



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

USDOE
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MAR 17 2010

Ohio Environmental
Protection Agency
Southeast District

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William E. Murphie
Manager
Portsmouth/Paducah Project Office
U.S. Department of Energy
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

Mr. W.A. Franz
Project Manager
LATA/Parallax Portsmouth, LLC
P.O. Box 855
Piketon, Ohio 45661

Re: Notice of Violation/Return to Compliance
RCRA Compliance Inspection
Portsmouth Gaseous Diffusion Plant
Piketon, Ohio
OH7 890 008 983

Dear Messrs. Murphie and Franz:

On June 22 and June 23, 2009, representatives of the U.S. Environmental Protection Agency and Ohio Environmental Protection Agency (OEPA) inspected your installation located at 3930 US Route 23 South, Piketon, Ohio. The purpose of the inspection was to evaluate compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based upon information provided by U.S. Department of Energy (DOE) and LATA/Parallax Portsmouth, LLC (LATA/Parallax) personnel, review of records, and physical observations by the inspectors, EPA has determined that DOE and LATA/Parallax violated a certain requirement of the Ohio Administrative Code (OAC) and the United States Code of Federal Regulations (CFR). We find that DOE and LATA/Parallax were in noncompliance with the following requirement:

- A large quantity generator storing containers of hazardous waste must comply with OAC Rule 3745-52-34(C)(1)(b) [40 CFR § 262.34(c)(1)(ii)], which requires that each

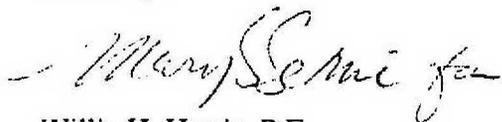
hazardous waste container, while being accumulated on-site, must be labeled with the words "Hazardous Waste" or with other words that identify the contents of the container. See, OAC Rule 3745-52-34(C)(1)(b).

During the inspection of Building X-627, the inspectors observed one 55-gallon container labeled "Trichloroethylene." The 55-gallon container was missing the words hazardous waste or other words identifying the contents as waste, as required by OAC Rule 3745-52-34(C)(1)(b). At the time of the inspection, DOE & LATA/Parallax, therefore, failed to comply with the above-referenced hazardous waste generator requirement. Later in the inspection, DOE and LATA/Parallax personnel provided the inspectors with a photograph of the 55-gallon SAA container in Building X-627, labeled "Waste Trichloroethylene." Based on this information, DOE and LATA/Parallax have resolved the violation of OAC Rule 3745-52-34(C)(1)(b) [40 CFR ' 262.34(c)(1)(ii)].

This letter is to inform you that EPA has reviewed the referenced information, and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA and the Ohio EPA will continue to evaluate DOE and LATA/Parallax in the future.

If you have any questions regarding this letter, please contact Walt Francis, of my staff, at (312) 353-4921.

Sincerely,



Willie H. Harris, P.E.
Chief, RCRA Branch
Land and Chemicals Division

Enclosure

cc: Melody Stewart, OEPA – Southeast District Office

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME: PORTSMOUTH GASEOUS DIFFUSION PLANT

FACILITY U.S. EPA ID NO.: OH7 890 008 983

FACILITY TYPE: Large Quantity Generator/Container Storage Facility

FACILITY ADDRESS: 3930 US Route 23 South
Piketon, Ohio 45661

U.S. EPA REPRESENTATIVE: Walt Francis

DATE(S) OF INSPECTION: June 22nd and June 23rd, 2009

SIC CODE: 2819 - Industrial Inorganic Chemicals, Not Elsewhere
Classified

NAICS CODE: 325188 - All Other Basic Inorganic Chemical
Manufacturing

PREPARED BY: Walt Francis
Walt Francis
Environmental Scientist

7/8/09
Date

ACCEPTED BY: Paul Little
Paul Little, Chief
Compliance Section 2
RCRA Branch

7-15-09
Date

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the U.S. Department of Energy Portsmouth Gaseous Diffusion Plant (Portsmouth), Piketon, Ohio to determine its compliance with the Resource Conservation and Recovery Act (RCRA), the Ohio Administrative Code (OAC), and the RCRA Permit requirements with respect to U.S. DOE's management of hazardous waste, universal waste and used oil.

Participants

U.S. Environmental Protection Agency (U.S. EPA) Inspector -
Walt Francis, Environmental Scientist

Ohio Environmental Protection Agency (Ohio EPA) Inspector -
Melody Stewart, Hazardous Waste Inspector

Representatives of U.S. DOE, LATA/Parallax, and Theta/Pro2Serve Management Company (TPMC) -
Melda Rafferty, U.S. DOE
Rosemary Richmond, LATA/Parallax Portsmouth, LLC
James Tomlin, Theta/Pro2Serve Management Company

Site Description/Background Information

Historically, the main function of the Portsmouth facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in uranium hexafluoride (UF6) feedstock which contains 0.711% U235. The Plant had produced enriched uranium continuously since September 1954. In 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). U.S. DOE retained ownership of the ongoing site environmental restoration program as well as two permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and are leased by USEC. These include decontamination of equipment and uranium recovery (X-705 Bldg.); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); photo and printing lab (X-100); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in U.S. DOE owned and permitted storage

facilities. Waste generated by U.S. DOE and LATA/Parallax from the environmental restoration is also stored in these facilities. USEC also generates non mixed radioactive hazardous waste which is shipped out of Building XT-847. USEC ceased the enrichment process in May 2001.

Uranium contaminated hazardous wastes (mixed waste) which were/are generated by USEC and U.S. DOE are stored on-site in U.S. DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of treatment, storage and disposal (TSD) facilities in the United States which could accept mixed waste, and a May 1991 U.S. DOE moratorium on off-site waste shipment. A large percentage of the waste generated at Portsmouth is U.S. DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in U.S. DOE-owned storage areas. U.S. DOE sends some waste off-site (to U.S. DOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to U.S. DOE - Portsmouth for storage in the interim prior to their final disposal.

U.S. DOE/LATA Parallax generated hazardous wastes are primarily shipped to Energy Solutions, Clive, Utah, Perma-Fix, Gainesville, Florida, and Diversified Scientific Services, Inc. (DSSI), Kingston, Tennessee. In addition, a wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes. UDS is working on a project to recover material from depleted uranium hexafluoride cylinders.

Opening Conference

On June 22, 2009, Walt Francis and Melody Stewart arrived at Building X-1000 at approximately 8:00 a.m. and informed the U.S. DOE and LATA/Parallax representatives of the nature, scope, and procedures for the RCRA inspection. The inspection was conducted by U.S. EPA and OEPA personnel as a Federal lead inspection. The facility representatives provided the team with a brief update of the facility since the last inspection. Ms. Rosemary Richmond allowed the inspectors access to the facility to conduct the inspection.

Site Tour

The walk-through began in Building X-720 where TPMC maintains a universal waste lamp accumulation area. The inspectors observed several containers of used fluorescent lamps. The inspection continued to Building X-700, where Mr. James Tomlin showed the inspectors several satellite accumulation area (SAA) containers, several containers of used oil and an area for accumulation of universal waste. Inspector Francis observed three SAA containers: a 30-gallon container labeled "Rags/Paint Debris"; a 10-gallon container labeled "Aerosol Cans"; and a 5-gallon container labeled "Paint and Solvents". The universal waste area included containers of used circuit boards, used batteries and used fluorescent lamps. Inspector Francis observed that the boxes of used fluorescent lamps were labeled with a "6/11/2009" accumulation date. Inspector Stewart located a spill control kit in the Paint Shop area. The inspection continued to Building X-623 where Mr. Greg Thompson showed the inspectors where U.S. DOE maintains a less than 90 day hazardous waste accumulation area and a SAA for waste TCE. Inspector

Francis observed that the hazardous waste less-than-90 day area did not contain any containers of hazardous waste. The inspectors also reviewed the weekly inspection logs for Building X-623. The inspection continued to the X-701B area where U.S. DOE maintains a less than 90 day accumulation area. The inspectors observed an emergency response spill kit and a weekly inspection log. The walkthrough continued at Building X-627 where Mr. Greg Thompsen showed the inspectors a 55-gallon SAA container. Inspector Francis observed a 55-gallon container that was labeled Waste "PPE/Bag Filters F001". The inspection continued to Building X-624 where U.S. DOE maintains a SAA container. The inspectors observed a 55-gallon container of PPE, filters and debris. Inspector Francis observed a 55-gallon container labeled "TCE" which was connected to the groundwater pump and treat system. The walkthrough continued at Building X-345, where Ms. Bridgette Eslinger showed the inspectors an empty SAA area and explained the small cylinder processing procedure. The walkthrough continued to Building X-770, where the inspectors observed a less-than 90 day hazardous waste accumulation area, which was empty and then to Building X-334. At Building X-334, Mr. Doug Questa showed the inspectors a universal waste accumulation area, which contained used batteries, and used fluorescent lamps,

The inspection continued at Building X-624 where U.S. DOE maintains an SAA area for "PPE/Filters F001". The inspection continued to the west L-Cage area in Building X-326. Inspector Francis observed approximately thirty 55-gallon containers labeled "Gunk D007/D008 3/3/1992" and approximately twelve 55-gallon containers labeled "Ash D006/D007/D008/D009/D011 3/3/92". The walk-through continued to Area #1, which was empty and then to Area 5, and then to Area 2. The inspection continued to Area 4, and then to an SAA in Building X-326. The inspection continued to an SAA in Building X-330 and then to an SAA in building X-333.

The inspectors then returned to Building X-1000 to review records.

Records Review

A record review was conducted. The inspection team requested to review hazardous waste manifests, land disposal restriction forms, mixed-waste shipment documentation, universal waste and used oil shipping records, personnel training information, weekly inspection logs, waste profiles for hazardous waste in storage, and the latest version of the contingency plan. The inspectors reviewed hazardous waste manifests since the date of the last inspection, two years of personnel training records, waste profiles, and weekly inspection logs. The inspectors reviewed a Contingency Plan that was last updated on June 20, 2007.

Closing Conference

The inspectors conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. U.S. DOE and LATA/Parallax would then receive a letter from U.S. EPA regarding the inspection including a

copy of the inspection report, and completed inspection checklists. Inspector Francis said that during the inspection of Building X-627, he observed an SAA container labeled "TCE", not "Waste TCE". Inspector Stewart said that the weekly inspection logs should include SAA spill kits.

Attachments

Inspection Checklists.

**STATE PART B HAZARDOUS WASTE PERMIT
INSPECTION CHECKLIST**

**DIVISION OF HAZARDOUS WASTE MANAGEMENT
OHIO EPA
July 2002**

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Portsmouth Gaseous Diffusion Plant
04-66-0680

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PROCESS DESCRIPTION

Historically, the main function of the DOE-PORTS facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in UF6 feedstock which contains 0.711% U235. However, in 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). USDOE retained ownership of the ongoing site environmental restoration program as well as two permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and are leased by USEC. These include decontamination of equipment and uranium recovery (X-705 Bldg.); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); photo and printing lab (X-100); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in DOE owned and permitted storage facilities. Waste generated by DOE from the environmental restoration is also stored in these facilities. USEC ceased the enrichment process in May 2001.

WASTE MANAGEMENT, GENERATION AND AMOUNT

Uranium contaminated hazardous wastes (mixed waste) which were/are generated by USEC and DOE are stored on-site in DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of TSDs in the U.S. which could accept mixed waste, and a May 1991 DOE moratorium on off-site waste shipment. A large percentage of the waste generated at PORTS is DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in DOE-owned storage areas. During the past year, numerous shipments of hazardous waste were manifested off-site by both DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for DOE and USEC. DOE sends some waste off-site (to USDOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to DOE for storage in the interim prior to their final disposal.

Hazardous

The DOE Part B permit lists numerous hazardous waste codes for wastes that are generated by the above processes and the environmental restoration. These are stored in drums ranging in size from 30 to 110 gallon capacity, 5 gallon containers, 20 gallon lab packs, 5' cans, 4'x4'x6' boxes, 4'x4'x8' boxes, polybottles and laboratory bottles.

Nonhazardous

A wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes.

HAZARDOUS WASTE MANAGEMENT UNITS

The following DOE-owned permitted storage facilities were inspected during the CEI:

- X-7725 Container Storage Facility
- X-326 Container Storage Facility

In addition, DOE-owned and operated HWMUs and SAAs were inspected in the following buildings:

- | | | | |
|---------|--------|--------|--------|
| | | -X-326 | -X-622 |
| -X-7725 | -X-624 | | |
| -X-623 | -X-627 | | |
| --X-333 | -X-330 | | |
| -X-701B | -X-770 | | |
| -X-345 | -X-700 | | |

REGULATORY/ENFORCEMENT HISTORY

As a result of violations of state and federal hazardous waste regulations found during the 1987, 1988, and 1989 OEPA RCRA inspections, USDOE and OEPA entered into a Consent Decree governing restoration of the environment at DOE-PORTS. This decree includes a requirement that DOE close the X-701B, X-749, X-231B, and X-616 units within specific timeframes. The X-749, X-616 and X-231B units have now been closed. X-701B is yet to be closed.

On October 4, 1995, DFFOs were signed which allowed DOE to store LDR wastes in excess of one year, so long as waste is being stored in compliance with the orders and an approved site treatment plan. These orders supercede the May 18, 1993, DFFOs.

On February 24, 1998, DOE, LMES and Ohio signed DFFOs and a Consent Order regarding past violations and the management of DUF6 and LiOH. This order was amended on March 12, 2004 and June 23, 2005. The latest amendment added LLP and UDS to the order.

On March 18, 1999, DOE and Ohio EPA signed DFFOs. These DFFOs provide exemptions to DOE and integrate the following unclosed units into the CMS/CMI process: X-749, X-231B, X-701C, X701B, X-230J7, and X-744Y.

A Part B permit was issued to DOE and its current co-operator, Bechtel Jacobs, for the X-7725 and X-326 storage facilities on March 15, 2001.

GENERAL CONDITIONS OF PERMIT

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1	Has the expiration date of the permit passed? If so:	Yes__ No <input checked="" type="checkbox"/> N/A __ RMK#
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a.	Is the permittee continuing any activity regulated by the permit after the expiration date of the permit?	Yes__ No__ N/A <input checked="" type="checkbox"/> RMK#
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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? (Or upon a later date if the permittee can demonstrate good cause for late submittal.) [Condition A.6.(a)]	Yes__ No__ N/A <input checked="" type="checkbox"/> RMK#
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NOTE:

The permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:

- A. The permittee has submitted a timely and complete application for a renewal permit under OAC rule 3745-50-40; and
- B. Through no fault of the permittee, a new permit has not been issued pursuant to OAC rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]

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 <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
3	Is the permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit? [Condition A.1.(b) and A.5]	Yes ___ No <input checked="" type="checkbox"/> N/A ___ RMK#
4	Have any provisions of the permit been identified as invalid? [Condition A.4.]	Yes ___ No <input checked="" type="checkbox"/> N/A ___ RMK#
5	Has the facility identified any instances of noncompliance with the permit, RC Chapter 3734, or the rules adopted thereunder, which may endanger human health or the environment? If so:	Yes ___ No <input checked="" type="checkbox"/> N/A ___ RMK#
	a. Did the facility immediately report orally the following to Ohio EPA's Emergency Response Section within 24 hours of becoming aware of the circumstance(s): [Condition A.20.(a)]	
	i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and	Yes ___ No ___ N/A <input checked="" type="checkbox"/> RMK#
	ii. Information concerning a release of hazardous waste, fire or explosion at the facility which could threaten human health or the environment, including a description of:	
	A. Name, address and telephone number of the owner or operator?	Yes ___ No ___ N/A <input checked="" type="checkbox"/> RMK#
	B. Name, address and telephone number of the facility?	Yes ___ No ___ N/A <input checked="" type="checkbox"/> RMK#
	C. Name and quantity of material(s) involved?	Yes ___ No ___ N/A <input checked="" type="checkbox"/> RMK#
	D. The extent of injuries, if any?	Yes ___ No ___ N/A <input checked="" type="checkbox"/> RMK#
	E. An assessment of the actual or potential hazard to the environment and human health where this is applicable?	Yes ___ No ___ N/A <input checked="" type="checkbox"/> RMK#

	F. Estimated quantity and disposition of recovered material that resulted from the incident?	Yes__ No__ N/A <u>X</u> RMK#
6	Did the permittee provide a written report to Ohio EPA's Emergency Response Section and DHWM, SEDO within five days of the time the permittee became aware of the circumstances reported in Question 5? [Condition A.21.] If so did the report contain:	Yes__ No__ N/A <u>X</u> RMK#
	a. A description of the noncompliance and its cause (including exact dates and times)?	Yes__ No__ N/A <u>X</u> RMK#
	b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue?	Yes__ No__ N/A <u>X</u> RMK#
	c. Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance?	Yes__ No__ N/A <u>X</u> 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 becomes aware of the circumstances. [Condition A.21.(c)]*

7	Has the permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8]	Yes__ No__ N/A <u>X</u> RMK#
8	Has the permittee identified any other instances of noncompliance not provided for in Question 5?	Yes__ No__ N/A <u>X</u> RMK#
	a. If so, did the permittee report to the director within a month of the time at which the permittee is aware of such noncompliance? [Condition A.22.]	Yes__ No__ N/A <u>X</u> RMK#
	b. Do the reports provided contain the information set forth in Condition A.20?	Yes__ No__ N/A <u>X</u> RMK#
9	Has the permittee planned any physical alterations or additions to the permitted facility?	Yes__ No <u>X</u> N/A __ RMK#
	a. If so, has the facility provided Ohio EPA with notice of such changes? [Condition A.15]	Yes__ No__ N/A <u>X</u> RMK#

Note: Such notification does not waive the permittee's duty to comply with the permit pursuant to Condition A.5.

REMARKS

PERMIT MODIFICATION, REVISION, REVOCATION

1	Has the permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK# <i>2009 - Transfer to H&B. 2/28/09.</i>
2	Has the permit been transferred to a new owner or operator? [Condition A.18.] If so,	Yes ___ No <input checked="" type="checkbox"/> N/A ___ RMK#
	a. Has the transfer been conducted in accordance with R.C. Chapter 3734. and the rules adopted thereunder? [Condition A.18.]; and	Yes ___ No ___ N/A <input checked="" type="checkbox"/> RMK#
	b. Before transferring ownership did the permittee notify the new owner in writing of the requirements of R.C. Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.18.]	Yes ___ No ___ N/A <input checked="" type="checkbox"/> RMK#
3	Has the permittee submitted reports of compliance or noncompliance with, or any progress reports on the requirements contained in any compliance schedule of the permit to Ohio EPA no later than 14 days following each scheduled date, unless otherwise specified? [Condition A.19.]	Yes ___ No ___ N/A <input checked="" type="checkbox"/> RMK#
4	Has the permittee furnished relevant information which Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
5	Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
6	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 HWFB? If so,	Yes ___ No <input checked="" type="checkbox"/> N/A ___ RMK#
	a. Has the permittee promptly submitted such facts or corrected information to the appropriate entity? [Condition A.24.]	Yes ___ No ___ N/A <input checked="" type="checkbox"/> RMK#
7	Is the permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application? [Condition A.14.(c)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#

8	Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14.(c)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
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REMARKS

SITE ENTRY - AVAILABILITY OF RECORDS

1	As specified in Condition A.11., has the permittee allowed the director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, 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 <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	b. Have access to and copy any records required to be kept under the conditions of the permit?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	c. Inspect at reasonable times facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	d. Sample, document, or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by R.C. Chapter 3734. and the rules adopted thereunder?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#

RECORDKEEPING REQUIREMENTS

CONFIDENTIALITY

1	Has the permittee requested confidentiality of any information of the permit in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.25.]	Yes ___ No <input checked="" type="checkbox"/> N/A ___ RMK#
---	---	---

OPERATING RECORD

2	Is the permittee maintaining a written operating record at the facility as set forth in OAC rule 3745-54-73 and Condition B.22. of the permit which contains the following elements:	
	a. A description and the quantity of each hazardous waste received?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	b. Method(s) and date(s) of treatment, storage or disposal at the facility?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	c. The location of each hazardous waste within the facility and the quantity at each location?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
3	Is the permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents as part of its operating record: [Condition A.28.]	
	a. Waste analysis plan in accordance with OAC rule 3745-54-13 and the conditions of the permit?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	b. Contingency plan in accordance with OAC rule 3745-54-53 and the conditions of the permit?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	c. Closure plan in accordance with OAC rule 3745-55-12 and the conditions of the permit?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	d. Personnel training plan and records required by OAC rule 3745-54-16 and the conditions of the permit?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	e. Inspection schedules developed in accordance with OAC rules 3745-54-15 and 3745-55-74 and the conditions of the permit?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
4	Have any of the documents identified in Question #3 been revised as required by the permit? If so,	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	a. Has the permittee submitted the revisions to Ohio EPA? [Condition A.28.(b)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	b. Has the permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.28.(b)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#

5	Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from the date of inspection? [Condition A.28.(c)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
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ANNUAL REPORT REQUIREMENT

6	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 and the conditions of the permit? [Condition B.25.]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
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SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

7	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
	b. Individual(s) who performed the sampling or measurement?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
	c. Date(s) analyses were performed?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
	d. Individual(s) who performed the analyses?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
	e. Analytical technique(s) or method(s) used?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
	f. Results of such analyses?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
8	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 A.12.(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
9	Has Ohio EPA requested submittal of any reports or other information required by the conditions of the permit from the permittee? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> RMK#
	a. Have the submittals been signed and certified according to OAC rules 3745-50-58(K) and 3745-50-42? [Condition A.13.]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> RMK#

WASTE MINIMIZATION REQUIREMENTS

1 0	Has the permittee submitted a Waste Minimization Report to Ohio EPA meeting the requirements of Condition A.29. of the permit within 180 days of permit journalization?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
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a.	Following the first submittal as identified above in Question #10, has the permittee submitted biennial updates to this report as required by Condition A.29.(c)?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
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REMARKS

OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS

1	Is all hazardous and mixed waste transported from the facility by a properly registered transporter of hazardous and mixed waste in accordance with all applicable laws, rules and standards? [Condition A.16.]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
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MANIFEST REQUIREMENTS/WASTES RECEIVED ON-SITE

2	Upon receipt of the manifests, has the permittee signed and dated each copy of the manifest? [OAC 3745-54-71(A)(1); Condition B.24.]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
3	For any significant discrepancies identified upon receipt of the manifest(s): did the permittee note such discrepancies on the manifest(s) in accordance with OAC rule 3745-54-71(A)(2) and Condition B.24?	Yes ___ No ___ N/A <input checked="" type="checkbox"/> RMK#
	a. Did the permittee attempt to reconcile the discrepancy? [Condition B.24.]	Yes ___ No ___ N/A <input checked="" type="checkbox"/> RMK#
	b. If the discrepancy was not resolved within 15 days: did the permittee submit a report, including a copy of the manifest, to the director in accordance with OAC rule 3745-54-72(B)? [Condition B.24.]	Yes ___ No ___ N/A <input checked="" type="checkbox"/> RMK#
4	Does the permittee immediately give the transporter at least one copy of the signed manifest? [OAC 3745-54-71(A)(3); Condition B.24.]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
5	Does the permittee provide the generator with a copy of the manifest within 30 days of receipt of waste on-site? [OAC 3745-54-71(A)(4); Condition B.24.]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
6	Does the permittee retain a copy of each manifest on-site for at least three years from the date of delivery? [OAC 3745-54-71(A)(5); Condition B.24.]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
7	Has the permittee received any hazardous waste or mixed waste from off-site, other than as described in Condition B.2(b)?	Yes ___ No <input checked="" type="checkbox"/> N/A ___ RMK#

WASTE ANALYSIS/WASTE ANALYSIS PLAN

GENERAL REQUIREMENTS

1	Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with OAC Chapters 3745-54 to 3745-57 and Condition B.3 of the permit (Section C of the approved permit application)? [OAC 3745-54-13(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
2	Since the last inspection, were any wastes generated by the facility which were unable to be characterized through process knowledge? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> RMK#
	a. Were the waste analysis procedures described in Section C of the approved permit application followed?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> RMK#
3	Is the permittee following the procedures described in the approved waste analysis plan (Section C of approved permit application) and the requirements of OAC rule 3745-54-13? [Condition B.3.]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
4	Is the permittee maintaining waste analysis data in the facility's operating record as required by OAC rule 3745-54-73 and Condition B.22. of the permit?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#

WASTE ANALYSIS QUALITY ASSURANCE REQUIREMENTS

5	Is the permittee verifying the analysis of each waste stream annually as part of its quality assurance program in accordance with SW-846? [Condition B.3.]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
6	In accordance with Condition B.3. of the permit, does the permittee's quality assurance plan ensure that the permittee is, at a minimum:	
	a. Maintaining property functional instruments?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
	b. Using approved sampling/analytical methods?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
	c. Verifying the validity of sampling and analytical procedures and performance of correct calculations?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
7	If the permittee uses a contract laboratory to perform analyses, did the permittee inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this permit?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#

REMARKS

GENERAL INSPECTION REQUIREMENTS

1	Is the permittee following the inspection procedures and schedules described in Section F of the approved permit application and the requirements of OAC rule 3745-54-15? [Condition B.5.]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
2	Does the permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [OAC 3745-54-15(A)(1)(2)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
3	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?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	a. Is the schedule kept at the facility? [OAC 3745-54-15(B)(2)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	b. Does the schedule identify the types of problems which are to be looked for during the inspection? [OAC 3745-54-15(B)(3)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	c. Does the schedule include inspection of areas subject to spills daily when in use and according to other applicable regulations when not in use? [OAC 3745-54-15(B)(4)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
4	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 <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
5	Is the permittee maintaining records of inspections for a minimum of three years? [Condition B.5.]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
6	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 <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	b. Signature of inspector?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	c. Notation of observations made?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	d. Date/nature of any repairs or other remedial actions?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#

SECURITY PROVISIONS/FACILITY OPERATION

1	Is the permittee complying with the security provisions of OAC rule 3745-54-14(B)(1) and B(2) and (C) and Section F of the approved permit application, including the following: [Condition B.4.]	
	a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility;	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility; or	Yes <input checked="" type="checkbox"/> 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 <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
2	In accordance with OAC rule 3445-54-14(C), does the permittee have signs reading "Danger-Unauthorized Personnel Keep Out" posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? [Condition B.4.]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
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 waters? [Condition B.1.]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#

PERSONNEL TRAINING

1	Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of OAC rule 3745-54-16: [Condition B.6.]	
	a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC 3745-54-16(A)(B)(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
	b. The facility provides personnel training to new employees within six months after their date of employment as required by OAC 3745-54-16(B)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
	c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(B)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#

REQUIRED EQUIPMENT

1	Is the permittee, at a minimum, maintaining the equipment set forth in the approved permit application (Section G) at the facility? [Condition B.9.]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
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2	Is the permittee inspecting, testing, and maintaining the equipment specified in Question #1 to assure its proper operation as specified in OAC rule 3745-54-33, the inspection plans and Section G of the approved permit application? [Condition B.10.]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
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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 Section G of the approved permit application? [Condition B.11.]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
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CONTINGENCY PLAN REQUIREMENTS

EMERGENCY PROCEDURES

1	In compliance with Condition B.13.(a) of the permit, does the permittee:	
	a. Familiarize the emergency response agencies likely to respond to an emergency at the facility with:	
	i. The location and layout of the facility?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	ii. Properties of hazardous waste and mixed waste managed at the facility and associated hazards?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	iii. Places where facility personnel will normally be working?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	iv. Entrances to and roads inside the facility?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	v. Evacuation routes as depicted in Section G of the permit application?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	b. Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit?; and	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	c. Familiarize local police and fire departments, local hospitals and other local emergency services with the properties of hazardous waste and mixed waste managed at the facility and the types of injuries which could result from fires, explosions or a release of hazardous wastes at the facility?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
2	Is the permittee in compliance with the requirements of OAC rule 3745-54-56 and Section G of the approved permit application regarding emergency procedures? [Condition B.20.]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#

EMERGENCY AUTHORITIES

3	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 <input checked="" type="checkbox"/> 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 <input checked="" type="checkbox"/> RMK#
4	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.]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
5	Has the permittee notified the agencies in Question #4, in writing, within ten days of the effective date of any amendments or revisions to the Plan? [Condition B.18.(b)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
6	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 in accordance with OAC rule 3745-54-53? [Condition B.18.(c)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#

EMERGENCY COORDINATOR

7	Is the permittee in compliance with the requirements of OAC rule 3745-54-55 with regard to the emergency coordinator? [Condition B.19.]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
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AMENDMENT OF PLAN

8	Is the permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17.]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
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Note: Also see Question #4 of RECORDKEEPING REQUIREMENTS to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.

IMPLEMENTATION OF PLAN

9	Has there been a fire, explosion or release of hazardous waste or mixed waste or constituents at the facility since the last date of inspection as described by Condition B.14. of the permit? If so,	Yes ___ No <u>X</u> 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? [Condition B.14.]	Yes ___ No ___ N/A <u>X</u> RMK#
	b. Did the permittee collect and manage released material, emergency response material and by-products as hazardous waste or mixed waste until making a demonstration to Ohio EPA that such materials are not subject to Ohio hazardous waste rules? [Condition B.16.]	Yes ___ No ___ N/A <u>X</u> RMK#
	c. 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 <u>X</u> RMK#
	i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23.] <i>Note: See also Conditions A.21. and A.22. of the permit for additional reporting/recordkeeping requirements.</i>	Yes ___ No ___ N/A <u>X</u> RMK#
	d. 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? [Condition B.23.]	Yes ___ No ___ N/A <u>X</u> RMK#

REMARKS

CONTINGENCY PLAN REQUIREMENTS

CLOSURE PLAN/AMENDMENT

1	Is the permittee maintaining at the facility, the approved closure plan which contains the elements set forth in OAC rule 3745-55-12? [Condition B.29.]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
2	Has the permittee amended the closure plan? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> RMK#
	a. Has the plan been amended in accordance with OAC rule 3745-55-12(C)? [Condition B.28.]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 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.

CLOSURE ACTIVITIES

3	Has the permittee closed the facility? If so,	Yes__ No <u>X</u> N/A __ RMK#
	a. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26.]	Yes__ No__ N/A <u>X</u> RMK#
	b. Did the permittee carry-out the approved closure plan as set forth in the permit application and terms and conditions of the permit? [Condition B.26.]	Yes__ No__ N/A <u>X</u> RMK#
	c. After receiving the final volume of hazardous waste, did the permittee remove from the facility all hazardous waste and mixed 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 <u>X</u> RMK#
	d. 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 <u>X</u> RMK#
	e. Did the permittee notify Ohio EPA's Southeast District Office within five working days prior to all rinseate and soil sampling? [Condition B.32.(b)]	Yes__ No__ N/A <u>X</u> 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 <u>X</u> RMK#

REMARKS

REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

1	Is the permittee following the procedures as specified in OAC rules 3745-54-17, 3745-55-77 and Section F of the approved application when managing ignitable, reactive and/or incompatible wastes? [Conditions B.7.(a) and C.10. and C.11.]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
2	Does the permittee not store incompatible waste except in accordance with OAC rules 3745-54-17(B) and 3745-55-77, and the terms and conditions of this permit? [Condition C.11.(a)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
3	Does the permittee take precautions to prevent placing hazardous waste or mixed waste in an unwashed container that previously held an incompatible waste or material? [Condition C.11.(b)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
4	Does the permittee ensure that all containers of incompatible wastes are physically separated from other incompatible wastes or materials by a wall, berm, dike, or other device in accordance with OAC rule 3745-55-77 and the Appendix to OAC rule 3745-55-99? [Condition C.11.(c)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	a. Are all containers of aqueous hazardous acids (ph \leq 2) and caustics ph \geq 12.5) sorted on different pallets and physically separated in different rooms? [Condition C.11.(c)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	b. Are aqueous acids and caustics in poly bottles, and other containers requiring nuclear criticality safety spacing physically separated in the same room by a dike? [Condition C.11.(c)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	c. Are containers of cyanides and sodium metals being stored in rooms physically separate from other incompatible wastes or other incompatible materials? [Condition C.11.(c)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
5	Does the permittee provide electrical grounding for all containers, tanks and transport vehicles during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(b)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
6	Does the permittee provide and require the use of spark proof tools during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(c)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#

7	Does the permittee prohibit smoking and open flames in areas where hazardous wastes are managed and post appropriate signs? [Condition B.7.(d)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
8	As required by OAC rule 3745-55-76, does the permittee store containers of ignitable or reactive wastes greater than 15 meters (50 feet) away from the Portsmouth Gaseous Diffusion Plant reservation boundary? [Condition C.10.(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#

REMARKS

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

NOTE: *The requirements of permit 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.*

1	Is the permittee storing in containers, only those wastes as specified in Section A of the Part B permit application? [Condition C.1.(a), C.2.]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
2	Does the permittee limit the total quantity of containerized waste in the container storage area to 133,000 gallons at any given time in the permitted container areas, located in building X-326 and no more than 5,456,000 gallons at any given time in the permitted storage areas located in building X-7725? [Condition C.1.(a)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#

NOTE: For the purposes of compliance with the capacity limitation of the permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity. For example, a 55-gallon drum will be considered to be holding 55 gallons of waste, regardless of the actual quantity stored in the drum. [Condition C.1.(b)]

3	When accumulating waste within the permitted X-7725 and X-326 container storage area, does the permittee ensure that the total amount of waste (both > 90 days and < 90 days) does not exceed the maximum container storage inventory established under Condition C.1.? [Condition C.1.(c)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
4	Are hazardous wastes subject to regulation by the permit stored only at the designated container storage area described in the approved permit application? (See Section D of the permit application) [Condition C.1.(a)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
5	Is each container stored clearly marked to identify its contents and the date each period of accumulation/storage begins? (See Section D of the permit application) [Condition C.3.]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
6	Does the permittee store hazardous waste in the types of containers described in Section D of the approved permit application? [Condition C.1.(a)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#

CONDITION OF CONTAINERS

8	Are containers holding hazardous wastes in good condition? [Condition C.3.]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	a. If not, (e.g., severe rusting, structural defects) did the permittee transfer the hazardous waste from such a container to a container that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit and OAC rule 3745-55-71? [Condition C.3.]	Yes ___ No ___ N/A <input checked="" type="checkbox"/> RMK#
9	Does the permittee ensure that all containers used at the facility are compatible with the hazardous waste to be stored in them as required by OAC rule 3745-55-72? [Condition C.4.]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
10	Is storage conducted in the container storage containment system as described in Condition C.1. of the permit and Section D of the approved permit application? [Condition C.5.(a)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
11	Does the permittee keep all containers closed during storage except when it is necessary to add or remove waste as required by OAC rule 3745-55-73? [Condition C.5.(b)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
12	Are lab-pack wastes handled in compliance with applicable storage requirements? [Condition C.5.(c)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
13	Are lab-pack wastes packaged in drums containing absorbent material that is compatible with the wastes? [Condition C.5.(d)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#

INSPECTIONS

1 4	Is the permittee inspecting the container area weekly in accordance with OAC rules 3745-54-15, and 3745-54-73 and the approved inspection schedule (Section F) to detect leaking containers and deterioration of containers and the containment system? [Condition C.8.]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
	a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken? [Condition C.8.]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
	b. On days when containerized waste are added or removed to and/or from any of the permitted areas for storage, does the permittee conduct inspections as described in Section F of the approved Part B permit application and maintain the inspection results in the facility operating record? [Condition C.8.]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#

CONTAINMENT SYSTEM

1 5	Does the permittee maintain the containment system as described in Section D of the approved Part B permit application, including: [Condition C.6.]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	a. Sufficient design to contain 10% of the total volume of the containers or the volume of the largest container, whichever is greater? [Condition C.6.(b)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	b. A system which is free of gaps and sufficiently impervious to contain leaks and spills?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	c. Equipped with a coating which is compatible with each waste stored in the area?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
	d. <i>For those wastes which are deemed incompatible with liner material:</i> Has the permittee installed a separate secondary containment structure within the existing structure which is equipped with a compatible liner?	Yes ___ No ___ N/A <input checked="" type="checkbox"/> RMK#
1 6	Has the permittee had a spill or leak of wastes or an accumulation of precipitation in the containment system? If so,	Yes ___ No <input checked="" type="checkbox"/> N/A ___ RMK#
	a. Are spilled or leaked wastes and accumulated precipitation removed from the sump or collection area in a timely manner? [Condition C.6.(c)]	Yes ___ No ___ N/A <input checked="" type="checkbox"/> RMK#
	b. Does removal of spilled/leaked wastes and accumulated precipitation occur within 24 hours from the time the spill or leak waste is discovered? [Condition C.6.(c)]	Yes ___ No ___ N/A <input checked="" type="checkbox"/> RMK#

REQUIRED AISLE SPACE

1 7	Is the permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in the event of an emergency to any area of the facility as required by OAC rule 3745-54-35? [Condition B.12.]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
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CLOSURE AND POST-CLOSURE

1 8	At closure of the container storage area, did the permittee remove all hazardous waste, hazardous waste residues, mixed waste and mixed waste residues from the containment system, in accordance with the procedures set forth in the approved closure plan (Section I of the permit application)? [Condition C.13.(a)]	Yes__ No__ N/A <u>X</u> RMK#
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1 9	During closure, if the permittee could not demonstrate that all contaminated soils could be removed, did the permittee close the unit and perform post-closure care following a plan approved by Ohio EPA? [Condition C.13.(b)]	Yes__ No__ N/A <u>X</u> RMK#
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CONTAINER STORAGE OF RESIDUAL WASTE

2 0 .	Is the permittee complying with the provisions of Section C-2E of the application as amended pursuant to Condition B.2.(b) of this permit?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK#
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LAND DISPOSAL RESTRICTION REQUIREMENTS

PROHIBITION AGAINST DILUTION

1	Has the permittee updated the annual Federal Facility Compliance Act Schedule? [OAC rule 3745-270-50; Condition B.36.]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
2	Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [OAC rule 3745-270-40 through 49; Condition B.36.(c)]	Yes ___ No <input checked="" type="checkbox"/> N/A ___ RMK#
	a. As a substitute for adequate treatment to achieve compliance with LDR treatment standards?	Yes ___ No ___ N/A <input checked="" type="checkbox"/> RMK#
	b. To circumvent the effective date of a prohibition (e.g., to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)?	Yes ___ No ___ N/A <input checked="" type="checkbox"/> RMK#
	c. To otherwise avoid a prohibition in OAC rule 3745-270-30 through -39?	Yes ___ No ___ N/A <input checked="" type="checkbox"/> RMK#
	d. To otherwise avoid a prohibition imposed by Section 3004(d) of RCRA?	Yes ___ No ___ N/A <input checked="" type="checkbox"/> RMK#

NOTE: If the answer to any of Questions 2(a) through 2(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of OAC rule 3745-270-03 [Condition B.36.]. Dilution of wastes is permissible under some conditions. See OAC rule 3745-270-03(B).

GENERATOR REQUIREMENTS

3	Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [OAC rule 3745-270-07; Condition B.36.(e)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
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	a. For determinations based solely on knowledge of the waste: Is supporting data used to make this determination being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
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	b. For determinations based upon analytical testing: Is a copy of waste analysis data being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
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4	Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g., wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [OAC rule 3745-270-07; Condition B.36.(e)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
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5	Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [OAC rule 3745-270-07(A); Condition B.36.(e)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
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6	Does the entity generate any listed waste(s) which are restricted from land disposal? If so,	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
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	a. Do such wastes also exhibit hazardous waste characteristics as identified in OAC rules 3745-51-20 to 3745-51-24?	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
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	b. For listed wastes which also exhibit a characteristic: Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [OAC rule 3745-270-09(A)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
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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)].

NOTIFICATION/CERTIFICATION

7	For wastes that do not meet treatment standards: Has the generator submitted a one-time written notice to the treatment/storage facility receiving the wastes, that wastes being received do not meet treatment standards? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
If so, does the notice including the following:		
a.	EPA hazardous waste number? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
b.	Appropriate treatment standard for the waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
c.	The manifest number associated with the first shipment of waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
d.	Waste analysis data, where available? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
e.	Applicable wastewater/non-wastewater category [OAC rule 3745-270-07(A)(2); Condition B.36.(j)]	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#
f.	For hazardous debris, list the contaminants subject to treatment, as described in paragraph (B) of OAC rule 3745-270-45; and an indication that these contaminants are being treated to comply with OAC rule 3745-270-45.	Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK#

LARGE 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

GENERAL REQUIREMENTS

1. Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)] Yes No N/A ___ RMK# ___

PROHIBITIONS

2. Did the LQUWH dispose of universal waste? [3845-273-31(A)] Yes No N/A ___ RMK# ___
3. Did the LQUWH dilute or treat universal waste, except when responding to releases or by managing specific wastes as provided in OAC 3745-273-33? [3745-273-31(B)] Yes No N/A ___ RMK# ___

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES:

4. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)] Yes No N/A ___ RMK# ___
5. If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? Yes No N/A ___ RMK# ___
6. Does the LQUWH 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. Regenerate 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)? [3745-273-33(A)(2)]

Yes No N/A RMK# _____

7. If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)(3)]

Yes No N/A RMK# _____

a. If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)]

Yes No N/A RMK# _____

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)]

Yes No N/A RMK# _____

8. Are the battery(ies) or container(s) of batteries located with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-34(A)]

Yes No N/A RMK# _____

UNIVERSAL WASTE LAMPS

9. Does the LQUHW 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? [3745-273-33(D)(1)]

Yes No N/A RMK# _____

10. 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 constituents to the environment? [3745-273-33(D)(2)]

Yes No N/A RMK# _____

11. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamps?" [3745-273-34(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.

12. **ACCUMULATION TIME**

Is the waste accumulated for less than one year? [3745-273-35(A)]

Yes No N/A RMK#

a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on handler to demonstrate) [3745-273-35(B)]

Yes No N/A RMK#

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

13. Has the length of time the universal waste has been accumulated documented by one of the following: [3745-273-35(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? [3745-273-35(C)(1)]

Yes No N/A RMK#

b. Marking or labeling the individual item of universal waste with the date that it became a waste or was received? [3745-273-35(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? [3745-273-35(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? [3745-273-35(C)(4)]

Yes No N/A RMK#

- e. Placing the universal waste in a specific accumulation area and identifying the earliest that any universal waste in the area became a waste or was received? [3745-273-35(C)(5)]
- 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 is received? [3745-273-35(C)(6)]

Yes No N/A RMK#

Yes No N/A RMK#

EMPLOYEE TRAINING

14. Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36]

Yes No N/A RMK#

RESPONSE TO RELEASES

15. Were releases of universal waste and other residues immediately contained? [3745-273-37(A)]
16. Was the released material characterized? [3745-273-37(B)]
17. If the released material was a hazardous waste, was it managed as required in OAC 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) [3745-273-37(C)]

Yes No N/A RMK#

Yes No N/A RMK#

Yes No N/A RMK#

OFF-SITE SHIPMENTS

NOTE: *If a LQUWH self-transportes wastes, then the handler must comply with the Universal Waste transporter requirements.*

18. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)]

Yes No N/A RMK#

NOTE: *LQUWHs are prohibited to send waste to any other facility.*

19. 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? [3745-273-38(C)]

Yes No N/A RMK#

20. Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)]

Yes No N/A RMK#

21. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:

Yes ___ No N/A RMK# ___

a. Receive the waste back? [3745-273-38(E)(1)]

Yes ___ No ___ N/A RMK# ___

b. Agree to where shipment will be sent? [3745-273-38(E)(2)]

Yes ___ No ___ N/A RMK# ___

22. If a handler rejects a partial or full load from another handler, does the receiver handler contact the originating handler and discuss one of the following:

Yes ___ No N/A RMK# ___

a. Sending the waste back to originating handler? [3745-273-38(F)(1)]

Yes ___ No ___ N/A RMK# ___

b. Sending the shipment to a destination facility? [3745-273-38(F)(2)]

Yes ___ No ___ N/A RMK# ___

23. If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)]

Yes ___ No N/A RMK# ___

24. If the handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-38(H)]

Yes ___ No N/A RMK# ___

TRACKING UNIVERSAL WASTE SHIPMENTS

25. Are universal waste received from another handler? If so: Yes ___ No N/A ___ RMK# ___
- a. Is a record of each shipment kept? [3745-273-39(A)] Yes No N/A ___ RMK# ___

NOTE: *This record can be in the form of a log, invoice, manifest, bill of lading, or other shipping document. This also applies to question No. 35(a).*

26. Does the record include the following:
- a. Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)] Yes No N/A ___ RMK# ___
- b. Quantity of each type of universal waste? [3745-273-39(A)(2)] Yes No N/A ___ RMK# ___
- c. Date received? [3745-273-39(A)(3)] Yes No N/A ___ RMK# ___
27. Is universal waste shipped to another handler? If so: Yes No ___ N/A ___ RMK# ___
- a. Is a record of each shipment kept? [3745-273-39(B)] Yes No N/A ___ RMK# ___
28. Does the record include the following?
- a. Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)] Yes No N/A ___ RMK# ___
- b. Quantity of each type of universal waste? [3745-273-39(B)(2)] Yes No N/A ___ RMK# ___
- c. Date shipped? [3745-273-39(B)(3)] Yes No N/A ___ RMK# ___
29. Are records kept for three years? [3745-273-39(C)(1)(2)] Yes No N/A ___ RMK# ___

EXPORTS

30. Is waste being sent to a foreign destination? If so: Yes ___ No N/A ___ RMK# ___
- a. Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56 and 3745-52-57? [3745-273-40(A)] Yes ___ No N/A RMK# ___

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA "Acknowledgment of Consent" 3745-52-50 to -52-57? [3745-273-40(B)]

Yes ___ No N/A RMK# ___

c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)]

Yes ___ No N/A RMK# ___

REMARKS

USED OIL INSPECTION CHECKLIST (Long Version)

PROHIBITIONS

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

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes ___ No N/A ___ RMK# ___
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes ___ No N/A ___ RMK# ___
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes No N/A ___ RMK# ___
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No N/A ___ RMK# ___
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes No N/A ___ RMK# ___
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes ___ No N/A RMK# ___
- b. Contained the release? Yes ___ No N/A RMK# ___
- c. Cleaned up and properly managed the used oil and other materials? Yes ___ No N/A RMK# ___
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A RMK# ___
10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: Yes ___ No N/A ___ RMK# ___

a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?

Yes No N/A RMK#

b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?

Yes No N/A RMK#

c. Are the combustion gases from heater vented to the ambient air?

Yes No N/A RMK#

11. Does the generator have the used oil hauled only by transporters that have obtained a 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#

REMARKS

USED OIL TRANSPORTER AND TRANSFER FACILITIES

- 16. Does the used oil transporter process used oil? [3745-279-41(A)] If so:
 - Is the used oil transporter in compliance with the requirements for processors/re-refiners in 3745-279-50 to 3745-279-59 (except as provided in 3745-279-41(B) and (C))? [3745-279-41(A)]
- 17. Has the used oil transporter notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-42(A)]
- 18. Has the used oil transporter delivered all used oil to:
 - a. Another used oil transporter that has a U.S. EPA ID#? [3745-279-43(A)(1)]
 - b. A used oil processing/re-refining facility that has a U.S. EPA ID#? [3745-279-43(A)(2)]
 - c. An off-spec used oil burning facility that has a U.S. EPA ID#? [3745-279-43(A)(3)]
 - d. An on-spec used oil burning facility? [3745-279-43(A)(4)]
- 19. Has the used oil transporter complied with all applicable USDOT regulations (49 CFR 171 to 180)? [3745-279-43(B)]
- 20. Has the used oil transporter had a discharge of used oil? If so:
 - Did they take the appropriate action as outlined in 3745-279-43(C)?
- 21. Has the used oil transporter determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? [3745-279-44(A)]
- 22. Does the transporter retain all records of analyses and information used to comply with 3745-279-44 for at least three years? [3745-279-44(D)]
- 23. Does the owner/operator of a used oil transfer facility:
 - a. Stored used oil in tanks, containers, or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-45(B)]

Yes ___ No ___ N/A ___ RMK# ___

Yes ___ No N/A ___ RMK# ___

- b. Stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-45(C)] Yes ___ No N/A ___ RMK# ___
- c. Provide secondary containment for containers used to store used oil as required by 3745-279-45(D)? [3745-279-45(D)] Yes ___ No N/A ___ RMK# ___
- d. Provide secondary containment for existing aboveground tanks required by 3745-279-45(E)? [3745-279-45(E)] Yes ___ No N/A ___ RMK# ___
- e. Provide secondary containment for new aboveground tanks as required by 3745-279-45(F)? [3745-279-45(F)] Yes ___ No N/A ___ RMK# ___
- f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-45(G)] Yes ___ No N/A ___ RMK# ___
- g. Upon detection of a release of used oil: [3745-279-45(H)]
- i. Stopped the release? Yes ___ No N/A ___ RMK# ___
- ii. Contained the release? Yes ___ No N/A ___ RMK# ___
- iii. Cleaned up and managed the used oil and other materials? Yes ___ No N/A ___ RMK# ___
- iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A ___ RMK# ___
24. Does the used oil transporter keep a record of each shipment of used oil? [3745-279-46(A)] Yes ___ No N/A ___ RMK# ___
- a. Does each record include the name and address of the generator, transporter or processor/re-refiner who provides the used oil for transport? [3745-279-46(A)(1)] Yes ___ No N/A ___ RMK# ___
- b. Does each record include the U.S. EPA ID# of the generator, transporter or processor/re-refiner (if applicable) that provides the used oil for transport? [3745-279-46(A)(2)] Yes ___ No N/A ___ RMK# ___
- c. Does each record include the quantity of used oil accepted? [3745-2679-46(A)(3)] Yes ___ No N/A ___ RMK# ___

- d. Does each record include the date of acceptance? [3745-279-46(A)(4)] Yes ___ No N/A ___ RMK# ___
- e. Does each record include the signature of a representative of the generator, transporter, processor/re-refiner that provided the used oil for transport? [3745-279-46(A)(5)] Yes ___ No N/A ___ RMK# ___
25. Does the used oil transporter keep a record of each shipment of used oil that is delivered to another used oil transporter, burner, processor/re-refiner, or disposal facility? [3745-279-46(B)] Yes ___ No N/A ___ RMK# ___
- a. Does each record include the name and address of the receiving facility or transporter? [3745-279-46(B)(1)] Yes ___ No N/A ___ RMK# ___
- b. Does each record include the U.S. EPA ID# of the receiving facility or transporter? [3745-279-46(B)(2)] Yes ___ No N/A ___ RMK# ___
- c. Does each record include the quantity of used oil delivered? [3745-279-46(B)(3)] Yes ___ No N/A ___ RMK# ___
- d. Does each record include the date delivered? [3745-279-46] Yes ___ No N/A ___ RMK# ___
- e. Does each record include the signature of a representative of the receiving facility or transporter (intermediate rail transporters are not required to sign a record of delivery)? [3745-279-46(B)(5)] Yes ___ No N/A ___ RMK# ___
26. Does the used oil transporter who exports used oil to a foreign country comply with 3745-279-46(B)(1) to (B)(4)? [3745-279-46(C)] Yes ___ No N/A ___ RMK# ___
27. Does the used oil transporter retain all records required under 3745-279-46 for at least three years? [3745-279-46(D)] Yes ___ No N/A ___ RMK# ___
28. Does the used oil transporter generate residues from the storage or transportation of used oil? Yes ___ No ___ N/A ___ RMK# ___
- If so, are they managed as specified in 3745-279-10(E)? [3745-279-47] Yes ___ No N/A ___ RMK# ___

REMARKS

USED OIL STANDARDS FOR PROCESSORS AND RE-REFINERS

29. Has the used oil processor and/or re-refiner notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-51(A)] Yes ___ No N/A ___ RMK# ___
30. Does the owner/operator of a used oil processing or re-refining facility comply with the following:
- a. Is the facility maintained and operated to minimize the possibility of fire, explosion, or release of used oil? [3745-279-52(A)(1)] Yes ___ No N/A ___ RMK# ___
 - b. Is the facility equipped with the equipment in 3745-279-52(A)(2), if necessary? Yes ___ No N/A ___ RMK# ___
 - c. Are all communication systems, alarm systems, fire protection equipment, spill control equipment, and decontamination equipment tested and maintained as required? [3745-279-52(A)(3)] Yes ___ No N/A ___ RMK# ___
 - d. Is there access to communication or alarm system(s)? [3745-279-52(A)(4)] Yes ___ No N/A ___ RMK# ___
 - e. Is the required aisle space being maintained? [3745-279-52(A)(5)] Yes ___ No N/A ___ RMK# ___
 - f. Are arrangements maintained with local authorities? [3745-279-52(A)(6)] Yes ___ No N/A ___ RMK# ___
31. Has the owner/operator of a used oil processing and re-refining facility complied with the following requirements:
- a. Has a contingency plan been developed? [3745-279-52(B)(1)] Yes ___ No N/A ___ RMK# ___
 - b. Does the contingency plan contain the requirements of 3745-279-52(B)(2)? Yes ___ No N/A ___ RMK# ___
 - c. Have copies and revisions been maintained and submitted to all local authorities? [3745-279-52(B)(3)] Yes ___ No N/A ___ RMK# ___
 - d. Is the contingency plan reviewed and amended whenever one of the events in 3745-279-52(B)(4) occurs? Yes ___ No N/A ___ RMK# ___
 - e. Is an emergency coordinator on the premises or on call at all times to meet the requirements of 3745-279-52(B)(5) and (6)? Yes ___ No N/A ___ RMK# ___

32. Does the used oil processor/re-refiner determine whether the total halogen content of the used oil being managed at the facility is above or below 1000 ppm? [3745-279-53(A)]

Yes ___ No N/A ___ RMK# ___

33. Does/has the used oil processor/re-refiner:

a. Only store used oil in tanks, containers or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-54(A)]

Yes ___ No N/A ___ RMK# ___

b. Only store used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-54(B)]

Yes ___ No N/A ___ RMK# ___

c. Provide secondary containment for containers as required by 3745-279-54(C)?

Yes ___ No N/A ___ RMK# ___

d. Provide secondary containment for existing aboveground tanks as required by 3745-279-54(D)?

Yes ___ No N/A ___ RMK# ___

e. Provide secondary containment for new aboveground tanks as required by 3745-279-54(E)?

Yes ___ No N/A ___ RMK# ___

f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil" [3745-279-54(F)]

Yes ___ No N/A ___ RMK# ___

g. Upon detection of a release of used oil, done the following in accordance with 3745-279-54(G):

i. Stopped the release?

Yes ___ No N/A ___ RMK# ___

ii. Contained the release?

Yes ___ No N/A ___ RMK# ___

iii. Cleaned up and managed the used oil and other materials?

Yes ___ No N/A ___ RMK# ___

iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary?

Yes ___ No N/A ___ RMK# ___

h. Performed closure of aboveground tanks and containers in accordance with 3745-279-54(H)?

Yes ___ No N/A ___ RMK# ___

34. Has the owner/operator of the used oil processing/re-refining facility developed, kept on-site, and followed a written waste analysis plan which meets the requirements in 3745-279-53 and, if applicable 3745-279-72? [3745-279-55] Yes ___ No N/A ___ RMK# ___
35. Does the used oil processor/r e-refiner keep a record of each shipment of used oil accepted for processing/re-refining? [3745-279-56(A)] Yes ___ No N/A ___ RMK# ___
- a. Does each record include the name and address of the transporter who delivered the used oil to the processor? [3745-279-56(A)(1)] Yes ___ No N/A ___ RMK# ___
- b. Does each record include the name and address of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(2)] Yes ___ No N/A ___ RMK# ___
- c. Does each record include the U.S. EPA ID # of the transporter who delivered the used oil to the processor/re-refiner? [3745-279-56(A)(3)] Yes ___ No N/A ___ RMK# ___
- d. Does each record include the U.S. EPA ID # (if applicable) of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(4)] Yes ___ No N/A ___ RMK# ___
- e. Does each record include the quantity of used oil accepted? [3745-279-56(A)(5)] Yes ___ No N/A ___ RMK# ___
- f. Does each record include the date of acceptance? [3745-279-56(A)(6)] Yes ___ No N/A ___ RMK# ___
36. Does the used oil processor/r e-refiner keep a record of each shipment of used oil that is shipped to a used oil burner, processor/re-refiner, or disposal facility? [3745-279-56(B)] Yes ___ No N/A ___ RMK# ___
- a. Does each record include the name and address of the transporter who delivers the used oil to the burner, processor/re-refiner or disposal facility [3745-279-56(B)(1)] Yes ___ No N/A ___ RMK# ___
- b. Does each record include the name and address of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(2)]. Yes ___ No N/A ___ RMK# ___

- c. Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner, processor/re-refiner or disposal facility? [3745-279-56(B)(3)] Yes ___ No N/A ___ RMK# ___
- d. Does each record include the U.S. EPA ID# of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(4)] Yes ___ No N/A ___ RMK# ___
- e. Does each record include the quantity of used oil shipped? [3745-279-56-(B)(5)] Yes ___ No N/A ___ RMK# ___
- f. Does each record include the date of shipment? [3745-279-56(B)(6)] Yes ___ No N/A ___ RMK# ___
37. Does the used oil processor/re-refiner retain all records required under 3745-279-56 for at least three years? [3745-279-56(C)] Yes ___ No N/A ___ RMK# ___
38. Does the owner/operator keep an operating record at the facility? [3745-279-57(A)(1)] Yes ___ No N/A ___ RMK# ___
- a. Does the operating record include records and results of used oil analysis performed as described in the analysis plan required under 3745-279-55? [3745-279-57(A)(2)(a)] Yes ___ No N/A ___ RMK# ___
- b. Are summary reports and details of all incidents that require implementation of the contingency plan as specified in 3745-279-52(B) maintained in the operating record? [3745-279-57(A)(2)(b)] Yes ___ No N/A ___ RMK# ___
39. Does the used oil processor/re-refiner report to the director in the form of a letter, on a biennial basis by March 1, the following information:
- a. The U.S. EPA ID#, name and address of the processor/re-refiner? [3745-279-57(B)(1)] Yes ___ No N/A ___ RMK# ___
- b. The calendar year covered by the report? [3745-279-57(B)] Yes ___ No N/A ___ RMK# ___
- c. The quantities of used oil accepted for processing/re-refining and the manner in which the used oil is processed/re-refined, including the specific processes employed? [3745-279-57(B)] Yes ___ No N/A ___ RMK# ___
40. Does the used oil processor/re-refiner, who initiates a shipment of used oil off-site, use a used oil transporter that has a U.S. EPA ID#? [3745-279-58] Yes ___ No N/A ___ RMK# ___

41. Does the used oil processor/re-refiner generate residues from the storage, processing or re-refining of used oil? [3745-279-59] Yes ___ No ___ N/A ___ RMK# ___

If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-59] Yes ___ No N/A ___ RMK# ___

REMARKS

STANDARDS FOR USED OIL BURNERS WHO BURN OFF-SPEC USED OIL FOR ENERGY RECOVERY

42. Is off-spec used oil fuel burned for energy recovery only in industrial furnaces identified in 3745-50-10, or boilers as defined in 3745-50-10 and identified in 3745-279-61(A)(2), or hazardous waste incinerators? [3745-279-61(A)] Yes ___ No N/A ___ RMK# ___

43. Does the used oil burner process used oil? [3745-279-61(B)] Yes ___ No ___ N/A ___ RMK# ___
If so, have they complied with the requirements for processors in 3745-279-50 to 3745-279-59? [3745-279-61(B)] Yes ___ No N/A ___ RMK# ___

44. Has the used oil burner notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-62(A)] Yes ___ No N/A ___ RMK# ___

45. Does the used oil burner determine whether the total halogen content of the used oil being managed at the facility is above or below 1000 ppm? [3745-279-63(A)] Yes ___ No N/A ___ RMK# ___

46. Does the used oil burner retain records of all analyses conducted or information used to comply with 3745-279-63 for at least three years? [3745-279-63(D)] Yes ___ No N/A ___ RMK# ___

47. Does the used oil burner:
a. Only store used oil in tanks, containers; or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-64(A)] Yes ___ No N/A ___ RMK# ___

b. Only stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-64(B)] Yes ___ No N/A ___ RMK# ___

c. Provided secondary containment for containers as required by 3745-279-64(C)? Yes ___ No N/A ___ RMK# ___

- d. Provided secondary containment for existing aboveground tanks as required by 3745-279-64(D)? Yes ___ No N/A ___ RMK# ___
- e. Provided secondary containment for new aboveground tanks as required by 3745-279-64(E)? Yes ___ No N/A ___ RMK# ___
- f. Labeled all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-64(F)] Yes ___ No N/A ___ RMK# ___
- g. Upon detection of a release of used oil, done the following in accordance with 3745-279-64(G):
- i. Stopped the release? Yes ___ No N/A ___ RMK# ___
 - ii. Contained the release? Yes ___ No N/A ___ RMK# ___
 - iii. Cleaned up and managed the used oil and other materials? Yes ___ No N/A ___ RMK# ___
 - iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A ___ RMK# ___
48. Does the used oil burner keep a record of each used oil shipment accepted for burning? [3745-279-65(A)] Yes ___ No N/A ___ RMK# ___
- a. Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-65(A)(1)] Yes ___ No N/A ___ RMK# ___
 - b. Does each record include the name and address of the generator or processor/re-refiner who sent the used oil to the burner? [3745-279-65(A)(2)] Yes ___ No N/A ___ RMK# ___
 - c. Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-65(A)(3)] Yes ___ No N/A ___ RMK# ___
 - d. Does each record include the U.S. EPA ID# (if applicable) of the generator or processor/re-refiner who sent the used oil to the burner? [3745-279-65(A)(4)] Yes ___ No N/A ___ RMK# ___
 - e. Does each record include the quantity of the used oil accepted? [3745-279-65(A)(5)] Yes ___ No N/A ___ RMK# ___
 - f. Does each record include the date of acceptance? [3745-279-65(A)(6)] Yes ___ No N/A ___ RMK# ___

49. Are the records described in 3745-27 9-65(A) maintained for at least three years? [3745-279-65(B)] Yes ___ No N/A ___ RMK# ___

50. Prior to accepting the first shipment of off-spec used oil fuel from a generator, transporter, or processor/re-refiner, does the used oil fuel burner provide to the generator, transporter, or processor/re-refiner a one-time written and signed notice certifying that:

a. The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-27 9-66(A)(1)] Yes ___ No N/A ___ RMK# ___

b. The burner will burn the used oil only in an industrial furnace or boiler identified in 3745-279-61? Yes ___ No N/A ___ RMK# ___

51. Is the certification maintained for at least three years from the date the burner last received a shipment of off-spec used oil from the generator, transporter, or processor/re-refiner? [3745-279-66(B)] Yes ___ No N/A ___ RMK# ___

52. Does the used oil burner generate residues from the storage or burning of used oil? [3745-279-67] Yes ___ No ___ N/A ___ RMK# ___

If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-67] Yes ___ No N/A ___ RMK# ___

REMARKS

STANDARDS FOR USED OIL MARKETERS

53. Does the used oil fuel marketer initiate shipments of off-spec used oil only to a used oil burner that has an a U.S. EPA ID# and burns the used oil in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-71] Yes ___ No N/A ___ RMK# ___

54. Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil meets the specification for used oil fuel under 3745-279-11 keep copies of analyses of the used oil (or other information used to make the determination) for at least three years? [3745-279-72(B)] Yes ___ No N/A ___ RMK# ___

55. Has the used oil marketer notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-73(A)] Yes ___ No N/A ___ RMK# ___

56. Does the used oil marketer keep a record of each shipment of **off-spec** used oil directed to a used oil burner? [3745-279-74(A)] Yes ___ No N/A ___ RMK# ___
- a. Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-74(A)(1)] Yes ___ No N/A ___ RMK# ___
- b. Does each record include the name and address of the burner who receives the oil? [3745-279-74(A)(2)] Yes ___ No N/A ___ RMK# ___
- c. Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-74(A)(3)] Yes ___ No N/A ___ RMK# ___
- d. Does each record include the U.S. EPA ID# of the burner? [3745-279-74(A)(4)] Yes ___ No N/A ___ RMK# ___
- e. Does each record include the quantity of the used oil shipped? [3745-279-74(A)(5)] Yes ___ No N/A ___ RMK# ___
- f. Does each record include the date of shipment? [3745-279-74(A)(6)] Yes ___ No N/A ___ RMK# ___
57. Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil **meets the fuel specifications** under 3745-279-11 keep a record of each shipment of used oil to an on-spec used oil burner? [3745-279-74(B)] Yes ___ No N/A ___ RMK# ___
- a. Does each record include the name and address of the facility receiving the shipment? [3745-279-74(B)(1)] Yes ___ No N/A ___ RMK# ___
- b. Does each record include quantity of used oil fuel delivered? [3745-279-74(B)(2)] Yes ___ No N/A ___ RMK# ___
- c. Does each record include date of shipment or delivery? [3745-279-74(B)(3)] Yes ___ No N/A ___ RMK# ___
- d. Does each record include a cross-reference to the record of used oil analysis or other information used to make the determination that the used oil meets the specification as required in 3745-279-72(A)? [3745-279-74(B)(4)] Yes ___ No N/A ___ RMK# ___
58. Are the records described in 3745-279-74(A) and (B) maintained for at least three years? [3745-279-74(C)] Yes ___ No N/A ___ RMK# ___

59. Before the used oil generator, transporter or processor/refiner directs the first shipment of off-spec used oil to a burner, does he obtain a one time written and signed notice from the burner certifying that:

a. The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-279-75(A)(1)]

Yes ___ No N/A ___ RMK# ___

b. The burner will burn the off-spec used oil only in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-75(A)(2)]

Yes ___ No N/A ___ RMK# ___

60. Is the certification maintained for at least three years from the date the last shipment of off-spec used oil was shipped to the burner? [3745-279-75(B)]

Yes ___ No N/A ___ RMK# ___

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REMARKS