



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490  
www.epa.state.oh.us

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

November 18, 2009

**LAWRENCE COUNTY  
HONEYWELL INTERNATIONAL INC.  
DHWM-SEDO  
OHD04370217**

Mr. Patrick Holmes  
Project Manager, CH2M Hill – OMI  
Honeywell International Inc.  
3329 South Third Street  
Ironton, Ohio 45638

Dear Mr. Holmes:

On October 28, 2009, Melody Stewart and I inspected Honeywell International Inc. (part of the Allied Signal/Ironton Coke Superfund site) to determine your facility's compliance with Ohio's hazardous waste laws found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). This letter will explain the violations we found during the inspection and what you need to do to correct the violations, as well as other general concerns we have and what you need to do to respond to those concerns.

We found the following violation of Ohio's hazardous waste laws. In order to correct these violations, you must do the following and send me the requested information and documentation **within 30 days** of your receipt of this letter:

- (1) **OAC Rule 3745-65-16(A), Personnel Training.** The owner/operator must have a training program which teaches facility personnel hazardous waste management procedures and emergency response procedures (including contingency plan implementation) relevant to their positions, and ensures the facility's compliance with OAC Rules 3745-65 to 3745-69 and 3745-256. The training program must be directed by a person trained in hazardous waste management procedures, and must include familiarizing employees with: procedures for inspecting, repairing, and replacing facility emergency monitoring equipment; key parameters for automatic waste feed cut-off systems; communications or alarm systems; response to fires or explosions; response to groundwater contamination incidents; and shutdown of operations. Additionally, the personnel training program document must include all the elements described under OAC Rule 3745-65-16(D)(3); including a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed in (D)(1) of this rule.

During the inspection, Honeywell could not produce documentation of having a training program designed to teach facility personnel hazardous waste management procedures, emergency equipment and response procedures, and contingency plan implementation specific to the site.

Honeywell must develop a personnel training program that meets the requirements of this rule. Honeywell must submit a document describing the training plan and how it meets the above requirements to this office for review.

- (2) **OAC Rule 3745-65-51, Purpose and Implementation of Contingency Plan.** The owner/operator must have a contingency plan for the facility that is designed to minimize hazards to human health and the environment from fires, explosions, or any unplanned, sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. The contingency plan must be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

Honeywell was not able to provide documentation of having a contingency plan for the facility. The company has a general health and safety plan on-site, but the plan does not address the specific hazardous wastes generated at the site and the actions to be taken in the event of an emergency situation involving these wastes. The facility also has a separate emergency response document, but it was outdated; the list of emergency coordinators was not current and pages were dated 1998 and 2001.

Honeywell must develop a contingency plan for the facility that is designed to minimize hazards to human health and the environment from fires, explosions, or any unplanned, sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

Compliance with this rule will occur once Honeywell submits to this office for review a copy of the contingency plan developed in response to this violation and contains the elements listed in Violation (3) below.

- (3) **OAC Rule 3745-65-52, Content of Contingency Plan.** The owner/operator must have a contingency plan for the facility that describes the actions facility personnel must take in order to comply with OAC Rule 3745-65-51 (Purpose and Implementation of Contingency Plan) and OAC Rule 3745-65-56 (Emergency Procedures) in response to fires, explosions, or any unplanned, sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. The contingency plan document must contain:

- actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)];
- arrangements with emergency authorities [3745-65-52(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)];
- a list of all emergency equipment, including: location, a physical description and brief outline of capabilities [3745-65-52(E)]; and
- an evacuation plan for facility personnel where there is possibility that evacuation may be necessary [3745-65-52(F)].

Honeywell was not able to provide documentation of having a contingency plan for the facility. The company has a general health and safety plan on-site, but the plan does not address the specific hazardous wastes generated at the site and the actions to be taken in the event of an emergency situation involving these wastes. The facility also has a separate emergency response document containing some of the items required of a contingency plan, but it was outdated; the list of emergency coordinators was not current and pages in the plan were dated 1998 and 2001.

Honeywell must develop a contingency plan for the facility that describes the actions facility personnel must take in response to fires, explosions, or any unplanned, sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. The contingency plan must include all the elements required by this rule. Honeywell must submit a copy of the contingency plan to this office for review.

- (4) **OAC Rule 3745-65-54, Amendment of Contingency Plan.** A facility's contingency plan must be reviewed and immediately amended or revised whenever: any applicable rules are revised; the facility design, construction, operation, maintenance, or other circumstances change that could increase the possibility of a fire, explosion or release or changes the response necessary in an emergency; or if the contingency plan fails in event of an emergency.

Honeywell was not able to provide documentation of having a contingency plan for the facility that addresses the specific hazardous wastes generated at the site and the actions to be taken in the event of an emergency situation involving these wastes. As stated above, the emergency response document contained some of the items required of a contingency plan, but it was not current as some pages were dated 1998 and 2001. The emergency response document contained a list of emergency coordinators that was not current.

Compliance with this rule will occur once Honeywell submits to this office for review a copy of the contingency plan that includes all the elements required by OAC Rule 3745-65-52 (see Violation (3) above) and that reflects current conditions at the facility, including an updated list of emergency coordinators.

- (5) **OAC Rule 3745-65-33, Testing and Maintenance of Equipment.** Facility communications/alarm systems, fire protection equipment, and spill/decontamination equipment must be tested and maintained as necessary in order to ensure its proper operation in a time of emergency. The owner/operator must record the inspections in a log to document that the inspections have taken place.

At the time of the inspection, Honeywell indicated that visual checks of emergency equipment, spill/decontamination supplies, etc. are conducted, but the facility does not have a schedule set up for regular inspections of these items. Honeywell did not have an inspection log documenting that inspections of emergency equipment and supplies have taken place.

Honeywell is required to develop and implement a schedule for regular inspections of emergency equipment, spill/decontamination supplies, etc., and must document that the inspection schedule for these items is followed by maintaining an inspection log that documents the inspections of these items have taken place.

On November 11, 2009, Honeywell submitted documentation indicating a centralized emergency spill/decontamination kit had been placed in the area where hazardous waste is handled, and of implementing a monthly inspection of the spill kit, which had been completed for November. Honeywell also submitted an inspection checklist for recording monthly inspections of all the safety and emergency equipment at the site. **Honeywell has demonstrated a return to compliance with this rule.**

*Please note that OAC Rule 3745-65-52(E) requires that the list of communications/alarm systems, fire protection equipment, and spill/decontamination equipment must be listed in the contingency plan.*

- (6) **OAC Rule 3745-66-74, Inspections.** The owner/operator must inspect hazardous waste containers and areas where the containers are stored at least weekly, looking for leaks and deterioration caused by corrosion or other factors. The owner/operator must record the inspections in a log to document that the inspections have taken place.

Honeywell indicated the <-90-day roll-off box containing iron filter cake waste (K060/K087) from groundwater treatment and is visually checked during daily operations; however, Honeywell does not maintain an inspection log documenting that these inspections take place.

Honeywell must inspect the hazardous waste <-90-day roll-off box containing iron filter cake waste at least weekly, and maintain an inspection log documenting that these inspections take place. To document your return to compliance with this rule, please submit to me a copy of two weeks of completed inspection logs.

#### GENERAL COMMENTS

- Please note that once the contingency plan has been completed, a copy of the plan (plus revisions) must be kept on-site at your facility, and also must be given to all emergency authorities that may be requested to provide emergency services at your facility, as required by OAC Rule 3745-65-53 (A) and (B).
- Honeywell indicated that spent activated carbon from treating contaminated groundwater from the coke plant (K060/K087) and spent activated carbon from treating contaminated tar plant surface/stormwater (D018) are removed directly from the 100 and 200 Carbon Tower Tanks when spent and taken off-site for regeneration/recycling by Calgon Carbon Corp. If it should become necessary to remove these wastes from the tanks and store them on-site until pick up by Calgon, Honeywell must also conduct and document inspections of any storage containers holding these wastes while they are on-site.

Enclosed, you will find a copy of the checklists that were completed during the inspection. You can find copies of the hazardous waste rules and other information on our division's web page at: <http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/dhwm>. Compliance assistance and pollution prevention information is available at: <http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/ocapp>.

Should you have any questions or require assistance, please feel free to call me at 740-380-5237.

Sincerely,



Vicky D. German  
Environmental Specialist  
Division of Hazardous Waste Management  
Ohio EPA, Southeast District Office

VDG/mlm

Enclosure

cc: Steve Conn, MACTEC Engineering and Consulting, Inc.  
Chuck Gadelmann, Honeywell International, Inc.  
Kevin O'Hara, Ohio EPA-DERR-SEDO

**NOTICE:**

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



Ohio Environmental Protection Agency

For Ohio EPA use only

RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM

E-mail this completed form to kristina.durnell@epa.state.oh.us or mail it to Kristina Durnell, DHWM-CO

<p><b>Site EPA ID No.</b></p> <p><b>Site Name</b></p> <p><b>Site Location Information</b></p> <p><b>Site Land Type</b> (check only one)</p> <p><b>NAICS codes</b> (see <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a> )</p>	<p>EPA ID Number: <b>OHD043730217</b></p> <p>Name: <b>Honeywell International, Inc.</b></p> <p>Website (Optional): <b><u>www.omi.ch2mhill.com</u></b></p> <p>Street Address: <b>3330 S. Third Street</b></p> <p>City, Town, or Village: <b>Ironton</b> State: <b>: OH</b></p> <p>County Name: <b>Lawrence</b> Zip Code: <b>45638</b></p> <p>Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/></p>
<p><b>Facility Representative</b></p> <p>Additional names can be recorded in Operators in the Comments Section.</p> <p>Provide address information only if different than the site address.</p>	<p>First Name: <b>Patrick</b> MI: <b>J.</b> Last Name: <b>Holmes</b></p> <p>Phone Number: <b>740-532-9486</b> Phone Number Extension:</p> <p>E-Mail Address: <b><u>patrick.holmes@CH2M.com</u></b></p> <p>Fax Number: <b>720-286-8445</b> Fax Number Extension:</p> <p>Street or P.O. Box: <b>3329 S. Third Street</b></p> <p>City, Town or Village: <b>Ironton</b></p> <p>State: <b>OH</b> Zip Code: <b>45638</b></p>
<p><b>Legal Owner And Operator of the Site</b></p> <p>List additional Owners and/or Operators in the Comments Section or on another copy of this page.</p>	<p>Name of Site's Legal Owner: <b>Honeywell International, Inc.</b> Date Became Owner (mm/dd/yyyy):</p> <p>Owner Private County District Federal Indian Municipal State Other Type: <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>Street or P.O. Box: <b>101 Columbia Rd.</b></p> <p>City, Town or Village: <b>Morristown</b> Owner Phone #: <b>975-455-2000</b></p> <p>State: <b>NJ</b> Country: <b>USA</b> Zip Code: <b>07960</b></p> <p>Name of Site's Operator: <b>CH2MHill OMI</b> Date Became Operator (mm/dd/yyyy): <b>02/01/2004</b></p> <p>Owner Private County District Federal Indian Municipal State Other Type: <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>Street or P.O. Box: <b>3329 S. Third Street</b></p> <p>City, Town or Village: <b>Ironton</b> Operator Phone #: <b>740-532-9486</b></p> <p>State: <b>OH</b> United States Zip Code: <b>45638</b></p>
<p><b>VIOLATIONS CITED?</b></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

<b>TYPE OF HANDLER – A MINIMUM OF ONE BOX MUST BE CHECKED</b>		
<input type="checkbox"/> Not a Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input checked="" type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input type="checkbox"/> Conditionally Exempt Small Quantity Generator <input type="checkbox"/> U.S. Importer of Hazardous Waste <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator
<b>TYPE OF REGULATED WASTE ACTIVITY</b>		
<input type="checkbox"/> Recycler of Hazardous Waste <input type="checkbox"/> Underground Injection Control Facility <input type="checkbox"/> Hazardous Waste Transporter <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace <input type="checkbox"/> Small Quantity On-Site Burner Exemption <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption	
<b>UNIVERSAL WASTE ACTIVITIES</b>		
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste <input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	<input type="checkbox"/> Destination Facility for Universal Waste	
<b>TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES</b>		
<input type="checkbox"/> Batteries <input type="checkbox"/> Pesticides <input type="checkbox"/> Mercury containing equipment <input checked="" type="checkbox"/> Lamps		
<b>USED OIL ACTIVITIES</b>		
<input checked="" type="checkbox"/> Used Oil Generator <input type="checkbox"/> Used Oil Transporter <input type="checkbox"/> Used Oil Transfer Facility <input type="checkbox"/> Used Oil Processor <input type="checkbox"/> Used Oil Re-refiner <input type="checkbox"/> Off-Specification Used Oil Burner <input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil <input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner		
<b>Waste Codes for Federally Regulated Hazardous Wastes.</b> List the codes for the federally regulated hazardous waste handled at the site, in the order they are presented in the regulations (e.g., D001, D003, F007, U112). If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all; just indicate the date of the most recent source record.		
K060	K087	K035 D018
<b>COMMENTS: Use this area to describe inspection conditions and additional information.</b>		
Announced	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Additional Facility Representatives: Steve Conn, MACTEC Engineering and Consulting
Tanks	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Other Comments: Wastes generated from on-site WWTP that treats contaminated groundwater and surface water (DERR remediation).
Containers	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>INSPECTOR(S):</b>		<b>INSPECTION DATE:</b>
Vicky German		Melody Stewart
		10/28/2009
<b>OPTIONAL CERTIFICATION.</b> 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.		
<b>Signature of Owner, Operator, or Authorized Representative</b>	<b>Name and Title (Print)</b>	<b>Date</b>

# LARGE QUANTITY GENERATOR REQUIREMENTS

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

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

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

## GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11]  Yes  No  NA

Honeywell submitted information to Ohio EPA on 11/10/09 regarding the waste evaluation and off-site shipment of DNAPL waste from WE-618 and PW-1A as non-regulated material.

2. Has the generator obtained a U.S. EPA identification number? [3745-52-12]  Yes  No  NA

3. Were annual reports filed with Ohio EPA on or before March 1<sup>st</sup>? [3745-52-41(A)]  Yes  No  NA

Honeywell submitted an Annual Hazardous Waste Report on 1/20/2009.

4. 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  NA

5. 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  NA

6. Does the generator accumulate hazardous waste?  Yes  No  NA

*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.)*

7. 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  NA

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

8. 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  NA

b. Tank that meets 3745-66-90 to 3745-66-101 (except 3745-66-97(C))?  Yes  No  NA

c. Drip pad that meets 3745-69-40 to 3745-69-45?  Yes  No  NA

d. Containment building that meets 3745-256-100 to 3745-256-102?  Yes  No  NA

*NOTE: Complete appropriate checklist for each unit. If waste is treated to meet LDRs, complete the LDR checklist.*

## WASTE IMPORT/EXPORT REQUIREMENTS

9. Does the generator export hazardous waste? If so:  Yes  No  NA

a. Has the generator (primary exporter) notified U.S. EPA of export activity? [3745-52-53(A)]  Yes  No  NA

b. Has the generator (primary exporter) complied with special manifest requirements? [3745-52-54]  Yes  No  NA

c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]  Yes  No  NA

d. Has an annual report been submitted to U.S. EPA? [3745-52-56]  Yes  No  NA

e. Are export related documents being maintained on-site? [3745-52-57(A)]  Yes  No  NA

Honeywell's iron filter cake waste (K060/K087) is shipped off-site to Corunna Ontario Canada. The transporter, Clean Harbors, re-manifests the waste at the U.S. border; thus becoming the primary exporter on behalf of Honeywell. The waste is taken to Clean Harbors' Corunna Ontario facility.

## MANIFEST REQUIREMENTS

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

11. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)]  Yes  No  NA

*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)]*

12. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]  Yes  No  NA

*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)].*

13. 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  NA

14. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)]  Yes  No  NA

*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 of the waste they generate.*

15. 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  NA

16. 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  NA

17. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]  Yes  No  NA

*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 DAC rule 3745-50-10.*

## PERSONNEL TRAINING

18. 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  NA

Honeywell does not have documentation of a training program that is designed to teach facility personnel hazardous waste management procedures and contingency plan implementation specific to the site.

19. Does the personnel training program include instructions to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)]  Yes  No  NA

Honeywell does not have documentation of a training program that is designed to ensure facility personnel are able to respond to emergencies involving hazardous waste by familiarizing them with emergency procedures and equipment.

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

Compliance yet to be determined. The current emergency coordinator (project manager) has had OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) training, as have other employees who handle hazardous waste; but the training is general and not specific to the wastes at the site. The current emergency coordinator has worked at the site for numerous years and provides "on-the-job" training to employees.

21. 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  NA  
 The current emergency coordinator (project manager) has had OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) training, as have other employees who handle hazardous waste, but the training is general and not specific to the wastes at the site. The current emergency coordinator has worked at the site for numerous years and provides "on-the-job" training to new employees.
22. Does the generator provide annual refresher training to employees? [3745-65-16(C)]  Yes  No  NA  
 Honeywell provides annual refresher training to employees; however, the training given does not address the specific hazardous wastes generated at the site and the actions to be taken in the event of an emergency situation involving these wastes, including contingency plan implementation.
23. Does the generator keep records including: job titles, job descriptions, type and amount of training given to each person, and documentation of completed training or job experience required? [3745-65-16(D)(1)-(D)(4)]  Yes  No  NA  
 Honeywell maintains a list of job titles/descriptions and the general training provided to each person. However, the training given does not address the specific hazardous wastes generated at the site and the actions to be taken in the event of an emergency situation involving these wastes, including contingency plan implementation.
24. 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  NA  
 Compliance yet to be determined.

#### CONTINGENCY PLAN

25. 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  NA  
 Honeywell has a general health and safety plan on-site, but the plan does not address the specific hazardous wastes generated at the site and the actions to be taken in the event of an emergency situation involving these wastes. The facility also has a separate emergency response document, but it was outdated; the list of emergency coordinators was not current and pages were dated 1998 and 2001.
26. 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  NA
- b. Arrangements with emergency authorities? [3745-65-52(C)]  Yes  No  NA
- 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  NA
- d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]  Yes  No  NA
- e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]  Yes  No  NA

**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)]**

27. 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  NA  
Compliance yet to be determined.

28. 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  NA  
Honeywell's list of emergency coordinators was not current.

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

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

## EMERGENCY PROCEDURES

30. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:  Yes  No  NA
- a. Was the contingency plan implemented? [3745-65-51(B)]  Yes  No  NA
- b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?  Yes  No  NA
- 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  NA

*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

31. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]  Yes  No  NA
32. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:
- a. Internal alarm system? [3745-65-32(A)]  Yes  No  NA
- b. Emergency communication device? [3745-65-32(B)]  Yes  No  NA
- c. Portable fire control, spill control and decontamination equipment? [3745-65-32(C)]  Yes  No  NA
- d. Water of adequate volume/pressure? [3745-65-32(D)]  Yes  No  NA

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

33. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]  Yes  No  NA  
Honeywell visually checks emergency equipment, spill/decontamination supplies, etc. but does not have a schedule set up for regular inspections of these items.

34. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]  Yes  No  NA  
Honeywell does not maintain an inspection log documenting that inspections of emergency equipment and supplies have taken place.

35. 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  NA

36. If there is only one employee on the premises, is there immediate access to a device (eg., 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  NA
37. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]  Yes  No  NA
38. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]  Yes  No  NA  
Compliance yet to be determined.
39. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]  Yes  No  NA  
Compliance yet to be determined.

#### SATELLITE ACCUMULATION AREA REQUIREMENTS

40. 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  NA
  - b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]  Yes  No  NA
  - c. Do not exceed one quart of acutely hazardous waste at anyone time? [3745-52-34(C)(1)]  Yes  No  NA
  - d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]  Yes  No  NA
  - e. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]  Yes  No  NA
41. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:  Yes  No  NA
- 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  NA
  - 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  NA
  - c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]  Yes  No  NA

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

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

42. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]  Yes  No  NA
43. Is the accumulation date on each container? [3745-52-34(A)(2)]  Yes  No  NA
44. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)]  Yes  No  NA
  - b. In good condition? [3745-66-71]  Yes  No  NA

- c. Compatible with wastes stored in them? [3745-66-72]  Yes  No  NA
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]  Yes  No  NA
45. Is the container accumulation areas(s) inspected weekly? [3745-66-74]  Yes  No  NA  
*Note: Per ORC 1.44(A) "Week" means seven (7) consecutive days.*
- a. Are inspections recorded in a log or summary? [3745-66-74]  Yes  No  NA

The <-90-day roll-off box containing iron filter cake waste (K060/K087) from groundwater treatment is visually checked during daily operations; however, Honeywell does not maintain an inspection log documenting that these inspections take place.

46. 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  NA
47. 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  NA
48. 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  NA
49. 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  NA

*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.*

#### GENERATOR CLOSURE REQUIREMENTS

50. 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  NA  
 There have been no recently closed <-90-day hazardous waste accumulation areas at the site. Generator closure documentation associated with CRO requirements were reviewed during the 2004 and 2006 inspections.

*NOTE: Please provide a description of the unit and documentation provided by the generator 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

51. 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  NA
52. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)]  Yes  No  NA
53. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]  Yes  No  NA

## LDR REQUIREMENTS

### 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  NA
  - a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)]  Yes  No  NA
  - b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)]  Yes  No  NA
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2), Table 1]  Yes  No  NA
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1]  Yes  No  NA
4. Does the generator generate a characteristic hazardous waste? If so:  Yes  No  NA
  - a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)]  Yes  No  NA

**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  NA
  - 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  NA

**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  NA

**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  NA

**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  NA

**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  NA
10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste? [3745-270-05] If so:  Yes  No  NA
  - a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment. [3745-270-05]

11. Does the facility have an extension to allow for a restricted waste to be land disposed? [3745-270-06] If so:  Yes  No  NA
- a. The facility can land dispose of the waste. [3745-270-06]
12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment?  Yes  No  NA
- If so:
- a. Has the facility complied with 3745-270-04?  Yes  No  NA

### 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  NA
14. If a generator's waste or contaminated soil **meets the treatment standard at the original point of generation**, does the generator have:
- a. a copy of the one-time written notice accompanying the initial shipment of waste to each treatment, storage, or disposal facility receiving the waste? [3745-270-07(A)(3)]  Yes  No  NA
- b. the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)]  Yes  No  NA
15. If a generator's 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  NA
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  NA
17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so:  Yes  No  NA
- 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  NA

**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  NA

### GENERATORS TREATING HAZARDOUS WASTE

1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40?  Yes  No  NA
2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)]  Yes  No  NA
- a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)]  Yes  No  NA
- b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)]  Yes  No  NA

3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)]  Yes  No  NA
4. Has the generator followed their WAP [3745-270-07(A)(5)]?  Yes  No  NA
5. Have the treated wastes met the applicable treatment standards in 3745-270-40?  Yes  No  NA
6. Has the generator sent a notification and certification with the initial shipment of waste? [3745-270-07(A)(5)(c)]  Yes  No  NA
7. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)]  Yes  No  NA
8. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following:  Yes  No  NA
- a. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)]  Yes  No  NA
- b. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)]  Yes  No  NA

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

9. Has the process/operation generating the waste or the solid waste landfill facility changed? If so:  Yes  No  NA
- a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)]  Yes  No  NA
- b. Has the director been notified of such changes? [3745-270-09(D)]  Yes  No  NA

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

10. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so:  Yes  No  NA
- a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49 (C)]  Yes  No  NA
11. Does each notification/certification form completed, contain the information found in Table 1? [3745-270-07(A)(3)]  Yes  No  NA

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

## HAZARDOUS DEBRIS

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)?  Yes  No  NA
2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.)  Yes  No  NA
3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so:  Yes  No  NA
- a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)]  Yes  No  NA

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

4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so  Yes  No  NA
- a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)]  Yes  No  NA

5. Is the waste a PCB waste under 40 CFR Part 761? If so:  Yes  No  NA
- a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)]  Yes  No  NA
6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)]  Yes  No  NA
7. Does the owner/operator of a treatment facility that claims the debris is excluded from regulation as a hazardous waste under 3745-51-03(F)(1) maintain the following information?  Yes  No  NA
- a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)]  Yes  No  NA
- b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)]  Yes  No  NA
- c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)]  Yes  No  NA
8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F)(1) have the following information? [3745-270-07(D)(3)]  Yes  No  NA
- a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)]  Yes  No  NA
- b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)]  Yes  No  NA
- c. Technology used from Table 1? [3745-270-07(D)(1)(c)]  Yes  No  NA
9. Has the above notification been sent to the director? [3745-270-07(D)(1)]  Yes  No  NA

### TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS

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

6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)]  Yes  No  NA
7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have:
- a. Copies of all notices and certifications required in 3745-270?  Yes  No  NA
  - b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49?  Yes  No  NA
  - c. The testing frequency specified in the facility's WAP and have they followed the protocol?  Yes  No  NA

# USED OIL GENERATOR COLLECTION CENTER, AND AGGREGATION POINT REQUIREMENTS

**NOTE:** A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

## PROHIBITIONS

1. Does the generator manage used oil in a surface impoundment or waste pile?  
If yes: Yes  No  N/A
- a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] Yes  No  N/A
2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes  No  N/A
3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? Yes  No  N/A

**NOTE:** Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

## GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil? If so, Yes  No  N/A
- a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] Yes  No  N/A

**NOTE:** Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

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

**NOTE:** If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6. Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] Yes  No  N/A
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
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
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
- b. Contained the release? Yes  No  N/A
- c. Cleaned up and properly managed the used oil and other materials? Yes  No  N/A
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes  No  N/A

## ON-SITE BURNING IN SPACE HEATER

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23]  
If so: Yes  No  N/A
- 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
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes  No  N/A
- c. Are the combustion gases from heater vented to the ambient air? Yes  No  N/A

## GENERATOR TRANSPORTATION

11. If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]
- a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24] Yes  No  N/A
- b. Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24] Yes  No  N/A

**NOTE:** Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

## 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
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes  No  N/A
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

**NOTE:** Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.

# SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - 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  NA
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  NA

## WASTE MANAGEMENT - LABELING/MARKING

### UNIVERSAL WASTE LAMPS

8. Does the SQUWH 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  NA
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  NA
10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamps" or "Waste Lamps" or "Used Lamps"? [3745-273-14(E)] Yes  No  NA

**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

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

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes  No  NA
- 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  NA
12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)]
- 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  NA
- 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  NA
- 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  NA
- 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  NA

- 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  NA
- 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  NA

### 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  NA

### RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes  No  NA
15. Is the material released characterized? [3745-273-17(B)] Yes  No  NA
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  NA

### OFF-SITE SHIPMENTS

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

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

*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  NA
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes  No  NA
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes  No  NA
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes  No  NA
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:
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes  No  NA
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes  No  NA
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  NA
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  NA

## EXPORTS

24. Is waste being sent to a foreign destination? If so: Yes  No  NA
- 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  NA
- 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 3745-52-57? [3745-273-20(B)] Yes  No  NA
- c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes  No  NA

## WASTE ACTIVITIES SUMMARY

Honeywell International, Inc.

OHD043730217

LQG

Description of Waste				On-Site Management			Off-Site Management
Process Generating Waste	Waste Generated	EPA Waste Code	Amount Generated per Month	Type of Accumulation and/or Storage	Type of On-Site Treatment	Waste Location	Name, state, and type of activity
GROUNDWATER REMEDIATION Wastewater treatment	Spent activated carbon	K060 K087	22 tons/yr.	Tank	NA	WWTP	Calgon Carbon Corp. Cattlettsburg KY Regenerated/recycled
GROUNDWATER REMEDIATION Wastewater treatment	Iron filter cake	K060 K087	60 tons/yr.	Roll-off box	NA	WWTP	Clean Harbors - Corunna Ontario Canada
GROUNDWATER REMEDIATION Wastewater treatment	DNAPL	Non-reg. (91% water)	Varies	55-G drum	NA	Tar Plant • WE-618 • PW-1A	Safety-Kleen, Poca WV
SURFACE WATER TREATMENT Wastewater treatment	Spent activated carbon	D018	11 tons/yr.	Tank	NA	WWTP	Calgon Carbon Corp. Cattlettsburg KY Regenerated/recycled
SURFACE WATER TREATMENT Wastewater treatment	Iron sludge clarifier residue from oil-water separator	NA	Varies	55-G drum	NA	WWTP	Safety-Kleen, Poca WV
Equipment maintenance	Spent parts cleaner solvent (mineral spirits)	NA	Varies	NA	NA	Maint. Shop	Safety-Kleen, Poca WV
Building maintenance	Spent fluorescent lamps	NA	Varies	Box	NA	WWTP	Safety-Kleen, Poca WV (Universal Waste)
Equipment maintenance	Used oil	NA	55-G drum every 2 yrs.	55-G drum	NA	Maint. Shop	Safety-Kleen, Poca WV

## PROCESS DESCRIPTION / SITE INFORMATION

The Honeywell Tar Plant is located at 3330 South Third Street in Ironton, and is part of the Allied Chemical/Ironton Coke Plant Superfund site. Across the street from the Honeywell Tar Plant is the former Ironton Coke Plant (at 3329 South Third Street), which is the location of the Waste Water Treatment Plant (WWTP) that treats contaminated groundwater and surface water/storm water from the Superfund site. The entire Allied Chemical/Ironton Coke Plant Superfund site encompasses approximately 95 acres, including portions of the adjacent Ice Creek. The Tar Plant occupies approximately 27 acres. Both the Tar Plant and the Coke Plant are now closed and most of the buildings have been demolished. One small office building, an open air shed, above-ground water conveyance lines, two groundwater extraction wells, and a significant number of monitoring wells are currently located on the Tar Plant property. The approximately 16 acre main parcel is secured by a 6-foot chain-linked fence.

This inspection is associated only with the on-site WWTP and the wastes generated from the treatment of groundwater and surface water at the site. The on-site WWTP is listed in RCRAInfo as "Honeywell International, Inc., and is a Large Quantity Generator (LQG) of hazardous waste. No Honeywell personnel are present at the site; CH2M Hill – OMI operates the on-site WWTP for Honeywell and maintains all necessary records.

### Site History:

#### Ironton Coke Plant

The Coke Plant began operations in 1917, and shut down in 1982. When the plant closed, the property and facilities were purchased by Iron City Fuels. In 1984, Allied purchased the Coke Plant property except for the surface facilities, which were retained by Iron City Fuels. Iron City Fuels continued to salvage material from the surface facilities until 1985, at which time ownership of these facilities were transferred to Allied (later known as AlliedSignal). Currently, the property is owned by Honeywell, as a result of a 1999 merger between AlliedSignal and Honeywell.

During operation, products from the coking operation included crude tar, coke, light oil, and ammonia. From 1920 through the 1960s, wastewaters and solid wastes generated in the coking process were discharged into marshy areas east of the plant adjacent to Ice Creek. In the early 1970s, a series of lagoons was constructed here for the purpose of treating these waste streams. These waste streams included process wastewater, coke and coal fines, tar decanter sludges, boiler ash, and weak ammonia liquor. Specific constituents present in these waste streams included: ammonia, benzene, cyanide, metals, naphthalene, phenolics, and polynuclear aromatic hydrocarbons (PAHs). The Coke Plant/Lagoon Area is referred to as CPLA.

#### Honeywell Tar Plant

Operations at the Tar Plant began in 1945, and were designed to manufacture products from the crude tar produced in the adjacent Coke Plant. Products from the operations included phthalic anhydride, pitch, creosote, naphthalene, anthracene, and carbolic acids. When in operation, the Tar Plant contained 124 aboveground storage tanks and process tanks varying in approximate size from several hundred to 750,000 gallons. These tanks stored a variety of process materials and chemicals used in the production of coal tar derivatives, including naphthalene, refined coal tar, light carbolic oil residue, carbolate, intermediate naphthalene oil, caustics, coal tar pitch, carbolic oil, creosote, and coal tar. Also used in past operations were three small underground storage tanks (150-gallon to 1,000-gallon capacity), and underground material transfer lines connecting CPLA and the barge dock on the Ohio River or used for transfer of finished tar product from CPLA to storage at the Tar Plant.

Process wastes included anthracene residue, anthracene salts, phthalic anhydride residue, and coal tar pitch scrap. Wastes and residues such as tar plant waste and foundry sand containing heavy metals, phenolics, and oils, were disposed in the nearby Goldcamp Disposal Area (GDA); a 4-acre, 40-foot deep sand and gravel pit that was used for the disposal of Tar Plant process chemical wastes from 1945 until it was shut down in 1977. Following the GDA shutdown, the Tar Plant continued to operate as a unit of Allied, and eventually transitioned to a unit of AlliedSignal's Engineered Materials Sector in the mid-1980s. This was

followed by the sale of the creosote product line to KMG-Bernuth in 1998, the acquisition of various carbon material product lines by Reilly Industries in 1999, and the sale of the naphthalene product line to Recochem in 2000. The Tar Plant was shut down in December 2000, with the buildings, process structures, and land remaining under the ownership of Honeywell, as a result of the 1999 merger between AlliedSignal and Honeywell. In 2003-2004, Honeywell removed all wastes and remaining products from the site as part of their Cessation of Regulated Substances (CRO) obligations.

#### **Allied Chemical/Ironton Coke Plant Superfund (Ohio EPA/U.S. EPA-DERR) Site Remediation:**

Spills and releases from aboveground or underground tanks and structures impacted soil and groundwater at the site. Discharges to the river sediments and surface water occurred in the past primarily due to releases at the docking facilities, contaminated run-off from the site through outfall structures, and discharge of contaminated groundwater through riverbed sediments. The Coal Grove Well Field is located about 2,000 feet south (upriver) of the Site on the south side of Ice Creek, and the City of Ironton's water intake is approximately 2 miles downriver from the site. As part of the site-wide Ohio EPA/U.S. EPA-DERR remedy, a site-wide ground water pumping, treatment, and monitoring system is in operation to address the Goldcamp Disposal Area (GDA), the former Coke Plant Lagoon Area (CPLA), and the Tar Plant area of the site.

Remediation activities included removal of contaminated soil in some areas of the site, installation of a RCRA-compliant cap over the surface of the GDA, construction of a low permeability slurry wall 2,000 feet in length and 90 feet deep encircling the GDA that creates an inward groundwater gradient within the slurry wall boundaries to capture all of the contaminated groundwater. Groundwater pumping wells outside the slurry wall (PW-1A and PW-2) intercept and withdraw contaminated groundwater. The pumping wells that comprise the groundwater collection network include four lagoon area wells and two Tar Plant area wells (WE-1800 and WE-618). Recovery of dense non-aqueous phase liquids (DNAPLs) is also performed in WE-618. Treatment of groundwater extracted from inside and outside of the slurry wall occurs at the on-site WWTP. The site remedy also included installation of fencing and warning signs, and implementation of institutional controls, including use restrictions. The development of a wetland plant community in the lagoon areas is also in progress.

Evaluation of the progress toward meeting the established groundwater cleanup standards for the site is accomplished through a quarterly monitoring program. In the GDA area, 32 wells are used for potentiometric level measurement. Monitoring of these wells to date indicates that a positive gradient is maintained; any leakage flows into the GDA containment system and then it is subsequently pumped out by the extraction well. Thirteen wells inside and outside of the slurry wall are part of the groundwater quality monitoring program. In the CPLA area, samples of groundwater are collected at 8 locations as part of the quarterly monitoring program. In addition, two Coal Grove pumping wells are sampled, and surface water samples are collected from two locations in Ice Creek.

Two parcels outside the GDA's slurry wall and cap perimeter and the uplands parcel of the CPLA (approximately 37 acres total) have been deemed as appropriate for industrial re-use by Ohio EPA/U.S. EPA-DERR and do not require any further action. These 37 acres were conveyed to the City of Ironton in 2002 as part of a Brownfields redevelopment effort. Later, the City of Ironton conveyed part of this land to the State of Ohio Department of Transportation (ODOT), who has since constructed a county garage for highway maintenance activities and office space for its county manager and clerical staff.

#### Information Sources:

September 2004. Second Five-Year Review Report for the Allied Chemical and Ironton Coke Superfund Site - Lawrence County, Ohio. United States Environmental Protection Agency, Region 5.

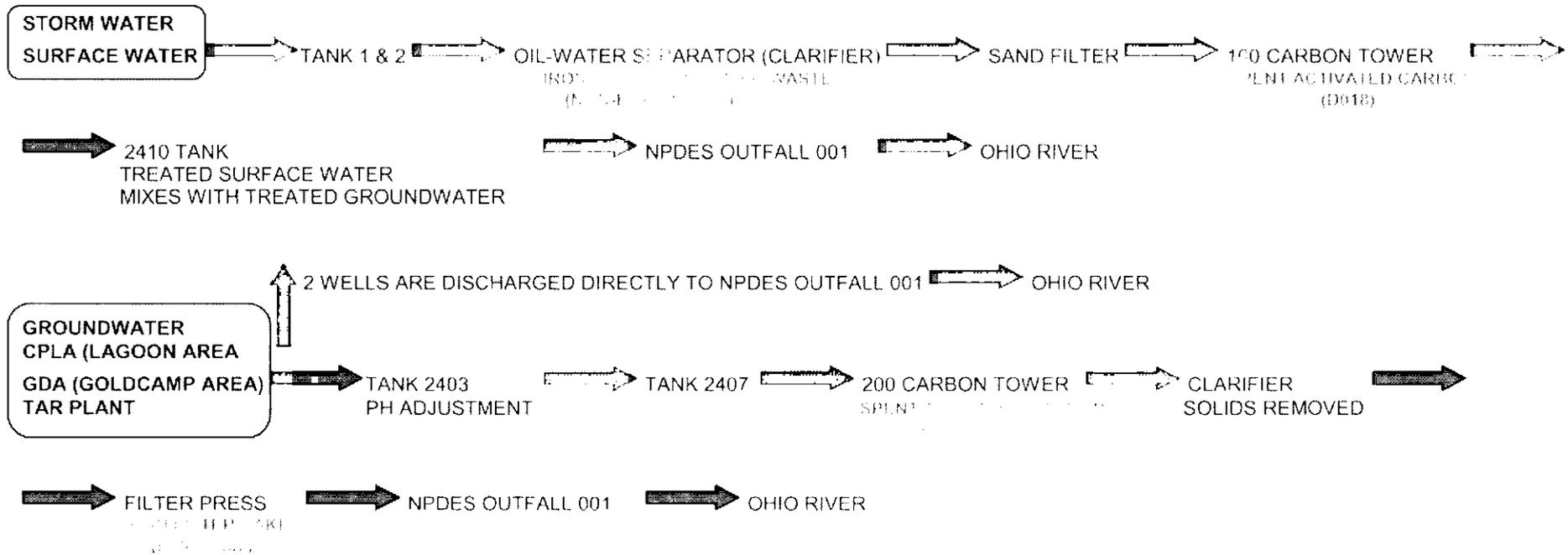
April 2007. Remedial Investigation Report - Honeywell Ironton Tar Plant / Allied Chemical & Ironton Coke - OU3. MACTEC Engineering and Consulting, Inc. Project No. 3293-06-1253.

September 2007. Record of Decision - Allied Chemical & Ironton Coke Site Operable Unit Three (Tar Plant). United States Environmental Protection Agency, Region 5.

## WASTE MANAGEMENT INFORMATION

The on-site WWTP treats contaminated groundwater from the Goldcamp Disposal Area (GDA), from the pumping wells located at the former Coke Plant Lagoon Area (CPLA), and from surface water/ stormwater collected from the site. The treated groundwater and surface/ storm water is then discharged to the Ohio River through NPDES permitted outfall 001. Wastes generated from treatment of contaminated groundwater and surface/ storm water at the site include:

- Iron filter cake from the filter press. The waste carries the hazardous waste codes K060 - ammonia still lime sludge from coking operations and K087 - decanter tank tar sludge from coking operations, due to previous site activities.
- Spent activated carbon that was used to treat Coke Plant wastewaters. The waste carries the hazardous waste codes K060 - ammonia still lime sludge from coking operations and K087 - decanter tank tar sludge from coking operations, due to previous site activities.
- Spent activated carbon used in treating Tar Plant surface/ stormwater and contaminated groundwater carries a D018 hazardous waste code (characteristic for benzene).



## REGULATORY HISTORY

Honeywell was last inspected by the Division of Hazardous Waste Management (DHWM) for compliance with Ohio's hazardous waste laws on November 7, 2006. No violations were noted during this inspection.

Source: <http://www.epa.gov/region5/sites/allied/chemical/pdfs/allied-chemical-5yr-review-200409-maps.pdf>

