OhioEPA

State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: BP Toledo Refinery
OHD 005057542
Hazardous Waste
Lucas County
NOV

July 11, 2007

Mr. James Nelson
BP Products North America - Toledo Refinery
4001 Cedar Point Road
PO Box 696
Toledo, Ohio 43697-0696

Dear Mr. Nelson:

On June 20, 2007, Ed Pulido and I conducted a hazardous waste compliance evaluation inspection of BP Products North America (BP Toledo) located in Oregon, Ohio on behalf of the Ohio Environmental Protection Agency (Ohio EPA). This inspection was conducted in order to determine BP Toledo's compliance with Ohio's hazardous waste laws as adopted under Chapter 3745 of the Ohio Administrative Code (OAC) and Chapter 3734 of the Ohio Revised Code (ORC). The Agency's inspection included a tour of your facility and a review of written documentation. This letter will explain the violations we found and what you need to do to correct the violations.

BP Toledo is a refinery of petroleum products. Products produced by the Toledo refinery include aviation gasoline, diesel fuel, and coke. The largest hazardous waste stream is filter cake from the on-site wastewater treatment plant (K048, K049, K050, K051, F037, F038). Other consistent waste streams include carbon canister waste (D001); sandblast/leaded paint chips (D007,D008); primary sludge from sewer clean-out (F037); refinery solids (D018); and scrubber catalyst (D018).

The following violations of Ohio's hazardous waste rules were observed and noted during the inspection:

1. **Condition of Containers, OAC rule 3745-66-71:** If a container begins to leak, the owner or operator shall transfer the hazardous waste from such container to a container that is in good condition.

   BP Toledo had several roll-off containers located in the hazardous waste storage area that were leaking hazardous waste liquid onto the concrete pad. Specifically, roll off boxes BP-12, BP-28, BP-10 and BP-616 were leaking. BP Toledo must immediately clean up the material that has leaked on the ground and also re-containerize the waste.

To abate this violation, you must send me a photograph documenting that the area has been properly cleaned up. You must also document how the material was re-containerized (which new roll off numbers were utilized, etc.)

2. **Container Management, OAC rule 3745-66-73(B):** A container holding hazardous waste shall not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.

   BP Toledo had several roll-off containers located in the hazardous waste storage area that were leaking hazardous waste liquid onto the concrete pad. Specifically, roll off boxes BP-12, BP-28, BP-10 and BP-616 were leaking. You stated that the amount of hazardous waste being stored was unusual due to a recent unscheduled shutdown. BP Toledo must immediately clean up the material that has leaked on the ground and also re-containerize the waste.

   To abate this violation, you must send me a photograph documenting that the area has been properly cleaned up. You must also document how the material was re-containerized (which new roll off numbers were utilized, etc.)

3. **Used Oil Labeling, OAC rule 3745-279-22(C)(1):** Any tank or container of used oil must be labeled with the words "used oil".

   BP Toledo has not properly labeled several buckets containing used oil which are located inside the maintenance area's storage shed.

   In order to abate this violation, BP must label these containers or document that a new used oil drum is in place. If a new drum is in place, please submit a photo showing that the buckets have been removed.

4. **Container Labeling, OAC Rule 3745-52-34(A)(2):**
   The date upon which each period of accumulation begins must be clearly marked and visible for inspection on each container.

   BP had one roll off box, BP-11, and two drums of hazardous waste that were not labeled with an accumulation start date.

   At the time of our inspection, the roll-off was labeled with the accumulation start date. The two drums of oil contaminated debri were also labeled with the accumulation start date. Therefore, this violation is considered abated.

Please respond, in writing, to this NOV letter within **thirty (30) days**. Your response must include all actions and timetables necessary to demonstrate compliance.

INFORMATION:
During our inspection, you requested an interpretation on Ohio's Universal Waste Rules as they apply to pesticides. After reviewing the regulations and discussing with others in my office, we clearly believe that you can puncture and drain aerosol cans for collection of pesticide residue and manage this as a universal waste. If you would like this interpretation in writing, you can go on our website (see hyperlink below) and click on "ANSWER PLACE" near the upper lefthand corner and ask the question online. If you would like to speak with someone, you can contact our regulatory services group for an verbal or written interpretation at 614-644-2917.

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.

Enclosed you will find a copy of the checklists that Ohio EPA completed during the inspection. Should you have any questions, please feel free to call me at (419) 373-3114.

Sincerely,

Wendy Miller

Wendy Miller
Division of Hazardous Waste Management

/lb

Enclosures

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
NWDO File (w/original enclosure)
Follow up File

ec: John Pasquarette, DHWM, NWDO

NOTE: Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST

Facility: BP Products North America - Toledo Refinery Ohio Permit: 03-48-0411

Address: 4001 Cedar Point Road
Oregon, OH
U.S. EPA ID: OHD005057542
Phone: 419-698-6339

County: Lucas

Inspection Date: 6/ 20/ 07 Time: 9:15-5:00

Was advance notice of the inspection given? X YES ____ NO
If so, how far in advance? 2 weeks

	Name	***Agency/Title***	***Phone***
Inspectors:	Wendy Miller	OEPA	419-373-3114
	Ed Pulido	OEPA	419-373-3015
Facility Reps:	Jim Nelson	BP	419-698-6339

Is facility operating as a generator? X YES ____ NO

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

PERMIT STATUS

Permit Issued: May 23, 2002
Permit Effective Date: May 23, 2002
Permit Expiration Date: May 23, 2012

Permit Renewal Date: ____

Permit Modification Date(s):_

LDR Checklist Attached: ☒ Yes ☐ No
Used Oil Checklist Attached: ☒ Yes ☐ No
Generator Checklist Attached: ☒ Yes ☐ No
Universal Waste Checklist is also attached

AUTHORIZED ACTIVITIES

STORAGE		***TREATMENT***		***DISPOSAL***	
X	Containers		Tanks		Injection Well
	Tanks		Incinerator		Landfill
	Waste Pile		Thermal Treatment		Land Application
	Surface Impoundment		Post-Closure		Surface Impoundment

☒ Post-Closure Care ☒ Corrective Action

Table of Contents

GENERAL PERMIT COMPLIANCE AND ACTIVITIES 1
- PERMIT MODIFICATION, REVISION, REVOCATION 3
- SITE ENTRY - AVAILABILITY OF RECORDS 5

RECORDKEEPING/OPERATING REQUIREMENTS 6
- OPERATING RECORD 6
- DOCUMENTS TO BE MAINTAINED AT FACILITY 7
- ANNUAL REPORT REQUIREMENT 8
- SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS 8

WASTE MINIMIZATION REQUIREMENTS 9

GROUND WATER MONITORING 10

WASTE ACCEPTANCE AND GENERATION 10

OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS 11

WASTE ANALYSIS/WASTE ANALYSIS PLAN 13

GENERAL INSPECTION REQUIREMENTS 14
- SECURITY REQUIREMENTS 16
- FACILITY OPERATIONS 16
- PERSONNEL TRAINING 17

REQUIRED EQUIPMENT 18

CONTINGENCY PLAN - EMERGENCY PROCEDURES 19
- EMERGENCY COORDINATOR 20
- IMPLEMENTATION OF CONTINGENCY PLAN 22

CLOSURE REQUIREMENTS 24

POST-CLOSURE MAINTENANCE 25

STORAGE OF HAZARDOUS WASTES IN CONTAINERS 26
- CONDITION OF CONTAINERS 26
- INSPECTIONS 27
- CONTAINMENT SYSTEM 27
- AISLE SPACE 28

LAND DISPOSAL RESTRICTION REQUIREMENTS 28

CORRECTIVE ACTION 29

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so: Yes__No_x_ 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_x_ 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 _x_ 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.26] Yes__ No□ N/A _x_ RMK#___

   (As long as >90 day pad is not constructed, this is not applicable)

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 x___ N/A __ RMK#___

4. Have any provisions of the permit been identified as invalid? [Condition A.4] Yes□ No __x_ 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 __x_ N/A __ RMK#___

   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 _x_ 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 _x_ RMK#___

         A. Name, address and telephone number of the owner/operator? Yes__ No□ N/A _x_ RMK#___

B. Name, address and telephone number of the facility? Yes__ No☐ N/A _x_ RMK#____

C. Name and quantity of material(s) involved? Yes__ No☐ N/A _x_ RMK#____

D. The extent of injuries, if any? Yes__ No☐ N/A _x_ RMK#____

E. An assessment of the actual or potential hazard to the environment and human health outside the facility? Yes__ No☐ N/A _x_ RMK#____

F. Estimated quantity and disposition of recovered material that resulted from the incident? Yes__ No☐ N/A _x_ 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 _x_ RMK#____

a. A description of the noncompliance and its cause (including exact dates and times)? Yes__ No☐ N/A _x_ RMK#____

b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? and Yes__ No☐ N/A _x_ 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 _x_ 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#____

a. Did the permittee report these instances to Ohio EPA, DHWM? [Condition A.22]? Yes__ No☐ N/A _X_ RMK#____

b. Do the reports provided contain the information set forth in Condition A.20? [Condition A.20] Yes__ No☐ N/A _x_ 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 _x_ 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_X_ 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 _X_ 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_X_ 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 _x_ 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_x_No__ N/A__ RMK#___

11. Has the permit, been transferred to a new owner/operator? If so: — Yes__No_x_ 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 _x_ 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_x_ 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_x_ 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_x_ 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_x_ No_ N/A __ RMK#___
16.	Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14©)]	Yes_x_ 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_X_ N/A__ RMK#___
	a. Has the permittee given notice to the director of such alterations/additions? [Condition A.15]	Yes__ No_ N/A _x_ 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 x 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 x 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 x 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 x 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 x No☐ N/A __ RMK#___

   b. The location of each hazardous waste and quantity at each location including cross-reference to specific manifest numbers? — Yes x No☐ N/A __ RMK#___

   c. Records and results of required waste analysis? — Yes x No☐ N/A __ RMK#___

   d. Summary reports and details of all incidents that required implementation of the contingency plan? — Yes x No☐ N/A __ RMK#___

   e. Records and results of required inspections? — Yes x No☐ N/A __ RMK#___

   f. Documents required to be maintained by LDR requirements of OAC Chapter 3745-270? — Yes x 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 x 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 X 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 X RMK#____

   b. Contingency plan in accordance with OAC rule 3745-54-53? — Yes x No□ N/A __ RMK#____

   c. Closure plan in accordance with OAC rule 3745-55-12? — Yes X 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 x No□ N/A __ RMK#____

   e. Personnel training plan and records required by OAC rule 3745-54-16? [Condition B.6] — Yes x 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 x No□ N/A __ RMK#____

   g. Operating record in accordance with OAC rule 3745-54-73? [Condition B.22] — Yes x No□ N/A __ RMK#____

   h. Post-closure plan, as required by OAC rule 3745-55-18(A)? [Condition A.28(a)(viii)] — Yes x 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 x 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 X No□ N/A __ RMK#____

4. Have any of the documents in Question No. 2 been revised? [Condition A.15] If so: — Yes X No__ N/A__ RMK#____

   a. Has the permittee submitted the revisions to Ohio EPA in accordance with OAC rule 3745-50-51? — Yes X No__ N/A __ RMK#____

b. Have all requirements of OAC rule 3745-50-51 been met, including, where required, Ohio EPA approval? Yes X No☐ N/A ___ RMK#____

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 x No☐ N/A __ RMK#____

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

6. In compliance with Condition A.12(b) of the permit, do the permittee's records of monitoring information specify the:

   a. Date(s), exact place(s), time(s) and method(s) of sampling or measurement? Yes__ No☐ N/A _X_ RMK#____

   b. Individual(s) who performed the sampling or measurement? Yes__ No☐ N/A _X_ RMK#____

   c. Date(s) analyses were performed? Yes__ No☐ N/A _X_ RMK#____

   d. Individual(s) who performed the analyses? Yes__ No☐ N/A _X_ RMK#____

   e. Analytical technique(s) or method(s) used? Yes__ No☐ N/A _X_ RMK#____

   f. Results of such analyses? Yes__ No☐ N/A _X_ 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 _X_ 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 _X_ RMK#____

9. Has Ohio EPA requested submittal of any reports or other information from the permittee? If so: Yes__No__ N/A_X_ RMK#____

   a. Have the submittals been signed and certified according to OAC rule 3745-50-42? [Condition A.13] Yes__ No☐ N/A _X_ 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 X 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(c)]	Yes X No☐ N/A __ RMK#____ Permit only states Office P2 receives copy...not NWDO
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 X No__ N/A__ RMK#____
	If so, what amount of waste has the permittee reduced this year? _____	See P2 report filed with OCAPP, Mike Kelley or Sean Tolentino
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 X No__ N/A__ RMK#____
	If so, how much money has the permittee's company saved this year? _____	See P2 report filed with OCAPP, Mike Kelley or Sean Tolentino

REMARKS

GROUND WATER MONITORING

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

2. Have they reported the results in the Annual Report to the director by March 1st as required by Condition B.25? Yes X No N/A RMK#

REMARKS

Ground Water monitoring items are evaluated by NWDO - DHWM closure group.

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]

***BP does not ship waste off-site from a <90 storage area. They do not hold waste over 90 days.**

   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 _X_ 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 _x_ 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 _x_ 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 _x_ 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 _x_ 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 _X_ RMK#____

Transporters:

Transporters:

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 _X_ 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 _X_ 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 _X_ RMK#___

5. Have any manifest discrepancies been reconciled within 15 days as required by 3745-54-72(B)? If not: — Yes__ No__ N/A _X_ RMK#___

   a. Has the owner/operator submitted the required information to the director? — Yes__ No__ N/A _X_ 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 _X_ 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)] — **BP does not store, treat or dispose <90 day waste on-site.**

   Yes__ No__ N/A _X_ RMK#___

2. Does the permittee follow the procedures described in the WAP (Application ____)? [Condition B.3(b)] — Yes__ No__ N/A _X_ 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 _X_ RMK#___

5. **FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER OAC 3745-270-04(A):** **BP DOES NOT OPERATE SURFACE IMPOUNDMENTS**

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 _X_ RMK#___

ii. The analysis of test data? [3745-65-13(B)(7)] Yes__ No☐ N/A _X_ 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 _X_ 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 _X_ 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 _X_ RMK#___

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_X_ 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_X_ No_ N/A __ RMK#___

   a. Is the schedule kept at the facility? [OAC rule 3745-54-15(B)(2)] Yes _X_ 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_X_ 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_X_ No_ N/A __ RMK#___

   b. Name of inspector? Yes_X_ No_ N/A __ RMK#___

   c. Notation of observations made? Yes_X_ No_ N/A __ RMK#___

   d. Date and nature of any repairs or other remedial actions? Yes_X_ No_ N/A __ RMK#___

INSPECTION ITEMS FROM THE PART B APPLICATION

See contingency plan/Table F-1.1 and F-1.2 for inspection schedule

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:

   a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility? Yes X No☐ N/A __ RMK#___

   b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility? Yes X 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 X No☐ N/A __ RMK#___

2. In accordance with OAC rule 3745-54-14(C), does the permittee have signs reading "Danger - Unauthorized Personnel Keep Out" posted at entrances of the hazardous waste container storage building number ___. Yes X 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 X 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 X No☐ N/A __ RMK#___

   b. Adequate funding? Yes X No☐ N/A __ RMK#___

   c. Adequate operator staffing and training? Yes X No☐ N/A __ RMK#___

   d. Adequate laboratory and process controls? Yes X No☐ N/A __ RMK#___

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)(C)] — Yes X 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 X No☐ N/A __ RMK#___

   c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(C)? — Yes X 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 X No☐ N/A __ RMK#___

REQUIRED EQUIPMENT

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 X No☐ N/A __ RMK#___

   b. A device such as a telephone which is capable of summoning emergency assistance from local emergency authorities? — Yes X No☐ N/A __ RMK#___

   c. Portable fire extinguishes and/or fire control equipment, spill control and decontamination equipment? — Yes X 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_X_ 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_X_ 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_X_ No_ N/A __ RMK#___

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_X_ No_ N/A __ RMK#___

   b. Inform such agencies of safety equipment, supplies, proper emergency safety procedures that are applicable to the facility? Yes_X_ 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_X_ No_ N/A __ RMK#___

2. Has a state or local agency declined to enter into the arrangements set forth in OAC rule 3745-54-37(A)? If so: Yes__No_X_ N/A__ RMK#___

   a. Has the permittee documented the refusal in the operating record as required by OAC rule 3745-54-37(B)? [Condition B.13(b)] Yes__ No_ N/A _X_ 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 X 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 X 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 X 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 X 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 X 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 X No☐ N/A __ RMK#___

   b. Facility operations/activities? — Yes X No☐ N/A __ RMK#___

   c. Waste characterization and location? — Yes X No☐ N/A __ RMK#___

   d. Location of all records in the facility? — Yes X No☐ N/A __ RMK#___

   e. Facility layout? — Yes X 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 X 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 X 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 X 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 X 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 X 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 X 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 X 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_X_ 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 _X_ 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 _X_ RMK#___

ii. Name and address of the facility? Yes__ No☐ N/A _X_ RMK#___

iii. Time and type of incident? Yes__ No☐ N/A _X_ RMK#___

iv. Name and quantity of materials involved? Yes__ No☐ N/A _X_ RMK#___

v. The extent of injuries? Yes__ No☐ N/A _X_ RMK#___

vi. The possible hazards to human health or the environment outside the facility? Yes__ No☐ N/A _X_ 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 _X_ 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 _X_ RMK#___

   I. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23] — Yes__ No□ N/A _X_ 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 _X_ RMK#___

REMARKS

CLOSURE REQUIREMENTS

1. Does the permittee maintain the approved closure plan at the facility? [Condition B.29] — Yes__ No__ N/A __ RMK#____

2. Is the permittee keeping at the facility and submitting annually to Ohio EPA, the latest closure cost estimate as required by OAC rule 3745-55-42(D) [Condition B.36] — Yes__ No__ N/A __ RMK#____

3. Has the permittee amended the closure plan? If so: — Yes__ No__ N/A __ RMK#____

   a. Has the plan been amended in accordance with OAC rule 3745-55-18(D)? [Condition B.28] — Yes__ No__ N/A __ RMK#____

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

4. Has the permittee closed 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*

1. Has the permittee inspected the components, structures, and equipment at the site in accordance with the inspection schedule in Post-Closure Plan [Condition B.35] — Yes X No__ N/A __ RMK#____

2. Has the permittee conducted and recorded an inspection of at least the following? [Condition B.35] — Yes X 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 X No__ N/A __ RMK#____

4. Have suitable repairs been made within a reasonable amount of time? [Condition B.35] — Yes__ No__ N/A X RMK#____

5. Have repairs been indicated on the Notification Repair Form? [Condition B.35] Yes__ No☐ N/A _X_ 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 _X_ RMK#___

INSPECTION ITEMS FROM THE PART B APPLICATION

RCRA Closure Plan, North Stormwater Impoundment Pond July 2002
Revised April 24, 2003 (approved May 21, 2003) Appendix F

REMARKS

STORAGE OF HAZARDOUS WASTES IN CONTAINERS no>90day storage taking place...

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*

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_X_ No☐ N/A _X_ RMK#___

2. Does the permittee comply with the notification and certification requirements of OAC rule 3745-270-07(A)? Yes_X_ No☐ N/A _X_ 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_X_ No☐ N/A _X_ RMK#___

4. Does the permittee retain supporting data used to determine if wastes managed at the facility are restricted from land disposal in the facility files as required by OAC rule 3745-270-07(A)(5)? Yes X No☐ N/A X RMK#___

   a. Are copies of all notices, certifications, demonstrations, waste analysis and other documentation produced pursuant to OAC Chapter 3745-270 retained for a period of three years as required by OAC rule 3745-270-07(A)? Yes X No☐ N/A X 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 X RMK#___

REMARKS

CORRECTIVE ACTION Not reviewed during CEI

1. Has the permittee submitted the monthly progress report for all corrective action activities? (This report is due by the 15th 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#___

REMARKS

Managed by DHWM-NWDO Closure/Corrective Action Group (Remediation Group)

LARGE 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 ☑ No ☐ N/A ☐
2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] — Yes ☑ No ☐ N/A ☐
3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] — Yes ☑ No ☐ N/A ☐
4. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] — Yes ☑ No ☐ N/A ☐
5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] — Yes ☑ No ☐ N/A ☐
6. Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] — Yes ☐ No ☑ N/A ☐
7. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] — Yes ☐ No ☑ N/A ☐
8. Does the generator accumulate hazardous waste? — Yes ☑ No ☐ N/A ☐

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 ☐ No ☑ N/A ☐

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 ☐ No ☐ N/A ☑
    b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? — Yes ☐ No ☐ N/A ☑
    c. Drip pads that meet 3745-69-40 to 3745-69-45? — Yes ☐ No ☐ N/A ☑
    d. Containment building that meets 3745-256-100 to 3745-256-102? — Yes ☐ No ☐ N/A ☑

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 ☑ No ☐ N/A ☐
    a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] — Yes ☑ No ☐ N/A ☐
    b. Has the generator complied with special manifest requirements? [3745-52-54] — Yes ☑ No ☐ N/A ☐
    c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] — Yes ☐ No ☐ N/A ☑
    d. Has an annual report been submitted to U.S. EPA? [3745-52-56] — Yes ☑ No ☐ N/A ☐
    e. Are export related documents being maintained on-site? [3745-52-57(A)] — Yes ☑ No ☐ N/A ☐

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 ☑ No ☐ N/A ☐
13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] — Yes ☑ No ☐ N/A ☐

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

14. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] — Yes ☑ No ☐ N/A ☐

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 ☐ No ☐ N/A ☑
16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] — Yes ☑ No ☐ N/A ☐

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
	Michael Stricker	10/4/06
	Jeff Reynolds	10/11/06
	Jeffrey Johnson	10/5/06
	Sheila Johnson	Kerry Justice (new-rcvd 12/8/06)

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 ☐

é. 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 throughly 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 ☐

d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(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 then 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 ☐

LDR CHECKLIST

GENERAL LDR REQUIREMENTS

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

   a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)] Yes ✓ No ☐ N/A __ RMK# ___

   b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes ✓ No ☐ N/A __ RMK# ___

2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] Yes ✓ No ☐ N/A __ RMK# ___

3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes ✓ No ☐ N/A __ RMK# ___

4. Does the generator generate a characteristic hazardous waste? If so: Yes ✓ No __ N/A __ RMK# ___

   a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes ✓ No ☐ N/A __ RMK# ___

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

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so: Yes ✓ No __ N/A __ RMK# ___

   a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes ✓ No ☐ N/A __ RMK# ___

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

6. Has the generator correctly determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)] Yes ✓ No ☐ N/A __ RMK# ___

NOTE: ***Wastes with EPA hazardous waste numbers K174 and K175 (chlorinated aliphatic wastes) have specific requirements in rule 3745-270-33. Waste with EPA hazardous waste numbers K176, K177 and K178 (inorganic chemical wastes) have specific requirements in rule 3745-270-36.***

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] Yes✓ No☐ N/A__ RMK# ___

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

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] Yes✓ No☐ N/A__ RMK# ___

NOTE: ***In other words, is combustion a legitimate treatment method.***

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes__ No☐ N/A✓ RMK# ___

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] If so: Y es__ No✓ N/A__ RMK# ___

    a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05] Yes__ No☐ N/A✓ RMK# ___

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] If so: Y es__ No✓ N/A__ RMK# ___

    a. The facility can land dispose of the waste. [3745-270-06] Yes__ No☐ N/A✓ RMK# ___

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? Y es__No✓N/A__RMK# __
If so:

a. Has the facility complied with 3745-270-04? Yes__No☐N/A✓RMK# __

NOTIFICATION AND CERTIFICATION REQUIREMENTS

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

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

15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)] Yes__No☐N/A✓RMK# __

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

17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so: recycling Y es__No✓N/A__RMK# __

    a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes__No☐N/A✓RMK# __

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

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

USED OIL INSPECTION CHECKLIST (Short Version)

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

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: — Yes___ No ✓ N/A ___ RMK#___

   Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] — Yes ___ No ☐ N/A ✓ RMK#___

2. Is used oil being used as a dust suppressant? [3745-279-12(B)] — Yes ☐ No ✓ N/A ___ RMK#___

3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? — Yes ___ No ☐ N/A ___ RMK#___

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] — Yes ___ No ☐ N/A ✓ RMK#___

5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] — Yes ___ No ☐ N/A ✓ RMK#___

6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] — Yes ✓ No ☐ N/A ___ RMK#___

7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] — Yes ✓ No ☐ N/A ___ RMK#___

8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] — Yes ___ No ✓ N/A ___ RMK#___
   several small containers not labeled (drum to collect oil was full)

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? spillage absorbent material suggest clean-up. 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#___

G:\Checklists & Forms\USEDOIL.SHORT.11.2004.fin.megaset[1]

REMARKS

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? [3745-273-15(A)] If not: Yes ✓ No___ N/A ___RMK#___

    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#___ regular shipments

    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-transports 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 <u>one of the following</u>:

    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

BP-Toledo Refinery

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: **Facility Type:** LQG/~~SQG/CESQG~~/TSD **Date of Inspection:** 6-20-07 **EPA ID#:** OHD005057542

Waste Generated				On- or Off-Site Management		P2 Activities	
	Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	**Waste Description** (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	**QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area**	**Type of On-Site Treatment** (recycle, wwt, etc)	**Name, state, and type of activity occurring at the off-site facility.**	**Current P2 Activities**	**P2 Opportunities**
1		Refinery Solids, D018					
2	Cleaning	ADHT Spent Catalyst, K171					
3	lab	LPG Coolescer filter cartridges					
4	Sandblasting	lead paint					
5	sewer	refinery process sewer solids, F037					
6	spent catalyst	Isocracker spent catalyst, K172					
7		Spent activated carbon, D018					
8	warehouse cleanout,	Aluminum oxide beads, D003					
9	x-ray imaging	Spent Fixer, D011 Spent Developer, D002					

- aerosol can puncturing
- contaminated PPE liquid → not shipped off yet
- used oil
- fluorescent bulbs, batteries, U. Waste
- Asbestos
- Scrap metal - R&M recycling

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.
Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

er:

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: **Facility Type:** LQG/SQG/CESQG/TSD **Date of Inspection:** **EPA ID#:**

Waste Generated				*On- or Off-Site Management*		P2 Activities	
	Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	**Waste Description** (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and **EPA Waste Code, if applic.**	**QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area**	**Type of On-Site Treatment** (recycle, wwt, etc)	**Name, state, and type of activity occurring at the off-site facility.**	**Current P2 Activities**	**P2 Opportunities**
1		Overhead accumulator drum waste, D018					
2		Fuel additive, D001					
3	site wide process	paint/solvent waste					
4		STCR filter waste, F003, F005					
5	scaltech	spent carbon, D001					
6		HCL acid mixture, D002					
7		lab testing waste chemical - COD, D002, D007, D009, D011					
8	out of date	Nalco 394, D001					
9	Condition reagents (catalyst)	Dimethyl Disulfide, D001					

Selenium, drum (solid)

REMARKS–GENERAL INFORMATION

General Process Information:

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.
Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

er: