



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

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JUN 20 2007

Ohio Environmental
Protection Agency
Southeast District

REPLY TO THE ATTENTION OF:

DE-9J

JUN 14 2007

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

Ms. Gail Mattson
Manager of Projects
LATA/Parallax Portsmouth, LLC
P.O. Box 855, Bldg. X-1000
Piketon, Ohio 45661

Re: Notice of Violation
RCRA Compliance Inspection
U.S. Department of Energy
Portsmouth Gaseous Diffusion Plant
Piketon, Ohio
OH7 890 008 983

Dear Mr. Murphie and Ms. Mattson:

On June 20th through June 22nd, 2006, representatives of the United States Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) inspected the U.S. Department of Energy (U.S. DOE) Portsmouth Gaseous Diffusion Plant located near Piketon, Ohio. The purpose of the inspection was to evaluate compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection checklists for your reference.

Based on information provided by U.S. DOE, LATA/Parallax and Uranium Disposal Services (UDS) personnel, review of records, and personal observations by the inspectors, U.S. EPA finds that U.S. DOE and LATA/Parallax are in violation of the following requirements of the Hazardous Waste RCRA Permit, Ohio Administrative Code (OAC) and the United States Code of Federal Regulations (C.F.R.):

- 1) A generator must retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to this rule for at least three years from the date that the waste that is the subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal. See, OAC § 3745-270-07(A)(8) and RCRA Hazardous Waste Permit Condition B.36(j).

During the UDS records review portion of the inspection, the inspectors reviewed a 6/12/2006 hazardous waste manifest for an off-site shipment of D002 corrosive waste. The Land Disposal Restriction (LDR) form had not been sent along with the original manifest/shipment, but was sent directly to the treatment, storage, disposal (TSD) facility from a consultant in Lexington, Kentucky. UDS had utilized the RCRA ID number (OH7 890 008 983) for this off-site shipment of waste. Therefore, U.S. DOE failed to comply with OAC Rule 3745-270-07(A)(2) [40 C.F.R. § 268.7] and violated RCRA Hazardous Waste Permit Condition B.36(j).

- 2) The contingency plan must describe the actions facility personnel must take to comply with OAC § 3745-54-51 through OAC § 3745-54-56 [40 C.F.R. Part 264 Subpart D]. See, OAC § 3745-54-52(a) [40 C.F.R. § 264.52(a)]. An owner or operator shall note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within fifteen days after the incident, the owner or operator shall submit a written report on the incident to the director. See, OAC § 3745-54-56(J) [40 C.F.R. § 264.56(j)] and violated RCRA Hazardous Waste Permit Condition B.23.

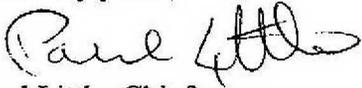
During the UDS records review portion of the inspection, the inspectors reviewed a UDS SPCC/Contingency Plan. The UDS SPCC/Contingency Plan did not contain information or procedures that included the required notification of the OEPA Director to be notified within 15 days after implementing the contingency plan. Therefore, U.S. DOE failed to comply with OAC § 3745-54-52(a) [40 C.F.R. § 264.52(a)] and violated RCRA Hazardous Waste Permit Condition B.23.

Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), U.S. EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above requirements.

You should submit your response to Walt Francis, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604. In addition, please submit a copy of your response to Melody Stewart at the OEPA Southeast District Office, 2195 Front Street, Logan, Ohio 43138.

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

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Paul Little".

Paul Little, Chief
Compliance Section # 2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosures

cc: Melody Stewart, OEPA-Southeast District Office

UNITED STATES 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 19th through June 22nd, 2006

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

10/3/06
Date

ACCEPTED BY: Paul Little
Paul Little, Chief
Compliance Section 2
Enforcement and Compliance Assurance Branch

10-3-06
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) and the Ohio Administrative Code (OAC), with respect to U.S. DOE's management of hazardous waste, universal waste and used oil, as part of a U.S. EPA, Region 5 multi-media inspection.

Participants

U.S. EPA Inspector -
Walt Francis, Environmental Scientist

OEPA Inspector -
Melody Stewart, Hazardous Waste Inspector

Representatives of U.S. DOE, Theta/Pro2Serve Management Company (TPMC),
LATA/Parallax, and Uranium Disposal Services (UDS) -
Melda Rafferty, U.S. DOE
Bob Anderson, TPMC
Cliff Beeks, LATA/Parallax
Rosemary Richmond, LATA/Parallax
Evelyn Hayes, UDS
Steve Gertz, UDS
Tom Marshall, UDS

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 TSDs in the U.S. 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. During the past year, numerous shipments of hazardous waste were manifested off-site by both U.S. DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and U.S. DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for U.S. DOE and USEC. 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 Envirocare of Utah, Inc., Clive, Utah. 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 19, 2006, U.S. EPA representatives conducted an overview of the multi-media inspection in Building X-1000 with representatives from U.S. DOE, LATA/Parallax, TPMC, UDS, USEC, USEC Centrifuge, Inc. and OEPA representatives. Ms. Melda Rafferty provided an overview of the Portsmouth Gaseous Diffusion Plant. Walt Francis arrived at the meeting at approximately 10:00 a.m. The inspection team was provided a general site tour which included: Buildings X-770, X-710, X-300, X-720, X-105, X-744G, X-623, X-344, UDS Building under construction, X-7725, Lithium Storage Buildings, Water Treatment Plant, X-735, Lime Sludge Beds/Prairie Restoration Area; X-746, X-744 J & H; X-749 and Building X-7725 Centrifuge Pilot Project.

Walt Francis and Melody Stewart informed the U.S. DOE and LATA/Parallax representatives of the nature, scope, and procedures of the RCRA portion of the 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

On June 21, 2006, the walk-through began in Building X-627 where U.S. DOE maintains a 55-gallon satellite accumulation container for waste TCE. The walk-through continued in Building X-623 where U.S. DOE maintains a less than 90 day area and a satellite accumulation area for waste TCE. No containers were observed in the less than 90 day accumulation area. The walk-through continued at Building X-700 where we observed an area utilized for accumulating universal waste such as used fluorescent lamps, and waste batteries and two SAAs for used solvent rags and used aerosol cans. The walk-through continued at Building X-622 where U.S. DOE maintains an SAA area for F001 personal protective equipment (PPE), waste plastic, and filters. The walk-through continued at Building X-624 where U.S. DOE maintains an SAA area for waste TCE such as used PPE and bag filters. The walk-through continued at Building X-333, DMSA 13, Column Ux 48, where U.S. DOE maintains one 55-gallon SAA container. In Building X-330 the inspectors observed another SAA container. The walk-through continued at Building X-326 where U.S. DOE maintains an SAA at DMSA, Column F2, and the Permitted "L Cage Area." In the L Cage, the inspectors walked around the containers in storage. In row #24, Inspector Francis observed a plastic bag and label that had fallen off of a container, due to the plastic bag deteriorating. The walk-through continued at Building X-7725, where U.S. DOE maintains areas for hazardous waste storage, and we met Mr. Charles Bearhs. Mr. Bearhs took the inspectors to Areas L, H, G, Q, P, P-1, N-1, 4A, B, and an area on the first floor for accumulating universal waste (used fluorescent lamps, mercury thermostats, and used batteries).

The walk-through continued at the UDS offices, where the inspectors met Evelyn Hayes, Steve Gertz and Tom Marshall. Ms. Hayes provided an overview of the UDS construction activities and future plans for recovery of depleted uranium at the Portsmouth site. Ms. Hayes also provided a copy of a hazardous waste manifest, training records for UDS personnel and a copy of the UDS Portsmouth Spill Prevention Control and Countermeasures Plan.

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

On June 22, 2006, the inspectors returned to the UDS office for a safety briefing and tour of the depleted UF6 cylinder yards with Evelyn Hayes and Tom Marshall. The walk-through included Yards E, C, and G.

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, personnel training records, waste profiles, and weekly inspection logs. The inspectors reviewed a

Contingency Plan that was last updated in February 2006.

Closing Conference

The inspectors conducted a closing conference on June 22, 2006. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. Kevin Vuillemeir explained that the RCRA report would be incorporated into the U.S. EPA, Region 5 multi-media 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 noted that during the records review portion of the inspection, the inspectors reviewed a 6/12/06 hazardous waste manifest for an off-site shipment of D002 corrosive waste from the UDS area. The Land Disposal Restriction Form had not been sent along with the manifest, but was sent directly to the TSD from a consultant in Lexington, Kentucky. Also, the UDS SPCC/Contingency Plan did not include the required text for the OEPA Director to be notified within 15 days after implementing the contingency plan.

Attachments

Inspection Checklists.

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

**DIVISION OF HAZARDOUS WASTE MANAGEMENT
OHIO EPA
June 2006**

Table of Contents
U.S. DOE - Portsmouth Gaseous Diffusion Plant
04-66-0680

RCRA Inspection Checklist	1
General Conditions of Permit	2
General Permit Compliance and Activities	2
Permit Modification, Revision, Revocation	5
Site Entry - Availability of Records	7
Recordkeeping Requirements	7
Confidentiality	7
Operating Record	7
Annual Report Requirement	9
Sampling/monitoring Recordkeeping Requirements	9
Waste Minimization Requirements	10
Off-site Shipments/manifest Requirements	11
Manifest Requirements/wastes Received On-site	11
Waste Analysis/waste Analysis Plan	11
General Requirements	12
Waste Analysis Quality Assurance Requirements	12
General Inspection Requirements	14
Security Provisions/facility Operation	15
Personnel Training	16
Required Equipment	16
Contingency Plan Requirements	17
Emergency Procedures	17
Emergency Authorities	18
Emergency Coordinator	18
Amendment of Plan	18
Implementation of Plan	19
Contingency Plan Requirements	20
Closure Plan/amendment	20
Closure Activities	20
Requirements for Ignitable, Reactive or Incompatible Wastes	22
Storage of Hazardous Wastes in Containers	24
Condition of Containers	25
Inspections	25
Containment System	26
Required Aisle Space	27
Closure and Post-closure	27
Container Storage of Residual Waste	27
Land Disposal Restriction Requirements	28
Prohibition Against Dilution	28
Generator Requirements	28
Notification/certification	29
Storage of Land Disposal Restricted Wastes	31

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

Facility: Portsmouth Gaseous Diffusion Plant Ohio Permit #: 04-66-0680

Co-operator: LATA/Parallax Portsmouth, LLC

Address: 3930 U.S. Route 23 South USEPA ID#: OH7 890 008 983
Piketon, OH 45661 Facility Phone: 740-897-5010

County: Pike Time: 8:00 -

Inspection Date: ~~6/19/06 - 6/20/06~~ 6/19/06 - 6/22/06

Advance notice of inspection given? (Yes) (No)
If so, how far in advance? _____

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspector(s):	<u>Walt Francis</u>	<u>U.S. EPA</u>	<u>312-353-4921</u>
	<u>Melody Stewart</u>	<u>Ohio EPA</u>	<u>740-380-5256</u>
Facility Representative(s):	<u>Melda Rafferty</u>	<u>U.S. DOE</u>	<u>740-897-5010</u>
	<u>Rosemary Richmond</u>	<u>LPP</u>	<u>740-897-5010</u>

Is facility operating as a generator? Yes No

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

PERMIT STATUS

Permit Issued: March 15, 2001
Permit Effective Date: March 15, 2001
Permit Expiration Date: March 15, 2006

STORAGE		TREATMENT		DISPOSAL	
<input checked="" type="checkbox"/>	Container	<input type="checkbox"/>	Tank	<input type="checkbox"/>	Injection Well
<input type="checkbox"/>	Tank	<input type="checkbox"/>	Surface Impoundment	<input type="checkbox"/>	Landfill
<input type="checkbox"/>	Waste Pile	<input type="checkbox"/>	Incinerator	<input type="checkbox"/>	Land Application
<input type="checkbox"/>	Surface Impoundment	<input type="checkbox"/>	Thermal Treatment	<input type="checkbox"/>	Surface Impoundment

GENERAL CONDITIONS OF PERMIT

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so: Yes__ No N/A __ RMK#__
- a. Is the permittee continuing any activity regulated by the permit after the expiration date of the permit? Yes__ No__ N/A RMK#__
- b. Has the facility submitted an application for a permit renewal to the director no later than 180 days prior to the expiration date of the permit? (Or upon a later date if the permittee can demonstrate good cause for late submittal.) [Condition A.6.(a)] Yes__ No__ N/A RMK#__

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 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 N/A __ RMK#__
4. Have any provisions of the permit been identified as invalid? [Condition A.4.] Yes__ No N/A __ RMK#__
5. Has the facility identified any instances of noncompliance with the permit, RC Chapter 3734. or the rules adopted thereunder, which may endanger human health or the environment? If so: Yes__ No 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 X RMK# ___
- ii. Information concerning a release of hazardous waste, fire or explosion at the facility which could threaten human health or the environment outside the facility, including a description of:
- A. Name, address and telephone number of the owner or operator? Yes ___ No ___ N/A X RMK# ___
- B. Name, address and telephone number of the facility? Yes ___ No ___ N/A X RMK# ___
- C. Name and quantity of material(s) involved? Yes ___ No ___ N/A X RMK# ___
- D. The extent of injuries, if any? Yes ___ No ___ N/A X RMK# ___
- E. An assessment of the actual or potential hazard to the environment and human health outside the facility where this is applicable? Yes ___ No ___ N/A X RMK# ___
- F. Estimated quantity and disposition of recovered material that resulted from the incident? Yes ___ No ___ N/A X RMK# ___
6. Did the permittee provide a written report to Ohio EPA's Emergency Response 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 X RMK# ___
- a. A description of the noncompliance and its cause (including exact dates and times)? Yes ___ No ___ N/A X RMK# ___
- b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? Yes ___ No ___ N/A X 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 X RMK# ___

Note: *The permittee need not comply with the five day written report requirement if the director, upon good cause shown by the permittee, waives that requirement and the permittee submits a written report within 15 days of the time the permittee 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 X RMK#__

8. Has the permittee identified any other instances of noncompliance not provided for in Question 5? Yes__ No__ N/A X 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 X RMK#__

b. Do the reports provided contain the information set forth in Condition A.20? Yes__ No__ N/A X RMK#__

9. Has the permittee planned any physical alterations or additions to the permitted facility? Yes__ No X N/A __ RMK#__

a. If so, has the facility provided Ohio EPA with notice of such changes? [Condition A.15] Yes__ No__ N/A X RMK#__

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

REMARKS

ERMIT MODIFICATION, REVISION, REVOCATION

Has the permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.]

Yes No ___ N/A ___ RMK# ___

Has the permit been transferred to a new owner or operator? [Condition A.18.] If so, *Co-owner LPP.*

Yes No 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 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 RMK# ___

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 RMK# ___

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 No ___ N/A ___ RMK# ___

Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10]

Yes No ___ N/A ___ RMK# ___

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 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 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 No ___ N/A ___ RMK# ___

8. Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14.(c)]

Yes No ___ N/A ___ RMK# ___

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 No ___ N/A ___ RMK# ___

b. Have access to and copy any records required to be kept under the conditions of the permit?

Yes 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 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 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 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 No ___ N/A ___ RMK# ___

b. Method(s) and date(s) of treatment, storage or disposal at the facility?

Yes No ___ N/A ___ RMK# ___

- c. The location of each hazardous waste within the facility and the quantity at each location? Yes X 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 X No ___ N/A ___ RMK# ___
- b. Contingency plan in accordance with OAC rule 3745-54-53 and the conditions of the permit? Yes X No ___ N/A ___ RMK# ___
- c. Closure plan in accordance with OAC rule 3745-55-12 and the conditions of the permit? Yes X No ___ N/A ___ RMK# ___
- d. Personnel training plan and records required by OAC rule 3745-54-16 and the conditions of the permit? Yes X 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 X No ___ N/A ___ RMK# ___
4. Have any of the documents identified in Question #3 been revised as required by the permit? If so,
- a. Has the permittee submitted the revisions to Ohio EPA? [Condition A.28.(b)] Yes X 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 X 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 X No ___ N/A ___ RMK# ___

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 No ___ N/A ___ RMK# ___

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 No ___ N/A ___ RMK# ___
 - b. Individual(s) who performed the sampling or measurement? Yes No ___ N/A ___ RMK# ___
 - c. Date(s) analyses were performed? Yes No ___ N/A ___ RMK# ___
 - d. Individual(s) who performed the analyses? Yes No ___ N/A ___ RMK# ___
 - e. Analytical technique(s) or method(s) used? Yes No ___ N/A ___ RMK# ___
 - f. Results of such analyses? Yes No ___ N/A ___ RMK# ___
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 No ___ N/A ___ 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 ___ No N/A ___ 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 ___ No ___ N/A RMK# ___

WASTE MINIMIZATION REQUIREMENTS

10. 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 No ___ N/A ___ RMK# ___

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 No ___ N/A ___ RMK# ___

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 No ___ N/A ___ RMK# ___

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 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?
- a. Did the permittee attempt to reconcile the discrepancy? [Condition B.24.] Yes ___ No ___ N/A 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 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 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 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 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 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 No ___ N/A ___ 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 ___ No N/A ___ RMK# ___
- a. Were the waste analysis procedures described in Section C of the approved permit application followed? Yes ___ No ___ N/A 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 No ___ N/A ___ 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 No ___ N/A ___ 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 No ___ N/A ___ 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 No ___ N/A ___ RMK# ___
- b. Using approved sampling/analytical methods? Yes No ___ N/A ___ RMK# ___
- c. Verifying the validity of sampling and analytical procedures and performance of correct calculations? Yes No ___ N/A ___ 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 No N/A 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 No N/A RMK# 1

- 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 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?
 - a. Is the schedule kept at the facility? [OAC 3745-54-15(B)(2)] Yes 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 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 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 No N/A RMK#

- 5. Is the permittee maintaining records of inspections for a minimum of three years? [Condition B.5.] Yes 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 No N/A RMK#

 - b. Signature of inspector? Yes No N/A RMK#

 - c. Notation of observations made? Yes No N/A RMK#

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

Yes 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 No ___ N/A ___ RMK# ___

b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility; or

Yes No ___ N/A ___ RMK# ___

c. A means to control entry, at all times, through gates or other entrances, to the active portion of the facility?

Yes No ___ N/A ___ RMK# ___

2. In accordance with OAC rule 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 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 No ___ N/A ___ RMK# ___

REMARKS

~~RMK #1 - Building 200 - OSHA inspector unable to view certain equipment and facility~~
~~inspectors~~

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 X No ___ N/A ___ RMK# ___

b. The facility provides personnel training to new employees within six months after their date of employment as required by OAC 3745-54-16(B)?

Yes X No ___ N/A ___ RMK# ___

c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(B)?

Yes X No ~~___~~ N/A ___ RMK# ~~___~~

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

Yes X No ___ N/A ___ RMK# ___

REQUIRED EQUIPMENT

1. 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 X No ___ N/A ___ RMK# ___

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 X No ___ N/A ___ RMK# ___

3. Whenever hazardous waste is being managed at the facility, has the permittee provided all personnel involved in the operation with immediate access to an internal alarm or emergency communication device as required by OAC rule 3745-54-34 and Section G of the approved permit application? [Condition B.11.]

Yes X No ___ N/A ___ RMK# ___

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 No ___ N/A ___ RMK# ___
 - ii. Properties of hazardous waste and mixed waste managed at the facility and associated hazards? Yes No ___ N/A ___ RMK# ___
 - iii. Places where facility personnel will normally be working? Yes No ___ N/A ___ RMK# ___
 - iv. Entrances to and roads inside the facility? Yes No ___ N/A ___ RMK# ___
 - v. Evacuation routes as depicted in Section G of the permit application? Yes 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 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 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 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 X N/A ___ RMK# ___
- a. Has the permittee documented the refusal in the operating record as required by OAC rule 3745-54-37(B)? [Condition B.13.(b)] Yes ___ No ___ N/A X RMK# ___
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 X 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 X 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 X 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 X No ___ N/A ___ RMK# ___

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 X No ___ N/A ___ RMK# ___

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 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 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 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 RMK#__
- i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23.] *Note: See also Conditions A.21. and A.22. of the permit for additional reporting/recordkeeping requirements.* Yes__ No__ N/A 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 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 No ___ N/A ___ RMK# ___
- 2. Has the permittee amended the closure plan? If so, Yes ___ No N/A ___ RMK# ___
 - a. Has the plan been amended in accordance with OAC rule 3745-55-12(C)? [Condition B.28.] Yes ___ No ___ N/A RMK# ___

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

CLOSURE ACTIVITIES

- 3. Has the permittee closed the facility? If so, Yes ___ No 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 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 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 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 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 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 X 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 X 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 X 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 X 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 X 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 X 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 X 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 X 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 X 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 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 No ___ N/A ___ 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 No ___ N/A ___ 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 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 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 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 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 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 No ___ N/A ___ RMK# ___

CONDITION OF CONTAINERS

8. Are containers holding hazardous wastes in good condition? [Condition C.3.] Yes 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 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 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 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 No ___ N/A ___ RMK# ___
12. Are lab-pack wastes handled in compliance with applicable storage requirements? [Condition C.5.(c)] Yes 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 No ___ N/A ___ RMK# ___

INSPECTIONS

14. 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 No ___ N/A ___ 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 No ___ N/A ___ 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 No ___ N/A ___ RMK# ___

CONTAINMENT SYSTEM

15. Does the permittee maintain the containment system as described in Section D of the approved Part B permit application, including: [Condition C.6.]

Yes 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 No ___ N/A ___ RMK# ___

- b. A system which is free of gaps and sufficiently impervious to contain leaks and spills?

Yes No ___ N/A ___ RMK# ___

- c. Equipped with a coating which is compatible with each waste stored in the area?

Yes No ___ N/A ___ RMK# ___

- d. *For those wastes which are deemed incompatible with liner material:* Has the permittee installed a separate secondary containment structure within the existing structure which is equipped with a compatible liner?

Yes ___ No ___ N/A RMK# ___

16. Has the permittee had a spill or leak of wastes or an accumulation of precipitation in the containment system? If so,

Yes ___ No 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 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 RMK# ___

REQUIRED AISLE SPACE

17. 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 No ___ N/A ___ RMK# ___

CLOSURE AND POST-CLOSURE

18. 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 RMK# ___
19. 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 RMK# ___

CONTAINER STORAGE OF RESIDUAL WASTE

20. 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 No ___ N/A ___ RMK# ___

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 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 N/A ___ RMK# ___
- a. As a substitute for adequate treatment to achieve compliance with LDR treatment standards? Yes ___ No ___ N/A 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 RMK# ___
- c. To otherwise avoid a prohibition in OAC rule 3745-270-30 through -39? Yes ___ No ___ N/A RMK# ___
- d. To otherwise avoid a prohibition imposed by Section 3004(d) of RCRA? Yes ___ No ___ N/A 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 No ___ N/A ___ RMK# ___
- 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 No ___ N/A ___ RMK# ___
- 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 No ___ N/A ___ RMK# ___

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 No ___ N/A ___ RMK# ___
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 No ___ N/A ___ RMK# ___
6. Does the entity generate any listed waste(s) which are restricted from land disposal? If so, Yes No ___ N/A ___ RMK# ___
- a. Do such wastes also exhibit hazardous waste characteristics as identified in OAC rules 3745-51-20 to 3745-51-24? Yes No ___ N/A ___ RMK# ___
- 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 No ___ N/A ___ RMK# ___

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

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 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 No ___ N/A ___ RMK# ___
- b. Appropriate treatment standard for the waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes 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 No ___ N/A ___ RMK# ___
- d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes No ___ N/A ___ RMK# ___
- e. Applicable wastewater/non-wastewater category [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes 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 No ___ N/A ___ RMK# ___
- g. For contaminated soil list the constituents subject to treatment as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. Yes No ___ N/A ___ RMK# ___

8. **For wastes that meet treatment standards:** Does the generator submit a one-time written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes ___ No ___ N/A RMK# ___

If so, does the notice/certification including the following:

- a. EPA hazardous waste identification number? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes ___ No ___ N/A RMK# ___
- b. The corresponding treatment standards and applicable prohibitions for the waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes ___ No ___ N/A RMK# ___
- c. The manifest number associated with the shipment of waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes ___ No ___ N/A RMK# ___

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes ___ No ___ N/A X RMK# ___

e. Is the certification signed by the generator or an authorized representative? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes ___ No ___ N/A X RMK# ___

f. For contaminated soil list the constituents subject to treatment as described as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. Yes ___ No ___ N/A X RMK# ___

9. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years? [OAC rule 3745-270-07(A)(8); Condition B.36.(j)] Yes ~~___~~ No X N/A ___ RMK# ___
UDS 0002 5/4/05 6/12/06 - no LDR Form in File.

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

NOTE: The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate LDR wastes that do not meet treatment standards in tanks or containers. A LQG who stores LDR wastes on-site for greater than 90 days becomes a operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.

NOTE: The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [OAC rule 3745-270-50(E); 40 CFR 268.50(e)]

10. Is the owner/operator storing LDR restricted wastes in containers? If so, is each container marked with the following information in accordance with OAC rule 3745-270-50(A)(2)(a) [Condition B.36(l)] Yes X No ___ N/A ___ RMK# ___

a. The identification of the contents? Yes X No ___ N/A ___ RMK# ___

b. The date which accumulation began? Yes X No ___ N/A ___ RMK# ___

NOTE: A TSD facility may store LDR wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [OAC rule 3745-270-50(B)]. During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.

11. Are LDR wastes being stored at the facility for greater than one year? If so,

- a. Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [OAC rule 3745-270-50(B); Condition B.36(m)]

Yes No N/A RMK#

**RCRA HAZARDOUS WASTE GENERATOR
INSPECTION CHECKLIST**

Company: Portsmouth Gaseous Diffusion Plant EPA ID#: OH7 890 008 983

Street: 3930 US Route 23 South City: Piketon

County: Pike State: Ohio Zip: 45661

Mailing Address: PO Box 700, Piketon, Ohio 45661-0700

(If different from above)

Telephone: 740-897-5010 Fax #: _____

Owner/Operator: Federal Government/Co-Operator LATA/Parallax Portsmouth, LLC
(If different from above)

Street: _____

City: _____ State: Ohio Zip: _____

Inspection Date(s): 6/19/2006 - 6/22/2006 Time(s): 8:00 am -

Inspection Announced? Yes NO If so, how much advance notice given? _____

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>Melody Stewart</u>	<u>OEPA</u>	<u>740-380-5256</u>
	<u>Walt Francis</u>	<u>U.S. EPA</u>	<u>312-353-4921</u>
Facility Representative:	<u>Melda Rafferty</u>	<u>U.S. DOE</u>	<u>740-897-897-5010</u>
	<u>Rosemary Richmond</u>	<u>LATA/Parallax Portsmouth, LLC</u>	<u>740-897-2967</u>

Complete All Other Applicable Checklists	
Generator Classification	Waste Management Activity
<input type="checkbox"/> Conditionally Exempt SQG (CESQG)	<input checked="" type="checkbox"/> Containers
<input type="checkbox"/> Small Quantity Generator (SQG)	<input type="checkbox"/> Tank(s)
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)	<input type="checkbox"/> Land Disposal Requirements (LDR)
<input type="checkbox"/> No Generation	<input type="checkbox"/> Used Oil
	<input checked="" type="checkbox"/> Universal Waste
	<input type="checkbox"/> Other

CESQG: < 100 Kg. (approximately 25-30 gallons) of waste in a calendar month
 SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month
 LQG: > 1,000 Kg. (~300 gallons) of waste in a calendar month or > 1 Kg. of acutely hazardous waste in a calendar month
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

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 U.S. DOE 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-3012
-X-333	-X-330
-X-622T	-X-747H
-X-3346	

Other Areas - X-744G Uranium Management Center

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.

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 RCRA 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.

POLLUTION PREVENTION

Note to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention (P2) practices that the company may have initiated or attempted to initiate. The checklist is also used to:

- Facilitate P2 discussions;
- Identify barriers to P2;
- Define the P2 universe;
- Identify the need for future P2 initiatives;
- Identify partnership opportunities; and
- Link companies with better P2 resources.

As a prelude to completing this checklist the inspector should use the following list of questions as a way to initiate a dialogue concerning P2:

1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate?
2. What is the largest waste stream that you generate?
3. How important would it be to you to eliminate that waste stream?
4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have?
5. Could you use better housekeeping practices to reduce the amount of waste that you generate?

If the company responds with one of the answers below, the appropriate box should be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided or in the remarks section.

1. Has the company undertaken any P2 activities to reduce the amount of hazardous waste generated? Yes ___ No ___ N/A ___ RMK# ___

a. *If so*, what has the company done to minimize hazardous waste generation?

- A change in the process resulting in less waste.
- A change in the product resulting in less waste.
- Use of fewer and less toxic hazardous raw materials.
- Better operations/improved housekeeping.
- On-site recycling/reuse of hazardous materials.
- Sending waste off-site for recycling/reuse.
- Other activities (specify): _____

b. *If so*, what hazardous wastes have been addressed?

- Solvents
- Paint related wastes

- Industrial process wastes (sludges, slags, contaminated waste waters, etc)
- Contaminated oils/hydraulic fluids
- Off-spec chemicals
- Fluorescent light bulbs
- Used batteries
- Shop rags
- Other (specify): _____

c. *If not, why hasn't the company considered P2?*

- The company just never thought about it
- Lack of information about practical alternatives
- Lack of capital to make process changes
- Lack of internal management support
- The company does not generate enough hazardous waste to consider P2
- Other reason given (specify): _____

- | | | |
|----|---|---|
| 2. | Does the company plan to do P2 activities in the future? | Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK# ___ |
| 3. | Would the company be interested in receiving additional information from Ohio EPA about P2? | Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK# ___ |
| 4. | Did you give the company information about P2 during the inspection? | Yes <input checked="" type="checkbox"/> No ___ N/A ___ RMK# ___ |
| 5. | Would the company like a P2 assessment? | Yes ___ No <input checked="" type="checkbox"/> N/A ___ RMK# ___ |

If the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the Pollution Prevention Assessments for Hazardous Waste Generators document and discuss it with them.

6. If the company does not want a P2 assessment, why not? *Company has Airborn in place.*

REMARKS

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A ___ RMK# ___
2. Has the generator obtained an identification number? [3745-52-12] Yes No N/A ___ RMK# ___
3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41] Yes No N/A ___ RMK# ___

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? If so: Yes ___ No N/A ___ RMK# ___
- a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] Yes ___ No N/A RMK# ___
- b. Has the generator complied with special manifest requirements? [3745-52-54] Yes ___ No N/A RMK# ___
- c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] Yes ___ No N/A RMK# ___
- d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes ___ No N/A RMK# ___
- e. Are export related documents being maintained on-site? [3745-52-57] Yes ___ No N/A RMK# ___

GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so: Yes ___ No N/A ___ RMK# ___
- a. Describe the unit(s) which the generator has closed.
- b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]. Yes ___ No N/A RMK# ___

- c. Please provide a description of the documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standards.

NOTE: *If the generator has closed a <90-day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]*

REMARKS

MANIFEST REQUIREMENTS

You must start this part of the inspection by telling the company representative about the certification statement on the hazardous waste manifest using the following question and statement:

Are you aware of what the statement that you sign on the manifest says? Yes No

If the answer is no, show them what the statement says using a signed manifest.

NOTE: *While the statement is a certification that a P2 strategy is in place, signing the statement does not establish any legal obligations with which the company must comply. In other words, there is no violation of the hazardous waste rules if they sign the manifest and they don't have a program in place.*

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

2. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Yes No N/A RMK#

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

3. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] Yes No N/A RMK#

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

4. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: Yes No N/A RMK#

a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes No N/A RMK#

5. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] Yes No N/A RMK#

6. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: Yes No N/A RMK#

a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)] Yes No N/A RMK#

b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]

Yes No N/A RMK# _____

7. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]

Yes No N/A RMK# _____

REMARKS

PERSONNEL TRAINING

1. Does the generator keep records required by 3745-65-16(D) including:
- a. Job titles, as they relate to hazardous waste management, and the name of each employee filling each job? Yes No N/A ___RMK#___
 - b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? Yes No N/A ___RMK#___
 - c. Type and amount of both introductory and continuing training to be given to each person filling a position? Yes No N/A ___RMK#___
 - d. Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)? Yes No N/A ___RMK#___

NOTE: *If the facility's business practices precludes written job titles/descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.*

2. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes No N/A ___RMK#___
3. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]
- a. Emergency procedures? Yes No N/A ___RMK#___
 - b. Emergency equipment? Yes No N/A ___RMK#___
 - c. Emergency systems? Yes No N/A ___RMK#___
4. Does emergency training described in 3(a), (b) and (c) above include, *where applicable*: [3745-65-16(A)(3)(a-f)]
- a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? Yes No N/A ___RMK#___

- b. Key parameters for automatic waste feed cut-off systems? Yes No N/A ___ RMK# ___
- c. Communication or alarm system? Yes No N/A ___ RMK# ___
- d. Response procedures for fire/explosions? Yes No N/A ___ RMK# ___
- e. Response to groundwater contamination incidents? Yes No N/A ___ RMK# ___
- f. Shutdown procedures? Yes No N/A ___ RMK# ___
- 5. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A ___ RMK# ___
- 6. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes No N/A ___ RMK# ___
- 7. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A ___ RMK# ___
- 8. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes No N/A ___ RMK# ___
- 9. Are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes No N/A ___ RMK# ___

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

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date(s) Trained</u>

REMARKS

CONTINGENCY PLAN

1. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]
- a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? Yes No N/A ___RMK#___
- b. Arrangements/agreements with emergency authorities? [3745-65-37] Yes No N/A ___RMK#___
- c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? Yes No N/A ___RMK#___
- d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? Yes No N/A ___RMK#___
- e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary? Yes No N/A ___RMK#___

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

2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes No N/A ___RMK#___
3. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)(B)] Yes No N/A ___RMK#___
4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] Yes No N/A ___RMK#___

EMERGENCY COORDINATOR

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

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

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes ___ No N/A ___ RMK# ___
- a. Was the contingency plan implemented? [3745-65-51(B)] Yes ___ No N/A RMK# ___
- b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes ___ No N/A RMK# ___
- c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes ___ No N/A RMK# ___

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

REMARKS

PREPAREDNESS AND PREVENTION [3745-52-34(A)(4)]

1. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes No N/A ___ RMK# ___
2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]
- a. Internal alarm system? Yes No N/A ___ RMK# ___
- b. Emergency communication device? Yes No N/A ___ RMK# ___
- c. Portable fire control, spill control and decon equipment? Yes No N/A ___ RMK# ___
- d. Water of adequate volume/pressure? Yes No N/A ___ RMK# ___
3. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes No N/A ___ RMK# ___
4. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33] Yes No N/A ___ RMK# ___
5. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32*)? [3745-65-34] Yes No N/A ___ RMK# ___
6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A ___ RMK# ___
7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes No N/A ___ RMK# ___
- a. Where authorities have declined to enter into arrangements/agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes ___ No N/A RMK# ___

REMARKS

GENERATOR ACCUMULATION

Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)]

Yes No N/A ___ RMK# ___

SATELLITE ACCUMULATION AREA REQUIREMENTS [3745-52-34(C)(1)]

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

- a. Are at or near a point of generation? Yes No N/A ___ RMK# ___
- b. Are under the control of the operator of the process generating the waste? Yes No N/A ___ RMK# ___
- c. Do not exceed a total of 55 gallons of hazardous waste? Yes No ___ N/A ___ RMK# ___
- d. Do not exceed one quart of acutely hazardous waste at any one time? Yes No N/A ___ RMK# ___
- e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? Yes No N/A ___ RMK# ___

NOTE: *The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to Ohio EPA's November 1994 Guidance on the Location of Satellite Accumulation Areas.*

Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so: Yes ___ No N/A ___ RMK# ___

- a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? Yes ___ No N/A RMK# ___
- b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? Yes ___ No N/A RMK# ___

MARKING AND MANAGEMENT OF CONTAINERS

Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]

Yes No N/A ___ RMK# ___

5. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No N/A ___RMK#___
6. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A ___RMK#___
- b. In good condition? [3745-66-71] Yes No N/A ___RMK#___
- c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A ___RMK#___
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A ___RMK#___
7. Is the container accumulation area(s) inspected weekly? [3745-66-74] (Note location in general information section of checklist) Yes No N/A ___RMK#___
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A ___RMK#___
8. For ignitable and/or reactive hazardous waste(s):
- a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes No N/A ___RMK#___
- b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] Yes No N/A ___RMK#___

PRE-TRANSPORT REQUIREMENTS

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

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REMARKS

LDR REQUIREMENTS

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

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

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

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

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

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

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

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

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

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

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

6. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [3745-270-07(A)(1)] Yes No N/A ___ RMK# ___

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

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

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

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

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

a. The facility can dispose of hazardous waste in a on-site landfill, or surface impoundment.[3745-270-05]

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

a. The facility can land dispose of the waste. [3745-270-06]

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? Yes ___ No N/A ___ RMK# ___

If so:

- a. Has the facility complied with 3745-270-04? Yes ___ No N/A RMK# ___

REMARKS

NOTIFICATION AND CERTIFICATION REQUIREMENTS

12. If a generators' waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1? [3745-270-07(A)(2)] Yes No N/A ___ RMK# ___
13. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1? [3745-270-07(A)(3)] Yes No N/A ___ RMK# ___
14. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1? [3745-270-07(A)(4)] Yes ___ No N/A RMK# ___
15. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1? [3745-270-07(A)(9)] Yes ___ No N/A RMK# ___
16. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so: Yes No ___ N/A ___ RMK# ___
- a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes No N/A ___ RMK# ___

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

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

NO LDR FROM LDI SITE & DUE
REMARKS

6/12/06

GENERATORS TREATING HAZARDOUS WASTE

1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? Yes ___ No N/A ___ RMK# ___
2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)] Yes ___ No N/A RMK# ___
- a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] Yes ___ No N/A RMK# ___
- b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes ___ No N/A RMK# ___
3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes ___ No N/A RMK# ___
4. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes ___ No N/A RMK# ___

NOTE: If the waste is a characteristic waste, which has been treated to render it non hazardous and subsequently sent to a solid waste landfill, proceed to question 7 & 8.

5. Has the generator sent a notification and certification with the initial shipment of waste? [3745-270-07(A)(5)(c)] Yes ___ No N/A RMK# ___
6. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] Yes ___ No N/A RMK# ___
7. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following:
- i. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes ___ No N/A RMK# ___
- ii. A description of the waste, including EPA hazardous waste numbers and treatability group, and UHCs? [3745-270-09(D)(1)(b)] Yes ___ No N/A RMK# ___

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

8. Has the process/operation generating the waste or the solid waste landfill facility changed? If so: Yes ___ No ___ N/A X RMK# ___

a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] Yes ___ No N/A X RMK# ___

b. Has the director been notified of such changes? [3745-270-09(D)] Yes ___ No N/A X RMK# ___

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

9. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: Yes ___ No ___ N/A X RMK# ___

a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49(C)] Yes ___ No N/A X RMK# ___

10. Does each notification/certification form completed, contain the information found in Table 1? [3745-270-07(A)(3)] Yes ___ No N/A X RMK# ___

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

REMARKS

HAZARDOUS DEBRIS

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)? Yes ___ No ___ N/A X RMK# ___
2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.) Yes ___ No ___ N/A X RMK# ___
3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so: Yes ___ No ___ N/A X RMK# ___
- a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)] Yes ___ No N/A X RMK# ___
- NOTE:** *If immobilization has been used in a treatment train, it must be the last treatment technology used.*
4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so: Yes ___ No ___ N/A X RMK# ___
- a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] Yes ___ No N/A X RMK# ___
5. Is the waste a PCB waste under 40 CFR Part 761? If so: Yes ___ No ___ N/A X RMK# ___
- a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 270? [3745-270-45(A)(5)] Yes ___ No N/A X RMK# ___
6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)] Yes ___ No N/A X RMK# ___
7. Does the owner/operator of a treatment facility that claims the debris is excluded under 3745-51-03(F)(1) maintain the following information?
- a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)] Yes ___ No ___ N/A X RMK# ___
- b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)] Yes ___ No N/A X RMK# ___

c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)]

Yes ___ No N/A RMK# ___

8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F) have the following information? [3745-270-07(D)(3)]

Yes ___ No N/A RMK# ___

a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)]

Yes ___ No ___ N/A RMK# ___

b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)]

Yes ___ No N/A RMK# ___

c. Technology used from Table 1? [3745-270-07(D)(1)(c)]

Yes ___ No N/A RMK# ___

9. Has the above notification been sent to the director? [3745-270-07(D)(1)]

Yes ___ No N/A RMK# ___

REMARKS

TREATING FACILITIES

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-14?[3745-270-07(B)] Yes No N/A RMK#
2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)] Yes No N/A RMK#
- Note:** *No further notification is necessary until such time that the waste changes or the receiving facility changes.*
3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07?[3745-270-07(B)(3)] Yes No N/A RMK#
4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so:** Yes No N/A RMK#
- a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)] Yes No N/A RMK#
5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-58-30? **If so:** Yes No N/A RMK#
- a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)), excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)] Yes No N/A RMK#
- b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4)[3745-270-07(B)(6)] Yes No N/A RMK#
- c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)] Yes No N/A RMK#
6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)] Yes No N/A RMK#
7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-70 have: Yes No N/A RMK#

a. Copies of all notices and certifications required in 3745-270?

Yes No N/A ___ RMK# ___

b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49?

Yes No N/A ___ RMK# ___

c. Followed the testing frequency specified in the facilities WAP?

Yes No N/A ___ RMK# ___

REMARKS

LARGE QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

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)]

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# 2

UNIVERSAL WASTE PESTICIDES

9. Does the LQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-33(B)(1)]

Yes No N/A RMK# ___

10. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-33(B)(2)]

Yes ___ No N/A RMK# ___

11. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 66-992, except for paragraph (C) of 3745-66-97; rule 3745-66-991 and 3745-66-992 of the OAC met? [3745-273-33(B)(3)]

Yes ___ No N/A RMK# ___

12. If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-33(B)(4)]

Yes ___ No N/A RMK# ___

13. Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)]

Yes ___ No N/A RMK# ___

14. Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)]

Yes No N/A RMK#

UNIVERSAL WASTE THERMOSTATS

15. Are thermostats that show evidence of leakage, spillage or damage that could cause leaks, properly contained? [3745-273-33(C)(1)]

Yes No N/A RMK#

16. If the thermostats are contained, are the containers closed, structurally sound, compatible with contents of the thermostats and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(C)(1)]

Yes No N/A RMK#

17. If the mercury-containing ampules are removed, does the LQUWH: [3745-273-33(C)(1)]

- a. Remove the ampules in a manner to prevent breakage and is the removal done over a containment device? [3745-273-33(C)(2)(a)(b)]

Yes No N/A RMK#

- b. Have a clean-up system readily available to transfer spilled material to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-33(C)(2)(c)(d)]

Yes No N/A RMK#

- c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-33(C)(2)(e)]

Yes No N/A RMK#

- d. Ensure employees are thoroughly familiar with proper waste handling and emergency procedures? [3745-273-33(C)(2)(f)]

Yes No N/A RMK#

- e. Ensure removed ampules are stored in closed, non-leaking containers that are in good condition? [3734-273-33(C)(2)(g)]

Yes No N/A RMK#

- f. Pack removed ampules in containers with packing material to prevent breaking during storage, handling and transportation? [3745-273-33(C)(2)(h)]

Yes No N/A RMK#

18. If mercury or clean-up residues resulting from spills or leaks or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-33(C)(3)(a)]

Yes ___ No N/A RMK# ___

a. If the waste is characteristic, was it managed in compliance with 3745-50 through 3745-69? (*The handler is considered the generator of the mercury, residues, and/or other waste and is subject to Chapter 3745-52*) [3745-273-33(C)(3)(b)]

Yes ___ No N/A RMK# ___

b. If the mercury, residues and/or other waste are not hazardous, are they managed in compliance with applicable law? [3745-273-33(C)(3)(c)]

Yes ___ No N/A RMK# ___

19. Are the thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)" [3745-273-34]

Yes ___ No N/A RMK# ___

ACCUMULATION TIME

20. 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.*

21. 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# 3

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)]
- 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#

Yes No N/A RMK#

EMPLOYEE TRAINING

- 22. 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

- 23. Were releases of universal waste and other residues immediately contained? [3745-273-37(A)]
- 24. Was the released material characterized? [3745-273-37(B)]
- 25. 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.*

- 26. 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.*

27. 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#
28. 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#
29. 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#
30. 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#
31. 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#
32. 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#