



**Environmental  
Protection Agency**

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

June 28, 2011

**PIKE COUNTY  
SOUTHERN WOOD PIEDMONT  
DMWM-SEDO  
OHD089431001**

Mr. William P. Arrants, President  
Southern Wood Piedmont  
P.O. Box 5447  
Spartanburg, SC 29304

Dear Mr. Arrants:

On June 17, 2011, Trevor Irwin and I inspected Southern Wood Piedmont's Waverly, Ohio facility. The inspection was conducted to determine the facility's compliance with the approved Post-Closure Care Plan dated April 2003 as amended July 2005 and May 2011, and to determine compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). This letter will explain any violations we found and what you need to do to correct the violations, as well as other general concerns we have and what you can do to address those concerns.

We found the following violations of Ohio's hazardous waste laws. In order to correct these violations, please take the steps outlined below and send me the required information ***within 30 days*** of your receipt of this letter:

**(1) Post-Closure Plan; Amendment of Plan, OAC Rule 3745-55-18(C).**

The owner/operator of a hazardous waste disposal unit must have a written post-closure plan. Until final closure of the facility, a copy of the most current approved post-closure care plan must be maintained on-site.

During the inspection, it was noted that Southern Wood Piedmont did not have a copy of the most recent approved post-closure care plan for the facility. The plan maintained on-site was dated April 2003. Ohio EPA approved amendments to the post-closure plan in July 2005, and most recently in May 2011, for the inclusion of the Sampling and Analysis Plan for the Aeration and Rainwater Ponds.

Southern Wood Piedmont must maintain a copy of the most current approved post-closure care plan (complete with all amendments) on-site. Southern Wood Piedmont will demonstrate a return to compliance with this rule upon abatement of ***Violation (2)*** below.

(2) **Post-Closure Plan; Amendment of Plan, OAC Rule 3745-55-18(D).**

The owner/operator of a hazardous waste disposal unit must have a written post-closure plan. The post-closure plan must be amended whenever events occur that affect or change the approved plan.

Southern Wood Piedmont's post-closure plan has not been amended to reflect a change in the facility's post-closure security and contact information. Section 2.0, Post-Closure Security (page 2), states that "the employee (site superintendent) is at the site during normal working hours and the entrance gate to the site is kept locked when the employee is not at the site." This section should be revised to reflect the change to Arcadis (Steve Clark) and that Arcadis personnel are not on-site during normal working hours on a daily basis. Section 3.0, Post-Closure Contact (page 2), lists Edward Legg as the on-site contact person. This section should be revised to reflect the change to Arcadis (Steve Clark), and provide an address and telephone number(s) for the site's current post-closure contact.

Southern Wood Piedmont must submit to this office a request for a minor amendment to the post-closure plan in order to update the plan with the above changes. To demonstrate a return to compliance with this rule, please submit this request and a copy of the revised updated pages to the post-closure plan to this office.

Upon Ohio EPA's approval of the amendment to the post-closure plan, Southern Wood Piedmont should insert the revised pages into the facility's post-closure plan. A complete copy of the post-closure plan (April 2003 as amended July 2005, May 2011 (Sampling and Analysis Plan), and the updated post-closure security and contact information), should be maintained on-site at the Waverly facility.

(3) **Content of Contingency Plan, OAC Rule 3745-54-52(D).**

The owner/operator of a hazardous waste disposal unit must have a contingency plan for the site, designed to minimize hazards to human health or the environment, and the plan must be implemented whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. The contingency plan must contain all of the information set forth in OAC 3745-54-52 (A) through (F). In addition, the contingency plan must be reviewed and amended in accordance with OAC 3745-54-54.

During the inspection, it was noted that two plans are maintained on-site; Southern Wood Piedmont's Site Safety and Environmental Health Plan dated July 2010, and Arcadis' Environmental Health and Safety Plan dated August 2010. Southern Wood Piedmont's plan contained a "Contingency Plan", but there was no tab or marker to easily find and access the Contingency Plan within this document. The "Contingency Plan" within this document did not list the current Emergency Coordinator and Site Contact information, addresses, and telephone

numbers. The Arcadis plan contained current site contact information in the back of the plan (there was no tab or marker to easily find and access this information), and it was not designated as a "Contingency Plan".

It was not clear to Ohio EPA or to the site representative which of the two documents is intended to be Southern Wood Piedmont's Contingency Plan. One plan must be designated as the site Contingency Plan, and this document must be clearly identifiable as such. The Contingency Plan must contain all of the information required by OAC 3745-54-52 (A) through (F), and must be updated with current emergency coordinator and site contact information. The contingency plan should be organized in such a manner that this information is easily accessible in case of emergency.

To demonstrate abatement of this violation, Southern Wood Piedmont must submit to this office for review an updated Contingency Plan that contains all of the information required by OAC 3745-54-52 (A) through (F) including updated emergency coordinator and site contact information.

- (4) **Arrangements/Agreements with Local Authorities, OAC Rule 3745-54-37(A).**  
The owner/operator of a hazardous waste disposal unit must attempt to make arrangements to familiarize emergency response agencies with the layout of the facility, the associated hazards, places where personnel will normally be working, facility entrances and possible evacuation routes; to inform such agencies of safety equipment, supplies, and emergency safety procedures applicable to the facility; and to familiarize the local police, fire departments, hospitals, and any other local emergency service listed in the facility's contingency plan with the properties of hazardous waste managed at the facility and the types of injuries or illness that could result from fires, explosions or releases at the facility.  
***Please note that this is also a requirement for Small Quantity Generators (SQG) of hazardous waste under OAC Rule 3745-65-37(A).***

During the inspection, it was noted that the Contingency Plan must be updated with current information. It was also noted that there has been no recent attempt to make the above-mentioned arrangements/agreements since the emergency coordinator and site contact information has changed.

Once Southern Wood Piedmont has submitted an updated Contingency Plan to this office for review, the facility must attempt to make arrangements to familiarize emergency response agencies, local police, fire departments, hospitals, and any other local emergency service listed in the facility's updated contingency plan with the properties of hazardous waste managed at the site and the types of injuries or illness that could result from fires, explosions or releases at the facility. To demonstrate a return to compliance with this rule, please submit documentation to this office that demonstrates that Southern Wood Piedmont has attempted to make the required arrangements/agreements.

## GENERAL COMMENTS:

- **Agency Notification of On-Site Activities.**

Southern Wood Piedmont's post-closure plan was amended on May 3, 2011 to incorporate the Sampling Analysis Plan (SAP) into the post-closure plan; making the SAP a part of the approved post-closure plan. The approved amendment (SAP) included an approximate schedule for on-site soil sampling of April 25 through May 6, 2011. The SAP stated that Ohio EPA will be notified at least 5 days in advance of any changes in the sample collection schedule, and that Ohio EPA would be notified by HzW or Southern Wood Piedmont to propose alternate scheduling if there were weather-related delays in the schedule.

On June 9, 2011, Ohio EPA received word that on-site sampling in the former Aeration and Rainwater Ponds by HzW Environmental had taken place on May 18 through May 25, 2011. Ohio EPA was not given any advance notice of the site sampling activities by Southern Wood Piedmont or HzW Environmental, or a proposal for alternate scheduling. In addition, it appears that the site contact from Arcadis also had no knowledge of the sampling schedule.

Although this lack of notification could be cited as a violation of the post-closure plan conditions and requirements, Ohio EPA is choosing not to cite a violation at this time. However, Ohio EPA is very disappointed at the apparent lack of communication between Southern Wood Piedmont, HzW, Arcadis, and our agency. In the future, please ensure that all involved parties are given proper notification of on-site activities.

- **Facility Mailing Address/Physical Address.**

It has come to our attention that Southern Wood Piedmont's Waverly facility no longer has a post office box (P.O. Box 149), and mail is not currently delivered to the physical address at 279 Industrial Park Drive. Therefore, correspondence regarding the Southern Wood Piedmont facility will be directed to your attention at the Spartanburg, SC location and may be forwarded to Arcadis at your discretion.

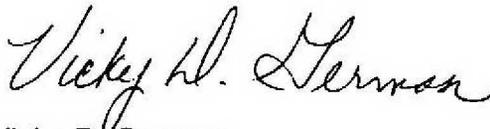
- **New Ohio EPA Southeast District Office Contact.**

Due to reorganization of several divisions within Ohio EPA, all site remediation and cleanup work as well as site post-closure work has been transferred to our new Division of Environmental Response and Revitalization (DERR). Effective immediately, Trevor Irwin will be your contact person at Ohio EPA's Southeast District Office for post-closure and remediation activities at the Southern Wood Piedmont Waverly site. Trevor can be reached at 740-380-5443 or [trevor.irwin@epa.ohio.gov](mailto:trevor.irwin@epa.ohio.gov).

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

If you have any questions regarding this letter, you may contact me at 740-380-5237.

Sincerely,



Vicky D. German  
Division of Materials and Waste Management  
Ohio EPA, Southeast District Office

VDG/mlm

Enclosures

cc: Trevor Irwin, Ohio EPA, DERR-SEDO

***Notice:***

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



# Ohio Environmental Protection Agency

For Ohio EPA use only

Send to Central Office

## RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM

Completed forms that are required to be submitted to CO should be e-mailed to [paula.canter@epa.state.oh.us](mailto:paula.canter@epa.state.oh.us)

<b>Site EPA ID No.</b>	EPA ID Number: <b>OHD089431001</b>
<b>Site Name</b>	Name: <b>Southern Wood Piedmont Company</b> Website (Optional): Street Address: <b>279 Industrial Park Drive</b>
<b>Site Location Information</b>	City, Town, or Village: <b>Waverly</b> State: <b>OH</b> County Name: <b>PIKE</b> Zip Code: <b>45690</b>
<b>Site Land Type</b> (check only one)	Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>
<b>NAICS codes</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	

<b>Facility Representative</b>	First Name: <b>Clark</b> MI: <b>P.</b> Last Name: <b>Steve</b>
	Phone Number: <b>614-940-2210</b> Extension:
	E-Mail Address: <b>steven.clark@arcadis-us.com</b>
Additional names can be recorded in comments section.	Fax Number: Fax Number Extension:
Only provide address information if it is different than the site address.	Street or P.O. Box: <b>6723 Towpath Road</b>
	City, Town or Village: <b>East Syracuse</b>
	State: <b>NY</b> Zip Code: <b>13057-9506</b>

<b>Legal Owner And Operator</b>	Name of Site's Legal Owner: <b>Rayonier, Inc.</b> Date Became Owner (mm/dd/yyyy):
	Owner Type: Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>
	Street or P.O. Box: <b>50 North Laura Street</b>
	City, Town or Village: <b>Jacksonville</b> Owner Phone #: Country: <b>United States</b> Zip Code: <b>32202</b>
List additional Owners and/or Operators in the Comments Section or on another copy of this page.	Name of Site's Operator: <b>Southern Wood Piedmont Company</b> Date Became Operator:
	Owner Type: Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>
	Street or P.O. Box: <b>P.O. Box 544</b>
	City, Town or Village: <b>Spartanburg</b> Operator Phone #: Country: <b>United States</b> Zip Code: <b>49304</b>
	State: <b>SC</b>

**VIOLATIONS CITED?**  Yes  No

**TYPE OF HANDLER (MARK AS APPROPRIATE)**

Not a Generator  UNKNOWN: Cited for violation of 3745-52-11  Large Quantity Generator (LQG)

Short-Term Generator  **Small Quantity Generator (SQG)**

Generated from short-term or one-time event and not from ongoing processes. Check the box for the applicable generator status and provide a comment.

Conditionally Exempt Small Quantity Generator (CESQG)

U.S. Importer of Hazardous Waste

Mixed Waste (Hazardous and Radioactive) Generator

<b>TYPE OF REGULATED WASTE ACTIVITY (MARK AS APPROPRIATE)</b>		
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace	
<input type="checkbox"/> Underground Injection Control Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption	
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption	
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste		
<b>UNIVERSAL WASTE ACTIVITIES (MARK AS APPROPRIATE)</b>		
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste	
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)		
<b>TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES (MARK ALL THAT APPLY)</b>		
<input checked="" type="checkbox"/> Batteries		
<input type="checkbox"/> Pesticides		
<input type="checkbox"/> Mercury containing equipment		
<input checked="" type="checkbox"/> Lamps		
<b>USED OIL ACTIVITIES (MARK ALL THAT APPLY)</b>		
<input checked="" type="checkbox"/> Used Oil Generator		
<input type="checkbox"/> Used Oil Transporter		
<input type="checkbox"/> Used Oil Transfer Facility		
<input type="checkbox"/> Used Oil Processor		
<input type="checkbox"/> Used Oil Re-refiner		
<input type="checkbox"/> Off-Specification Used Oil Burner		
<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil		
<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner		
<b>Eligible Academic Entities with Laboratories:</b> Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the boxes below to indicate the laboratory type.		
<input type="checkbox"/> College or University		
<input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university		
<input type="checkbox"/> Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university		
<b>Waste Codes for Federally Regulated Hazardous Wastes:</b> List the codes for the federally regulated hazardous waste handled at the site, in the order they are presented in the regulations (e.g., D001, D003, F007, U112). If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all; just indicate the date of the most recent source record.		
F034		
<b>COMMENTS: Use this area to describe inspection conditions and additional information.</b>		
Announced	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Additional Facility Representatives: William Arrants, Southern Wood Piedmont/Rayonier
Tanks	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>Advanced inspection notice necessary because maintenance personnel do not remain on-site at all times.</b>
Containers	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>ADDITIONAL COMMENTS:</b>		
Wastes generated are from post-closure groundwater collection and remediation activities, and from equipment and building maintenance.		
<b>INSPECTOR(S)</b>		<b>INSPECTION DATE/TIME</b>
Vicky German, DMWM-SEDO      Trevor Irwin, DERR-SEDO		6/17/11

## POST-CLOSURE INSPECTION CHECKLIST

<b>Facility:</b>	Southern Wood Piedmont Company	<b>US EPA ID#</b>	OHD089431001
<b>Street Address:</b>	279 Industrial Park Drive	<b>Facility Contact:</b>	William Arrants Southern Wood Piedmont Company
<b>City, State, Zip:</b>	Waverly, Ohio 45690	<b>Phone Number:</b>	
<b>County:</b>	Pike	<b>Date of Inspection:</b>	June 17, 2011

**Was advance notice of the inspection given?** Yes  No

**If so, how far in advance?** *Two weeks. Advanced inspection notice is necessary because Arcadis site maintenance personnel do not remain on-site at all times.*

	Name	Agency/Title	Phone Number:
<b>Inspector(s):</b>	Vicky German	OEPA, DMWM-SEDO	740-380-5237
	Trevor Irwin	OEPA, DERR-SEDO	740-380-5443
<b>Facility Rep(s):</b>	Steve Clark	Arcadis	614-940-2210

### POST-CLOSURE STATUS

<b>Post-Closure Plan Approval Date:</b>	April 2003 Amended July 2005 Amended May 2011 (SAP)
Notice of land use restriction/deed notice on property deed filed at the county courthouse?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Date of filing:	November 19, 1992
Notice of land use restriction/deed notice and survey plat filed with the local zoning authority?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Date of filing:	November 19, 1992
Number of years remaining of 30-year post-closure care period?	12

### GENERATOR STATUS

**Is the facility operating as generator?** Yes  No  N/A   
*If so, complete the applicable sections of the Generator Requirements checklist for wastes being managed under generator status.*

GENERATOR CLASSIFICATION	WASTE MANAGEMENT ACTIVITY
<input type="checkbox"/> Conditionally Exempt Small Quantity Generator (CESQG)	<input checked="" type="checkbox"/> Containers
<input checked="" type="checkbox"/> Small Quantity Generator (SQG)	<input type="checkbox"/> Tanks
<input type="checkbox"/> Large Quantity Generator (LQG)	<input checked="" type="checkbox"/> Other (describe): On-site groundwater collection and treatment system.

**POST-CLOSURE PLAN**

1.	Is a copy of the post-closure plan maintained on-site?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Has the post-closure plan been amended since the date of the last inspection?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	If so, list the dates of the approved amendments to the plan:	
	<i>Southern Wood Piedmont was last inspected on July 22, 2009. The facility's Post-Closure Care Plan was amended on May 3, 2011, to include a Sampling and Analysis Plan for soil sampling in the Aeration and Rainwater Pond area.</i>	
	<i>The most recent Post-Closure Care Plan maintained on -site was dated April 2003. The plan has been amended twice since then (July 2005 and May 2011).</i>	
2.	Did the facility submit to Ohio EPA annually updated financial requirements for closure of the facility, including:	
a.	Updated post-closure cost estimate for facility closure, in accordance with OAC Rule 3745-55-42? (estimate only; adequacy of estimate evaluated by CO-Financial Assurance Section)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Updated financial assurance for facility closure required by OAC Rule 3745-55-43?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Updated liability insurance required by OAC Rule 3745-55-47?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	<i>Southern Wood Piedmont's financial assurance documentation was reviewed and determined adequate on 4/5/2011.</i>	
3.	In accordance with the approved post-closure care plan, did the facility submit to Ohio EPA a semi-annual Post-Closure Effectiveness Report?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**CONTINGENCY PLAN**

1.	Does the facility have a contingency plan for the facility that:	
a.	Describes the actions facility will take to comply with OAC Rules 3745-54-51 through 3745-54-56 in response to fires, explosions, or releases of hazardous waste or hazardous waste constituents to air, soil or surface water at the facility?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
b.	Describes arrangements with local police, fire departments, hospitals, and contractors, as well as Ohio EPA and local emergency response teams to coordinate emergency services when necessary?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
c.	Includes an up-to-date list of names, addresses and phone numbers (office and home) for all persons qualified to act as emergency coordinator, in the order that they will assume responsibility for coordination of an emergency response?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	<i>Southern Wood Piedmont's Site Safety and Environmental Health Plan dated July 2010 is maintained on site. This plan contains the site Contingency Plan but there is no tab or marker to easily find and access the Contingency Plan within this document. The contingency plan within this document does not list the current Emergency Coordinator and site contact information, addresses, and telephone numbers.</i>	

	<i>In addition, an Arcadis Environmental Health and Safety Plan dated August 2010 is also maintained on-site and contains much of the same information as the Southern Wood Piedmont plan but it also includes MSDS information, the site contact information is in the back of the plan but there is no tab or marker to easily find and access it. The Arcadis plan is not designated as a contingency plan. It is not clear which document takes precedence.</i>	
d.	Includes a list of all emergency equipment, including fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
e.	Includes the location and a physical description of each item on the list, and a brief outline of its capabilities?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
f.	Includes a facility evacuation plan for on-site personnel, describing signals to be used to begin evacuation, evacuation routes, and alternate evacuation routes to be used in situations where the primary routes could be blocked by releases of hazardous waste?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
2.	Is a copy of the current contingency plan maintained on-site?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.	Has the facility submitted a copy of the contingency plan (including any amendments, revisions, or changes) to all local authorities, agencies, and response contractors that are designated in the plan as required by OAC Rule 3745-54-53?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
4.	Is the facility reviewing the contingency plan at least annually and amending the plan if needed, in accordance with OAC Rule 3745-54-54?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	<i>Two plans are maintained on-site; Southern Wood Piedmont's Site Safety and Environmental Health Plan dated July 2010, and Arcadis' Environmental Health and Safety Plan dated August 2010. One plan must be designated as superseding the other and that plan should be updated and organized, and contain all of the information required by the Contingency Plan rules. The designated contingency plan must be reviewed at least annually and updated if necessary.</i>	
5.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility since the date of the last inspection, including:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>• any spill or release of hazardous waste or hazardous waste constituents greater than or equal to 55 gallons;</li> <li>• any spill or release of hazardous waste or hazardous waste constituents less than 55 gallons may result in a fire or explosion hazard as determined by the Emergency Coordinator;</li> <li>• any spill on-site that may potentially cause on or off-site soil and/or ground or surface water contamination;</li> </ul>	<ul style="list-style-type: none"> <li>• any spill or release of hazardous waste or hazardous waste constituents that is reported to the National Response Center or local (city or county) emergency response center because the spill exceeded the "RQ" limits;</li> <li>• any fire involving hazardous waste;</li> <li>• any explosion involving hazardous waste</li> </ul>
6.	Did the facility immediately implement the contingency plan and follow the emergency procedures described in OAC rule 3745-54-56?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

7.	Did the facility immediately notify Ohio EPA's emergency response team using the 24-hour toll free number (800-282-9378) and provide the following information required by OAC Rule 3745-54-56(D)(2):		
	a.	Name and telephone number of the reporter?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	Name and address of the facility?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c.	Time and type of incident?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	d.	Name and quantity of materials involved?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	e.	The extent of injuries?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	f.	The possible hazards to human health or the environment outside the facility?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
8.	Did the facility collect all liquid and/or solid material resulting from fire, explosion, released material, or emergency response material and manage them as hazardous waste until it could be demonstrated that these wastes were not hazardous?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
9.	Within 15 days of the incident did the facility submit to the director a written report of the incident? If so:		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	a.	Did the report contain the elements set forth in OAC Rule 3745-54-56(J)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
10.	As required by OAC Rule 3745-54-56(J), did the facility note in the operating record the time, date, and details of any incident that required the implementation of the approved contingency plan?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

### CONTINGENCY PLAN - EMERGENCY PROCEDURES

1.	In compliance with OAC Rule 3745-54-37(A) and (B), does the facility:		
	a.	Familiarize emergency response agencies with the layout of the facility, the associated hazards, places where personnel will normally be working, facility entrances and possible evacuation routes?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	b.	Inform such agencies of safety equipment, supplies, and the proper emergency safety procedures that are applicable to the facility?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	c.	Familiarize the local police, fire departments, hospitals, and any other local emergency service listed in the facility's contingency plan with the properties of hazardous waste managed at the facility and the types of injuries or illness that could result from fires, explosions or releases at the facility?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	<i>Emergency response agencies, local police, fire, hospitals, and/or other local emergency services listed in the contingency plan have not been familiarized with the site and types of hazardous waste managed. This should be addressed when the facility revises and updates the Contingency Plan.</i>		
2.	Has a state or local agency declined to enter into the arrangements set forth in OAC Rule 3745-54-37(A)? If so:		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a.	Has the facility documented the refusal in the operating record as required by OAC Rule 3745-54-37(B)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

	b.	In addition to routine quarterly inspections, are inspections also conducted after major storm events?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Are the surface impoundment inspections recorded and maintained in an inspection log?		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a.	Do the inspection records note the date, time, and inspector's name?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Are any problems or concerns noted, and appropriate repairs made?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Have suitable repairs been made within a reasonable amount of time?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>POST-CLOSURE STRUCTURES, COMPONENTS, AND EQUIPMENT</b>			
3.	In accordance with OAC rule 3745-55-17 and the approved post-closure plan, has the facility inspected the following components, structures, and equipment:		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a.	Security control devices (gates, locks, fences, signs)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Erosion control?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Cover settlement, subsidence, displacement?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Vegetative cover conditions?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e.	Integrity of run-on/run-off control measures (drainage channels, ditches)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	f.	Cover and drainage system function?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	g.	Monitoring well conditions?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	h.	Integrity of permanent benchmarks?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Are inspections of the components, structures, and equipment conducted as specified in the post-closure plan:		
	a.	Are inspections conducted <b>QUARTERLY</b> ?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	In addition to routine quarterly inspections, are inspections also conducted after major storm events?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Are the inspections recorded and maintained in an inspection log, using the inspection forms found in the approved post-closure plan?		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>GROUNDWATER MONITORING SYSTEM</b>			
6.	Is the facility conducting <b>QUARTERLY</b> groundwater monitoring well maintenance activities as specified in the post-closure plan, and maintaining inspection logs of the following maintenance items:		
	a.	Checking the protective casing, cap, and locks?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	b.	Checking well identification label tags?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Checking condition of concrete collar, measuring point, and survey mark?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Checking condition of inner casing and cap?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e.	Other well maintenance activities, (mowing, etc.)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are the groundwater monitoring well maintenance inspections being conducted as specified in the post-closure plan:		
	a.	Are the inspections completed quarterly and after major storm events?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Do the inspection logs note the date, time, and inspector?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Are any problems or concerns noted, and appropriate repairs made?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Have suitable repairs been made within a reasonable amount of time?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>GROUNDWATER RECOVERY AND TREATMENT SYSTEM</b>			
8.	Is the facility conducting groundwater recovery and treatment system inspections as specified in the post-closure plan and maintaining inspections logs, including:		
	a.	<b>WEEKLY</b> inspections of the groundwater collection sump pump?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	<b>WEEKLY</b> inspections of the bag filters and carbon canisters?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	<b>WEEKLY</b> inspections of the transfer pump?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	<b>WEEKLY</b> inspections of the equalization tank?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e.	<b>WEEKLY</b> inspections of all associated piping?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Are the groundwater recovery and treatment system inspections being conducted as specified in the post-closure plan:		
	a.	Are the inspections completed quarterly and after major storm events?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Do the inspection logs note the date, time, and inspector?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Are any problems or concerns noted, and appropriate repairs made?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Have suitable repairs been made within a reasonable amount of time?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

## SMALL QUANTITY GENERATOR REQUIREMENTS

*CESQG: Less than 100Kg (220 pounds or about 27 1/2 gallons) monthly*

*SQG: Between 100 kg and 1000 Kg (More than 220 pounds or 27 1/2 gallons and less than 2204 pounds or 275 1/2 gallons) monthly*

*LQG: Over 1000 Kg (More than 2204 pounds or 275 1/2 gallons) monthly OR more than 1 Kg of acutely hazardous waste monthly*

### GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
2.	Has the generator obtained a U.S. EPA I.D. number? [3745-52-12]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
3.	Has the generator transported or caused to be transported hazardous waste to <b>other</b> than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
4.	Has the generator disposed of hazardous waste <b>on-site without a permit</b> or at another facility <b>other</b> than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
5.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<b>NOTE: If the SQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements might still apply, e.g. manifest, marking, LDR, etc.</b>				
6.	Has the generator accumulated hazardous wastes <u>in excess of (180/270) days</u> without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
<b>NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]</b>				
7.	Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
<b>NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.</b>				
8.	Does the generator treat hazardous waste in a:			
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
<b>NOTE: Complete appropriate checklist for each unit. NOTE: If waste is treated to meet LDRs, use LDR checklist.</b>				

### MANIFEST REQUIREMENTS

9.	Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
10.	Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Does the contractual agreement specify the type of waste and frequency of shipment?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
b.	Is the transport vehicle owned and operated by the reclaimer?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

c.	Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
<b>NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) &amp; (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.</b>				
11.	Have items 1 through 20 of each manifest been completed?[3745-52-20(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
<b>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 complete. [3745-52-20 (A)]</b>				
12.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
<b>NOTE: The generator may designate on the manifest one alternative 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)]</b>				
13.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D) ]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
14.	Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
<b>NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.</b>				
15.	If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? 3745-52-42(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
16.	Are signed copies of all manifests being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
<b>NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.</b>				

### PREPAREDNESS AND PREVENTION

17.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
18.	Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]			
a.	Name and telephone number of emergency coordinator?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
b.	Location of fire and spill control equipment, and, if present, fire alarm(s)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
c.	Telephone number of local fire department?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
<i>Emergency contact information posted by the telephone should be reviewed and updated if necessary.</i>				
19.	Are employees familiar with waste handling and emergency procedures? [3745-52-34(D)(5)(c)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

20.	Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
21.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
22.	Does the generator have the following equipment at the facility (if it is required due to actual hazards associated with the waste):			
a.	Internal alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
c.	Portable fire control, spill control and decontamination equipment? [3745-65-32(C)]?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
d.	Water of adequate volume/pressure per documentation or facility representative? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
23.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-65-33]?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
24.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
25.	If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance? (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
26.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
27.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
<p><i>Also see OAC 3745-54-37(A), Post-Closure Inspection Checklist.</i>  <i>Emergency response agencies, local police, fire, hospitals, and/or other local emergency services listed in the contingency plan have not been familiarized with the site and types of hazardous waste managed. This should be addressed when the facility revises and updates the Contingency Plan.</i></p>				
28.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

#### SATELLITE ACCUMULATION AREA REQUIREMENTS

29.	Does the generator ensure that satellite accumulation area(s):			
a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)].	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
f.	Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	<i>One 55-gallon drum containing spent bag filters (F034) was located next to the bag filter area. The drum is not yet full.</i>			
30.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
b.	Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

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

### USE AND MANAGEMENT OF CONTAINERS

31.	Has the generator marked containers with the words "Hazardous Waste"? [3745-52-34(D)(4)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
32.	Is the accumulation date on each container? [3745-52-34(D)(4)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
33.	Are hazardous wastes stored in containers which are:			
a.	Closed except when adding/removing wastes? [3745-66-73(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
b.	In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
d.	Handled in a manner which prevents rupture or leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
34.	Is the container accumulation area inspected at least weekly? [3745-66-74]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

**Note: Per ORC§1.44(A) "Week" means seven (7) consecutive days.**

a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input checked="" type="checkbox"/>
	<p><i>At the time of the inspection, the following containers of hazardous waste generated from site sampling and analysis activities were accumulated in the groundwater treatment building:</i></p> <ul style="list-style-type: none"> <li><i>• 1 55-gallon drum "decon water and soil cuttings" (F034) dated 5/25/11.</i></li> <li><i>• 1 55-gallon drum "PPE" (F034) dated 5/25/11.</i></li> </ul> <p><i>These wastes should be manifested off-site within 180/270 days, per 3745-52-34; ORC §3734-02(E) and (F).</i></p> <p><i>These wastes are not normally generated by activities at Southern Wood Piedmont. Any wastes generated by the facility and accumulated and or stored on-site is subject to the inspection requirements of OAC Rule 3745-66-74.</i></p>			

35.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
36.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B) 3745-66-77(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
37.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
<b>NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.</b>				

**PRE-TRANSPORT REQUIREMENTS**

38.	Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31, and 3745-52-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
39.	Does each container greater than 100 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
40.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

## LAND DISPOSAL RESTRICTIONS (LDR) REQUIREMENTS

### GENERAL 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
2.	Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2), See Table 1.]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
3.	Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), See Table 1.]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
4.	Does the generator generate a characteristic hazardous waste? If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
	a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
<b>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.</b>				
5.	Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
	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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
<b>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)]</b>				
6.	Has the generator correctly determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
<b>NOTE: Wastes with EPA hazardous waste numbers K174 and K175 (chlorinated aliphatic wastes) have specific requirements in rule 3745-270-33. Waste with EPA hazardous waste numbers K176, K177 and K178 (inorganic chemical wastes) have specific requirements in rule 3745-270-36.</b>				
7.	Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
<b>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)]</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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
<b>NOTE: In other words, is combustion a legitimate treatment method?</b>				
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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

	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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	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? If so:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	a.	Has the facility complied with 3745-270-04?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

### NOTIFICATION AND CERTIFICATION REQUIREMENTS

1.		If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
2.		If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
3.		If a generator's waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.), does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
4.		If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
5.		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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

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

6.		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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
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### GENERATORS TREATING HAZARDOUS WASTE

1.		Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
2.		If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)]			
	a.	A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
3.		Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
4.		Has the generator followed their WAP [3745-270-07(A)(5)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
5.		Have the treated wastes met the applicable treatment standards in 3745-270-40?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

6.	Has the generator sent a notification and certification with the initial shipment of waste? [3745-270-07(A)(5)(c)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
7.	Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
8.	Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following:			
	a. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	b. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
<b>NOTE: If the waste will be treated and monitored for all UHCs then they do not need to be listed on the notice.</b>				
9.	Has the process/operation generating the waste or the solid waste landfill facility changed? If so:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	a. Has the notification and certification been updated in the generators' and treaters' files? [3745-270-09(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	b. Has the director been notified of such changes? [3745-270-09(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
<b>NOTE: The director need only be notified on an annual basis but no later than December 31.</b>				
10.	Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
11.	Does each notification/certification form completed, contain the information found in Table 1? [3745-270-07(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
<b>NOTE: If the waste will be treated and monitored for all constituents, there is no need to put them all on the LDR notice.</b>				

### HAZARDOUS DEBRIS

1.	Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
3.	Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
<b>NOTE: If immobilization has been used in a treatment train, it must be the last treatment technology used.</b>				
4.	Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
5.	Is the waste a PCB waste under 40 CFR Part 761? If so:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

7.	Does the owner/operator of a treatment facility that claims the debris is excluded from regulation as a hazardous waste under 3745-51-03(F)(1) maintain the following information:				
a.	Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
b.	Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
8.	Do the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F)(1) have the following information: [3745-270-7(D)(3)]				
a.	Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
b.	Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
c.	Technology used from Table 1? [3745-270-07(D)(1)(c)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
9.	Has the above notification been sent to the director? [3745-270-07(D)(1)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

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

1.	Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13? [3745-270-07(B)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
<b>Note: No further notification is necessary until such time that the waste changes or the receiving facility changes.</b>					
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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
4.	Are wastes or treatment residues being sent to another TSD to be further managed? If so:		Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
a.	Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
5.	Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? If so:		Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
b.	Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4) [3745-270-07(B)(6)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
c.	Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
7.	Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have:				
a.	Copies of all notices and certifications required in 3745-270?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
b.	Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
c.	The testing frequency specified in the facility's WAP and have they followed the protocol?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

## USED OIL GENERATOR COLLECTION CENTER, AND AGGREGATION POINT REQUIREMENTS

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

### PROHIBITIONS

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

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

### GENERATOR STANDARDS

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

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

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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**NOTE:** If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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*At the time of the inspection, no used oil was collected or accumulated on-site. When used oil is generated it is stored in a 55-gallon drum until recycled.*

7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]			
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	a. Stopped the release?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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	b. Contained the release?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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	c. Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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	d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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### ON-SITE BURNING IN SPACE HEATERS

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	c. Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

### USED OIL TRANSPORTATION

11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<i>When used oil is generated from equipment maintenance, it must be taken off-site by a registered used oil transporter to a registered used oil recycler.</i>				
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	b. Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

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

### COLLECTION CENTERS AND AGGREGATION POINTS

13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

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

## SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS BATTERIES AND LAMPS

Large Quantity Universal Waste Handler (LQUWH) = More than 5,000 Kg (11023 pounds) monthly  
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg (11023 pounds) or less monthly

### PROHIBITIONS

- |    |   |                              |  |  |
|----|---|------------------------------|--|--|
| 1. | Did the SQUWH dispose of universal waste? [3745-273-11(A)]  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | NA <input type="checkbox"/>            |
| 2. | Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] | Yes <input type="checkbox"/> | No <input type="checkbox"/>            | NA <input checked="" type="checkbox"/> |

### WASTE MANAGEMENT – LABELING AND MARKING

#### BATTERIES

- |    |   |                              |                             |  |
|----|---|------------------------------|-----------------------------|--|
| 3. | Are batteries that show evidence of leakage spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]  | Yes <input type="checkbox"/> | No <input type="checkbox"/> | NA <input checked="" type="checkbox"/> |
| 4. | If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the batteries, and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] | Yes <input type="checkbox"/> | No <input type="checkbox"/> | NA <input checked="" type="checkbox"/> |
| 5. | Does the SQUWH conduct any of the following activities:   |                              |                             |  |
|    | a. Sort batteries by type?  | Yes <input type="checkbox"/> | No <input type="checkbox"/> | NA <input checked="" type="checkbox"/> |
|    | b. Mix battery types in one container?  | Yes <input type="checkbox"/> | No <input type="checkbox"/> | NA <input checked="" type="checkbox"/> |
|    | c. Discharge batteries to remove the electric charge?   | Yes <input type="checkbox"/> | No <input type="checkbox"/> | NA <input checked="" type="checkbox"/> |
|    | d. Regenerate used batteries?   | Yes <input type="checkbox"/> | No <input type="checkbox"/> | NA <input checked="" type="checkbox"/> |
|    | e. Disassemble them into individual batteries or cells?   | Yes <input type="checkbox"/> | No <input type="checkbox"/> | NA <input checked="" type="checkbox"/> |
|    | f. Remove batteries from consumer products?   | Yes <input type="checkbox"/> | No <input type="checkbox"/> | NA <input checked="" type="checkbox"/> |
|    | g. Remove the electrolyte from the battery?   | Yes <input type="checkbox"/> | No <input type="checkbox"/> | NA <input checked="" type="checkbox"/> |
|    | If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)]   | Yes <input type="checkbox"/> | No <input type="checkbox"/> | NA <input checked="" type="checkbox"/> |
| 6. | If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)]   | Yes <input type="checkbox"/> | No <input type="checkbox"/> | NA <input checked="" type="checkbox"/> |
|    | a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]  | Yes <input type="checkbox"/> | No <input type="checkbox"/> | NA <input checked="" type="checkbox"/> |
|    | b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]  | Yes <input type="checkbox"/> | No <input type="checkbox"/> | NA <input checked="" type="checkbox"/> |
| 7. | Are the batteries or containers of batteries labeled with the words "Universal Waste Batteries" or "Waste Batteries" or "Used Batteries"? [3745-273-14(A)]  | Yes <input type="checkbox"/> | No <input type="checkbox"/> | NA <input checked="" type="checkbox"/> |

*At the time of the inspection, no batteries from equipment were stored on site.*

#### LAMPS

- |    |  |   |                             |  |
|----|--|---|-----------------------------|--|
| 8. | Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | NA <input type="checkbox"/>            |
| 9. | Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] | Yes <input type="checkbox"/>            | No <input type="checkbox"/> | NA <input checked="" type="checkbox"/> |

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

**NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.**

### ACCUMULATION TIME

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

11. Is the waste accumulated for less than one year? [3745-273-15(A)] Yes  No  NA   
 If not:  
 a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes  No  NA
12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)]
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes  No  NA
  - b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes  No  NA
  - c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes  No  NA
  - d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes  No  NA
  - e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes  No  NA
  - f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes  No  NA

### EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] Yes  No  NA

### RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes  No  NA
15. Is the material released characterized? [3745-273-17(B)] Yes  No  NA
16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? [3745-273-17 (B)] Yes  No  NA

**Note: If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52.**

### OFF-SITE SHIPMENTS

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

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

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

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes  No  NA
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes  No  NA
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes  No  NA
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes  No  NA
21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes  No  NA
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes  No  NA
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes  No  NA
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes  No  NA

#### EXPORTS

24. Is waste being sent to a foreign destination? If so: Yes  No  NA
- a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes  No  NA
- b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to 3745-52-57? [3745-273-20(B)] Yes  No  NA
- c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes  No  NA



	b.	The manifest contains all information required by OAC Rule 3745-52-20 and the minimum number of copies required by OAC Rule 3745-52-22?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	The facility has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste, in compliance with OAC Rule 3745-52-20(B)(C)(D)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Prepared manifests have been signed by the facility and the initial transporter, in compliance with OAC Rule 3745-52-23?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.		Are signed copies of all hazardous waste manifests and any documentation required for exception reports retained for at least three years at the facility as required by OAC Rules 3745-52-40 and 3745-54-71(A)(5)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.		Does the facility use only properly registered transporters when removing hazardous wastes?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.		Does the facility give one copy of the manifest to the transporter?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.		If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met? [OAC Rule 3745-54-71(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
6.		Are any significant discrepancies in the manifest, defined in OAC Rule 3745-54-72(A), noted in writing on the manifest document?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
7.		Have any manifest discrepancies been reconciled within 15 days as required by OAC Rule 3745-54-72(B)? If not:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	a.	Has the facility's owner/operator submitted the required information to the director?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>SECURITY REQUIREMENTS</b>			
1.		Is the facility complying with the security provisions set forth in the approved post-closure plan, including:	
	a.	A 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	An artificial or natural barrier in good condition which completely surrounds the active portion of the facility?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	A means to control entry, at all times, through gates or other entrances, to the active portion of the facility?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.		In accordance with the approved post-closure plan, does the facility have signs reading "Danger - Unauthorized Personnel Keep Out" posted at each facility entrance and at other locations, in sufficient numbers to be seen when approaching the facility?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>POST-CLOSURE INSPECTIONS, MAINTENANCE AND RECORDKEEPING</b>			
<b>SURFACE IMPOUNDMENT (CLOSED AERATION AND RAINWATER PONDS)</b>			
1.		Are inspections of the surface impoundment area being conducted as specified in the post-closure plan:	
	a.	Are inspections conducted <b>QUARTERLY</b> ?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

3.	Has the facility notified in writing all parties identified in the contingency plan of amendments, modifications, or revisions to the plan within 10 days of the effective date of the change?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
4.	Has the facility submitted a copy of the contingency plan and all amendments and modifications to the Ohio EPA, Division of Emergency and Remedial Response (DERR) in accordance with OAC Rule 3745-54-53?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
5.	Is an emergency coordinator on the premises or on call at all times, as required by OAC Rule 3745-54-55?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	In accordance with OAC Rule 3745-54-55, is the facility's emergency coordinator familiar with the following:	
	a. Contingency plan?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Facility operations and activities?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Waste characterization and location of wastes?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. Location of all records in the facility?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e. Facility layout?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	In accordance with OAC Rule 3745-54-55, does the emergency coordinator have the authority to commit the resources needed to carry out the facility's contingency plan?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

### EMERGENCY EQUIPMENT AND INSPECTIONS

1.	Is the facility equipped the with the following emergency equipment required by OAC rule 3745-54-32 as set forth in the contingency plan:	
	a. An internal communications or alarm system?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. A device such as a telephone which is capable of summoning emergency assistance from local emergency authorities?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Portable fire extinguishers and/or fire control equipment, spill control and decontamination equipment?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. Water in adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers or water spray systems?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Whenever hazardous waste is being managed at the facility, are facility personnel involved in the operation provided with immediate access to an emergency communication device as required by OAC Rule 3745-54-34?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.	Is the facility inspecting, testing, and maintaining the on-site equipment as necessary in order to ensure proper operation in case of emergency?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

### MANIFEST REQUIREMENTS FOR OFF-SITE SHIPMENT OF WASTES

1.	Is the facility complying with the following manifest requirements set forth in OAC Chapter 3745-52 and OAC Rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76:	
	a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, U.S. EPA Form 8700-22 and, if necessary, U.S. EPA Form 8700-22A in compliance with OAC Rule 3745-52-20(A)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

10.	Does the facility maintain a groundwater treatment system maintenance log, which includes any maintenance activities conducted on the system?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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**ANNUAL AND SEMI-ANNUAL GROUNDWATER SAMPLING AND MONITORING**

1.	Has the facility conducted semi-annual sampling of the point of compliance (POC) wells (MW-17 or its replacement well, MW-19, and MW-17A)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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2.	Has the facility conducted annual sampling of the downgradient well, MW-21?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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3.	Has the facility submitted the results to Ohio EPA as required by the post-closure plan?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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**GENERAL FACILITY OPERATIONS**

1.	In accordance with OAC rule 3745-54-31, is construction, maintenance, and operation of the facility being conducted to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, ground or surface water?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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**PROCESS INFORMATION AND WASTE ACTIVITIES SUMMARY**

Southern Wood Piedmont Company

SQG

OHD089431001

<i>Description of Waste</i>				<i>On-Site Management</i>			<i>Off-Site Management</i>
<b>Process</b>	<b>Waste Generated</b>	<b>EPA Waste Code</b>	<b>Amount Generated per Month</b>	<b>Accumulation and/or Storage</b>	<b>On-Site Treatment</b>	<b>Waste Location</b>	<b>Name, state, and type of activity</b>
GROUNDWATER TREATMENT	GRANULAR ACTIVATED CARBON CANISTERS	F034	1900 P/YR	55-GALLON DRUM	NA	GROUNDWATER TREATMENT BUILDING	CALGON CORPORATION CATTLETTSBURG KY  REGENERATED
GROUNDWATER TREATMENT	FILTER BAGS	F034	90 P/YR	55-GALLON DRUM	NA	GROUNDWATER TREATMENT BUILDING	CLEAN HARBORS  DISPOSAL
GROUNDWATER MONITORING AND SAMPLING ACTIVITIES	PPE, BAILERS, PLASTIC, ABSORBENTS, ETC.	F034	VARIES (INCLUDED WITH FILTER BAG WASTE ABOVE)	55-GALLON DRUM	NA	GROUNDWATER TREATMENT BUILDING	CLEAN HARBORS  DISPOSAL
EQUIPMENT MAINTENANCE	USED OIL	NA	VARIES	55-GALLON DRUM	NA	LOCKED SHED BESIDE GROUNDWATER TREATMENT BUILDING	GLOCKNER OIL  RECYCLED
BUILDING MAINTENANCE	FLUORESCENT BULBS	NA (UNIVERSAL WASTE)	VARIES INFREQUENTLY GENERATED	CARDBOARD BOX	NA	UPSTAIRS IN GROUNDWATER TREATMENT BUILDING	SAFETY-KLEEN CINCINNATI OH  RECYCLED

## **FACILITY INFORMATION**

Southern Wood Piedmont Company (SWP) is located on State Route 220, south of Waverly, in Pike County Ohio. The facility was built in 1978 and operated a railroad cross-tie treating facility from 1979 to 1987, using creosote to treat raw wood. Wastewater generated during this process was routed to an API separator and then discharged to an Aeration Pond for treatment. An adjacent Rainwater Storage Pond collected run-off from the main treating area, the drip track, and treated wood storage area. Creosote treating operations at the facility were ceased in 1987 and the process-related structures at the site, including the concrete drip pad, treating room, treating cylinders and door pit sump, API separator and API separator effluent pipe, were removed between March and August 1990. The bottom sludges in the Aeration Pond and the Rainwater Storage Pond were identified as K001 listed hazardous waste. The Aeration Pond and the Rainwater Storage Pond were closed in September 1992 in accordance with an approved closure plan, and remain in post-closure care. The maintenance and office building are the only structures remaining on the property besides the groundwater treatment building.

## **PROCESS INFORMATION**

A groundwater quality monitoring program at the site was initiated in 1984-1985 with the installation of monitoring wells MW-1 through MW-11. These wells were installed to monitor the groundwater quality adjacent to the Aeration Pond and to monitor background water quality. Since then 23 additional monitoring wells and 17 piezometers have been installed at the site, for a total of 51 groundwater monitoring locations. The current groundwater monitoring plan, which is part of the facility's post-closure care plan, includes 11 groundwater monitoring wells that are sampled on a semi-annual or annual basis, and an additional 8 wells that are sampled biennially. Groundwater samples are analyzed for creosote constituents set forth in 40 CFR 261 Appendix VII.

Two areas of contaminated groundwater within the uppermost aquifer have been delineated at the site. Migration of contaminated groundwater from these two areas is currently controlled by pumping from groundwater intercept/recovery systems installed within each of these two areas. The groundwater collection system consists of an interceptor trench, a transfer piping system, a collection piping system, and a collection sump which connects the transfer piping system to the collection piping system. The treatment system consists of granular activated carbon filtration. Groundwater flows through one of a series of bag filters to remove silt and other solids, and then enters an equalization tank. From there it is pumped through a series of 4 connected carbon-containing vessels. The treated groundwater is discharged through a permitted NPDES outfall in a ditch on the property that drains to Big Beaver Creek, a tributary of the Scioto River.

## **WASTE INFORMATION**

On-going remediation activities at the site make SWP operate as a Small Quantity Generator of Hazardous Waste (SQG). Hazardous wastes related to groundwater sampling and treatment activities are generated at the site, including spent carbon canisters and filter bags, and sampling-related waste such as PPE, bailers, plastic, etc. These wastes all carry the hazardous waste code F034 for creosote compounds. The facility also generates wastes from equipment and building maintenance, including small amounts of used oil and spent fluorescent lamps.

## **REGULATORY HISTORY**

In 1990, SWP entered into a Consent Decree with the Ohio Attorney General's Office to close the Aeration Pond, the Rainwater Storage Pond, the Sprayfield, and the Effluent Pond. The Sprayfield, and Effluent Pond were certified clean closed by Ohio EPA in 1993. The Aeration Pond and the Rainwater Storage Pond were closed in the 1990's by excavation of the sludge material (K001). However, contamination remained after excavation activities and these units were unable to clean close. Therefore, the Aeration Pond and the Rainwater Storage Pond were combined into one unit which was closed as a landfill in 1992, and remain in post-closure care as outlined in the facility's July 2005 Post-Closure Care Plan. On May 3, 2011, the July 2005 Post-Closure Care Plan was amended to include a Sampling and Analysis Plan the former Aeration Pond and Rainwater Pond, to determine concentrations of contaminants that remain in the area and further evaluate cleanup options. The other portions of the site that do not include the Aeration

Pond and the Rainwater Storage Pond and Post-Closure Area are currently being addressed via the Ohio EPA-DERR-VAP program. SWP was last inspected for compliance with the approved post-closure plan and with Ohio's hazardous waste regulations on July 22, 2009.

### CURRENT SITE AERIAL MAP



### HISTORIC SITE LAYOUT DRAWING

