
2.	Does the written assessment include the following: [OAC 3745-66-92(A)]	

a.	Certification by an independent, registered, professional engineer?	Yes ___ No_X_ N/A ___RMK#_6__ *PE registered in Ohio; however, the certification statement should have included language in accordance with paragraph (D) of rule 3745-50-42 of OAC*
b.	Consideration of the design standards of the system?	Yes _ No_X_ N/A ___RMK#_7__ *There is not an adequate description of the tank system. Nationally recognized design standards are not listed for the tank or ancillary equipment.*
c.	Consideration of the hazardous characteristics of the waste(s)?	Yes _X_ No___ N/A ___RMK#___ *Attachment A shows waste characteristics.*
d.	An evaluation by a corrosion expert (if the external system/components are metal)?	Yes ___ No___ N/A _X_RMK#___ *Above Ground Tank*
e.	A determination of design and operational measures that will be needed to protect the tank system from potential damage (for underground tank components)?	Yes ___ No___ N/A _X_RMK#___ *Above Ground Tank*
f.	Design considerations to ensure that the tank foundations will maintain the load of a full tank?	Yes_X_ No___ N/A ___RMK#___ *Design considerations provided in Attachment C*
g.	Design considerations for anchoring the unit to prevent floatation (for tanks situated in a seismic fault zone or saturated zone)?	Yes ___ No___ N/A _X_RMK#___
h.	Design considerations to ensure that the tank system will withstand the effects of frost heave (for underground tank systems)?	Yes ___ No___ N/A _X_RMK#___ *Above ground.*
3.	Are there written statements by those person who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)]	Yes___ No__ N/A ___RMK#_8__ *Inspection of installation did occur; however certification statement should have included language in accordance with paragraph (D) of rule 3745-50-42 of OAC.*
	Do the written statements address all of the following:	
a.	Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)]	Yes_X_ No__ N/A ___RMK#___
b.	Statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)]	Yes ___ No_X_ N/A _RMK#___ *The statement only states the deficiencies will be corrected. The written assessment must state the deficiencies have been corrected.*
c.	Proper backfilling? [3745-66-92(C)]	Yes ___ No___ N/A_X_RMK#___

d. Tightness test; if the tank was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)] — Yes ___ No___ N/A_X_RMK#___
Not to be covered and will be visually inspected

e. Proper support and protection of ancillary equipment? [3745-66-92(E)] — Yes_X_ No___ N/A ___RMK#___

f. Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)] — Yes ___ No___ N/A _X_RMK#___

TANK SYSTEM - GENERAL OPERATING REQUIREMENTS (OAC 3745-66-94)

1. Does the o/o follow the general operating requirements below:

a. Does the o/o prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail? [3745-66-94(A)] — Yes_ No___ N/A ___RMK#___
Not considered in written assessment.

b. Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)? [3745-66-94(B)] — Yes _ No___ N/A ___RMK#___

c. If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96? [3745-66-94(C)] — Yes ___ No___ N/A _X_RMK#___

TANK SYSTEM - INSPECTION REQUIREMENTS (OAC 3745-66-95)

1. Has the o/o documented the inspections required in 3745-66-95, in the operating record, including inspection of the following: — *Not considered in written assessment.*

a. Spill control equipment (daily)? [3745-66-95(A)(1)] — Yes ___ No___ N/A ___RMK#___

b. Above ground portion of tank (daily)? [3745-66-95(A)(2)] — Yes ___ No___ N/A ___RMK#___

c. Data from leak detection equipment (daily)? [3745-66-95(A)(3)] — Yes ___ No___ N/A ___RMK#___

d. Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste (daily)? [3745-66-95(A)(4)] — Yes ___ No___ N/A ___RMK#___

e. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(B)(1)] — Yes ___ No___ N/A ___RMK#___

f. Where applicable, all sources of impressed current at least bi-monthly? [3745-66-95(B)(2)] — Yes ___ No___ N/A ___RMK#___

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES (OAC 3745-66-98 AND 3745-66-99)

1. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with **one of the following:** [3745-66-98(A)] — *Not considered in written assessment.*

a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-65-17(B)? [3745-66-98(A)(1)]; **OR** — Yes___ No___ N/A __RMK#___

b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A)(2)]; **OR** — Yes___ No___ N/A ___RMK#___

c. The tank is used solely for emergencies? [3745-66-98(A)(3)] — Yes___ No___ N/A ___RMK#___

2. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (1996)? [3745-66-98(B)] — Yes ___ No___ N/A ___RMK#___

3. Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material? [3745-66-99] — Yes___ No___ N/A___RMK#___

a. **If so,** have the requirements of 3745-65-17(B) been met? — Yes ___ No___N/A ___RMK#___

REMARKS